

Attachment 5  
LAX SPECIFIC PLAN AMENDMENT STUDY  
Final EIR

**Original Comment Letters on the  
SPAS Draft EIR**

January 2013

*Prepared for:*

Los Angeles World Airports  
One World Way  
Los Angeles, California 90045

*Prepared by:*

**CDM Smith**  
111 Academy Way, Suite 150  
Irvine, CA 92617





FEMA

August 9, 2012

Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, California 90045-5803

Dear Mr. Alvarez:

This is in response to your request for comments on the Public Review and Comment document, Draft Environmental Impact Report (EIR) Review for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043) and City of Los Angeles (Community Number 060137), Maps revised September 26, 2008. Please note that the City of Los Angeles, Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

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- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfia/forms.shtml>.

**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Los Angeles floodplain manager can be reached by calling Gary L. Moore, City Engineer, at (213) 485-4935. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

If you have any questions or concerns, please do not hesitate to call Michael Hornick of the Mitigation staff at (510) 627-7260.

Sincerely,

Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

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Diego Alvarez  
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cc:  
Gary L. Moore, City Engineer, City of Los Angeles  
George De La O, Senior Civil Engineer, Los Angeles County  
Garret Tam Sing/Solomon Miranda, State of California, Department of Water Resources, Southern Region Office  
Michael Hornick, NFIP Planner, DHS/FEMA Region IX  
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

[www.fema.gov](http://www.fema.gov)

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Attachments: 13B0008-13TA0009\_LA\_DEIR LAX Specific Plan Amendment Study\_s20121010\_jds.pdf

From: Brittni Moskus@fws.gov [Brittni.Moskus@fws.gov]  
Sent: Wednesday, October 10, 2012 5:26 PM  
To: SPASEIR Comments  
Subject: Draft Environmental Impact Report for the Los Angeles International Airport (LAX) Specific Plan Amendment Study, Los Angeles, California

Brittni Moskus  
Office Assistant  
Carlsbad Fish and Wildlife Office  
8010 Hidden Valley Road, Suite 101  
Carlsbad, California 92011  
Office 760-431-9440, ext. 280  
Fax 760-431-9618

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# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
Carlsbad Fish and Wildlife Office  
6010 Hidden Valley Road, Suite 101  
Carlsbad, California 92011



In Reply Refer To:  
FWS-LA-13B0006-13TA0009

Mr. Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, California 90045-5803

OCT 1 0 2012

Subject: Draft Environmental Impact Report for the Los Angeles International Airport (LAX)  
Specific Plan Amendment Study, Los Angeles, California

Dear Mr. Alvarez:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (DEIR) for the above-referenced project, dated July 2012. In 2004, we issued a biological opinion addressing impacts to the federally endangered Riverside fairy shrimp (*Streptocephalus woottoni*, "RFS") and El Segundo blue butterfly (*Euphilotes battoides allyni*, "ESB") in accordance with section 7 of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*), based on our review of Alternative D of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Los Angeles World Airports Master Plan for LAX. The Specific Plan Amendment Study has been prepared to satisfy a lawsuit settlement regarding approval of the LAX Master Plan, and the study involves the identification and evaluation of potential alternative designs, technologies, and configurations that could be implemented consistent with the LAX Master Plan Program.

The primary mission of the Service is to "work with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, the Service administers the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), and provides support to other Federal agencies in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*).

As indicated above, our prior biological opinion addressed proposed impacts to RFS and ESB anticipated under one of four primary alternatives considered for the LAX Master Plan. The current DEIR is tiered off of the prior EIS/EIR (i.e., impacts and mitigation measures proposed under the prior impact analysis are discussed as part of the baseline) and addresses impacts associated with approximately nine different proposed alternatives that include various airfield, terminal, and ground access improvements. Components of these alternatives are interchangeable such that airfield and terminal improvements from one alternative could be implemented in association with the ground access improvements proposed under another alternative. Due to the inter-relationship of the Specific Plan Amendment Study with

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Mr. Diego Alvarez (FWS-LA-13B0006-13TA0009)

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implementation of programmatic alternatives identified in the LAX Master Plan and our prior biological opinion, we have the following specific comments and concerns:

1. The DEIR indicates that 2.69 acres of disturbed southern dune scrub occur on the northerly edge of the north airfield, an area that is proposed to be permanently removed in association with construction staging areas and airfield improvements from most, if not all, of the alternatives. This area is noted to be degraded and surrounded by urban development but is also characterized as supporting various indicator species of this plant community, including coast buckwheat (*Eriogonum parvifolium*), the known host plant of the endangered ESB. Although the DEIR discusses recent survey efforts for ESB within the El Segundo Dunes and ESB Preserve west of Pershing Drive, we were not able to determine what survey efforts have been performed within the 2.69 acres of disturbed southern dune scrub in the vicinity of the airfield. Because ESB is vagile with potential to colonize suitable habitat adjoining the ESB Preserve, we request that the DEIR identify what survey efforts have been performed at this location. If no recent survey efforts (i.e., within the last year) have been performed at this location, then we recommend that appropriately timed updated surveys for ESB be performed so that the potential impacts to ESB from removal of this habitat area can be properly disclosed and addressed.
2. The DEIR indicates that the relocation of navigational aids proposed in association with implementation of Alternatives 1 through 7 will result in impacts to undeveloped areas within the Los Angeles/El Segundo Dunes, including impacts ranging between 0.33 to 1.03 acres of disturbed southern foredune vegetation, depending on the alternative. Because ESB is anticipated to be impacted in association with impacts to the disturbed southern foredune plant community, the DEIR proposes to implement LAX Master Plan Mitigation Measures MM-BIC-1, MM-ET-3, and MM-ET-4 to reduce the anticipated impacts to this species to a level below significance. Mitigation Measure MM-ET-4 makes specific reference to the Service's April 2004 biological opinion addressing the LAX Master Plan and references a number of conservation measures that were committed to in association with that biological opinion.

Among the conservation measures that were included as the basis for our biological opinion was the commitment to limit activities associated with navigational aid development to the existing roads and proposed impact areas depicted in Figure S4.14-1 and F4.14-1, *Location of Proposed Navigational Aids-Alternative D*, in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Supplement to the Draft EIS/EIR and Final EIS/EIR, respectively. Based on this commitment we anticipated that construction of the proposed navigational aids would permanently convert 0.25 acre of the El Segundo sand dune complex to structures supporting the navigational lighting system in an area where there are very few coast buckwheat plants. Therefore, we anticipated that construction of the navigational lighting system would result in the removal and translocation of two coast buckwheat plants, causing a small but unquantifiable number of ESB pupae being killed as a result of ground disturbance and the loss of the food source from these plants. Because the DEIR suggests that

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Mr. Diego Alvarez (FWS-LA-13B0006-13TA0009)

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implementation of any of Alternatives 1 through 7 will impact more disturbed southern foredune vegetation than was addressed in our biological opinion, it appears that the amount or extent of take that was anticipated in association with the removal of two coast buckwheat plants could be exceeded.

As provided for in 50 CFR § 402.16, reinitiation of formal consultation is required when an action proposed by a Federal agency is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in the original biological opinion. Because there appears to be a discrepancy between the extent of habitat impact that was anticipated to be removed in association with construction of navigational lighting in our biological opinion and implementation of the various alternatives presented in the DEIR, we request that the DEIR be revised to include a discussion of consistency of each of the potential alternatives with the analysis of the biological opinion. For those alternatives anticipated to exceed the loss or removal of two coast buckwheat plants, the DEIR should identify the need for further consultation with the Service prior to implementation of those alternatives.

We appreciate the opportunity to comment on the subject DEIR. Should you have any questions, or wish to discuss any of the above please contact William B. Miller of this office at 760-431-9440, extension 206.

Sincerely,

for Karen A. Goebel  
Assistant Field Supervisor

cc:  
Ed Pert, California Department of Fish and Game, San Diego, CA

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EDMUND G. BROWN, JR.  
GOVERNOR

## STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALLEN  
DIRECTOR

### Memorandum

Date: August 6, 2012  
To: All Reviewing Agencies  
From: Scott Morgan, Director  
Re: SCH # 1997061047  
Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS)

The Lead Agency has corrected some information regarding the above-mentioned project. Please see the attached materials for more specific information. All other project information remains the same.

cc: Diego Alvarez  
Los Angeles World Airports  
LAWA - Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045

1400 10th Street P.O. Box 9044 Sacramento, California 95812-9044  
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

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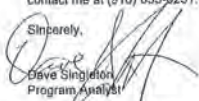


around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 853-9251.

Sincerely,



Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

SPAS-AS00002

**Native American Contact**  
Los Angeles County  
August 13, 2012

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles, CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 60608  
Los Angeles, CA 90068  
samdunlap@earthlink.net  
(909) 262-9351 - cell

T'AT Society/Inter-Tribal Council of Pimu  
Cindi M. Alvirre, Chairwoman-Manisar  
3094 Mace Avenue, Apt. B  
Costa Mesa, CA 92626  
calvirre@yahoo.com  
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490  
Baillflower, CA 90707  
rtongva@verizon.net  
562-761-6417 - voice  
562-761-6417 - fax

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address  
tattnlaw@gmail.com  
310-570-6567

Gabrielino-Tongva Tribe  
Bernie Acuna  
1875 Century Pk East #1500  
Los Angeles, CA 90067  
(819) 294-8860-work  
(310) 428-5690 - cell  
(310) 587-0170 - FAX  
bacuna1@gabrielinotribe.org

Gabrielino/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
P.O. Box 693  
San Gabriel, CA 91778  
GTTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe  
Linda Candelaria, Chairwoman  
1875 Century Pk East #1500  
Los Angeles, CA 90067  
lcandelaria1@gabrielinotribe.org  
626-676-1184 - cell  
(310) 587-0170 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7060.8 of the Health and Safety Code, Section 6097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1997061047; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment (SPAS) Study; located in the el Segundo area; Los Angeles County, California.

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**Native American Contact**  
Los Angeles County  
August 13, 2012

Gabrielino Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393  
Covina, CA 91723  
(626) 926-4131  
gabrielinolandians@yahoo.com



EDMUND G. BROWNE, II  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



12th A.D.  
DIRECTOR

September 11, 2012

Diego Alvarez  
Los Angeles World Airport  
LAWA - Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045

Subject: Los Angeles International Airport Specific Plan Amendment Study (SPAS) Project  
SCH# 1997061047

Dear Diego Alvarez:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 10, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,



Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resource Agency

1600 10th Street, W.O. Box 3044, Sacramento, California 95832-3044  
(916) 845-6613 FAX: (916) 522-3018 www.opr.ca.gov

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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7060.8 of the Health and Safety Code, Section 6097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1997061047; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment (SPAS) Study; located in the el Segundo area; Los Angeles County, California.

SPAS-AS00002

Document Details Report  
State Clearinghouse Data Base

**SCH#** 1997061047  
**Project Title** Los Angeles International Airport Specific Plan Amendment Study (SPAS) Project  
**Lead Agency** Los Angeles World Airports

**Type** EIR Draft EIR

**Description** The SPAS serves to identify and evaluate potential alternatives to certain components of the LAX Master Plan program, referred to as the Yellow Light Projects. The nine SPAS alternatives include offering various options to the Yellow Light Projects. The improvements associated with the SPAS alternatives include improvements to the north airfield, terminals, and ground access improvements. Alternatives 1 through 4 are "fully-integrated" alternatives that include specific improvements in all three categories. Alternatives 5 through 7 focus on variations to the airfield improvements, which, in turn, affect the terminal improvements and ground access into the Central Terminal Area. Alternatives 8 and 9 focus on variations to the ground access improvements.

**Lead Agency Contact**

**Name** Diego Alvarez  
**Agency** Los Angeles World Airport  
**Phone** 424 646-5179  
**email** LAXSPAS@lawa.org  
**Address** LAWA - Facilities Planning Division  
1 World Way  
**City** Los Angeles **State** CA **Zip** 90045

**Project Location**

**County** Los Angeles  
**City** Los Angeles, City of  
**Region**  
**Lat / Long** 33° 56' 38" N / 118° 24' 34" W  
**Cross Streets** Sepulveda Blvd. & Century Blvd.  
**Parcel No.**  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-405, I-105  
**Airports** LAX  
**Railways**  
**Waterways** Pacific Ocean  
**Schools** St. Bernard's High School  
**Land Use** LAX A Zone - Airport Airside Subarea; LAX L Zone - Airport Landside Subarea

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Noise; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

**Reviewing Agencies** Caltrans, Division of Aeronautics; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; Resources Agency; California Highway Patrol; Caltrans, District 7; Air Resources Board; Airport/Emergency Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** 07/27/2012 **Start of Review** 07/27/2012 **End of Review** 08/06/2012  
SPAS-AS00003

Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA, 42 U.S.C. 4321-4335). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 105 and 4(f) of federal NHPA (16 U.S.C. 470 et seq.), 36 CFR Part 800.3 (f) (2) & 5, the President's Council on Environmental Quality (CEQ, 42 U.S.C. 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interior's Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 105 consultation. The aforementioned Secretary of the Interior's Standards include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254 (r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.95, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built

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STATE OF CALIFORNIA

Edward G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

615 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-6391  
Web Site: www.NAHC.GS.GOV  
e-mail: nahc@pacbell.net

August 13, 2012

Mr. Diego Alvarez

**Los Angeles World Airports**  
LAWA Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045

Re: SCH#1997061047 CEQA Notice of Completion, draft Environmental Impact Report (DEIR) for the "Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS);" located in the Del Rey Community area and the City of El Segundo, Los Angeles County, California.

Dear Mr. Alvarez:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3<sup>rd</sup> 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3 et seq. This project is also subject to California Government Code Section 65352.3 et seq. This project is also subject to California Government Code Section 65352.3 et seq.

The California Environmental Quality Act (CEQA - CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.95

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around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton  
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

SPAS-AS00003



Attachments: I20120136 DEIR LAX Specific Plan Amendment Study .pdf

**From:** Pamela K. Lee [LEEP@scag.ca.gov]  
**Sent:** Tuesday, October 09, 2012 5:35 PM  
**To:** SPASEIR Comments  
**Cc:** ALVAREZ, DIEGO; Jonathan Nadler  
**Subject:** SCAG Comments on the DEIR for the Los Angeles International Airport Specific Plan Amendment Study - SCAG no. I20120136

Dear Mr. Alvarez:

Please find attached SCAG's comments on the DEIR for the Los Angeles International Airport Specific Plan Amendment Study - SCAG no. I20120136.

Please contact me with any questions or difficulties with the attached file.

Thank you,

**Pamela Lee**

Associate Regional Planner  
 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
 816 West 7th Street, 12th Floor  
 Los Angeles, CA 90017  
 T: (213) 236-1855 | F: (213) 236-1853  
 E: [leep@scag.ca.gov](mailto:leep@scag.ca.gov) | W: [www.scag.ca.gov](http://www.scag.ca.gov)



**Main Office**  
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 12th Floor  
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 Committee Member

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 Committee Member  
 Committee Member

**Technical/Research**  
 Committee Chair  
 Committee Member

October 9, 2012

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 Facilities Planning Division  
 1 World Way  
 Los Angeles, CA 90045  
[dalvarez@lawa.org](mailto:dalvarez@lawa.org)

**RE: Comments on the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study [SCAG No. I20120136]**

Dear Mr. Alvarez:

Thank you for submitting the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study (SPAS) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and as such is responsible for preparation of the Regional Transportation Plan including its Sustainable Communities Strategy component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has determined that the proposed project is regionally significant per CEQA Guidelines, Sections 15125 and 15206 and evaluated this project based on the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy.

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 816 West 7th Street, 12th Floor, Los Angeles, California, 90017. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1855 or [leep@scag.ca.gov](mailto:leep@scag.ca.gov). Thank you.

Sincerely,

*Jonathan Nadler*  
 Jonathan Nadler  
 Manager, Compliance and Performance Assessment

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

The Regional Council is comprised of 44 elected officials representing 111 cities, six counties, six County Transportation Commissions and a Tribal Government representative within Southern California.

10/12/2012

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October 9, 2012  
 Mr. Alvarez

SCAG No. I20120136

**COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES INTERNATIONAL AIRPORT SPECIFIC PLAN AMENDMENT STUDY [SCAG No. I20120136]**

**SUMMARY**

Based on SCAG staff review, the proposed project supports the SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), where applicable.

**2012-2035 RTP/SCS**

The 2012-2035 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project.

2012-2035 RTP/SCS GOALS	
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region
RTP/SCS G3:	Ensure travel safety and reliability for all people and goods in the region
RTP/SCS G4:	Preserve and ensure a sustainable regional transportation system
RTP/SCS G5:	Maximize the productivity of our transportation system
RTP/SCS G6:	Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
RTP/SCS G7:	Actively encourage and create incentives for energy efficiency, where possible
RTP/SCS G8:	Encourage land use and growth patterns that facilitate transit and non-motorized transportation
RTP/SCS G9:	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

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The 2012-2035 RTP/SCS also contains regional aviation policies ([http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012RTP\\_Aviation.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012RTP_Aviation.pdf)), including Airport and Land Use Compatibility and Environmental Impacts policies.

2012-2035 RTP/SCS Regional Aviation Policies	
III.A. Airport and Land Use Compatibility and Environmental Impacts Regional Aviation Policies	
•	Increased coordination between airport planning and land use planning on both regional and local levels should be promoted.
•	Regional support and coordination should be extended to the region's Airport Land Use Commissions.
•	Information on aviation environmental "best practices" should be shared and disseminated on a regional level.
•	Mechanisms for promoting cleaner and quieter aircraft at the region's airports should be identified and supported.

The proposed project is listed in SCAG's 2012-2035 RTP/SCS, Aviation and Airport Ground Access Report, Appendix, as the LAX Specific Plan "Yellow Light Projects."

The adopted 2012-2035 RTP/SCS includes total regional and LAX air passenger demand forecasts for 2035 of 145.9 million of annual passengers (MAP) and 78.9 MAP, respectively.

**SCAG Staff Comments**

The proposed Los Angeles International Airport Specific Plan Amendment is consistent with SCAG's 2012-2035 RTP/SCS air passenger demand forecast of 78.9 MAP.

Chapter 4.9 (Land Use and Planning) and Appendix I (Land Use and Planning) of the proposed project Draft EIR analyze, where applicable, each project alternative's consistency with SCAG's 2012-2035 RTP/SCS Airport Land Use Compatibility and Environmental Impacts regional aviation policies, as well as SCAG's 2004 Compass Blueprint principles (which are precursors to the mobility and sustainability goals in the 2012-2035 RTP/SCS). The proposed project's Final EIR should clarify the information in Chapter 4.9 and Appendix I to also specifically address the 2012-2035 RTP/SCS goals listed above, where applicable.

The Draft EIR includes some of alternatives that do not propose ground access improvements. SCAG encourages selection of a preferred alternative that maximizes implementation of the economic, mobility, and sustainability goals of the 2012-2035 RTP/SCS, which would include ground access improvements and close collaboration with Los Angeles County Metropolitan Transportation Authority on the proposed Crenshaw/LAX Transit Corridor.

**MITIGATION**

**SCAG Staff Comments**

SCAG staff recommends that you review the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: [http://scag.ca.gov/fair/pdf/SCAG\\_IGRMMPR\\_2012.pdf](http://scag.ca.gov/fair/pdf/SCAG_IGRMMPR_2012.pdf)

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**South Coast**  
**Air Quality Management District**  
21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-mailed: October 25, 2012  
dalvarez@lawa.org  
spaseircomments@lawa.org

October 25, 2012

Mr. Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045-5803

**Review of the Draft Environmental Impact Report (Draft EIR) for the  
Los Angeles International Airport (LAX) Specific Plan Amendment Study Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document and the lead agency's consideration of the enclosed comments beyond the comment period. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (EIR) as appropriate.

Based on a review of the Draft EIR the proposed project will generate significant regional and local air quality impacts during operations. The project's significant air quality impacts are predominantly from aircraft emissions generated by a significant increase of air passenger capacity at the project site. For example, the project could result in an additional 11,000 lbs/day of NOx emissions from future aircraft activity, resulting in significant localized impacts. Therefore, it is imperative that the lead agency provide additional mitigation measures that address these significant project emissions pursuant to CEQA Guidelines Section 15126.4. Because of the high baseline and future emissions from the project site, the lead agency should also ensure that any approved build alternatives minimize exposures wherever feasible, including through providing the largest possible buffer between emission sources (such as runways) and sensitive receptors.

Further, the Draft EIR lacks necessary specificity in several areas, including how mitigation will be implemented, what other air quality work has been recently completed for LAX and the surrounding community, and in many of the air quality analysis methodologies. Without presenting the details of the analysis, AQMD staff is unable to confirm whether the air quality analysis is consistent with our guidance. Further, by omitting this information, the decision makers and the public are not afforded the opportunity to review all of the pertinent information prior to determining the environmental impacts of this project. As a result, AQMD staff has suggested revisions to this analysis (included in the attachment).

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Mr. Diego Alvarez

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Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Staff is available to work with the lead agency to address these issues and recommends that the lead agency coordinate with our staff prior to releasing the Final EIR. If you have any questions regarding the enclosed comments please contact Dan Garcia at (909) 396-3304.

Sincerely,

  
Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG  
LAC120731-06  
Control Number

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Mr. Diego Alvarez

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**Operational Emissions Mitigation**

1. Given that the lead agency's operational air quality analysis demonstrates significant regional air quality impacts from PM10 and PM2.5 and localized air quality impacts from NO2, SO2, PM10, and PM2.5 emissions the AQMD staff recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4. Because of these significant current and future air quality impacts, the lead agency should ensure that any approved build alternative looks to minimize exposures wherever possible. This can include providing the maximum buffer between emission sources (such as runways, major travel routes, parking lot entrances, etc.) and sensitive receptors.
2. In addition, the AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.

**Aircraft Emissions**

- a) Encourage or incentivize airlines to route the cleanest aircraft engines to serve the South Coast Air Basin.

**Energy Efficiency Mitigation Measures**

- b) Maximize use of solar energy including solar panels; specifically, the lead agency should review, estimate and commit to a minimum installation based on the total available space at the project site. The lead agency should provide a brief justification for any areas found to be infeasible for solar panel installation.
- c) Require all lighting fixtures, including signage, to be energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- d) Use light colored paving and roofing materials.
- e) Use passive heating, natural cooling, and solar hot water systems for buildings, and reduced pavement for non-roadway areas where possible.
- f) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- g) Limit the hours of operation of outdoor lighting where possible.
- h) Install energy efficient heating and cooling systems, appliances and equipment, and control systems.

**Transportation Mitigation Measures**

- i) Set specific goals for service levels applicable to LAX Flyaway Service that will provide direct shuttle service between the site and off-site locations.
- j) Set goals for the introduction of zero/near zero emission shuttles serving LAX.
- k) Ensure that LAX Flyaway Services provide adequate seating capacity for employees.

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Mr. Diego Alvarez

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- l) Implement a home dispatching system where employees receive routing schedules by phone.
- m) Provide incentives to encourage public transportation and carpooling (e.g., through internal retail and restaurant discounts).
- n) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- o) Implement and/or enhance a rideshare program for employees.
- p) Require the use of 2010 diesel, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) as soon as feasible and prior to the 2023 CARB compliance deadline.
- q) Provide electric infrastructure (wiring, panel upgrades, etc.) for truck loading areas to allow future charging station installation.
- r) Provide a direct connection between the MTA Green Line/Crenshaw Line and any constructed Automated People Mover (APM).
- s) Require the APM to operate with zero emissions technology.
- t) Provide zero/near-zero emissions and alternative fueled technologies to transport passengers from nearby locations such as rental car centers.

**Parking Mitigation Measures**

- u) Provide parking system for quick entry and exit that will reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking, parking locations, and parking fee.
- v) Provide real time information on parking availability in the parking structures to minimize the time it takes to find available parking.
- w) Install electrical hookups at docks for any TRU's.

**Other Mitigation Measures**

- x) Require diesel particulate filters on all diesel-fueled emergency generators.
- y) Require use of electric lawn mowers and leaf blowers.
- z) Require use of electric or alternatively fueled sweepers with HEPA filters.

Further, given that the lead agency incorporates MMAQ-4 from the Final EIR for the LAX Master Plan in the proposed project the AQMD staff recommends that the lead agency provide an updated inventory in the Final EIR that demonstrates the lead agency's progress toward achieving a zero/near zero (low emission) fleet of ground support equipment. The aforementioned inventory should provide an overview of the existing ground support equipment fleet and near future milestones toward achieving a low emission fleet.

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#### Construction Emissions Mitigation

3. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds for NOx, VOC, CO, PM10, and PM2.5; therefore, beyond MMAQ-1 and MMAQ-2 and the requirements of the applicable settlement agreement the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)<sup>1</sup> have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
  - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

<sup>1</sup> For example see the Metro Green Construction Policy at: [http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

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Additional measures to reduce off-road construction equipment can be found at the following website: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

#### Specificity of Mitigation Measures

4. Many of the mitigation measures from the LAX Master Plan that are carried forward into the LAX SPAS Draft EIR are vague and need further clarification in the Final EIR. Without this added specificity, it is unclear how effectively the proposed measures from Table 4.2-9 of the Draft EIR may mitigate air quality impacts. The Final EIR should include additional discussion of the following items:
- It is unclear how many charging stations will be provided by implementing this project. The currently installed electric vehicle charging stations are commonly overcrowded, thus not allowing electric vehicles the ability to charge while onsite. At a minimum, enough Level 1 charging capacity should be added to accommodate demand.
  - It is unclear how promoting "best engine" technologies at rental car fleets will be implemented. The types of technologies that will be promoted and the incentives provided should be detailed in the Final EIR.
  - It is unclear how the lead agency will promote SULEV/ZEV technology for commercial vehicles using terminal areas. The Final EIR should specify the types of incentives that will be offered, as well as the applicability of these incentives (e.g., how will it apply to heavy duty delivery trucks, shuttle buses, etc?)

#### Electrification of Passenger Gates

5. Page 4-107 of the Draft EIR states that newly constructed passenger gates will be electrified (Measure X.A). Because of the significant air quality impacts of this project, the lead agency should investigate the feasibility of electrifying all gates at LAX. The Final EIR should include a discussion of the feasibility of this additional mitigation, as well as the time frame that would be needed to implement it.

#### CEQA Baseline

6. Establishing a proper baseline is fundamental to accurately assessing a project's impacts. The function of the baseline is to set conditions against which project impacts are compared to determine whether an environmental impact is significant. As such, the baseline should not be established in a way that understates project impacts. The baseline emissions in this Draft EIR are from 2010. While conditions at the time the NOP is released normally constitutes the baseline for analysis of project impacts, a future conditions baseline is the more appropriate baseline to evaluate the impacts from this proposed project. This is because use of a current conditions baseline underestimates project impacts by taking credit for projected improvements to air quality that are unrelated to the proposed project. These improvements include the future air quality benefits from currently adopted and enforceable vehicle emission standards. Crediting the project with such benefits does not disclose the impacts of the project. Therefore, in order to ensure that the impacts of this project

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are accurately described, the AQMD staff believes the impacts of the proposed Project should be measured against future conditions without the proposed Project. In other words, a baseline should be presented that includes current activity levels along with project build-out emission standards.

#### Air Quality Analysis Interim Milestone Years Needed in Air Quality Analysis

7. The analysis years for the Draft EIR includes only two analysis years: baseline year 2009/2010 and build out year 2025. It is not clear that 2025 captures the peak daily emissions. By 2025, the project will be at full build and vehicle and truck fleets will meet the most stringent emission standards currently required. Although the proposed project may not be at peak capacity in earlier years, it is possible that due to higher emission rates of vehicles and trucks in earlier years that peak daily emissions may occur before 2025. The overall emission rates of vehicles and trucks are higher in earlier years as more stringent emission standards have not been fully implemented and fleets have not fully turned over. The Final EIR must provide additional information to demonstrate that 2025 is the peak year, and if it is found that an earlier year is the peak year, that year should be presented in the air quality analysis.

#### Diesel Idling

8. Page 4-108 of the Draft EIR describes a ten minute idling limitation for vehicles onsite (Measure X.M). This measure should be revisited and made consistent with the most recent CARB rule on diesel idling, including no more than five minutes of idling for trucks.

#### Monitoring Studies Evaluating Black Carbon and Ultrafine Particles

9. LAX is currently undertaking a monitoring study to evaluate the community impacts of air pollution from the existing facility.<sup>2</sup> According to the LAWA website, the study will be complete by Spring of 2013. This study will evaluate a diverse suite of pollutants, including two pollutants commonly associated with health impacts, ultrafine particles and black carbon. Another recent study that investigated pollutant concentrations near LAX found that black carbon and ultrafine particles are substantially elevated during aircraft takeoffs and landings.<sup>3</sup> However AQMD staff was unable to identify any discussion of either study in the Draft EIR. As both of these studies were conducted to help the public and decision makers for this project evaluate potential air quality impacts from this facility, a robust description should be included in the Final EIR.

#### Receptors Used in Dispersion Modeling

10. The dispersion modeling used to determine criteria and toxic air pollutant concentrations uses a set of receptors along the boundary of the project site. As shown in Table 4.2-15 of the Draft EIR, most of the pollutants exceed significance thresholds, some by a large margin. However, because receptors were not included

<sup>2</sup> [http://www.lawa.org/welcome\\_LAX.aspx?id=1066](http://www.lawa.org/welcome_LAX.aspx?id=1066)

<sup>3</sup> <http://arb.ca.gov/research/apr/past/04-325.pdf>

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farther out in the community, it is impossible to determine the extent of these impacts. While knowing whether predicted concentrations exceed the Ambient Air Quality Standards (AAQS) is important, the public and decision makers also need to know if this impact is strictly at the fence line or if it impacts a substantial number of people in the surrounding community. The Final EIR should include results of the dispersion model, including contour maps, showing the extent of criteria pollutant impacts offsite. Guidance regarding receptor placement for dispersion modeling can be found at the website below:

[http://www.aqmd.gov/smog/metdata/AERMOD\\_ModelingGuidance.html](http://www.aqmd.gov/smog/metdata/AERMOD_ModelingGuidance.html).

#### Dispersion Modeling Source Treatment

11. The Draft EIR does not contain any description of how emission sources were treated in the dispersion model. Without this key description of the modeling exercise, neither AQMD staff, nor the public, is able to confirm the validity of the dispersion modeling analysis. Key parameters that require additional clarification include source type, placement, strength, dispersion parameters, etc. The Final EIR should include a copy of the dispersion modeling input and output files as a separate appendix. AQMD staff also requests that the input and output files be provided to us in their native format (consistent with our request from our comment letter on the project's NOP) when available.

#### Meteorological Data Used in Dispersion Model

12. Page 4-88 of the Draft EIR states that one year of meteorological data was used to complete the dispersion modeling analysis. While one year of meteorological data is appropriate if collected onsite for most modeling purposes, it is not clear how the NO2 and SO2 modeling analysis comparing against the federal standards were completed. The federal NO2 and SO2 standards are based on the three year average of the 98<sup>th</sup> and 99<sup>th</sup> percentile (respectively) of the daily maximum hourly concentration. Three years of meteorological data is available from the LAX met station<sup>4</sup> and should be used to determine these potential impacts.

#### Emissions Inventory Calculations for Vehicles

13. It is unclear how the emission inventories were calculated for vehicles accessing the project site. For example, Table 56 of Attachment 2 of Appendix of the Draft EIR presents estimates of Vehicle Miles Travelled (VMT) for different speed bins and different vehicle types for the baseline scenario. This VMT estimate is then presumably multiplied by the emission factors from Table 61 of the same appendix to determine the total emission inventory from this source. However, there are several parameters that are not clear from Table 56 including 1) how the VMT was apportioned to each speed bin (it does not correlate with EMFAC 2011 for example); 2) how the different vehicles classes (at least 6 classes of vehicles likely travel to LAX) were weighted down to the two classes presented in Table 56; 3) how the VMT per trip value was determined; and 4) how the number of trips presented in Table 56 correlates with Tables 4.12.1-2 and 4.12.1-5 from the transportation analysis in the Draft EIR. The Final EIR should include a more thorough explanation of how the

<sup>4</sup> <http://www.aqmd.gov/smog/metdata/AERMOD.html>

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emission calculations were performed, including providing additional calculation sheets if necessary.

#### Emissions Inventory Calculations for Aircraft

14. The Draft EIR and its appendices only contain summary results for the emission inventory for aircraft emissions. AQMD staff could not find any backup calculations, including spreadsheets or EDMS input or output files in any of the project files. Without these emission calculations, neither AQMD staff, nor the public, is able to confirm the validity of the aircraft emission calculations. The Final EIR should include all of the calculation sheets and model files used to determine air quality impacts from aircraft emissions.

#### Consistency with the AQMP

15. The Draft EIR does not address how the project is consistent with the AQMP. Although the capped number of passengers (78.9 million annually) appears to be consistent with assumptions in the Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS), it is not clear if the assumptions about on-road vehicular travel are consistent with the RTP. The AQMP relies on the assumptions contained within the RTP/SCS. Given the volume of vehicles travelling to LAX, it is important to understand if the analysis contained within this EIR is consistent with regional planning assumptions. The Final EIR should include a discussion of the consistency between this project's traffic analysis and the RTP/SCS and the AQMP in general.

#### Greenhouse Gas Calculations for Aircraft

16. Page 4-389 of the Draft EIR describes how the GHG emissions were calculated from aircraft. Consistent with the criteria pollutant analysis, emissions were only included below the average mixing height of 1,806 feet above sea level. While using the mixing height is an appropriate method for a criteria pollutant analysis, it is not clear why this is appropriate for a GHG analysis. Aircraft travel the vast majority of their trip above the mixing height, and hence emit the bulk of their GHG's above this level. The Final EIR should include further clarification about why this is an appropriate method. The lead agency should also describe why other methods are not more appropriate (e.g., calculating aircraft GHG's based on the amount of fuel dispensed from LAX).

#### Greenhouse Gas Emissions Mitigation

17. Based on a review of the Draft EIR the lead agency has determined that the proposed project will not achieve a greenhouse gas (GHG) reduction target of 16% per passenger below 2009 levels by 2025. However, the lead agency indicates that, at a minimum, the project will achieve a 13.05% reduction in GHG emissions per capita. Therefore, the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

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- Incorporate mitigation measures (b) through (x) in comment #2 and all mitigation measures in comment #3 identified above.
- Develop a monitoring and reporting plan that ensures the implementation of the applicable mitigation measures and requires future updates of the project's GHG emissions inventory. At a minimum, the inventory should demonstrate that the project achieves 13.05% reduction per capita consistent with the lead agency's GHG emissions analysis in the Draft EIR.

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**From:** Barry Kurtz [BKurtz@dlsh.lacounty.gov]  
**Sent:** Wednesday, October 03, 2012 2:15 PM  
**To:** SPASEIR Comments  
**Cc:** Kerry Silverstrom; Gary Jones; John Kelly; 'JWalker@dpw.lacounty.gov'; 'Lehman, Desri'; 'Pietak, Jeff'; 'sflau@dpw.lacounty.gov'; 'PMasella@dpw.lacounty.gov'; 'barry.kurtz@culvercity.org'  
**Subject:** LAX Specific Plan DEIR

Mr. Diego Alvarez,

The Los Angeles County Department of Beaches and Harbors has the following comments on the Draft Environmental Impact Report (Draft EIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS):

The Off-Airport Transportation traffic study on Page 4-1301 indicates the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard. The report states, "The addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound through lane would require widening of the southbound approach and departure. Is considered infeasible. No other feasible improvements have been identified to fully mitigate the project impact. Therefore, this impact would remain significant and unavoidable." We disagree that there are no other feasible mitigation measures. Costco also had an impact on the Lincoln/Washington intersection and was required to pay Culver City \$1.5 million towards the SR90 Connector Road to Admiralty Way project to mitigate their impact. Similarly, this project should contribute towards the SR90 Connector Road to Admiralty Way project to mitigate this project's impact or contribute to Admiralty Way improvements, since Admiralty Way serves as a "relief valve" to Lincoln Boulevard when it reaches capacity.

Table 4.12.2-25 shows in the PM peak hour Admiralty/Fiji LOS A, Admiralty/Mindanao LOS B and Admiralty/Palawan LOS B. These levels of service show less congestion than the levels of service shown in recent previous traffic studies. Provide the backup data to verify these levels of service.

All the intersections of Lincoln Boulevard near Marina del Rey show worse levels of service after the project, except the intersection of Lincoln/Mindanao shows no change in the PM peak hour. This appears to be an error. Provide the backup data to verify these levels of service.

We will follow up with a letter with these comments.

Barry Kurtz, P.E.  
 County of L.A. Dept. of Beaches and Harbors  
 13837 Fiji Way  
 Marina del Rey CA 90252  
 Phone: (310) 821-4762  
 email: bkurtz@dlsh.lacounty.gov



SPAS-AL00001



Diego Alvarez, Program Director  
 LOS ANGELES WORLD AIRPORTS  
 1 World Way  
 Los Angeles, CA 90045-5803

File: SG.CE

Dear Mr. Alvarez:

#### Los Angeles International Airport (LAX) Specific Plan Amendment Study – Draft EIR

This is in response to your letter requesting a review of your proposed Specific Plan Amendment Study project. The Bureau of Sanitation has conducted a preliminary study of the wastewater and stormwater systems of the proposed project.

#### WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to enhancing safety and security, minimizing environmental impacts on surrounding communities, and designing for a practical capacity only.

Based on the project description, we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient detail to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

#### STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements.



within the City of Los Angeles. We anticipate the following requirements would apply for this project.

#### POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook – Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: [www.lasstormwater.org](http://www.lasstormwater.org). It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

#### GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

#### CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturbed more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3<sup>rd</sup> Fl, Station 18.

SPAS-AL00002

Sincerely,

  
Alf Poosti, Division Manager  
Wastewater Engineering Services Division  
Bureau of Sanitation

cc: Kosta Kaporis, BOS  
Rowena Lau, BOS

Dir Files\SCARICEQA Review\Final Response LAX Los Angeles International Airport (LAX) Specific Plan Amendment Study – Draft EIR

SPAS-AL00002

Attachments: LAX SPAS Draft EIR Response.pdf

**From:** Hartwell, Scott [HARTWELLS@metro.net]  
**Sent:** Tuesday, October 09, 2012 10:16 AM  
**To:** SPAS EIR Comments  
**Cc:** McAllester, Bradford; Berlin, Renee; Diaz, Roderick; Hollis, Calvin  
**Subject:** MTA's response to the LAX SPAS Draft EIR

Mr. Alvarez,

Attached is MTA's response to the LAX SPAS Draft EIR. A hard copy will arrive via U.S. Mail as well.

Thank you,

**Scott Hartwell**  
Transportation Planner  
One Gateway Plaza mailstop 99-25-2  
Los Angeles, CA 90012  
(213)922-2836

SPAS-AL00003



Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90001-9925  
213-922-3000 Tel  
metro.net

**Metro**

October 8, 2012

Mr. Diego Alvarez, Program Director  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045-5803

Re: LAX Specific Plan Amendment Study (SPAS) Draft EIR

Dear Mr. Alvarez:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the LAX Specific Plan Amendment Study (SPAS). The Los Angeles County Metropolitan Transportation Authority (LACMTA) is responding in its capacity as a responsible agency with respect to the proposed project's potential impacts on existing and planned Metro and municipal transit services.

#### Valuable Analysis Tools to Clarify Differences in Benefits / Impacts among Alternatives

To support a better understanding of the benefits of various ground transportation solutions when comparing alternatives, please note the following suggestions for the traffic analysis:

##### 1) Traffic Micro-simulation

The traffic analysis performed for the SPAS presents a significant level of rigor following the Critical Movement Analysis methodology using the TRAFFIX traffic modeling tool (as indicated on Page 4-1079). It may be helpful to complement the Critical Movement Analysis with more detailed micro-simulation to clarify differences in benefits and impacts to ground transportation among the various ground transportation and transit alternatives. Traffic flow micro-simulation is often able to capture interactions across many roadway segments (links) and intersections (nodes) and can simulate compounding downstream effects of traffic delay and queuing ("spill back") and bottlenecks ("lane blocking") that are common to airports, especially those with ring roads. Especially in the Central Terminal Area (CTA), there are complex interactions with different curb configurations, ramps, turn lanes, parking garage entrances and exits, weaving lanes, and drop off areas that create location-specific bottlenecks and weaving friction. Capturing these differences in performance of the roadway system will help to clarify the differences between the performance of transit buses operating in mixed flow traffic and other transit solutions that are not affected by roadway performance (elevated busway, automated people movers, and light rail).

##### 2) Without Alternative Condition with Future Traffic Levels

The Without Alternative condition for 2025 is presented with air passenger traffic levels for 2009. As noted on Page 4-1048, this approach is conservative for determining the extent of impacts for each individual "With Alternative" condition. It may be worthwhile to compare some "With Alternative" conditions to a Without Alternative Condition at 2025 air passenger traffic levels, rather than 2009 traffic levels. Alternatively, it may be useful to compare them to the 2025 traffic levels and impacts

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that would be generated using either Alternative 5, 6, or 7 as a baseline (if this is pursued, Alternatives 5, 6, and 7 should include the proposed Metro station at Aviation and Century Boulevards as part of the baseline). Comparing these scenarios with 2025 traffic levels may help to clarify the benefits of transit investments and to test the robustness of the background roadway and transportation networks.

Connections to Metro's Light Rail Lines (Crenshaw/LAX Line and the Metro Green Line) and Aviation/Century Station

LACMTA notes that all of the Alternatives that involve Ground Transportation Improvements, especially the elevated busway between Aviation and Sepulveda Boulevards (Alternatives 1, 2, 4, and 8) and the Automated People Mover (Alternatives 3 and 9) connect to both light rail lines that will operate in the area—the Metro Green Line and the Crenshaw/LAX Line and a new station to be developed by LACMTA at Aviation/Century (to be constructed and in service by 2018). LACMTA supports plans by LAWA to extend any transit connection to serve both lines, thereby minimizing the number of transfers for passengers on their journey to and from LAX. When LAWA considers how connections are made at Aviation and Century Boulevards (near Manchester Square), we request that the evaluation of alternatives should consider the impacts upon the design of the Metro Rail Station, on the proposed bus facility on the west side of Aviation Boulevard and upon long-term use of LACMTA's property (currently in process for purchase).

Rail Connection to LAX Terminals

LACMTA looks forward to working with LAWA to develop a connection between the regional rail system and LAX. Such a connection builds upon several initiatives already underway. We are already set to award contracts in early 2013 to construct the \$1.7 billion Crenshaw/LAX Transit Corridor by 2018. The Crenshaw/LAX Line will create connections between the LAX airport district and both the Exposition Line and Metro Green Line light rail corridors. With this investment, passengers from many different parts of Los Angeles County (including downtown Los Angeles, the Westside, South Los Angeles, the South Bay, and the Gateway Cities) will have improved access to the LAX area at a new station near the intersection of Aviation and Century Boulevards. This new connection also brings the Metro Green Line to this station, giving LAWA savings in two ways. In the short term, the "G" shuttle operated by LAWA can have lower operating cost due to the fact that the rail system will be one mile closer. In the long-term, the distance to connect any airport transit system to the regional transit system is shortened by one mile, reducing the cost by several hundred million dollars for Automated People Mover connections contemplated in the LAX Master Plan.

The next step is to determine a solution that builds upon this foundation and the work you have developed through this SPAS. We have identified several alternatives through our Airport Metro Connector Study that potentially close the last gap to get to LAX terminals and provide viable alternatives to driving or being driven to the airport. We found that many of the air passengers and employees who would be attracted to more direct airport transit connections originate along corridors already served or planned to be served by the Metro Green Line and the Crenshaw/LAX Line or lines that connect to them (South Los Angeles, Inglewood and Hawthorne, the South Bay, and the Westside). We note that many of the Alternatives explored in SPAS have un-mitigable traffic impacts, including intersections several miles to the east of the airport. Improving transit connections could help to alleviate some of these traffic impacts.

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To complement the investment in the Crenshaw/LAX Line, we would recommend that LAWA investigate how soon it can make an investment in transit connections, especially if the reported performance of the roadway network relies upon an assumption of consolidation of shuttle services (Page 34 of the Appendix E2 – Ground Access Concept Development). As noted in the Preliminary SPAS Report (Table 8-1), the total investment in ground transportation envisioned in the Master Plan (as represented by Alternative 3) would exceed \$3 billion (escalated costs), with more than \$2.4 billion in costs for an Automated People Mover system alone. Any investment in transit considered in other alternatives presented in SPAS or considered as part of the Airport Metro Connector are significantly less in cost than the Master Plan scope of investments. This favorable cost comparison should hopefully make commitments to transit more financially feasible. Furthermore, the full cost of traffic mitigation should be calculated for another useful companion to transit investments. Many intersections are deemed un-mitigable (Table 4.12.2-33 on Page 4-1318 to 4-1319), but it may nonetheless be useful to assign a cost to them for purposes of comparison with potential contributions to transit solutions. Doing so may help to highlight the value of transit to provide alternative access and alleviate traffic impacts.

Bus Connectivity to LAX Terminals

We also look forward to working with you to devise appropriate solutions to connect local buses to airport terminals. Possibilities may include enhancement to the existing bus terminal at Lot C, or a new bus terminal at Aviation and Century Boulevards. Both potential facilities can facilitate bus connections. The location of such a bus terminal shall coincide with the development of alternatives for the Airport Metro Connector as well as circulator systems contemplated within the SPAS Program. The location of such a facility should also consider potential opportunities to complement and avoid conflict with other consolidated transportation facilities. Particularly, whether at this level or at project-level environmental reviews, it will be important to devise strategies to limit the impact of concentrated traffic on the reliable operation of bus lines operating in the airport area. Finally, it will also be worthwhile to confirm how LAWA will connect the bus facilities to the terminals within the ultimate SPAS Program.

Congestion Management Program Statutory Requirements

In accordance with the State of California Congestion Management Program (CMP) statute, the Traffic Impact Analysis (TIA) contained in the LAX SPAS Draft EIR identified several CMP arterial and highway monitoring stations which would be significantly impacted by the proposed project. Per the CMP TIA Guidelines published in the "2010 Congestion Management Program for Los Angeles County", Appendix D, section D.9, the following should be included in relation to CMP arterial and highway monitoring stations and associated mitigation measures as identified in the Draft EIR:

- 1) **Criteria for Determining a Significant Impact.** For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 25% of capacity ( $V/C \geq 0.02$ ), causing LOS F ( $V/C > 1.00$ ); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 25% of capacity ( $V/C \geq 0.02$ ). The lead agency may apply a more stringent criteria, if desired.

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- 2) **Identification of Mitigation.** Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- ☐ Cost estimates, indicating fair share costs to mitigate the impact of the proposed project. If the improvements from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips;
- ☐ Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

- 3) **Project Contribution to the Planned Regional Improvements.** If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- ☐ Any project contribution to the improvement, and
- ☐ The means by which trips generated at the site will access the regional facility.

LACMTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact Scott Hartwell at 213-922-2836 or by email at [hartwells@metro.net](mailto:hartwells@metro.net).

Please send the Final EIR to the following address:

LACMTA CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Scott Hartwell

Sincerely,

  
Martha Welborne, FAIA  
Executive Director, Countywide Planning

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Attachments: LAX SPAS comment letter (10-09-2012).PDF

From: Cynthia Jawad [[jawad@smwlaw.com](mailto:jawad@smwlaw.com)]  
Sent: Tuesday, October 09, 2012 11:09 AM  
To: SPASEIR Comments  
Cc: Osa L. Wolff; Jaclyn H. Prange  
Subject: LAX SPAS Comment Letter

Mr. Glasgow,

Attached is a PDF of a comment letter on the DEIR. If you have a problem accessing this attachment, please let me know.

The original is being sent via Federal Express.

Thank you:

Cynthia Jawad  
Assistant to Jaclyn H. Prange  
Shute, Mihaly & Weinberger LLP  
396 Hayes Street  
San Francisco, CA 94102  
Tel: (415) 552-7272, Ext. 234  
Fax: (415) 552-5818  
Email: [jawad@smwlaw.com](mailto:jawad@smwlaw.com)

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October 9, 2012

Via Email and FedExLos Angeles World Airports,  
Facilities Planning Division  
Attention: Herb Glasgow  
1 World Way  
Los Angeles, CA 90045-5803  
spacecomments@lawa.orgRe: Draft Environmental Impact Report for Los Angeles International  
Airport Specific Plan Amendment Study

Dear Mr. Glasgow:

We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for the Specific Plan Amendment Study ("SPAS") at Los Angeles International Airport ("LAX"). The City of El Segundo has been an active participant in the LAX Master Plan process since its inception. In February of 2006, El Segundo, together with other petitioners, entered into a Stipulated Settlement Agreement with LAWA. El Segundo continues to monitor LAWA's efforts to implement the LAX Master Plan in order to ensure those efforts comply with the terms of the Master Plan and Stipulated Settlement. In keeping with that approach, and in the spirit of continued cooperation, we submit this comment letter on behalf of the City of El Segundo.

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El Segundo is pleased to finally have the opportunity to submit comments on LAWA's SPAS. Although the SPAS process has been exceedingly slow, and we have raised concerns in the past regarding that slow pace,<sup>1</sup> it is apparent from the documents released by LAWA that the delay was due in part to LAWA taking seriously its obligation to engage in meaningful reconsideration of certain previously adopted LAX Master Plan elements. LAWA has, for the most part, produced documents that clearly explain the available options and fairly describe their potential benefits and impacts. This letter, which is based on our review of those documents, will: (1) advocate for LAWA adoption of El Segundo's preferred "100' north" alternative (Alternative 6); (2) underscore the importance of limiting aircraft gates to 153 and planning for a maximum of 78.9 million annual passengers ("MAP"), as LAWA has itself proposed in the SPAS; (3) request certain clarifications and commitments relating to El Segundo's residential sound insulation program funding and flexibility; and (4) point out problems with the SPAS and DEIR analysis that LAWA should address in the Final EIR.

In addition, as LAWA is aware, outside of the SPAS process, El Segundo has a number of long-standing concerns related to LAX. Those concerns include the adverse noise impacts that result when aircraft: (1) make "early turns" over/toward El Segundo; and (2) violate the adopted preferential runway policy by departing from the outboard runway closest to El Segundo (violators are typically cargo freighters). El Segundo anticipates LAWA's continued cooperation with respect to these and other concerns regardless of how the SPAS process is resolved.

**Constraining Passenger Gates.** El Segundo was gratified to see that LAWA's SPAS document clearly acknowledges the importance of limiting the number of gates at LAX as a means of limiting the airport's capacity (i.e., increased operations). Maintaining this limit indefinitely, even after the 2020 expiration of the gate cap contained in the Stipulated Settlement, is critically important. The gate cap is important because it: (1) provides some much-needed assurance to airport neighbors like El

<sup>1</sup> The Stipulated Settlement provided clear timelines for expedient progress in the SPAS process, but that process has suffered significant delay all along the way. See Settlement Agreement § V(A) (commence study process within 60 days), § V(B) (good faith effort to select a contractor and prepare budget/scope of work for study within 6 months), § V(C) (good faith effort to complete study within 24 months). In light of the fact that more than six years have already passed since the Stipulated Settlement was approved, it is more important than ever that LAWA proceed expeditiously to complete the SPAS process.

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Segundo that LAX operations will not increase without limit; and (2) sends a clear message that LAWA is committed to regionalization of aviation (e.g., promoting Ontario International Airport). The FAA recognized the LAX gate cap as legitimate in its May 20, 2005 Record of Decision ("ROD") for the LAX Master Plan, in which it noted that one objective of the LAX Master Plan is to improve the efficiency of passenger operations while also "encouraging, but not requiring, other airports in the Los Angeles Basin to increase capacity." ROD at 17. As noted in the ROD, "[t]his is accomplished by restricting the overall availability of gates where passengers will board and exit an aircraft." *Id.*

LAWA has already recognized the importance of extending the gate cap throughout its SPAS documents by applying that number of gates to each of the alternatives studied. El Segundo encourages LAWA to strengthen that commitment in a number of ways as described below.

**Continued El Segundo Gate Counts.** LAWA should underscore its commitment to 153 gates by memorializing and extending El Segundo's continued authority to periodically tour the airport and count passenger gates. Section IV(F) of the Stipulated Settlement (entitled "PASSENGER GATE PROVISION") states, in relevant part: "No more than four times per year total, Petitioners shall have the right to conduct physical inspections at LAX to verify LAWA compliance with [the LAX gate limit provision]. Petitioners shall provide LAWA with reasonable written notice of their intent to inspect, no less than 24 hours prior to the proposed inspection, to the office of the Deputy Executive Director of the Office of Quality and Compliance. LAWA shall provide Petitioners' representative with the appropriate security clearance and on-airport transportation to conduct such physical inspections."

El Segundo has conducted seven "gate counts" at LAX since the 2006 approval of the Stipulated Settlement, and anticipates continuing to conduct counts approximately annually. These counts have proved exceedingly helpful to El Segundo and have required only a limited amount of effort by LAWA (i.e., provision of a vehicle and driver for approximately an hour for each visit). Because the LAX gate limit provision of the Stipulated Settlement is currently set to expire at the end of 2020 (unless extended by the parties), it is theoretically possible that LAWA could withdraw its support for El Segundo's counts beginning in 2021. As part of the SPAS process, El Segundo is therefore seeking assurances from LAWA that it will continue to allow El Segundo to confirm LAWA's compliance with the applicable gate limit. This commitment by LAWA could be memorialized in a SPAS mitigation measure and/or in an extension of the Stipulated Settlement.

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**LAWA Gate Plans & Reports.** In order for the 153 gate limit to be meaningful, it is important that LAWA at all times makes clear its current gate inventory and future intentions with regard to gates. We note LAWA's SPAS documentation includes maps of where the 153 gates would be located and how they would be configured under various alternatives (Appendix F-1, Attach. A, Figures A-D). We also note, however, that the gate position maps include a note stating that "[a]ircraft parking positions are shown for illustrative purposes only." This is understandable to some degree because the SPAS is conceptual and programmatic in nature, so further refinement and environmental review will follow at the project level. However, as LAWA proceeds to implement Master Plan elements, including one of the SPAS alternatives, it must provide ongoing public disclosure regarding how LAX's gate configuration measures up against the applicable limit of 153 gates. To do this, LAWA should produce a gate position report for the public at least annually,<sup>2</sup> as well as reports tied to approval/implementation of those Master Plan elements that include/impact passenger gates. This commitment by LAWA should be memorialized in a SPAS mitigation measure and in the Specific Plan as discussed below.

**Longer Planning Horizon.** In addition to being interested in the number of passenger gates at LAX, El Segundo is concerned about the related issue of ensuring that the airport's overall passenger activity level stays within the long established planning level of 78.9 MAP. We were therefore pleased to see that the SPAS documents point to LAWA's continued commitment to that figure. See SPAS Report Appendix F (Operational Analysis) at 11 (section 2.5). LAWA should, however, adopt a longer planning horizon of at least 2035 and plan for 78.9 MAP out to that date. Doing so would be more consistent with the most recent planning projections from SCAG. See *Id.* at 8-9.

**Revisions to Specific Plan Section 7.H.** The LAX Specific Plan (dated September 29, 2004 and amended 2007) is an important guiding document for LAX because it prohibits proposed development unless LAWA staff clearly establish that development is consistent with the adopted Master Plan and other applicable requirements, including mitigation obligations under CEQA. The "yellow light" projects are listed in Section 7.H of the Specific Plan, and LAWA appropriately proposes to amend Section 7.H at the conclusion of the SPAS process to delete that list. LAWA's SPAS documents also propose other revisions to Section 7.H of the previously adopted LAX Specific Plan. See

<sup>2</sup> LAWA staff have periodically produced a drawing/inventory of existing LAX gate positions in connection with El Segundo's gate counts. That drawing/inventory could be used as a starting point and model for the annual report El Segundo is requesting.

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SPAS Report Chapter 7. We understand the need to amend Section 7.H at the conclusion of the SPAS process, but would recommend it be amended to read as follows, rather than as LAVA proposes:

"H. Additional Study Requirements.

1. Specific Plan Amendment Study. LAVA shall immediately initiate a complete LAX Specific Plan Amendment Study (SPAS) comprehensively addressing security, traffic, aviation activity and corresponding environmental analysis consistent with CEQA, in the three circumstances listed below. LAVA shall complete that study prior to commencing construction of any Master Plan Project that is not already under construction when this obligation to commence a SPAS is triggered.

(a) If the annual traffic generation report required in Subsection G.1 above, and/or the annual traffic generation report considered together with any Project-specific traffic study, shows that any Master Plan Projects will be generating net new airport peak hour Trips in excess of 8236 (unless the total Trips for that year are related to construction or phasing impacts).

(b) If the annual aviation activity analysis required in Subsection G.1 above forecasts that the annual passengers for that year are anticipated to exceed 75 million.

(c) If LAVA seeks to approve, install and/or operate more than 153 passenger boarding gates."

This language is similar to the language proposed by LAVA, but preferable because it contains a more meaningful commitment to 78.9 MAP and 153 gates. For example, El Segundo's language makes express LAVA's commitment to conduct further public review and analysis before ever exceeding the clear cap of 153 gates. El Segundo's language also calls for LAVA to commence a Specific Plan Amendment Study when annual passenger levels reach 75 MAP, rather than waiting for them to reach 78.9 MAP. This earlier SPAS trigger is designed to ensure LAVA has enough lead time to plan and act appropriately (e.g., promoting regionalization, adding capacity constraints at LAX) before LAX reaches 78.9 MAP. Once levels reach 78.9 MAP, it will be too late to plan, particularly in light of the long lead time involved (see comments above regarding delay in the current SPAS process).

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In addition to the above amendments to Section 7.H, El Segundo recommends Section 7G.1(b) be amended to require LAVA's annual aviation activity analysis to report on the number and location of passenger gates at LAX. Including that information in the annual report already required will help ensure LAX does not exceed the number of approved gates authorized under the Master Plan and current SPAS.

**Runway Balance/Alternatives.** El Segundo appreciates the DEIR's inclusion of a wide range of alternative versions of the SPAS Project. We are concerned, however, about its failure to select a single "proposed" or "preferred" project. This approach appears to contradict the CEQA Guidelines' frequent references to "the project." E.g., CEQA Guidelines § 15126.2(a) ("An EIR shall identify and focus on the significant environmental impacts of the proposed project.") (emphasis added). Moreover, the lack of a single proposed project makes reviewing the document difficult for readers, and may hamper LAVA in the identification of appropriately-tailored mitigation measures.

Despite the difficulties posed by the DEIR's approach, several of LAVA's fundamental choices reflect an accurate view of the burden that the current airfield design places on El Segundo. The north airfield's current limitations and the south-side location of several cargo carriers' facilities combine to impose noise impacts on El Segundo that are disproportionate to the airport's northerly impacts. El Segundo was glad to see that resolving this imbalance is among the Project's stated objectives, and that LAVA accordingly rejected alternatives, such as the three-runway airfield, that would worsen it. See DEIR at 2-2, 2-72. Similarly, the presence in several alternatives of the new Terminal 0 and the aircraft capacity improvements to the existing terminals on the north side of the airport are heartening signs that LAVA is taking this problem seriously.

Appendix E1-05 to the SPAS Report (June 2010) points the way toward one of the key means by which the SPAS projects can advance the goal of ending the runway imbalance: lengthening Runway 6R/24L. This document shows that in its current state, the runway is incapable of supporting operations by many important classes of aircraft, while runway 7L/25R (the inbound runway on the southern field) can handle a much broader set of aircraft. This disparity inevitably adds to the excessive number of operations—particularly operations by heavier craft—on the southern airfield, which in turn adds to El Segundo's disproportionate noise burden. The alternative that LAVA ultimately selects must include lengthening Runway 6R/24L.

The north airfield is similarly constrained by its lack of sufficient separation between its two runways, which limits the classes of aircraft that can use the runways. The SPAS projects must provide enough separation to make the north and south airfields

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equally attractive to larger aircraft while avoiding overburdening the airport's northern neighbors: El Segundo has no interest in inflicting noise burden on others.

The DEIR makes clear that Alternative 6, extending Runway 6R/24L and moving it 100 feet north, is the alternative that best balances the airport's commitments to ease the absolute and relative noise burdens on El Segundo by improving the capacity and efficiency of the north airfield with its responsibility to minimize overall impacts. We therefore urge LAVA to select Alternative 6.

At the same time, El Segundo must express its great concern with those alternatives that leave the northern airfield in its current state and therefore do nothing to resolve the present operational imbalance (Alternatives 2, 3, and 4), or that make it even worse by shifting Runway 6R/24L, and therefore the airport's entire noise contour, southwards (Alternative 7). These alternatives are wholly unacceptable to El Segundo. Including these alternatives in this document for comparison purposes may have been appropriate as a matter of good CEQA practice, but LAVA should not select any of them.

We would further note that the SPAS Report includes a chapter addressing the anticipated costs associated with the various SPAS alternatives (SPAS Report Chapter 8). That financial analysis provides considerable support for Alternative 6, as it would be among the least expensive options. The analysis also underscores the complete infeasibility of those alternatives that would be unacceptable to El Segundo. Alternative 3, for example, would involve astronomical costs, particularly in comparison with other options (see SPAS Report at Table 8-2). Of course, LAVA cannot and should not select a SPAS alternative based solely on cost. In this case, however, the financial analysis serves to reinforce the superiority of Alternative 6.

**Ground Transportation Alternatives and Traffic.** As LAVA is aware, El Segundo's proximity to LAX means that LAX's traffic problems will significantly affect the quality of life for El Segundo residents. The list of intersection studied in the DEIR appears comprehensive and shows that LAVA has taken El Segundo's past comments about traffic impacts seriously. El Segundo submits these comments and questions to aid LAVA in further evaluating the traffic impacts of the Project.

Among the ground access improvements that can be paired with El Segundo's preferred alternative, Alternative 6, El Segundo prefers the ground access improvements in Alternatives 1 and 2. LAVA's analysis shows that Alternatives 8 and 9—the other two alternatives compatible with the airfield improvements in Alternative 6—would have a significant impact on the intersection of Sepulveda Boulevard and Imperial Highway

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compared to baseline conditions. DEIR at 4-1232. Given Sepulveda Boulevard's importance as a regional transportation artery, El Segundo requests that LAVA select alternatives that minimize traffic impacts on that street.

However, should LAVA decide to adopt an alternative that includes the consolidated rental car facility ("CONRAC"), El Segundo requests that the CONRAC be located in Manchester Square rather than in Lot C, as this appears to impose fewer traffic impacts on Sepulveda Boulevard.

The DEIR mentions that traffic counts were conducted for a majority of study intersections in July and August of 2010. DEIR at 4-1194. The DEIR also states that because July and August are peak traffic months, no seasonal adjustments were necessary. *Id.* The DEIR then states that traffic counts for an additional 36 intersections were collected in March 2012, but it does not say that any seasonal adjustments were made for those intersections. *Id.* If LAVA made seasonal adjustments for these 36 additional intersections, the DEIR should say so. If not, the DEIR should explain why no seasonal adjustments were necessary for counts conducted in March.

El Segundo would also like clarification regarding the 2025 traffic scenarios. In the 2025 Without Alternatives scenario (the 2025 baseline), LAVA did not include increases in airport-related traffic that it says will occur regardless of which alternative it approves. DEIR at 4-1208. Although we appreciate that this approach is conservative because it attributes all new trips to the alternatives when, in fact, LAVA's analysis assumes those new trips would occur regardless of the Project, we are concerned that this approach may obscure the impacts of the alternatives relative to each other. LAVA must explain whether this approach makes it more difficult to separate out the impacts of the alternatives from each other.

The DEIR states that it will mitigate significant traffic impacts at a variety of intersections. As an initial matter, the DEIR states that the SPAS-related mitigation measures will occur "with implementation of the SPAS alternatives." DEIR at 4-3. To mitigate a significant impact, LAVA must implement applicable mitigation measures *before* that impact is likely to occur (i.e., before building the improvements that will result in increased traffic).

El Segundo also has concerns about the following proposed mitigation measures:

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#### Intersection 15 – Aviation Boulevard and El Segundo Boulevard

This mitigation measure proposes to restructure the northbound and southbound approaches of Aviation Boulevard to provide an additional through lane in each direction. DEIR at 4-1292. However, the measure fails to explain how the receiving side of the intersection would accommodate these additional lanes. The receiving side for each of these changes currently has only two lanes. Thus, as proposed, the mitigation measure would result in a new lane with nowhere to go once it crosses the intersection. Furthermore, Aviation Boulevard is bordered by development on the east and west sides, so widening of the street would be difficult. Accordingly, LAWA's proposed mitigation measure is flawed and will not reduce impacts to a less-than-significant level. LAWA should explain how it will mitigate the significant impacts at this intersection in light of these constraints.

#### Intersection 60 – Sepulveda and Grand Avenue

This mitigation measure proposes to improve right turn capacity from eastbound Grand Avenue to southbound Sepulveda Avenue by allowing vehicles in the middle lane to turn right. DEIR at 4-1296. This would result in the middle lane being a shared left-turn/through/right-turn lane. However, this proposed shared lane may interfere with the left turn and through movements from this lane because of queues from vehicles turning right. Furthermore, at times, queues from the left turn and through movements would interfere with the right turn movement.

In sum, this measure will not reduce the significant impact at this intersection, and will, in fact, create more significant impacts by reducing the eastbound through capacity. Therefore El Segundo requests that LAWA revise this mitigation measure so that it does not interfere with existing movements and better mitigates the impact identified in the DEIR.

#### Intersection 125 – Sepulveda Boulevard and Rosecrans Avenue

The DEIR claims that the proposed mitigation measure for this intersection—widening the northbound approach—is infeasible because it would require removal of existing businesses. DEIR at 4-1289, 1302. This statement is apparently referring to the Fry's Electronics building at the southeast corner of the intersection.

However, LAWA has failed to support this determination of infeasibility with substantial evidence, as required by CEQA. See CEQA Guidelines § 15091(b). In fact, in

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June 2012, the City of Manhattan Beach released a Draft EIR for its proposed Manhattan Village Shopping Center Enhancement Project. This project includes a proposal to demolish the Fry's building. See Manhattan Village Shopping Center Enhancement Project DEIR at page 1-7. Therefore, removal of this building is likely feasible. Furthermore, LAWA has not supported its conclusion that the additional environmental impacts associated with this widening would render the measure infeasible because LAWA could mitigate those impacts.

#### Intersection 55 – Sepulveda Boulevard and El Segundo Boulevard and Intersection 117 – Sepulveda Boulevard and Mariposa Ave

LAWA claims that the Project will not cause significant impacts at Intersections 55 and 117. Intersection 55 is currently operating at LOS C during the morning and midday periods and LOS E during the evening period. DEIR at 4-1220. Intersection 117 is currently operating at LOS C during the morning and evening periods. DEIR at 4-1222. In 2025, these intersections will be operating at LOS D and LOS F during certain periods, without the Project. DEIR 4-1262, 1263.

Given that Intersections 55 and 117 are already heavily impacted, it is difficult to see how the Project will not cause significant impacts at these intersections. Although LAWA's traffic model shows that the Project will not exceed El Segundo's thresholds of significance for these intersections, the Project will, in fact, significantly increase traffic impacts. Therefore, LAWA must treat the impacts on these intersections as significant and incorporate appropriate mitigation measures.

#### Construction Impacts

The DEIR chapter regarding traffic concludes that it would be speculative to estimate construction-related traffic impacts because no construction plans, programs, or schedules have been prepared for any alternatives. DEIR at 4-1281. The DEIR therefore discloses that construction-related traffic could, at times, result in significant and unavoidable traffic impacts. *Id.* at 4-1282. Because LAWA has deferred analysis of construction-related traffic impacts, it must study any such impacts in a project-level EIR when LAWA approves a specific project. Furthermore, when LAWA does approve a specific project, we request that it locate construction staging areas away from El Segundo so as to minimize traffic and other impacts on El Segundo residents.

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**Aircraft Noise and Land Use.** The DEIR's discussion of aircraft noise, split between its Land Use and Aircraft Noise chapters, makes clear that the Project will have substantial impacts, regardless of which alternative is selected. As discussed above, the size and location of the affected areas and populations varies widely among the alternatives, but all of them will have serious impacts. Mitigation measures thus must be an essential part of LAWA's analysis and planning.

**Inconsistent Significance Conclusions:** El Segundo was disappointed to find that the DEIR does not present a clear view of the required mitigation. The document's brief consideration of noise mitigation understandably focuses on an existing measure, Master Plan MM-LU-1 (Implement Revised Aircraft Noise Mitigation), from the LAX Master Plan. This measure requires LAWA to continue to make improvements to its mandated Aircraft Noise Mitigation Program. The "ANMP" is a good starting point for mitigation of aircraft noise, as it includes the essential elements for reducing the effects of aircraft noise, including most importantly funding for residential sound insulation ("RSI") programs in El Segundo and other neighboring jurisdictions. The ANMP in its current form, however, is not sufficient, as the DEIR partially recognizes.

This recognition is only partial, however, thanks to a confusing inconsistency in the DEIR's analysis. The Aircraft Noise chapter concludes that the ANMP will "mitigate the significant noise impacts" related to residences and other facilities newly exposed to noise levels of 65 CNEL or higher. DEIR at 4-932. It does not state whether such mitigation would reduce the impact to a less-than-significant level, but implies that it would do so. The Land Use chapter of the DEIR, however, reaches an inconsistent conclusion: Because RSI-based mitigation would take many years to implement, the ANMP "would reduce, but not eliminate, aircraft noise impacts on residential uses and non-residential facilities newly exposed to noise levels of 65 CNEL or higher." DEIR at 4-778. This implies, again without clearly concluding, that the impact would continue to be significant even after mitigation.

**RSI Funding under the ANMP, the Settlement, and the Master Plan:** As an initial matter, the DEIR should be revised to reconcile the inconsistency addressed above. The Land Use conclusion—that the ANMP is insufficient to fully mitigate the impacts of the various alternatives—is likely correct for a number of reasons. The ANMP achieves mitigation chiefly through funding RSI in the communities surrounding the airport, including El Segundo. Each year, LAWA funding allows El Segundo and other jurisdictions to assist property owners in insulating their homes, thus reducing noise impacts. The program is incremental—many homes remain uninsulated; the Project will add to this overall backlog. The ANMP's effectiveness, and the pace of its progress, thus depends in large part on the amount of funding that LAWA provides each year. At

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present, as the Land Use discussion apparently acknowledges, the ANMP is effective, but may not be sufficient to mitigate the Project's impacts.

As LAWA is aware, the Stipulated Settlement strengthened the ANMP by providing much-needed predictability for RSI programs in El Segundo and other jurisdictions. The Settlement did this by: (1) describing LAWA's minimum annual funding commitments; and (2) eliminating LAWA's prior aviation easement requirement in favor of a more limited noise easement that is consistent with State law. These Stipulated Settlement provisions relating to RSI will expire in 2015 if they are not extended; the Project's impact will extend well past that date. In fact, it is unlikely that the Project will even be complete before the Settlement is set to expire. Extending the Settlement is thus a feasible mitigation measure (or, rather, a feasible improvement to an existing measure) that will help reduce the Project's impacts.<sup>3</sup> We urge LAWA to commit now, via this DEIR, to moving forward on such an extension.

Beyond the Stipulated Settlement, LAWA also has significant continuing obligations with respect to RSI in El Segundo under its adopted Master Plan and State law. Under State law, LAWA is required to work to sound insulate noise-impacted residences in El Segundo. See California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6). Under its adopted Master Plan, LAWA also committed to:

- "[E]xpand and revise [its] existing Aircraft Noise Mitigation Program (ANMP) in coordination with affected neighboring jurisdictions [such as El Segundo], the State, and the FAA,"
- "[A]ccelerate the ANMP's timetable for achieving full compatibility of all land uses within the existing noise impact area,"
- "Continue[] implementation of successful programs to convert existing incompatible land uses to compatible land uses through sound insulation of structures,"
- "Increase[] annual funding by LAWA for land use mitigation,"

<sup>3</sup> Please note that a stronger ANMP will improve the mitigation of all noise impacts, including single-event noise impacts, which the DEIR's analysis indicates are significant (e.g., 4-838–4-841), but which are not discussed in the conclusion section of the Aircraft Noise chapter (4-932–4-933).

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- Reevaluate "aviation easements requirements with sound insulation mitigation,"<sup>4</sup> and
- Provide "additional technical assistance, where needed, to local jurisdictions to support more rapid and efficient implementation of their land use mitigation programs."

Master Plan MM-LU-1 (Implement Revised Aircraft Noise Mitigation).

In light of these commitments, El Segundo expects LAWA to maximize RSI grant funding and continue accepting/acquiring noise (not aviation) easements even if the Stipulated Settlement is allowed to expire. Making such commitments clear and binding in the present DEIR would strengthen the ANMP further and is another feasible mitigation that could reduce the Project's noise impacts. Specifically, LAWA should add mitigation measure commitments to: (1) "continue to accept/acquire noise (not aviation) easements," and (2) "Maximize RSI funding at levels equal to or greater than those contained in the Stipulated Settlement."

We also noted with interest that LAWA's financial analysis for the SPAS includes a recognition that LAWA will have significant ongoing expenses related to RSI. See SPAS Report, Chapter 8, fns. 1 and 4 in Tables 8-1, which references "continued sound proofing" as a "LAX Base Development Project." We urge LAWA to include in the next version of this document additional detail regarding how much grant funding it expects to provide annually for RSI programs in El Segundo and elsewhere. This information is not only key to understanding the efficacy of mitigation, it is critically important in that it would let El Segundo know how much funding is available annually. This data, in turn, allows El Segundo to maximize the number of homes treated and do so efficiently, improving El Segundo's service to its residents and LAWA's mitigation of the Project's impacts.

**Construction-Related Aircraft Noise Impacts:** We would also note a serious omission in the DEIR's analysis of aircraft noise impacts: it does not consider temporary changes in the airport's noise contours during construction of the northern airfield modifications. Any runway closures or other limitations on capacity will necessarily increase operations on the southern runway. This will shift the noise contours southward

<sup>4</sup> As LAWA's reports on MMRP implementation have indicated, "[a]viation easements are no longer required for sound insulation." See LAX MMRP 2010 Annual Report at 18.

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and significantly increase impacts on El Segundo. New homes will be exposed, and the currently-exposed population will face more intense noise. Similar noise shifts during the relatively recent modification to the southern airfield should give LAWA a useful guide to projecting this temporary, but potentially significant impact. Disclosing these temporary effects is not only essential under CEQA, but is also important to the process of selecting and planning the SPAS Project: any version of the Project (whether or not currently among the analyzed alternatives) that would minimize construction time should receive serious consideration.

**Ground Run Up Enclosures:** Finally, the previously approved LAX Master Plan commits LAWA to construct two ground run-up enclosures (GREs) to shield airport neighbors from the noise associated with engine run-ups during maintenance activities at LAX. See 2003 Master Plan Addendum at 2-95. Moreover, the 2010 Stipulated Variance approved by LAWA, El Segundo and others provides that LAWA will design two GREs by 2015.

The DEIR notes that LAWA may at some point construct a new GRE at the west end of LAX as part of a larger aircraft maintenance area. See DEIR at 5-17, 5-19, Figure 5-2. This is the only GRE we found mentioned in the SPAS document. To comply with its Master Plan and Variance commitments, LAWA should ensure it plans for a second GRE and proceed expeditiously with design of both GREs so they can be constructed and operated as soon as possible.

**Conclusion:** In sum, LAWA should move forward expeditiously to correct the deficiencies discussed in this letter, and should take no action to adopt any alternative until it has made such corrections. Once it has done so, El Segundo encourages LAWA to ultimately select SPAS Alternative 6 (100' North).

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

*Jaclyn H. Prange*  
Jaclyn H. Prange

(352)923

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SPAS-AL00004

Attachments: DF Ltr Alvarez LAWA SPAS DEIR 10-10-12.pdf

From: Karen Kirk [KKirk@lax.org]  
Sent: Wednesday, October 10, 2012 1:34 PM  
To: SPASEIR Comments  
Cc: Dan Feger  
Subject: LAX SPAS Comments Draft Environmental Impact Report

Message sent on Behalf of Dan Feger:

Please see the attached letter regarding the Los Angeles International Airport Specific Plan Amendment Study - Comments on Draft Environmental Impact Report. A hard copy of this letter is also being delivered by messenger today.

Thank you,  
Karen Kirk  
Executive Assistant to Dan Feger and John Hainsworth  
Burbank-Glendale-Pasadena Airport Authority  
2827 Hollywood Way, Burbank CA 91505  
Direct: 818-729-2228 Fax: 818-957-0363



October 10, 2012

Mr. Diego Alvarez, SPAS Program Director  
Facilities Planning Division  
Los Angeles World Airports  
One World Way  
Los Angeles, California 90045-5803

Via Messenger and Email  
spasircomments@lawa.org

Re: Los Angeles International Airport Specific Plan Amendment Study  
Comments on Draft Environmental Impact Report

Dear Mr. Alvarez:

The Burbank-Glendale-Pasadena Airport Authority ("Authority") has reviewed the July 2012 Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS") Draft Environmental Impact Report ("DEIR") released by Los Angeles World Airports ("LAWA"). The Authority's interest in the LAX SPAS primarily arises from the contemplated regionalization of air traffic. Specifically, the Authority is concerned about the proposed LAX Specific Plan amendment to require that, upon a forecast of more than 75 million annual passengers, LAWA shall conduct a domestic passenger survey/study and an airline survey/study with the goal of creating conditions that encourage passengers and airlines to utilize other airports in the region.

The Authority believes that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA") and the State CEQA Guidelines. Accordingly, the Authority respectfully requests that LAWA suspend any further consideration of the LAX SPAS until a DEIR that fully discloses and analyzes the potential impacts of air traffic regionalization has been prepared and recirculated for public review and comment. The Authority objects to any further action by LAWA on the LAX SPAS until the necessary and proper environmental review has been completed.

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The DEIR exceeds 1,800 pages, yet barely seven of them (pp. 6-5 to 6-11) are devoted to an analysis of the environmental impacts of LAWA's proposed air traffic regionalization. Moreover, those seven pages essentially defer meaningful assessment of every environmental impact category by repeatedly asserting that "it would be speculative at this point to estimate" how affected airports would be impacted. This cursory discussion violates CEQA, particularly State CEQA Guidelines Sections 15144 and 15145. The former provision mandates that a lead agency "must use its best efforts to find out and disclose all that it reasonably can." The latter requires a lead agency to conduct a "thorough investigation" prior to making a finding that an impact is "too speculative for evaluation" and terminating discussion of that impact.

Although LAWA may not know right now exactly how many passengers and airlines it will be able to shift to other airports in the region, LAWA certainly can make a good faith effort at evaluating whether those airports (at existing and planned capacity) and their surrounding environs (including existing and planned land uses and infrastructure) can accommodate any shifting without unmitigated environmental impacts. To comply with CEQA, the DEIR must be revised to address matters such as noise, traffic, and air quality impacts that inevitably will result if LAWA were to achieve its goal of redistributing passenger and airline activity in the region.

The Authority appreciates the opportunity to submit these comments and hopes that they will result in a productive dialog between our agencies, and will lead to an air traffic regionalization solution that benefits all airport operators without adversely affecting the regional environment.

Sincerely,

  
Dan Feger  
Executive Director

SPAS-AL00005

Attachments: image001.jpg; LAX Specific Plan Amendment comments October 10, 2012.pdf

From: Mike Calzada [mcalzada@cityofinglewood.org]  
Sent: Wednesday, October 10, 2012 11:35 AM  
To: SPASEIR Comments; ALVAREZ, DIEGO  
Cc: Linda Tatum; Barbara Lichman  
Subject: LAX SPAS DEIR Comments

Good day Diego,

Please accept this transmission of the RSI Department comments re: the LAX SPAS DEIR. This letter is to augment the submittal of BuchalterNemer submitted earlier today.



Michael F. Calzada  
Residential Sound Insulation Director

(310) 412-5869 (office)  
(310) 412-5371 (voice mail)  
(310) 330-5787 (fax)

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## CITY OF INGLEWOOD

RESIDENTIAL SOUND INSULATION DEPARTMENT

MICHAEL F. CALZADA  
DIRECTOR

City of Los Angeles  
Los Angeles World Airports  
Facilities Planning  
1 World Way  
Los Angeles, CA 90045-5803

Attention: Diego Alvarez

Subject: LAX Specific Plan Amendment Study Draft Environmental Impact Report (DEIR)

October 10, 2012



These comments are intended to augment the City of Inglewood's comments prepared on the City's behalf by the firm of BuchalterNemer regarding the LAX Specific Plan Amendment DEIR.

The City of Inglewood as a neighboring community has been engaged in collaborative efforts with LAWA in mitigating noise impacts of LAX for over a generation.

From early legal wrangling to the creation of stakeholder discussions resulting in the adoption of Airport Noise Contour and Land Use Compatibility study findings in the 1970's to 1984, to the resolution of lawsuits in respect to the 2004 Master Plan, the City has constructively engaged a succession of administrations in defining and then dealing with the affects of aircraft noise at minimum.

The Stipulated Agreement which followed the Master Plan in 2006, in addition to the adopted Mitigation Monitoring and Reporting Program for the Master Plan's Specific Plan, has enabled a mutually beneficial framework from which results can be measured.

It is with this historical framework in mind that these comments on the LAX Specific Plan Amendment (SPA) and Draft Environmental Impact Report (DEIR). Fundamentally it appears that the LAX proposed alternatives will accommodate an increase of operations while attempting to achieve efficiencies in operational safety and transportation systems. Increasing operations will have an ongoing adverse impact on the community of Inglewood.

The City of Inglewood continues to be concerned with the long term impacts to health due to noise (sleep interruption and deprivation, and interruptions to learning and educational study) and air quality from airfield operations, aircraft exhaust and increased traffic; impacts to the traffic circulation to and from the airport along with congestion within and through the community. The SPAS proposed alternatives and in turn the proposed north airfield operations will alter the present noise contours. The introduction of multi-modal integration with regional transit, and a consolidated rental/parking area(s) will all have an impact on local circulation patterns.

The following are comments concerning potential areas of impact and areas which require consideration in the preparation of the final DEIR.

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1. Incorporated as reference are comments made November 29, 2010 concerning the preparation of the LAX Specific Plan Amendment DEIR.
2. The data source for the Population and Population per Household for **Table 4.9-2** and **Table 4.9-4** at page 4-633 should be re-examined.
  - a. At **Table 4.9-2** a total of 12,596 people are shown for living within both single-family and multi-family units. This averages to 2.78 persons per household. As the City of Inglewood has aged and become relatively younger, the family size has decreased nominally over ten years according to the 2010 Census. However, the basis for utilizing a factor less than 3.0 persons per household requires scrutiny.
  - b. Examining **Table 4.9-4** reveals a person per household factor of 2.59 for single-family and 2.80 for multi-family. As a result there are possibly greater than 5,000 more persons in Inglewood within the Study Area than are shown. Therefore **Table 4.9-2** may under count the affected population as well.
3. The discussion of the present status of the adopted **Mitigation Monitoring and Reporting Program** at page 4-686 states support of increased funding for and more expeditious implementation of noise mitigation measures. This would include funding for Land Use Mitigation and Noise Mitigation for residential uses. This is welcomed. In light of recent federal prerogatives, the standing of the State of California regulations and policies affecting airport operations must take precedence.
4. Within **Appendix J1-1 Aircraft Performance**, the methodology for noise measurements was described at 3.1.1.3, page 11.
  - i. Assumptions for relative humidity and temperature which affect the perception and tolerance of noise were detailed. These assumptions are considerations and factors affecting the modeling and noise sensitivity.
  - ii. In light of increasing climatic temperatures and growing fluctuations in climatic conditions in North America, what is the potential affect of a 2009 baseline when temperatures may increase on average or humidity decreases or increases significantly through 2025 and how might this affect the noise modeling? How significantly if at all will this affect the ensuing impact area?
  - iii. If there are measurable or discernible affects, then how the Air Quality impacts might be interpreted as well?

Please accept our thanks for this opportunity to provide comments. Please do not hesitate to call our office for any general questions at (310) 412-5289.

Sincerely,

Michael F. Calzada  
Director

cc:  
Artie Fields, City Manager  
David L. Esparza, Assistant City Manager-CFO  
Cal Saunders, City Attorney  
Barbara Lichman, BuchalterNemer

SPAS-AL00006

SPAS-AL00006



Attachments: Comments of Inglewood, Culver City, Ontario and County of San Bernardino to LAX SPAS DEIR 10.10.12.pdf

From: Barrett, Susan [sbarrett@buchalter.com]  
Sent: Wednesday, October 10, 2012 9:51 AM  
To: SPASEIR Comments  
Subject: LAX SPAS DEIR - Comments of City of Inglewood, City of Culver City, City of Ontario and County of San Bernardino

Attached please find the comments of the City of Inglewood, City of Culver City, City of Ontario and County of San Bernardino to the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study.

Susan Barrett for Barbara E. Lichman, Ph.D.  
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18400 Von Karmann Avenue, Suite 800 | Irvine, CA 92612-0514  
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SPAS-AL00007

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October 10, 2012

VIA E-MAIL (SPASEIRCOMMENTS@LAWA.ORG)

Los Angeles World Airports  
Facilities Planning Division  
Attn: Diego Alvarez  
1 World Way  
Los Angeles, CA 90045-5803

Re: Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study - Comments of City of Inglewood, City of Culver City, City of Ontario and County of San Bernardino

Dear Mr. Alvarez:

The following are the comments of the City of Inglewood, City of Culver City, City of Ontario and County of San Bernardino (collectively "Cities/County") concerning the Draft Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study ("DEIR"). From a global perspective, Cities/County view the DEIR as just the latest illustration of the ancient adage – "The more things change, the more they stay the same," where the DEIR reflects the same analytic deficiencies as Cities brought to the attention of Los Angeles World Airports ("LAWA") in their comments on the environmental review of the Draft and Supplemental Draft Environmental Impact Report/Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan and Master Plan Addendum in 2003 and comments on the Notice of Preparation of Draft Environmental Impact Report (SCH No. 1997061047) – Los Angeles International Airport Specific Plan Study on June 17, 2008 and Revised Notice of Preparation of Draft Environmental Impact Report (SCH No. 1997061047) – Los Angeles International Airport Specific Plan Study on November 29, 2010, which are attached to this letter as Exhibits 1, 2 and 3 respectively, and incorporated in it by reference.

Specifically, the DEIR continues LAWA's long tradition of:

(1) Failing to designate a "project," substituting instead an array of project components, leaving it up to the reviewer to aggregate and analyze the collective impacts of the various ground and air components, in defiance of the mandate of the California Environmental Quality Act, Cal. Pub. Res. Code § 21000 *et seq.*, ("CEQA") for an "accurate, stable and finite description." See, e.g., *Planning and Conservation League v. Castaic Lake Water Agency*, 180 Cal.App.4<sup>th</sup> 210, 234 (2010);

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(2) Failing to designate a proper "No Project" Alternative where Alternative 3, the existing, approved Master Plan, still includes the "Yellow Light" projects that were required by a settlement of the case of *City of El Segundo, et al. v. City of Los Angeles, et al.*, Riverside County Superior Court Case No. RIC426822 ("Settlement") to be replaced by other projects that serve the same purposes, and over which Settlement the Court still retains jurisdiction;

(3) Disclaiming the manifest capacity enhancing impacts, both on and off-airport, of the project, including potential shifting of flight paths over the proximate communities of Inglewood and Culver City, despite FAA's definition of capacity as "throughput rate, i.e., the maximum number of operations that can take place in an hour," FAA Advisory Circular 150/5060-5, § 3, and despite the DEIR's long discussion of the way in which greater runway separation will facilitate greater efficiency, and, thus, "throughput" by, among other things, providing an airfield "consistent with FAA design standards for the largest aircraft types currently in service . . . for all weather conditions," and "[m]inimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service." DEIR, § 1.2.1.1, p. 1-11; and

(4) Failing to adequately analyze the project's air quality, greenhouse gas, noise, land use and planning, and surface transportation impacts.

#### I. THE DEIR DOES NOT COMPORT WITH CEQA'S MANDATE TO DESIGNATE AN ACCURATE, STABLE AND FINITE PROJECT DESCRIPTION

In a new twist on the same old theme, the DEIR fails to designate a project at all. Rather, it states that LAWA will choose a "project" at the conclusion of public comments and in the Final EIR ("FEIR"), see, e.g., § 1-26, 1.2.3 ("more detailed evaluation of that relationship [between each project objective and each SPAS alternative] will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearings process,").

In lieu of a "project," the DEIR provides an array of airfield and surface traffic choices from which the public can choose "one from Column A and two from Column B" and, thereby, purportedly, compute the environmental impacts of each. In taking this approach, the DEIR flies in the face of judicial authority which unanimously requires not only that a project include "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change . . ." CEQA Guidelines § 15378(a); *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonoma*, 155 Cal.App.4<sup>th</sup> 1214, 1222 (2007), but also that the scope of the environmental review conducted, even for the Initial Study, "must include the entire project." Specifically, "[a]ll phases of project planning, implementation, and operation must be considered" as early as in the Initial Study of the project." CEQA Guidelines § 15063(a)(1); *Tuolumne, supra*, 155 Cal.App.4<sup>th</sup> at 1222. Therefore, whether a program or project EIR is contemplated, by the time the DEIR stage is reached, a coherent whole must be presented to the public, not interchangeable parts in as yet indeterminate combination.

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Here, in direct contravention of these unequivocal requirements, the DEIR presents nine options from which the public may choose. The options are not "alternatives" to one another in the standard sense, because only options 1 through 4 are complete projects, i.e., include both airfield components and off-airfield surface traffic components. Alternatives 5 through 7 omit any mention of associated surface traffic or its impacts. Conversely, options 8 through 9 evaluate only surface traffic, and omit any mention of airfield improvements. Apparently, this approach was chosen on the assumption that the impacts of various components are additive, e.g., the air quality and noise impacts of Alternative 5 can simply be added to those of Alternatives 8 or 9 as assumed in the EIR. Certain impacts, however, such as noise are evaluated logarithmically. That means the noise impacts from the surface traffic discussed in Alternatives 8 and 9 may be subsumed within the far greater noise impacts calculated from airfield operations when the two are added together, masking the true impacts of both.

Nor can the DEIR's approach be justified on the ground that the airfield and surface traffic options have "independent utility," see, e.g., *Planning and Conservation League, supra*, 180 Cal.App.4<sup>th</sup> at 237, and would occur with or without the project. It is clear from the DEIR that surface traffic improvements are critical to the stated purpose of the project as a whole, the replacement of the "Yellow Light" projects, as defined in the Settlement, which includes both airfield and surface traffic projects. See, e.g., DEIR, Project Description, § 2.2, Objective No. 2, "Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area." [Emphasis added.]

In short, the DEIR fails to designate a "project" or preferred alternative at all. Rather, it confronts the public with four "projects" and five components of a single project, and asks it to evaluate several in combination, all with the same level of specificity, as any one or more may be chosen to be implemented. The same sort of obfuscation was summarily rejected by the court in *Woodward Park Homeowners Association, Inc. v. City of Fresno*, 150 Cal.App.4<sup>th</sup> 683, 711 (2007). In that case, the court rejected the use of a baseline predicated on a previously approved project, rather than the existing physical condition of the property, which would have required the public to research prior published documents to create a relevant comparison with project impacts. Its holding applies to the complex conglomeration of options at issue here including the synergistic impacts of each of those options with those projects of Alt. D, the current Master Plan, which are still being implemented. "The sum of the earlier identified impacts and those identified now would be the actual impacts of the present project. . . . Even assuming this [addition] would have been possible, an agency cannot satisfy its CEQA obligations by imposing a burden of that kind on the public." *Id.* at 711.

#### II. THE DEIR INCORRECTLY RELIES ON ALTERNATIVE 3 AS THE "NO PROJECT" ALTERNATIVE WHERE IT INCLUDES IMPLEMENTATION OF THE "YELLOW LIGHT" PROJECTS THAT WERE ELIMINATED BY THE SETTLEMENT

The purpose of the "no project" alternative is to allow a comparison of the environmental impacts of approving the proposed project with the effects of maintaining the status quo. CEQA Guidelines § 15126.6(e)(1). When the project involves revisions of an existing plan, policy, or

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ongoing operation, the "projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." CEQA Guidelines § 15126.6(e)(3)(A). See also, *Woodward Park Homeowners, supra*, 150 Cal.App.4<sup>th</sup> at 711. CEQA Guidelines § 15126.6(e)(3)(C) further provides that the lead agency "should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be 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." In addition, an EIR's analysis of the no project alternative must also include a discussion of conditions existing at the time the notice of preparation is published, or, in the alternative, upon commencement of the environmental analysis. CEQA Guidelines § 15126.6(e)(2).

In this case, Alternative 3 does seem to meet the basic definition, *i.e.*, the situation on the ground including all previously approved projects. However, this is not a conventional case. Alternative 3 here includes "Yellow Light" projects which, according to the Settlement, are to be replaced with other projects which serve the same purpose. Therefore, Alternative 3 actually includes more components than are currently permitted or can be expected to be implemented.

In this unique situation, Alternative 4 would seem to be the appropriate "No Project" Alternative. That is because Alternative 4 represents the "project" with "Yellow Light" projects, *i.e.*, those that cannot "reasonably be expected to occur in the foreseeable future if the project were not approved," CEQA Guidelines § 15126.6(e)(3)(C), eliminated.

It is also notable that Alternative 4 is used as the benchmark of analysis in the air quality analysis, Table 4.2-14, as the closest to the "no Yellow Light" condition. ("Of the nine alternatives, Alternative 4 has the least amount of improvements and most closely represents a future (2025) 'no Yellow Light Projects' scenario. . ."). DEIR, p. 4-121. In summary, the existing Master Plan represented by Alternative 3 is not, in this peculiar case, the proper No Project Alternative against which to benchmark the impacts of the project.

### III. THE DEIR IMPROPERLY DISCOUNTS THE CAPACITY ENHANCING POTENTIAL OF THE PROJECT

As was true with respect to the 2003 Master Plan EIR, the DEIR here strongly emphasizes the safety enhancing purposes of the project, and downplays its capacity enhancing potential. In fact, the DEIR emphasizes that a 30-40% increase in aircraft and passenger activity is projected to occur regardless of the project (*i.e.*, would occur if none of the SPAS alternatives was implemented). DEIR, p. 1-47, § 1.4. Nevertheless, the proposed "safety" improvements, including increased runway separations and extension eastward for the north runways, the addition of centerline taxiways, and high speed runway exits, to accommodate departures of the New Large Aircraft ("NLA") and other aircraft that cannot currently access the North Airfield without delay, are inextricably linked to capacity, defined by FAA as "throughput rate, *i.e.*, the maximum number of operations that can take place in an hour." FAA Advisory Circular 150/5060-5, § 3.

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#### A. The DEIR Presents Supporting Data Insufficient to Allow the Public to Verify the Accuracy of the DEIR's Analysis

As a threshold matter, the DEIR only reflects air quality modeling for options 1 through 4 (the integrated alternatives). For options 5 through 7, specific aircraft modeling (*e.g.*, runway assignments, delay times, etc.) was not performed. Instead, results were apparently inferred from modeling data for Alternatives 1 through 4, again for "budget considerations." LAX Specific Plan Amendment Study Report, Appendix F-2, p. 1. Moreover, the "inferred" data are not presented in either the main body of the DEIR or the appendices, and, therefore, it is not possible to evaluate the purported "inferences," even if they had been documented with data. This is especially true for Alternative 5 which proposes to move Runway 24R 350 feet to the north, essentially requiring extrapolation of the data beyond the 260 foot northward movement of Runway 24R proposed in Alternative 1.

In addition, the data that is provided is inadequate to assess even the impacts of the "modeled" Alternatives 1 through 4. First, under the constant activity approach discussed in Section III above, the only variables that should affect airside emissions are taxi time and delay time. Aircraft approach, takeoff and climbout emissions should be identical across the evaluated alternatives, as should Ground Support Equipment ("GSE") and Auxiliary Power Unit ("APU") emissions. The DEIR, however, fails to present aircraft emissions by operating mode, making it impossible to confirm the expected consistency using presented data.

Specifically, the DEIR contains no comparative tables either listing or summarizing the way in which GSE and APU populations were estimated, the way in which those populations were assigned activity estimates, or the way emissions were calculated from the activity. Instead, there is the cursory discussion referencing:

(1) A purported survey of data on specific GSE types and their times in mode for servicing common aircraft types, although the discussion does not reveal how "common types" were chosen, why the analysis did not apply to all aircraft using GSE, and what times in mode are applicable to GSE;

(2) Use of the FAA's Emissions Dispersion Modeling System ("EDMS") to supplement site specific data, without complete disclosure of the "site specific" data supplemented and the analytic interaction between the site specific data and the EDMS assumptions;

(3) General use of emissions factors from the California Air Resources Board ("CARB") OFFROAD2007 Model and 2011 Inventory Model for In-Use Off-Road Equipment in the analysis of GSE emissions without revealing the way in which each was used and the specific emissions factors derived from either. This is in spite of the fact that the DEIR acknowledges that "future year inventories of alternative-fueled GSE were based on these evaluations and LAX environmental policies." DEIR, p. 4-92; and

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The DEIR itself does not disclaim this link to capacity enhancement. It makes clear that the further separation of the north runways is necessary to efficiently accommodate NLAs, and to allow for some larger aircraft currently using the South Complex to use the North Complex as well. See, *e.g.*, DEIR, pp. 1-10, 2-2. Nevertheless, aircraft activity is held constant across all evaluated runway alternatives. In other words, the number of flights into and out of LAX is identical (2053 operations per peak day), as is the aircraft fleet mix through which those flights are conducted. By assuming constant aircraft activity in 2025 under all four runway "integrated" alternatives, the DEIR is implying that LAX can handle the forecasted aircraft demand – even that related to the new generation of NLA – regardless of whether any redesign of the northernmost runways is implemented. That is, the DEIR assumes that the same aircraft, in the same numbers, will fly into and out of LAX whether the runways are moved or left as is, whether or not more efficient runway exits are constructed, and whether or not taxiways are or are not reconfigured. The explicit assumption is that the potential improvements will enhance the safety of these aircraft operations. However, in this case the improvements made to enhance safety also enhance effective runway capacity. It is this additional capacity that should allow for differential levels of activity under the various alternatives.

However, and despite the DEIR's admission that the various airfield alternatives will have differential operational effects, depending on the type of aircraft, time of day and weather, the capacity enhancing impacts of these differential operational effects remain stubbornly unanalyzed because of "budget considerations." Neither the CEQA Guidelines nor the courts recognize such budget constraints on reasonable analyses, fundamental to a complete picture of project impacts. Until such analyses are conducted and their results reported, including an analysis of the differential operational characteristics of options 1 through 7, and their resulting capacity enhancing characteristics, including the potential for more divergent flight paths taking additional aircraft over proximate communities such as Culver City and Inglewood than currently exist, the DEIR will remain fatally defective.

### IV. THE DEIR AIR QUALITY SECTION OMITTS DATA AND ANALYSIS CRITICAL TO A DETERMINATION OF THE IMPACTS OF THE VARIOUS ALTERNATIVES

In another exercise in "d'jà vu all over again," the DEIR air quality analysis omits both the data and analysis necessary to fully and accurately disclose the air quality impacts of any of the potential alternatives.

<sup>1</sup> See LAX Specific Plan Amendment Study Report, Appendix F-2, p. 1; "For the purposes of developing detailed airside design assumptions that could be utilized in modeling a reasonable range of airfield configuration options, and do so in an efficient and cost-effective manner taking into account contract scope and budget considerations, the simulation analysis focused on only Alternatives 1 through 4. Based on the detailed information developed for those alternatives, the SPAS Environmental Team was able to estimate performance assumptions and projections for Alternatives 5 through 7, as utilized in the aircraft noise and air quality analyses."

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(4) For APU emissions rates, use of emissions factors from EDMS without disclosing the way in which the assumption that all gates would be equipped with preconditioned air (making APU use less necessary) was reached, the numerical impacts of that assumption, or the data or analysis underlying the assumption. DEIR, p. 4-93.

Finally, the aircraft emissions data that is presented in the DEIR reveals a fundamental inconsistency between Alternatives 3, Master Plan Alternative D, and Alternative 4, the "No Project" Alternative for air quality purposes (*see, e.g.*, Table 4.2-14). Presented data for Alternative 4 indicates 27.72 minutes per landing/takeoff cycle ("LTO"), and for Alternative 3, Alt. D, 29.56 minutes, *i.e.*, more aircraft emissions for the same total traffic. The 2003 Master Plan EIR, however, reached precisely the opposite conclusion with the taxi and delay times for the "No Action" Alternative exceeding that of Alt. D by 3%, and Alt. D exhibiting airside emissions generally 5% lower than those of the "No Action" Alternative.<sup>2</sup>

#### B. Reverse Thrust Emissions are Omitted from the Air Quality Analysis

Just as in the 2003 Master Plan EIR, and as addressed in Inglewood's comments on that document attached, emissions associated with reverse thrust operations are not considered in the current DEIR. The bottom line then, as now, is that reverse thrust operations are common at LAX under all alternatives (*see, e.g.*, DEIR, p. 4-829), and there is an accepted procedure for estimating them. They are, moreover, a high thrust, high nitrogen oxide ("NO<sub>x</sub>") mode of operation. Thus, even though short in duration (normally 15 to 20 seconds per arrival), a high amount of NO<sub>x</sub> is produced, all of which is emitted at ground level. The absence of any analysis of reverse thrust, therefore, casts doubt on the aggregate analysis of NO<sub>x</sub> emissions from all project alternatives.

#### C. The DEIR Omits Critical Engine Assignments

The DEIR contains no information regarding the specific engine types used in the modeling of aircraft operations.<sup>3</sup> As a result, it is impossible to evaluate whether the selection methodology and resulting emissions estimates are accurate. This omission is important because aircraft engines available and employed by different airlines for a given airframe can differ dramatically in their emissions profiles. Thus, the selection of specific engine types can have a significant bearing on the overall air quality impacts of any alternative that affects aircraft operations. As with the issue of reverse thrust emissions, aircraft engine selection was addressed in detail in Inglewood's comments on the 2003 Master Plan EIR. At minimum, the DEIR should provide a list of the engine assignments utilized in the air quality modeling so that the potential significance of the engine differentials can be determined. The omission of that data renders the DEIR air quality analysis deficient.

<sup>2</sup> The total taxi and delay times for Alternative D (in the 2003 Master Plan EIR (then the Preferred Alternative)) was 31 minutes per LTO cycle, compared to 29.6 minutes per LTO cycle in the current DEIR.

<sup>3</sup> See also comments on noise analysis which suffers from the same omission.

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D. The DEIR Lacks Any Evaluation of the Project's Greenhouse Gas Impacts

Greenhouse gas ("GHG") emissions from APU are not estimated in the DEIR, on the premise that "[a]lthough operations of APUs are expected to contribute to GHG emissions, EDMS does not estimate CO<sub>2</sub> emissions or fuel consumption; therefore, APUs are not included in the emissions inventory," DEIR, p. 4-390. It is true that EDMS does not provide such capability, but that does not lead to the conclusion that GHG emissions cannot be estimated. While no formal model may be available, there are brake specific fuel consumption data available for APU engines. These data, combined with APU design and operational characteristics, and the carbon content of jet fuel, can be used to generate CO<sub>2</sub> emissions estimates for APU engines. Methane and nitrous oxide emissions may be less certain, but "typical" emissions factors for similarly operating engines can be applied without inordinate error (as methane and nitrous oxide emissions constitute only a few percent of total GHG emissions for typical mobile sources). In reality, the use of zero as a "default" emission rate for GHGs (an assumption implicit in cases where non-zero emissions are not estimated) reflects an analytic error that is grossly more significant than the error that might be associated with an imprecise, but non-zero, GHG emission estimation methodology.

The failure to analyze GHG emissions is legally insupportable as well. In *Communities for a Better Environment v. City of Richmond*, 184 Cal.App.4<sup>th</sup> 70 (2010), the court found the City of Richmond's initial failure to conduct any GHG analysis on a proposed refinery, as well as its ultimate failure, once analysis was conducted, to prescribe mitigation measures, rendered the EIR defective. *Id.* at 93.

E. The DEIR Omits from its Evaluation of Construction Emissions the Realignment of Lincoln Boulevard

While the DEIR addresses construction impacts at some length, it appears to omit a significant component of those impacts, the reconstruction, including undergrounding, of portions of Lincoln Boulevard. Options 1, 5 and 6, which include relocation of Runway 6L/24R to the north, include, of necessity, the relocation of 6,080 feet of Lincoln Boulevard, and, to varying degrees, its depression into a tunnel.<sup>4</sup>

Nevertheless, and despite the substantial construction activity required to realign, and tunnel to accommodate, a major thoroughfare, the DEIR entirely omits to study, or report on, the construction related impacts of the reconstruction of more than a mile of proximate roadway. See, e.g., DEIR, p. 4-88.<sup>5</sup> The remainder of the DEIR's discussion of construction emissions

<sup>4</sup> "Alternative" 1 requires 250 linear feet of tunnel; "Alternative" 5, 765 feet; and "Alternative" 6, 540 feet.

<sup>5</sup> "Construction activities were assumed to be located on the north airfield and at the north terminals, in the Central Terminal Area (CTA), at Manchester Square, in the current Parking Lot C, at the proposed International Transportation Facility (ITF) site just south of Lot C, on the east side of Aviation Boulevard south of Century Boulevard, on the Automated People Mover (APM) routes along Century Boulevard and 98<sup>th</sup> Street, and on the west side where batch plant operations permitted by the SCAQMD and USEPA and project support activities could occur."

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signatures of the various aircraft, the absence of such critical raw data alone renders the noise analysis entirely inadequate.

Finally, the DEIR fails to explain why "Alternative" 5, with the greatest runway displacement of 350 feet, results in the least population exposed to the 65 CNEL contour, and the third least exposed to an increase of 1.5 decibels within the 65 CNEL contour. DEIR, p. 4-738, § 4.9.6.5, despite the fact that the "Alternative" 5 noise contour contains the second highest population newly exposed to the 75 decibel noise contour, DEIR, p. 1-83. Similarly, the DEIR concludes, without explanation, that "Alternative" 2, which does not contemplate any runway displacement, implicates more impacted land use than any other alternative, DEIR, p. 4-706, § 4.9.6.2.

These apparent, but unexplained inconsistencies, are merely systematic of a larger issue within the DEIR. While the DEIR cavalierly reaches numerous conclusions, not merely about noise, but also about air quality and other impacts, those conclusions are never fully explained either in the body of the DEIR or in its associated appendices. Thus, while the DEIR's noise analysis is notable for its lack of underlying data and coherent analysis, its failure to explain its conclusions in such a way as to allow the public to adequately evaluate them is endemic to the entire DEIR.

VI. THE DEIR'S LAND USE AND PLANNING ANALYSIS SIGNIFICANTLY MISSTATES THE IMPACTS OF, AND MITIGATION POTENTIAL FOR, THE PROJECT

The DEIR relies on its land use and planning analysis as the bulk of its mitigation for the yet to be fully analyzed noise impacts of the various project options. That reliance is misplaced, not only from a substantive perspective, because the noise impacts still remain to be accurately analyzed, but also from a procedural perspective, as implementation of the FAA purchase and sound insulation programs upon which LAWA relies for mitigation, are years, even decades in the future, and, under recently published FAA policies, may never be applicable at all for a substantial portion of the impacted population.

The DEIR's land use impacts analysis, § 4.9.6, p. 4-689, is procedurally flawed in several ways. First, it benchmarks the consistency of its alternatives to the existing LAX Specific Plan, recognizing at the same time that it is the fundamental purpose of the DEIR to document the amendment of the existing Specific Plan. Thus, the DEIR creates a moving target as a benchmark for analysis.

Second, with respect to the potential acquisition of property as mitigation for noise impacts, the DEIR indefinitely and impermissibly defers evaluation of the need for acquisition associated with changes in Runway 6L/24R's Runway Protection Zone ("RPZ"), brought about by the runway's movement north, despite the identification in § 4.7.2 of land uses in the RPZs for all options, thus leaving potential mitigation requirements unsatisfied. *Communities for a*

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suffers from the same deficiencies. See also, DEIR, pp. 4-112 and 4-118 re: emissions for Alternative 5, which alternative involves in the most radical realignment of Lincoln Boulevard.

F. The DEIR Lacks Any Data or Analysis of Sulfur Dioxide Emissions

Finally, emissions of sulfur dioxide ("SO<sub>2</sub>") do not appear to have been estimated for GSE, motor vehicles, or stationary sources, based on the omission of any SO<sub>2</sub> data from the "detailed" operational emissions tables included in DEIR Appendix C (see, e.g., Table 21, Operational Concentrations). SO<sub>2</sub> emissions are exclusively a function of the sulfur content of fuel, which is relatively easily assessed, leaving no stated reason for their omission, but a gaping hole in the analysis.

In summary, budget constraints are not a sufficient excuse for depriving the public of the requisite air quality analysis and complete disclosure under CEQA. Moreover, this project will eventually require FAA funding. In order to obtain it, the project must comply with the conformity requirements of 42 U.S.C. § 7506(c), and its implementing regulation, 40 C.F.R. 93.150, *et seq.* Compliance will require that the project not exceed the emissions thresholds set forth in that section. It is Cities/County's position that LAWA will be unable to establish the requisite conformity absent the filling of the data void specified here. And any reliance on a previous finding of conformity, based on the 2003 Master Plan EIR and associated conformity analysis, is seriously misplaced. That analysis never established conformity methodologically, but relied on an "exemption" provided by Southern California Air Quality Management District ("SCAQMD"), which was not delegated the duty of granting such an "exemption" under the then existing statutory regime. Thus, Cities/County strongly recommend the DEIR be revised to provide a thorough disclosure of the various options' air quality impacts, in order to satisfy both Federal and State unequivocal mandates.

V. THE DEIR FAILS TO ADEQUATELY DISCLOSE THE PROJECT'S NOISE IMPACTS

The DEIR is dramatically deficient in its purported analysis of the noise impacts of the various alternatives. Notably, none of the noise contours depicted in the DEIR include the 1992 contour employed by LAWA for sound insulation purposes in Inglewood, see DEIR, p. 4-665.

Perhaps most notably, the noise analysis does not appear to have been based on the Integrated Noise Model ("INM"), the model required for use by FAA. FAR Part 150, Appendix A, § A150.103(a); FAA Order 1050.1E, § 14.2b. Instead, the flight tracks depicted in the EIR and used in the noise analysis appear to be radar tracks, wholly independent of the INM protocol.

Moreover, the noise analysis lacks critical fundamental data concerning types of aircraft, numbers of each type of aircraft projected, the number of operations anticipated for each aircraft type, and the source of the data in the DEIR database. Instead, the DEIR substitutes percentages without revealing the source or calculation of those percentages. Given the differential noise

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*Better Environment, supra*, 184 Cal.App.4<sup>th</sup> at 92, citing CEQA Guidelines § 15126.4(a)(1)(b) ["Formulation of mitigation measures should not be deferred until some future time."].

In doing so, the DEIR may be incorrectly relying on the claim that, in gaining compliance with the "clear zone" requirements for the RPZ, and included Runway Safety Area ("RSA"), FAA has the option of redirecting or removing an object. Page 4-512, § 4.7.2.6.1. FAA has no such option, because only the local land use jurisdiction possesses such power.

Moreover, the DEIR disclaims the need for any acquisition under options 5 through 7, purportedly because only airfield projects are at issue in those options, not the "integrated" options 1 through 4, thus disavowing the need for mitigation. The basis for this disclaimer is not discernible, in that the DEIR makes clear that it is the movements of the runways under options 5 and 6, as well as 1 and 3, that create the need for acquisition of property in the RPZ in the first instance, not the surface traffic options that are "integrated" into options 1 through 4.

From a substantive perspective, the DEIR omits relevant factors in the calculation of land use impacts resulting from the project. First, it entirely omits from its land use impacts analysis the Westchester Business District, part of which may be affected by the RPZ for one or more of the alternatives, without accompanying explanation. Second, it deceptively portrays the City of Los Angeles as the jurisdiction with the greatest existing impacted total land area, DEIR, p. 4-668, see also Table 4.9-4, by including the land mass of the airport in the calculation. If the calculation were not arbitrarily skewed by including the land area of the airport, the origin of the impact, in the determination of the impact's scope, it is the City of Inglewood that would have, by far, the greatest land area impacted.<sup>6</sup> The analysis, as well as the planning, should be predicated on that assumption alone.

Finally, the DEIR asserts that the impacts of noise can be mitigated to insignificance by sound insulation, as set forth in MM-LU-1. The DEIR ignores the fact that a sound insulation program encompassing the vast area already exposed to LAX's noise impacts, as well as new areas in surrounding communities, will take decades to implement, if it is funded by FAA at all. And the totality of that funding is now in question. FAA recently published Program Guidance Letter 12-09, "AIP Eligibility and Justification Requirements for Noise Insulation Projects," August 17, 2012 ("PGL") which will limit the access of populations newly brought into the 65 CNEL contour, or affected by an increase of 1.5 dB or more, to sound insulation of all but a small percentage of homes with an average, across all habitable rooms, of less than 45 dB interior noise levels (see, September 17, 2012 letter to FAA regarding "Program Guidance Letter – 12-09 – AIP Eligibility and Justification Requirements for Noise Insulation Projects," attached to this letter as Exhibit 4). This means, among other things, that those who are newly impacted by the project, but also who, in good faith, installed sound insulation with their own funds in some rooms; or who could afford to sound insulate bedrooms but not public spaces; or whose dwellings were below the 45 dB interior noise standard under the former operational

<sup>6</sup> Table 4.9-2 seems to indicate that Inglewood has the greatest existing land area of noise impacted uses, in direct contradiction to the statement that "[t]he jurisdiction with the greatest total area (on- and off-airport) within the 65 CNEL or higher noise contour is the City of Los Angeles . . ." DEIR, p. 4-668.

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configuration but will be changed under the new regimen, may be left without mitigation, at least for the foreseeable future, a salient fact that is not acknowledged, let alone discussed or analyzed in the DEIR.

In summary, even though noise mitigation is alleged to be feasible, the DEIR is inadequate, both because necessary mitigation measures are entirely omitted with respect to the impacts of property acquisition; and because, in the alternative, even where mitigation measures are provided (although vague), "mandatory performance standards to ensure that the measures, as implemented, will be effective." *Communities for a Better Environment, supra*, 184 Cal.App.4<sup>th</sup> at 94, are similarly absent.

VII. The DEIR Does Not Adequately Analyze or Mitigate the Project's Admittedly Significant Surface Traffic Impacts

In spite of the DEIR's acknowledgment of the significance of the project's direct and indirect impacts on various intersections within the study area, it relegates those impacts to the category of "significant but unavoidable." It is Cities/County's position, however, that not only are those impacts, in fact, more extensive than reported in the DEIR, but also avoidable through the application of reasonable mitigation measures not offered in the DEIR.

A. The DEIR Does Not Fully Delineate or Mitigate the Surface Traffic Impacts of the Project on Culver City

First, the criteria used in the DEIR for calculating the project's intersection impacts on Culver City is inaccurate. More than five years ago, Culver City requested that LAWA and City of Los Angeles Department of Transportation ("LADOT") use "thresholds of significant transportation impact identified in LADOT's traffic impact analysis guidelines to analyze the impact on intersections and streets in Culver City." (See, letter of October 31, 2006 from Charles Herbertson, Culver City Director of Public Works and City Engineer to Jim Richie, LAWA, attached to this letter as Exhibit 5).

The rationale behind Culver City's request is directly related to the SPAS. "This will simplify the preparation and review of the LAX Specific Plan traffic study, since the City of Los Angeles and Culver City share jurisdiction of several intersections that will be analyzed as part of the study." (See also, letter to Gloria Jeff, General Manager, City of Los Angeles Department of Transportation, October 31, 2006, attached to this letter as Exhibit 6).

Nevertheless, the traffic study used Culver City's, not City of Los Angeles' traffic impact analysis criteria to assess the impact of the project on Culver City intersections. Use of Culver City criteria significantly understates the project's impacts on those intersections. For instance, using LADOT criteria, the intersections of Centinela/Washington Boulevard (Intersection No. 30), Overland/Culver (Intersection No. 43) and Sepulveda/Slauson (Intersection No. 130) would, in fact, be impacted, as would the non-signalized intersections of Overland/Sawtelle (Intersection No. 154) and Walgrove/Washington (Intersection No. 156) which are already revealed as

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impacted in the DEIR. Despite the acknowledged significance of the impacts on the latter intersections, however, the DEIR states that they already meet the Manual of Uniform Traffic Control Devices ("MUTCD") warrants for the installation of these traffic signals and, therefore, Culver City should be fully responsible for the installation of the traffic signals. In this instance, as the project contributes to the significant impacts on those intersections, it stands to reason that Los Angeles should be responsible for the installation of traffic signals to mitigate the impacts.

Further, the DEIR traffic study, DEIR, p. 4-1301, indicates the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard (Intersection No. 110), which is not in Culver City, but in the City of Los Angeles. The DEIR indicates that the addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound lane would require widening of the southbound approach and departure and is not considered feasible. In addition, the DEIR finds that there are no other feasible improvements that could fully mitigate the project's impacts, and, thus, declines to mitigate, leaving the impact on that intersection significant and unavoidable.

With respect to the intersection of Lincoln Boulevard and Washington Boulevard, as with respect to other intersections within the project study area of which the DEIR deems the impacts "unavoidable," there are, in fact, feasible mitigation measures that would alleviate these impacts. For example, with respect to northbound Lincoln Boulevard to westbound Washington Boulevard, the County of Los Angeles' SR90 connector road to Admiralty Way would mitigate the project's impact at this intersection as it would reduce the left turn traffic demand. Similarly, the Costco project at the intersection of Lincoln Boulevard and Washington Boulevard was required to pay Culver City \$1.5 million toward the SR90 connector road to Admiralty Way to mitigate Costco's impact at this intersection. In the same way, LAWA should be responsible for contributing toward the SR90 connector road to Admiralty Way to mitigate the SPAS project's significant impacts that, with the named mitigation, would be avoidable.

B. The DEIR Does Not Fully Delineate or Mitigate the Surface Traffic Impacts of the Project on Inglewood

The traffic analysis is flawed as it relates to Inglewood as well. First, although the Future (2025) with Alternative Impact Analysis Summary Table lists 25 of the 29 Inglewood intersections studied as having significant traffic impacts with one or more alternatives, the DEIR indicates that some potential intersection improvements such as those for the intersection of Arbor Vitae Street and Aviation Boulevard are not feasible (see, e.g., § 4.12.2.6.4, p. 4-1283; § 4.12.2.7, p. 4-1285; and § 4.12.2.7.1, p. 4-1291). The DEIR does not, however, set forth the specific criteria upon which that determination was based. This is despite the fact that lack of right of way was cited as one factor of concern, but the acquisition of right of way is common as an element of intersection capacity improvement. The inevitable conclusion is that, even though Inglewood is a significant, perhaps primary conduit, for airport directed traffic, the DEIR shortchanges the manifest traffic, as well as other, impacts on Inglewood as well as on Culver City.

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In summary, the DEIR's inadequacies are no less substantial and significant for being, in many cases, repeats of old errors, because the public living and working in the project study area will be the ultimate victims of these analytic deficiencies. From a more global perspective, the DEIR represents not only a flawed attempt to implement an as-yet undesignated project with as-yet unanalyzed environmental impacts, but, insofar as LAWA's efforts go exclusively toward the expansion of capacity and associated improvements at LAX, also a patent abnegation of responsibility under the Settlement to regionalize air travel for the purpose of mitigating LAX's impacts on close-in populations, while providing increased air travel opportunities to the rest of Southern California. Due to the DEIR's manifest inadequacies, Cities/County strongly recommend LAWA revise and recirculate the DEIR in strict compliance with CEQA's unequivocal mandates.

Sincerely,

BUCHALTER NEMER  
A Professional CorporationBy   
Barbara Lichman

Attachments

# DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES INTERNATIONAL AIRPORT SPECIFIC PLAN AMENDMENT STUDY

## COMMENTS OF CITY OF INGLEWOOD, CITY OF CULVER CITY, CITY OF ONTARIO AND COUNTY OF SAN BERNARDINO

EXHIBIT 1A

C4173.0004 BN 12433660v1

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November 4, 2003

Mr. Jim Ritchie  
City of Los Angeles  
Los Angeles World Airports  
LAX Master Plan/Room 218  
P.O. Box 92216  
Los Angeles, CA 90009-2216

Mr. David B. Kessler, AICP, AWP 611.2  
Federal Aviation Administration  
P.O. Box 92007  
World Way Postal Center  
Los Angeles, CA 90009-2007

Re: Draft and Supplemental Draft Environmental Impact Report/Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan and Master Plan Addendum - Comments of the City of Inglewood

Dear Mr. Ritchie and Mr. Kessler:

The following constitute the comments of the City of Inglewood ("Inglewood") concerning the Draft ("DEIR") and Supplemental Draft Environmental Impact Report/Environmental Impact Statement ("SEIR") for the Los Angeles International Airport ("LAX") Master Plan ("Master Plan") and Master Plan Addendum ("Addendum") (together "Project"), submitted pursuant to the requirements of the California Environmental Quality Act, *Public Resources Code* § 21000, *et seq.*, ("CEQA"), its implementing Guidelines, 14 Cal.Code Regs. § 15000, *et seq.*, ("CEQA Guidelines") and the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.*, ("NEPA").

It should be noted at the outset that the body of this letter emphasizes evaluation of new Alternative D as set forth in the SEIR. However, LAX has chosen a format that purports to integrate the analysis of Alternative D into the platform of the original DEIR which is predicated on analysis of Alternatives A-C. While Inglewood believes this format is not optimal in achieving the goal of informing the public and decision makers of the Project's potential impacts, as set forth below, it has attached comments specific to the analyses of Alternatives A through C, as contained in the DEIR, to the extent they remain applicable, as Attachment 1 to this letter. It

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the Project, even though the Project, under the most optimistic circumstances, is not scheduled to begin until 2005 and, thus, a fifteen year Project term will end in the year 2020, leaving the environmental impacts of the Project arising during the last five years of the Project term, from 2015 to 2020, unanalyzed.

#### A. The SEIR Improperly Attenuates Analysis of the "Whole" Project

A "project" for CEQA purposes, "means the whole of an action, which has the potential for resulting in either a direct physical change to the environment, or a reasonably foreseeable indirect physical change in the environment. . . ." CEQA Guidelines § 15378(a). "Project" is "given a broad interpretation so as to maximize protection of the environment." See, e.g., *McQueen v. Board of Directors of the Midpeninsula Regional Open Space District*, 202 Cal.App.3d 1136, 1143 (1988). "In general, the lead agency must fully analyze each 'project' in a single environmental review document." *Remy, Michael, Guide to the California Environmental Quality Act*, 10<sup>th</sup> Ed. 1999, p. 75. "Thus, in performing its analysis, the agency should not split a project into two or more segments". *Id.*, thus insuring "that environmental considerations do not become submerged by chopping a large project into many little ones. . . ." *Burbank-Glendale-Pasadena Airport Authority v. Hensler*, 233 Cal.App.3d 577, 592 (1991).

That dissection of a large project into several smaller ones is, however, precisely what seems to have happened here. Although the SEIR purports to relate Alternative D to DEIR Alternatives A through C, in reality the two documents are not directly comparable. The principal goal of the DEIR is capacity expansion and elimination of delay. [F. . . .] LAX does not increase capacity to accommodate some of the projected increase in demand for air travel services; the demand will be met by other airports in the region or elsewhere in the Western United States." The principal goals of Alternative D are, however, very different, i.e., (1) to enhance the safety and security at LAX for users and to protect the airport infrastructure; (2) to encourage the development and use of regional airports to serve local demand by constraining the facility capacity to approximately the same aviation activity levels identified in the no action/no project alternative; (3) to maintain LAX as the international gateway to Southern California; and (4) to mitigate the environmental impacts of LAX's continued operations, SEIR, Section 2, pp. 2-1, 2.

Even though the SEIR maintains that "purpose and need for the LAX Master Plan has not changed since the publication of the DEIR", Executive Summary, p. ES-1, it is clear that adequate analysis of the two sets of alternatives involves different data, methodology and assumptions. As a consequence of the failure to incorporate the analyses of all alternatives into a single document, structured by the same goals, assumptions and methodologies, the conclusions concerning Alternative D's relationship to the other alternatives, as well as to the environment, are suspect at the outset.

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should be further noted that issues raised in Attachment 1 with regard to the analytic adequacy of the DEIR with respect to Alternatives A through C may impact the adequacy of the SEIR's analysis of Alternative D. With that caveat, the issues raised with respect to Alternative D fall generally into six categories:

(I) The SEIR's Project definition is improperly attenuated in that: (a) its baseline for analysis is 1996, almost 10 years before scheduled commencement of Project construction. While arguably reflective of physical environmental conditions in the vicinity of the Project when the Notice of Preparation ("NOP") for the DEIR was published in 1997, a 1996 baseline cannot faithfully represent environmental conditions 10 years later; and (b) the SEIR's purported 15 year term, from the year 2000 to the year 2015, does not take into account the four to five year delay in Project implementation from 2001 to at least 2005-6, and, thus, leaves the final five (5) years of the 15-year term of Project implementation, from 2015 to 2020, and the environmental impacts that may arise during those years, unanalyzed;

(II) Alternative D does not represent a meaningful constraint on capacity because it does not consider the capacity enhancing capability of new large aircraft or the Project's airfield reconfiguration designed to accommodate them;

(III) As a result, the SEIR's noise analysis fails to fully reveal the Project's aircraft and traffic noise impacts on homes and schools, the vast bulk of which fall on Inglewood, or to provide adequate measures to mitigate these impacts;

(IV) The SEIR's air quality methodology and resulting analysis does not adequately portray the emissions impacts of construction vehicles, aircraft and ancillary Ground Support Equipment ("GSE") or truck traffic associated with the Project;

(V) The SEIR's traffic analysis understates the Project's traffic impacts;

(VI) The SEIR's proforma discussion of environmental justice does not fully address the skewed distribution of the Project's impacts which fall almost entirely upon the minority/low income citizens of Inglewood, or offer adequate measures to avoid, minimize or mitigate the maldistribution of Project impacts.

#### I. THE SEIR'S PROJECT DEFINITION IS INCOMPLETE

The SEIR's Project definition is improperly circumscribed by: (1) the utilization of the vehicle of a "supplemental" EIR, where a complete new EIR, encompassing Alternatives A through D would have been appropriate; (2) the utilization of a 1996 baseline, dating back seven years from the publication of the SEIR, where data indicates that the correct baseline would have been the full year 2001; and (3) the utilization of the years 2000 to 2015 as the 15-year term of

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Moreover, the SEIR exceeds the proper scope of a supplement as set forth in the CEQA Guidelines. A supplement only "augments a previously certified EIR", CEQA Guidelines § 15163, Discussion, and only where "minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation." CEQA Guidelines § 15163(a)(2). Neither of these conditions exists here. The DEIR was never certified. Further, the changes to the Master Plan contained in the SEIR are far from minor. In fact, they constitute a new "preferred alternative", supported by new goals, objectives, methodological approaches, and data, as well as resulting comparisons and ultimate conclusions.

The legislature and the public resources agency charged with CEQA's implementation have taken the position that, prior to ultimate certification, a single project must be analyzed in a single comprehensive document. The rationale for this position becomes clear with reference to the SEIR. The isolation of a single alternative, Alternative D, and the consequent welter of cross-references to the previous DEIR, a two year old document, its technical reports and appendices, as well as to the SEIR, its technical reports and appendices, is a nearly insurmountable challenge to the public and to decision makers, even if the analytic framework of the DEIR and SEIR were comparable, thus defeating CEQA's principal goals of "informed decision-making and informed public participation." *Save Our Peninsula Committee v. Monterey County Board of Supervisors*, 87 Cal.App.4th 99, 118 (2001).

#### B. The Use of the Years 1996 and 2015 as the Project's Temporal Parameters is, in Practical Terms, Inappropriate

Despite the distinct justification and framework of analysis for Alternative D, the SEIR links Alternative D to the DEIR through the use of the same 1996 environmental baseline and 2015 Project end date. While the 1997 date for publication of the NOP (or 1996, the last full year of data before publication) theoretically constitutes the correct environmental baseline, CEQA Guidelines § 15125(a),<sup>1</sup> it does not in this case, for at least two reasons. First, the 1996 baseline used in the DEIR does not accurately reflect the physical conditions in the vicinity of the Project even at the time of the publication of the NOP in July 1997 (see Attachment 1, pp. 3-6). Second, even if 1996 did accurately reflect conditions applicable to the DEIR, it does not do so where, as here, a complete new comprehensive EIR containing equivalent analyses of all alternatives is required. The new EIR would have required publication of an NOP sometime after the year 2001, when the DEIR was originally circulated. Thus the years 2001 or 2002, the

<sup>1</sup> CEQA Guidelines § 15125 states, in pertinent part: "An EIR must include a description of the physical and 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 environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." CEQA Guidelines § 15125(a).

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likely last full years of data before the publication of the new EIR, would have been the appropriate base years for the analysis contained in the SEIR.

Nevertheless, the SEIR avoids the use of 2001/2002 by introducing a year 2000 baseline "for informational purposes only", predicated on "the most recent normal year for which a complete data set is available." SEIR, § 3, p. 3-5. The rationale behind the choice of the year 2000 was apparently that, due to the terrorist attacks of September, 2001, "2001 is an anomalous year that would be inappropriate to use for a comparison to the Draft EIS/EIR's baseline year." SEIR § 3.2.1, p. 3-5, and "similarly, aviation activity in 2002 is also considered to be an anomalous year due to the effects of September 11, 2001." SEIR, § 3.2.1, p. 3-5.

Neither the SEIR's conclusions nor its rationale are convincing. SEIR, App. S-B acknowledges that, with respect to the year 2001 "the typical month for the design day schedule (August) would be unaffected by September 11, 2001." App. S-B, p. 1 [emphasis added]. Nevertheless, the SEIR further opines "the ratio of peak month activity to annual activity is exceptionally high, due to the overwhelming fourth quarter decline in activity," App. S-B, p. 2, although the SEIR contains no data to support that contention. However, review of OPSNET statistics for the years 1996 through 2002 reveals that operations for the full year 2001 at LAX declined by only 50,000, to 738,679 from the seven year high of 783,684 reached in 2000. The data also demonstrates natural annual fluctuations of almost 20,000 operations between 1996 (approximately 763,000 operations) and 2000 (approximately 783,000 operations). Thus, use of 2001, with requisite caveats, would have constituted at least as accurate a picture of the environmental circumstances in the vicinity of the Project as did the year 1996, seven years in advance of the publication of the SEIR.

The practical impact of utilizing the year 2001, rather than 1996, as a base year, is manifest. As there were fewer operations in 2001, and, thus, potentially fewer environmental impacts from them, a comparison with the Project years would have resulted in greater apparent impacts from the Project, than when compared to 1996, with a larger number of operations and concomitant impacts.

Finally, the use of the year 2015 as the end point of the Project is confounding at best. The SEIR's purpose and need statement includes the need to "respond to local and regional demand for air transportation during the period 2000 to 2015." SEIR, p. ES-1. From that statement, it can be reasonably deduced that LAX looks to a 15 year Project period. The problem is that the Project will not now commence construction, let alone full implementation, until in or after 2005. This would bring the end point of the Project period to the year 2020. 2020 is, however, outside the DEIR's, as well as the SEIR's, scope of analysis. In other words, the SEIR appears to leave the environmental impacts which may arise during the last five years of the Project's implementation entirely unevaluated.

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configuration is a striking contrast to today's situation where there is not room to hold multiple smaller aircraft between the runways. If an aircraft is holding at a runway exit, the landing aircraft must now proceed to another exit. This requires increased separation between arrivals as there is not sufficient room to hold the aircraft exiting the runways.

Finally, the proposed limitation on increase in cargo handling facilities to 3.1 million square feet, as a means to control capacity, is entirely beside the point. Many cargo carriers at LAX are in the business of "same day" delivery, requiring fast turn around, but no warehousing. Where warehousing is required, off-site warehousing is available.

#### C. Alternative D Does Not Appear to Materially Further the Twin Goals of "Safety and Security"

In stark contrast to the SEIR's unstated goal of capacity increase, its stated goals of increased safety and security are elusive. With respect to the alleged Project safety goal of remedying runway incursions, obviously the proposed runway taxiway configuration will help. In the last analysis, however, six billion dollars is a steep price to pay, where significant improvements could be achieved by better airport signage, increased controller and pilot education, and strict enforcement of regulations and relevant provisions of operations handbooks.

With respect to security, Alternative D is an anachronism. By the time it is completed in 2015 or after, the world situation and/or technological progress will likely have rendered the security rationale for restructuring whole terminals and parking structures as well as freeway access to make them even more remote from aircraft and difficult for passengers to access, obsolete. While the goal is noble, Alternative D vastly exceeds current security requirements, developed and administered by the Transportation Security Agency, which the SEIR acknowledges are currently being met at LAX. On the other hand, the SEIR fails to address security issues such as: (1) the potential threat directly posed by airport employees and vendors who cannot, by virtue of their jobs, be funneled through the GTC; (2) the near term additional Federal security requirements such as the requirement for screening of cargo; and (3) the potential for attack on the GTC itself, where thousands of passengers will be concentrated, instead of dispersed, as they are now, through a number of terminals.

In summary, the final goal of Alternative D, to make LAX an international hub, is the dominant one, although somewhat inconsistent with Alternative D's other goals, because it can only be accomplished through the significant increases in capacity brought about by the reconfiguration of the airfield to allow the introduction of NLA capable of carrying large numbers of passengers long distances. Capacity increases are inevitably accompanied by increases in air quality, noise and related impacts. Therefore, the theme that flows throughout the

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#### II. ALTERNATIVE D DOES NOT REPRESENT A MEANINGFUL CONSTRAINT ON CAPACITY AND, THUS, WILL CAUSE IMPACTS IN EXCESS OF THOSE ANTICIPATED FROM THE "NO PROJECT" ALTERNATIVE.

One of the SEIR's stated goals is to "encourage the development and use of regional airports to serve local demand by constraining the facility capacity at LAX to approximately the same aviation activity levels identified in the no action/no project alternative." In support of that goal, the SEIR proposes a purported reduction in the available number of loading gates and spaces from 163 to 153; reduction in the linear feet of terminal frontage; and maintenance of cargo warehouse space at 3.1 million square feet. Despite these changes, the SEIR does not meet its goal of constrained capacity.

##### A. The New Runway Configuration Encourages Access for New Large Aircraft.

First, the reduction in available gates will not meaningfully constrain capacity because of the evolution toward higher utilization of New Large Aircraft ("NLA"), including the A380. With increasing use of NLAs, the airport will be able to accomplish more throughput with fewer gates, although of a larger size. The close to doubling in terminal capacity as between the 1996 baseline and Alternative D (from 3,997,000 square feet to 6,550,000 square feet) will also serve to accommodate the apparent projected increase in passengers resulting from introduction of NLA's.

NLAs are not however included in the projected fleet mix for the Project (SEIR, App. SC-1, Table S7), although it is apparent that the real aim of the Project is to accommodate them. The reconstruction and separation of Runways 7R/25L and 7L/25R in the south complex, and the addition of parallel taxiways (SEIR, Section 3, p. 3-48), as well as the ultimate extension of Runway 6R/24L to 1,280 feet to the east, to a total length of 11,700 feet and the extension of Runway 6L/24R 1,495 feet to the west, for a total length of 10,420 feet (SEIR, Section 3, p. 3-41) confirm that conclusion.

##### B. The Separation of Runways and Additional Taxiways Will Encourage Increased Capacity for Conventional Aircraft.

Second, even without NLAs, capacity would increase. Staggered runway ends (SEIR, Figure S3-8), permits simultaneous arrivals and departures in Visual Flight Rule (clear) weather, as do increased runway separations. The construction of two parallel taxiways between existing sets of runways will also allow an increase in the number of operations the airport can accommodate. Aircraft will be able to land with minimal separation and will be able to hold on taxiways between arrival and departure runways. Aircraft will then be able to land on one parallel runway and depart on the other without interruption. Multiple aircraft can be held between runways crossed to the terminal when there is no departure demand. This changed

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SEIR, that the characteristics and impacts of Alternative D are more or less the same as those of the "No Project" alternative is, at minimum, an overly optimistic assessment.

#### III. ALTERNATIVE D'S NOISE IMPACTS ARE, AT BEST, UNVERIFIABLE AND, AT WORST, UNDERSTATED.

Alternative D's noise impacts in general, and on Inglewood specifically, appear significantly understated. As a consequence, the mitigation measures set forth in both SEIR, Sections 4.1, Noise, and 4.2, Land Use, are inadequate to compensate for its impacts.

##### A. The SEIR Appears Methodologically Flawed.

One of the most notable issues from a methodological perspective is, as set forth above, the absence of the NLA, the A380 aircraft, from the fleet mix from which the noise analysis was derived (see SEIR, App. SC-1, Table S7). If, as set forth above, the NLAs are the principal beneficiaries of Alternative D's proposed reconfiguration of the airfield, their operation should be anticipated from a noise perspective. As it stands, however, Inglewood, and other affected communities, remain in the dark regarding the potential noise impacts of the larger, heavier, and potentially noisier aircraft. And, as Inglewood is the principal recipient of arrival noise, the size and shape of the contour over Inglewood may be materially affected by the omission of the A380 and other NLAs from the Project fleet mix.

The second issue arises out of the bifurcation of the analyses of DEIR Alternatives A through C, from SEIR Alternative D. SEIR App. S-C1 states that the DEIR was prepared with the INM 6.0 model, and the SEIR with the INM 6.0c model. As the two model versions use slightly different databases, it is not possible to ascertain whether the comparisons contained in the SEIR between alternatives are, in fact, accurate.

Similarly the flight track assumptions in the DEIR and SEIR diverge. SEIR, App. SC-1, Exh. S2, contains what purports to be existing flight tracks to the west for the noise analysis of Alternatives A through C, showing multiple turns originating immediately at the ends of the runways. SEIR, App. SC-1, Exhibit S4, however, reveals accurate flight tracks which do not begin to diverge until at or about the shoreline. The use of flight tracks that diverge immediately after takeoff, and prior to the shoreline, results in noise contours artificially expanded to the north and south along departure routes in areas west of the airport. Had the actual flight tracks represented in SEIR, App. SC-1, Table S4 for Alternative D, been used in the DEIR noise analysis of Alternatives A through C, the noise contours to the north and south depicted in the DEIR for Alternatives A through C would have been nearly identical to those in the SEIR for the analysis of Alternative D. As a result, the purported beneficial change to communities north and southwest of the airport from implementation of Alternative D may not exist if the correct

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baseline for noise analysis is used. Absent defensible inputs, it is not possible to ascertain with any certainty the integrity of the comparative results of the noise modeling.

Further, the apparent contradictory information set forth in SEIR, App. SC-1 ("Reserve runway 6L/24R for arrival traffic only, during normal operating conditions . . ." See, e.g., § 3, p. 3-42, and Tables S-2 and S-8, which appear to demonstrate the use of both outboard runways for both arrivals and departures at all times of the day (see also Section 3, p. 3-42 ["occasional departures would continue off the outboard runway 6L/24R during peak departing period. . ."], obscures both Alternative D's capacity enhancing and consequent noise enhancing potential. Departures over Inglewood on Runway 6L/24R at night could substantially change the noise contours in ways not already analyzed or disclosed in the SEIR. In addition, SEIR, App. SC-1, Project 2.1.4, states that a 3 degree glide slope has been assumed for all approaches. While this is the normal default option, the SEIR does not: (1) validate the assumption with use of actual data from LAX operations; or (2) disclose the noise impacts of the 3 degree glide slope, when combined with the extension of Runway 6L/24R over 1,000 feet to the east. A preliminary calculation reveals that the combination may result in aircraft between 125 and 250 feet lower in altitude over Inglewood, with concomitantly higher noise impacts on arrival not disclosed in the SEIR.

The same lack of validation impacts flight track and operations data in several ways. First, SEIR, App. S-C1, Section 2.1, states that the LAX software automatically assigns an aircraft to a flight track and to an INM aircraft type. However, the SEIR is not clear as to whether there any radar tracking data to verify the INM assigned flight tracks, nor is it clear that the aircraft types are being assigned properly (e.g., "light" vs. "heavy" aircraft). Second, SEIR, App. S-C1, Section 2.1.5 states that the average number of aircraft operations by aircraft type and time of day were estimated on proportional basis, using the 85% of operations that were actually monitored by the LAX software. The Appendix does not reveal, however, whether this approach yields data that is consistent with actual operations at the airport. Third, SEIR App. SC-1, Table S-15, which purports to identify the anticipated L-MAX noise levels generated by aircraft operations provides no comparison with the results from noise monitoring stations surrounding LAX to determine the accuracy of the INM model in predicting L-MAX levels.

Fourth, SEIR App. SC-1, Table S14, portrays the aircraft noise analysis results in terms of DNL not CNEL. As DNL is a less stringent measure which omits additional weighting to noise events that occur in the evening hours from 7:00 to 10:00 p.m., a conversion factor must be applied to DNL results in order to accurately portray CNEL impacts. As a consequence, the CNEL impacts identified in SEIR, App. SC-1, Table S20, cannot be corroborated.

Last, and potentially most crucial, SEIR App. SC-1, Section 2.1.7 states that the INM underpredicts the CNEL by 0-3 dB based on noise monitoring around LAX. As the INM model uses SEL values to calculate  $L_{eq}$  and CNEL, it may be reasonably concluded that the SEL and  $L_{eq}$

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analyses for Alternative D are also underpredicted by the same 0-3dB. Although a deviation of 3 dB CNEL is significant, as alluded to in the SEIR significance criteria used for assessing airport noise impacts, the SEIR contains no attempt to investigate the accuracy of the input data for the INM model for the purpose of calibrating the model to actual measurements at LAX, or verifying the results of the noise analysis.

#### B. Alternative D Does Not Fully Assess the Noise Impact on Inglewood Schools.

It is above dispute that, in general, the potential impacts of airport noise on children, and particularly children in a learning environment, are of critical importance, not only to the children and their families, but to society as a whole. Of particular importance to Inglewood, however, is that, as set forth in SEIR, App. SC-1, Alternative D will result in 12 additional schools in Inglewood exposed to single event noise levels sufficient to disrupt classes, as compared to noise levels in 1996. Nevertheless, the SEIR disaffirms significant impact from the increased exposure. SEIR Section 4.1.2.1.2, Project 4-11, ["no reliable statistical relationship between the amount of aircraft noise exposure present and the degree of learning difficulty experienced by children at affected schools" has been established.]

The treatment of the noise methodology used to evaluate noise impacts on schools reflects this conclusion. For example, SEIR Section 4.1.2.1.2, states that the peak hour of airport operations during school hours was used to assess the impact of aircraft noise on the schools. While this would be the proper approach (based on the threshold of significance established for the Project), SEIR, App. S-C1 reveals that instead of the peak hour, an average of 8 school hours was used in the analysis.

Moreover, the  $L_{eq}$  metric used in SEIR, App. SC-1, Table S33 appears incorrectly calculated. The average  $L_{eq}$  for the 8 hour school day in Table S33 is obtained by adding 10 log (3) to the 24 hour  $L_{eq}$  calculated by the INM model. The basis for this calculation appears to be that the 8 hour school day is 1/3 of the 24 hour day. However, this methodology is not correct since flights are not evenly distributed throughout the day. The result of the analysis is an average  $L_{eq}$  that is too low because most flights at LAX occur during the daytime. It should be further noted that, as set forth above, the model is acknowledged to underpredict  $L_{eq}$  values by 0 to 3 dB in any event. This underprediction, as well as the diminution in  $L_{eq}$  values caused by averaging were apparently not considered in the analysis or assessment of impact which should have been based on the peak, not average, hour, as acknowledged in SEIR Chapter 4.1.

Finally, while Section 4.1.2.1.2 also states that the "time above" was used as a threshold to evaluate noise impacts on schools, "time above" was not identified as a significance criterion in SEIR, App. S-C1. In fact, as set forth in SEIR Section 4.4.1.1, it is not clear whether the "time above" criterion is cumulative for a school day or for the peak hour, or whether it applies to each individual aircraft event. If it is cumulative, it can take many aircraft disruptions to achieve the 3

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second "time above" criterion level used in the SEIR to establish disruption, thus creating an unrealistically high hurdle to the establishment of noise impacts on school populations.

#### C. Because of the Under Calculation of Noise Impacts, Measures Offered to Mitigate Noise Impacts on Schools are Inadequate.

Just as the analysis of noise impacts on schools is incomplete, so are the mitigation measures to remedy those impacts. Mitigation measures applicable to noise impacts on schools are limited to MM-LU-3 ["conduct study of the relationship between aircraft noise levels and the ability of children to learn", SEIR Section 5, Project 5-21], and MM-LU-4 ["provide additional sound insulation for schools shown by MM-LU-3 to be significantly impacted by aircraft noise", SEIR Section 5, Project 5-21 (emphasis added)]. The former involves the conduct of a study to determine if any measurable relationship exists between aircraft noise levels and the ability to learn. The latter is contingent upon the outcome of the former. The proposed measures are both legally and practically inadequate.

First, it does not take a "comprehensive study", or a mathematical relationship, to establish what is, at minimum, intuitively obvious - that an increase in airport noise of the type and magnitude portrayed in the SEIR will not be beneficial to learning. Second, it is improper for lead agencies to "defer formulation of possible mitigation programs by simply requiring future studies to see if mitigation may be feasible." *Fairview Neighbors v. County of Ventura*, 70 Cal.App.4th 238, 244 (1999). Indeed, it is only where "after a thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, [that] the agency should note its conclusion and terminate discussion of the impact." *Los Angeles Unified School District v. City of Los Angeles*, 58 Cal.App.4th 1019, 1026 (1997).

In *Los Angeles Unified School District*, a case only five years old, and involving the City of Los Angeles, proprietor of LAX, the court found that noise impacts on several schools from the proposed Warner Center Development in the San Fernando Valley were not too speculative for determination as claimed in the EIR, where "the authors of the EIR took precise measurements of existing traffic noise around Canoga Park High School and then used a Federal Highway Administration computer model to predict noise levels under alternative versions of the plan." *Id.* On that ground, as well as a second ground, that sufficient reliable data had been developed to permit development of noise mitigation measures for residences in the area, *Id.* at 1028, the Court found that Los Angeles had failed to establish the reason why the same could not be done for the schools.

The same situation exists here. The SEIR contains what its authors, the lead agency, consider to be appropriate significance criteria based on several existing studies of classroom disruption, and analyzed in the INM, a Federal Aviation Administration model. Moreover, the SEIR contains what purports to be a definitive evaluation of noise impacts on residences, which

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is accompanied by a number of mitigation measures, some of which are to be applied immediately upon Project implementation, and based on the determinations contained in the SEIR. There is, therefore, no cognizable reason, and the SEIR provides none, why reasonable, feasible mitigation measures to allay the impact of airport noise on children in 12 Inglewood schools should not be set forth in the SEIR.<sup>3</sup>

#### D. The SEIR's Analysis of Newly Awakened Population is Unclear and Potentially Inaccurate.

The SEIR reveals that the vast bulk of the population newly exposed by Alternative D to noise sufficient to awaken it on a regular basis, (i.e., 17,030 persons,<sup>3</sup> lives in Inglewood, while all other affected jurisdictions, including the City of Los Angeles, Los Angeles County and El Segundo will experience a net decrease of up to 19,000 residents in population exposed to SEL levels sufficient to awaken. SEIR, Table 4.2-29. For that reason alone, Inglewood has a deep concern that the analysis of Alternative D's sleep impacts be accurate, understandable, and that proposed mitigation measures be adequate to mitigate those impacts. Thorough review of the SEIR and its Appendices fails to disclose relevant answers.

#### 1. The Methodology Employed to Analyze Sleep Impacts of Aircraft Noise is Unclear and Leads to a Potentially Inaccurate Conclusions.

The SEIR uses a 94 dB SEL "noise contour" as a metric to measure aircraft noise sufficient to awaken. SEIR § 6.1.2 contains a description of the methodology used to calculate the location of the 94 dB SEL noise contour. That description is, however, unclear. The 94 dB level represented in SEIR Section 6.1.2 is based on a study that states that 10% of the population exposed to this level of noise will be awakened no more than once every 10 days. To establish a noise contour for operations that would occur once every 10 days, it appears that the methodology only considered aircraft operations that occur at least 0.1 times per day (or once every 10 days). If this is a correct understanding of the methodology, then the methodology is in error. If the methodology includes only aircraft that have at least 0.1 operations per day, then some operations have been excluded from the analysis. This could mean for example, that

<sup>3</sup> To further complicate the issue, SEIR, Section 6.2.3, based eligibility for school noise mitigation on CNEL levels, a much higher, cumulative hurdle than the SEL criteria used to assess noise impacts on schools in SEIR Section 6.2. The SEIR should be revised to apply the relevant SEL criteria consistently to both the determination of noise impacts on schools and the eligibility for mitigation of those noise impacts.

<sup>3</sup> When the population removed from the noise affected area by change in airfield configuration and resultant shift in the noise contour is considered, the net population in Inglewood exposed to regular awakening is 12,800 persons.

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infrequent takeoffs to the east under Santa Ana conditions were not considered in the analysis. This omission would, of course, have a significant effect on Inglewood.

In effect, what is plotted in the SEIR is the 94 dB SEL contour (*i.e.*, the contour for 10% awakenings) for a subset of the total operations occurring at the airport. Therefore, the resulting analysis will be incorrect for two reasons: (1) It underpredicts the contour because it does not include all the flight operations at the airport; and (2) As the SEIR acknowledges that the model underpredicts SEL values by 0 to 3 dB, the resulting 94 dB SEL contour may also be underestimated by that amount. Finally, it is unclear from SEIR Section 6.1.2 whether the analysis of nighttime awakenings only included aircraft operations or also included ground ramp operations which, in some instances, can be extremely noisy.

## 2. The Measures Proposed to Mitigate Awakenings are Incomplete and, Thus, At Least Partially Ineffective.

As a threshold matter, Inglewood appreciates the intent expressed in mitigation measure MM-LU-2, SEIR, Section 5, Project 5-20, to "incorporate residential dwelling units exposed to single event awakenings threshold into aircraft noise mitigation program." However, SEIR Section 5 clouds that commitment by predicating the calculation of affected units on a comparison with "1992 65 CNEL contour". Inglewood's problem with that approach is twofold. First, the relevant baseline comparison throughout the SEIR for CEQA purposes is 1996. To suddenly employ 1992 contours as a baseline for comparison, without further explanation, renders the conclusion derived from that comparison suspect.

Inglewood is aware that the rationale for use of the 1992 contour is that, according to explanations offered in other forums, the 1992 contour represent the noisiest recent year due to the level of operations and the relative preponderance in the fleet of Stage 2 aircraft at that time. Nevertheless, neither the 1992 contour, nor data from 1992, are presented anywhere in the SEIR or relied upon in other sections. Therefore, further analysis of 1992 operations, noise levels, and resulting contours, as compared to those for 1996 and 2000, the designated baselines for analysis in the SEIR, is required to justify use of 1992 contours in this isolated instance.

Moreover, the results of the comparison of Alternative D with 1992 contours is inconsistent with the results derived from comparison with the designated 1996 baseline. While the comparison with 1992 purports to result in 4,140 dwelling units and 13,170 residents of Inglewood newly exposed to nighttime awakenings, the comparison with 1996 results in 6,010 dwelling units and 17,930 residents newly exposed. Clearly, a measure that excludes 1,870 units and 4,760 residents will only incompletely mitigate Alternative D's noise impacts.

Second, while Inglewood appreciates the time and effort devoted to an application to the FAA for enforceable noise restrictions under 14 C.F.R. Part 161, that measure will also result in

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residents and other noise sensitive occupants . . ." SEIR, Project 5-19, 20. MM-LU-1, however, fails to identify the manner in which the housing needs of newly exposed residents will be accommodated after their properties are acquired. In fact, the SEIR, Section 4.4.3, rejects the necessity of acquisition, and consequently ignores the need for attendant relocation. ("Under Alternative D, there would be a substantial reduction in property acquisition compared to the other build alternatives. No residential acquisition is proposed . . ." SEIR, p. 4-333) Nor is there any discussion of the way in which, in the tight and expensive L.A. housing market, decent affordable housing will be provided, or made available through new construction.

In light of the size of the potentially affected population, most of which are in Inglewood, and its heavily low income and minority characteristics, MM-LU-1 is sorely inadequate to mitigate the impacts of any of the proposed alternatives.

## F. The Data and Metrics Used in the SEIR's Analysis of Alternative D's Traffic Noise Impacts Are Inconsistent With Those Used in the Evaluation of its Aircraft Noise Impacts.

The methodology used in the SEIR's analysis of Alternative D's traffic noise impacts is unclear as to the data used in the evaluation of peak hour traffic noise, as well as inconsistent as between the metrics used to assess traffic and aircraft noise. These inconsistencies may render the SEIR's conclusions regarding Alternative D's cumulative noise impacts questionable.

The SEIR states that peak noise hour data, *i.e.*, data for the noisiest one hour period of the day, were used in the analysis of traffic noise. SEIR § 4.1.2.1.3. However, based on review of SEIR, App. SC-2, Roadway Noise Data, it appears that, in fact, either peak a.m. or p.m. traffic data were used. These are not typically the noisiest hours of the day since traffic slows due to congestion. Thus, the SEIR's traffic noise analysis may not have captured the true extent of the Project's traffic noise impacts.<sup>4</sup>

Further, the metrics used to measure aircraft and traffic noise are inconsistent. The SEIR's aircraft noise analysis depends on the cumulative CNEL metric.<sup>5</sup> The SEIR's significance criterion for traffic noise, however, is the 24 hour  $L_{eq}$  metric which is a predicate to, but not identical with, the CNEL significance criterion. Where the SEIR purports "for information purposes", to combine aircraft and traffic noise to estimate the total experienced

<sup>4</sup> It appears, although it is by no means certain, that the data in SEIR, App. SC-2 takes this into account by reducing traffic speeds for future years. However, a more accurate way of dealing with the problem would be to start with the correct data in the first instance.

<sup>5</sup> The exceptions to the use of the CNEL metric is to assess noise impacts on schools and awakenings.

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only incomplete mitigation. As SEIR, App. S-C1, Section 3.1.6 indicates, the Part 161 application will only eliminate gratuitous use of nighttime takeoffs to the east. For safety reasons, takeoffs to the east will still occur during Santa Ana conditions or when coastal fog limits visibility. As acknowledged in SEIR, App. S-C1, Section 3.1.6, these safety reasons account for the great majority of takeoffs to the east. Therefore, the mitigation measure that is the subject of a Part 161 application will be only intermittently applicable, and, thus, may provide little relief to the residents of Inglewood. Finally, SEIR, App. S-C1, Section 6.1.3 states that the Part 161 application will only apply to eastbound takeoffs between midnight and 6:30 a.m. However, SEIR, App. S-C1, Section 6.1 states that the analysis of nighttime awakenings applies to the hours between 10:00 p.m. and 7:00 a.m. Therefore, the proposed mitigation measure will not cover a period of two and one-half hours each night.

In the last analysis, the gravamen of the mitigation for nighttime awakenings is the sound insulation program identified in SEIR, App. S-C1, Section 6.1.3. However, without further clarification concerning the extent of the units and population that will be covered by the sound insulation program, the program appears inadequate to mitigate the full noise impacts of Alternative D.

## E. The Expansion of the ANMP Contemplated in Mitigation Measure MM-LU-1 May Provide Only Limited Relief to Inglewood Residents Newly Exposed to Noise in Excess of 65 dB CNEL.

The SEIR makes painfully clear that the vast bulk of the population newly exposed by Alternative D to noise in excess of 65 dB CNEL will be in Inglewood. Specifically, Alternative D is projected to increase the number of Inglewood residents impacted by noise in excess of 65 dB CNEL by 4,190, when compared to the 1996 baseline (as opposed to zero in El Segundo, 790 in the City of Los Angeles, and 380 in Los Angeles County). Nevertheless, the scope of MM-LU-1's applicability to these newly affected populations is not clearly defined.

For example, while MM-LU-1 proposes to expand the existing ANMP to "mitigate land uses that would be rendered incompatible by noise impacts associated with implementation of the LAX Master Plan", SEIR, S-19, it also imposes criteria for inclusion in the ANMP that require the existing ANMP to be completed before expansion to newly impacted residences. As the current ANMP already involves thousands of units in Inglewood alone, not to speak of other communities; and as the process of sound insulation construction can be a lengthy and complex one, the almost 5,000 newly impacted residents of Inglewood may have to wait in line behind other residents of Inglewood and other communities for up to 10 years, all the while suffering the debilitating impacts on sleep, learning and living in general caused by Alternative D.

Moreover, as an alternative to insulation, MM-LU-1 proposes "acquisition of properties within the highest CNEL measurement zone" as well as those with "high concentrations of

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noise, Section 4.1.2.1.3, p. 4-12, it does so by converting both traffic and aircraft noise to a 24 hour  $L_{eq}$  metric, rather than converting traffic noise to a CNEL metric. The result is a comparison of "apples and oranges", that deprives the public of the simplicity of a consistent metric. If using the  $L_{eq}$  metric would result in a more accurate characterization of the Project's noise impacts, its use would be acceptable. However, the SEIR does not claim that this is so.

In short, while the SEIR states that the computation of the combined noise impacts of traffic and aircraft are for "information purposes" only, the reality is that noise in the vicinity of the project will have multiple components, two of which are aircraft and traffic, and another, construction noise as set forth below. The SEIR has an affirmative responsibility to fully and accurately depict the cumulative impacts of all three.

## G. The Impact of Construction Noise From the Proposed GTC on Residents of Inglewood Has Not Been Adequately Evaluated.

SEIR Section 4.1.6.4.3 states, in pertinent part, that: (1) as the closest noise sensitive uses to the GTC are more than 1,000 feet to the east across La Cienega Boulevard and the I-405 in the City of Inglewood; (2) because construction equipment noise of 86 dBA  $L_{eq}$  would dissipate to approximately 66 dBA  $L_{eq}$  at that distance; and (3) because the road traffic and other noise would mask any construction noise, the impact of construction noise on homes in Inglewood would be less than significant. In reaching that conclusion, the SEIR relies on a theory conclusively rejected by the court in *Los Angeles Unified School District, supra*, 58 Cal.App.4th at 1025.

In its EIR in that case, as in the SEIR here, Los Angeles reasoned that "the noise level around the schools is already beyond the maximum level permitted under Department of Health Guidelines so even though traffic noise from the new development will make things worse, the impact is insignificant." *Id.* After characterizing Los Angeles' position, the court rejected it, relying on *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 720 (1990).

"This ratio theory, the court explained, 'trivialized the project's impact' by focusing on individual inputs, not their collective significance. . . [T]he relevant issue to be addressed in the EIR on the plan is not the relative amount of traffic noise resulting from the project when compared to existing traffic noise, but whether any additional amount of traffic noise should be considered significant in light of the serious nature of the traffic noise problem already existing around the schools." *Id.* quoting *Kings County Farm Bureau, supra*.

The SEIR's analysis of the construction noise impacts of Alternative D is predicated upon precisely the same impermissible "ratio theory" as that rejected in *Los Angeles Unified School*

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*District*. The SEIR opines both that construction equipment noise would dissipate to a less than discernable level at a distance of 1,000 feet from Inglewood and that road traffic noise would mask any construction noise. While some analysis exists in the SEIR to support the former, none whatsoever exists with respect to the latter. In other words, it is yet to be determined whether traffic noise, when calculated using peak noise hour data, as well as peak traffic data, will sufficiently exceed the level of construction noise, the peak hours of which may be entirely different, to mask or obliterate its impacts on residents less than a fifth of a mile away. As the court held in *Los Angeles Unified School District*, "we do not know the answer to this question but, more important, neither does the City". *Id.* at 1026. Without those answers respecting the Project's cumulative traffic, aircraft and construction noise impacts, the SEIR is potentially inadequate.

#### IV. THE SEIR DOES NOT FULLY DISCLOSE THE PROJECT'S AIR QUALITY IMPACTS.

The SEIR's air quality analysis is of questionable accuracy where: (1) the methodology employed in the analysis understates baseline emission concentrations, thus leaving substantial headroom within which to make the finding that the Project increases emissions without violating ambient air quality standards ("AAQS"); (2) understates emissions from aircraft; (3) overstates emissions benefits from electrification of aircraft ground support equipment and the use of gate-based power, and understates emissions impacts from construction equipment; (4) omits heavy duty construction and transport truck emissions from the analysis; and (5) improperly defers the conformity analysis required for all Federally funded projects pursuant to the conformity provisions of the Clean Air Act, 42 U.S.C. § 7506, *et seq.*

##### A. The Methodology Used in the Calculation of Background Pollutant Concentrations Leads to Understatement of Impacts.

To varying degrees, the determination of the Project's environmental impacts is dependent upon the background environment with which the Project impacts are compared. With respect to a determination of air quality impacts, the accurate calculation of background concentrations is particularly crucial, because it is upon that base that the compliance of Project specific emissions with regional air quality standards is determined. If that base is underestimated, the overall effect of airport improvements on AAQS compliance will be similarly understated. Here, it appears that the baseline concentrations upon which Alternative D's compliance is predicated are calculated through a methodology that artificially lowers background emissions levels so as to allow room for Project emissions to fall below maximum applicable AAQS.

The SEIR employs a methodology whereby future year background concentrations, excluding  $PM_{10}$ s, are determined by adjusting base year concentrations by the ratio of future

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south coast regional emissions to current south coast regional emissions. For  $PM_{10}$ , the process is similar but is based on the ratio of estimated future year  $PM_{10}$  concentrations to current  $PM_{10}$  concentrations in central Los Angeles. Both methods seem likely to produce optimistic (too low) background concentrations for LAX.

First, both methods assume that regional reductions affect all areas of the region equally. However, background concentrations, as well as future emission reduction influences are constrained by geography around LAX. Since the prevailing wind is from southwest to northeast, the Pacific Ocean represents a physical constraint and it is unlikely that background pollutant concentrations coming into LAX will be reduced in proportion to emission reduction occurring downwind. In addition, the emissions based approach assumes that fully 100% of the background can be reduced, i.e., if emissions go to zero, ambient concentrations go to zero. While this may be true in an idealized situation, transport and biogenic emissions represent a floor below which air quality cannot be locally reduced. For example, emissions associated with shipping may represent a floor for background NO<sub>x</sub> and SO<sub>x</sub> at LAX. The SEIR does not provide enough data from which to make that determination.

The SEIR does, however, provide additional evidence to support the conclusion that the Project's baseline concentrations are artificially reduced. For example, the SEIR's methodology assumes that emissions from LAX are already included in background concentrations, and, thus, they must represent conservative background pollutant concentration baselines for air quality analysis, as LAX emissions will be added on top of a background that already includes those same LAX emissions. This assumption is based on data concerning baseline short-term (sub-annual) background concentrations measured at an on-site monitoring station located just east of the southern runway configuration, and annual concentrations based on data collected at a SCAQMD monitoring facility in Hawthorne, located near, but southeast of LAX. Because, as set forth above, the prevailing wind direction for LAX area is southwest to northeast, the bulk of airport activity, including all terminal and motor vehicle operations, occur under the influence of a prevailing wind plume that is further north than the on-site monitoring station. While certain aircraft takeoff and queuing emissions are undoubtedly accounted for in the on-site baseline concentrations, these represent only a small fraction of overall airport emissions.

National Weather Service data for 1984 through 1992 at LAX demonstrates the likelihood that these monitoring data are not significantly impacted by LAX emissions. Winds are out of the west or southwest 48 ± 6% (or approximately 1/2) of all hours in that period. To get a better idea of the significance of this distribution, if a circle were centered at LAX and split into 16 equal "slices", the wind would be blowing off the ocean through only two of those 16 slices for fully 1/2 of all hours. Moreover, these winds would be blowing in a direction such that LAX emissions would have no influence on the off-site monitoring station and little, if any, influence on the on-site measurement. Perhaps most tellingly, winds moved in a prevailing south to north direction (from the bottom half of the circle to the top half) 82 ± 3% of all hours between 1984

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and 1992. Thus, only during 9 ± 2% of all hours did wind move from the northwest quadrant of the circle toward the southeastern quadrant (i.e., in the direction necessary to influence either the on-site or off-site monitors). Therefore, whatever influence LAX has on either site is clearly modest since the off-site station is located south of LAX and the on-site station is on the southeastern corner of the airport. Consequently, there is little influence from LAX on the off-site concentrations used as background, and only a slight influence on the on-site based background concentrations.

In summary, as a result of employing the specified methodology, 2015 background concentrations are potentially reduced by 50% for NO<sub>x</sub>, 60% for CO, and 30-80% for  $PM_{10}$ . Clearly, these reductions provide substantial "headroom" for local emissions increases within the confines of the AAQS. Furthermore, these reductions appear to represent the most significant influence on forecasted pollutant concentrations in the years 2005 and 2015.

The overall sensitivity of the air quality analyses to the background concentration reduction is perhaps best recognized in examining the forecasted 2015 pollutant concentrations. Despite the 50% background concentration reductions for NO<sub>x</sub>, annual average on-site NO<sub>x</sub> concentrations are forecasted to increase between 1996 and 2015. While the forecasted increase is not sufficient to cause a violation of the NO<sub>x</sub> AAQS, that may be entirely the result of the reduced background concentrations resulting from the flawed methodology employed. Clearly, the integrity of the AAQS compliance status hinges on the proper demonstration of background concentration propriety. Since this is the case, it is critical that assumed background concentrations be supported with appropriate analyses, and those analyses are currently lacking in both the DEIR and SEIR.

##### B. The SEIR Understates Aircraft Emissions.

Aircraft emissions are understated in the SEIR through utilization in the analysis of: (1) incorrect aircraft  $PM_{10}$  factors; (2) incorrect taxi times; (3) incorrect default aircraft engine assignments; and (4) omission to consider reverse thrust emissions.

##### 1. The SEIR Air Quality Analysis Utilizes Incorrect Aircraft $PM_{10}$ Emission Factors.

As set forth in Attachment 1 to this letter, the DEIR's air quality analysis was based on incorrect  $PM_{10}$  emissions factors. As nothing has changed in the SEIR, this issue is again worthy of note.  $PM_{10}$  emission factor estimation in the DEIR shows that the basic estimation approach yields an emission factor that only considers the basis nonvolatile portion of the particulate. An adjustment factor (that varies with fuel sulfur content) should be used to correct the estimate to total PM. As set forth in Attachment 1, this factor is estimated to be approximately 2.6 for low sulfur (about 70 PPMW) jet fuel and 14.7 for high sulfur (about 675 PPMW) jet fuel. As EPA

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data demonstrates that U.S. jet fuel averages about 600 PPMW sulfur, the appropriate adjustment factor for the SEIR would be about 13.2. However, as the SEIR uses unadjusted emissions factors,  $PM_{10}$  emissions are underestimated by a factor of 13.

This alternative approach to PM emission factor estimation is based on a strong statistical relationship between measured PM and the inverse of measured NO<sub>x</sub> (with co-efficients significant at 99+% confidence levels). With such a relationship, the entire existing database of aircraft NO<sub>x</sub> emissions rates can be evaluated to develop aircraft engine and operating mode specific PM emissions rates. This approach produces PM emissions rates that range from 4 to 37 times higher (depending on operating mode) than those used in the DEIR and SEIR. The smallest differentials are observed at the highest thrust modes. For a typical landing/takeoff ("LTO") cycle at LAX (i.e., using local times in mode), the SEIR appears to underpredict the aggregate PM emission factor by a factor of about 17. The effect on related PM air quality analysis is obvious.<sup>6</sup>

Interestingly, if the appropriate carbon-to-total PM emission factor correction of 13.2 is applied to the emissions rates used in the DEIR and SEIR, the differential between the two emissions factor estimation approaches is dramatically reduced, from a factor of 17 to a factor of 13. However, even this differential is worthy of investigation since mode specific differences are in and of themselves significant and the overall air quality impact depends on how individual mode significance changes over time.

##### 2. The SEIR Inaccurately Represents Aircraft Taxi Times.

The DEIR did not present any aircraft to taxi/queue times. The SEIR, however, does present a single set of taxi/queue times that are stated to have been "used to estimate aircraft emissions for all alternatives in both horizon years". SEIR, App. S-E, p. 10. However, based on analysis of the data set forth in SEIR App. S-E, this statement does not appear to be accurate. As shown in Table 1 below, the main benefit ascribed to Alternative D is a reduction in taxi times.

<sup>6</sup> Inglewood acknowledges that the available PM emissions testing database is both small and dated. It does not, however, agree with the DEIR that the age of available testing data renders it valueless. While engine technology has advanced relative to the engines represented in the database, the fundamental combustion characteristics that give rise to PM formation have not. Further, the claim that the existing aircraft emissions factors are not of value since they reflect total PM as opposed to  $PM_{10}$  is also without merit. Virtually 100% of combustion related PM is  $PM_{10}$ , so any error resulting from the substitution of total PM for  $PM_{10}$  is insignificant relative to the analysis errors contained in the DEIR and SEIR. Ironically, the PM emission factor estimation approach employed in both the DEIR and SEIR requires the very same assumption of equivalency between total PM and  $PM_{10}$ .

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TABLE 1

	NO <sub>x</sub> (tpy)	VOC (tpy)	CO (tpy)	SO <sub>2</sub> (tpy)	PM-10 (tpy)
Taxi Emissions - NA/NP Alternative	723.3	794.9	4,381.6	89.9	17.8
Taxi Emissions - Alternative D	659.2	707.6	3,956.6	80.9	14.6
Taxi Emissions Difference	-64.1	-87.3	-425.0	-9.0	-3.2
Aircraft Emissions - NA/NP Alternative	5,154.9	1,204.1	8,668.7	232.5	70.2
Aircraft Emissions - Alternative D	5,171.7	1,111.2	8,240.7	227.7	62.0
Aircraft Emissions Difference	16.8	-92.9	-428.0	-4.8	-8.2
Percent of Total Difference Due to Taxi	-382%	94%	99%	-102%	39%

As also shown in Table 1, with the exception of PM<sub>10</sub>, changes in taxi related emissions account for virtually 100% of the claimed reductions in aircraft emissions from Alternative D. Therefore, it would be methodologically unlikely that the same taxi times were used for all airport alternatives, because if that were so, the differences between the alternatives would be far less distinguishable.

As the bulk of aircraft VOC and CO emissions are generated during taxi, and although NO<sub>x</sub> emissions rates are low during taxi, the amount of time spent in taxi mode results in a significant contribution to overall aircraft NO<sub>x</sub> emissions, it is important that taxi time be accurately modeled. The SEIR contains insufficient information to allow an appropriate evaluation.

### 3. The SEIR Utilizes Incorrect Default Aircraft Engine Assignments.

The SEIR sets forth the assumed aircraft engines for all modeled airframes. It appears that these assumptions reflect the EDMS version 4.11 Default Engine Assignments without exception. While such an assumption would not affect the relative impacts of the various LAX alternatives, it can have a significant impact on the absolute level of aircraft emissions and the magnitude of associated ambient concentrations. The EDMS default engine reflects the "most popular" engine for an airframe based on total airframe sales. For a particular airport, total airframe sales may or may not be an accurate indicator of local conditions due to variations in airline specific activity (e.g., local vs. national). Different airlines favor different airports and the associated traffic into and out of those airports is biased toward local airline distributions. Thus, aircraft engine assignments should, at a minimum, be conducted on the basis of the local airline mix, which is unlikely to be consistent with EDMS default assumptions. The SEIR does not contain an analysis based on local airline mix and, thus, its conclusions with regard to aircraft emissions are not definitive.

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### 4. The SEIR Air Quality Analysis Does Not Include Reverse Thrust Emissions.

The SEIR, like the DEIR, omits from its air quality analysis emissions from aircraft reverse thrust operations, on the ground of lack of adequate emissions factors and short usage times. Both of these claims are, however, misleading. Reverse thrust is essentially a high thrust operating mode and emissions factors for such modes (i.e., climb out and takeoff) are readily available. Common practice utilizes takeoff emission factors. It is true that the time in mode for reverse thrust operations is short. However, high thrust modes produce very high NO<sub>x</sub> per unit time relative to other operating modes such as aircraft taxi. For example, at a commonly utilized reverse thrust mode time of 15 seconds, overall effective takeoff time would increase by approximately 25% (approximately one minute standard takeoff time plus 0.25 reverse thrust minutes vs. one minute without reverse thrust). This, in turn, increases NO<sub>x</sub> by 25% relative to takeoff alone. Since takeoff accounts for about 35% of total aircraft NO<sub>x</sub> under all alternatives, including the No Project alternative, the overall aircraft NO<sub>x</sub> inventory could increase by about 10% simply due to the inclusion of reverse thrust related emissions. Without some enforceable measure prohibiting reverse thrust operations, there is no supportable rationale for excluding reverse thrust emissions from the air quality analysis.

### C. The SEIR Overstates Emissions Benefits from Electrification of Aircraft Ground Support Equipment and the Use of Gate Based Power.

As a threshold matter, emissions factors employed in the DEIR for off road engines, including, but not limited to, construction equipment and aircraft GSE were significantly underestimated by the use of outdated emissions factor sources. The SEIR purports to have corrected that flaw through the use of emissions factors for off road construction equipment derived from the California Air Resources Board ("CARB") OFFROAD Emission Factor Model. This would be the correct approach. However, it is not possible to confirm that the revised emissions factors are derived from the OFFROAD model, as the SEIR contains only an aggregate emissions summary (as opposed to the DEIR's actual emissions factors for comparison).

With respect to GSE, the SEIR relies on emissions factors derived from the latest version of the FAA's EDMS model (updated since the DEIR). While the emissions factors in the SEIR also appear consistent with those contained in EPA's NONROAD Emission Factor Model, the SEIR still raises significant concerns regarding the overall propriety of the GSE emissions analysis.

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### i. The SEIR Does Not Validate the Assumptions Contained in FAA's EDMS Model with Real Data.

Like the DEIR, the SEIR continues to rely on the FAA's EDMS model to estimate the LAX GSE population and equipment characteristics (e.g., horsepower, hours of use, load factor). Given that the current GSE population and most of the associated operating parameters for LAX are already known, it is appropriate to validate the EDMS model assumptions with actual LAX conditions. Ideally, the current assumptions should be replaced in their entirety with known LAX data. At a minimum, consistency should be demonstrated. The FAA has facilitated the use of actual airport data through their latest release of the EDMS model (Version 4.11), identical to that used to support the SEIR) by allowing users to replace aircraft based GSE activity assumptions with airport specific "census" data. The analysis in the SEIR should take advantage of this opportunity to establish the air quality analysis' accuracy.

### 2. The SEIR's Assumption That Alternative D Will Involve GSE Electrification and the No Project Alternative Will Not be Groundless.

Like the DEIR, the SEIR posits a wide spread GSE electrification program under all four build alternatives, while retaining a large percentage of fossil fuel powered GSE under the No Project alternative. While this GSE electrification program is asserted to be the most effective mitigation measure set forth in the SEIR, there are no grounds to assume that GSE will not be similarly electrified under the No Project alternative, thus, eliminating any differential resulting from the use of fossil fuel powered GSE between the No Project and build alternatives.

First, it is arbitrary to apply GSE electrification only to the build alternatives, as there are no specific constraints to implementation under the No Project alternative. Moreover, electrification of GSE is cost effective from a market standpoint today so whatever incentive or mandate will be offered under the build alternatives to move toward electrification could just as easily be applied today to generate emissions reductions under a No Project alternative.

Even ignoring the tenuous relationship between the build alternatives and GSE electrification as a mitigation measure, by far the most troubling issue is that GSE electrification appears to be accounted for in the "unmitigated" emission estimates for all build alternatives. If this is a correct assessment, no additional emissions reductions will be achieved through GSE electrification. For example, unmitigated GSE emissions for Alternative D and the No Project alternative (from SEIR App. S-4, Attachment N), are virtually identical in terms of aircraft and, thus, GSE activity. Although there is no reason set forth in the SEIR to expect GSE to emit any differently between an unmitigated implementation of Alternative D and the No Project alternative, the data in Attachment N demonstrates that Alternative D presents a substantial reduction in emissions of all pollutants over the emissions in the No Project alternative.

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TABLE 2

	NO <sub>x</sub> (tpy)	VOC (tpy)	CO (tpy)	SO <sub>2</sub> (tpy)	PM-10 (tpy)
NA/NP Alternative	618.7	246.4	5,683.9	11.4	24.0
Alternative D	135.3	88.1	1,523.2	1.4	30.8
Percent Change	-78%	-63%	-73%	-88%	28%

There are only two possible explanations for the reported differences. Either the Table in Attachment N is incorrectly labeled, and actually reflects mitigated emissions differentials, or the GSE electrification is included in the "unmitigated" emissions from the Project.

In the final analysis, it is clear that the reason air quality impacts under Alternative D are reported to be less than those of the No Project alternative can be traced almost entirely to emissions reductions associated with GSE and aircraft taxi times. In fact, impacts for all other emissions sources under Alternative D are either null or negative compared to the No Project alternative.

TABLE 3

	NO <sub>x</sub> (tpy)	VOC (tpy)	CO (tpy)	SO <sub>2</sub> (tpy)	PM-10 (tpy)
NA/NP Alternative	6,278.8	1,775.0	14,413.1	251.8	170.0
Alternative D	3,746.5	1,625.0	9,660.3	246.4	187.1
Total Emissions Difference	-2,532.3	-150.0	-4,752.8	-5.4	-17.1
GSE Emissions Difference	-483.2	-152.3	-4,162.7	-10.0	6.8
Percent of Total Difference Due to GSE	91%	102%	88%	185%	40%
Aircraft Taxi Difference	-64.1	-87.3	-425.0	-9.0	-3.2
Percent of Total Difference Due to Taxi	12%	58%	9%	167%	-19%
Percent of Total Difference Due to GSE and Taxi	103%	160%	97%	352%	21%

If that conclusion is correct, then all air quality benefits accruing from GSE electrification in Alternative D could just as readily be applied to the No Project alternative, rendering any air quality benefits from Alternative D ephemeral at best.

### 4. The SEIR Overstates the Emissions Benefits of Gate Based Power and Understates the Potential for Auxiliary Power Unit Emissions.

Like the DEIR, the SEIR assumes that 100% 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. This assumption is overly optimistic because,

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even under conditions where gate based equipment is available, not all airlines or aircraft will utilize it consistently. Although the assumption of 100% availability and usage affects the No Project alternative and build alternatives equally, it is necessary to account for the full range of expected emissions in order to determine AAQS compliance. Without some enforceable policy requiring that gate base systems (both air and power) be used, and that any onboard APU be shut down until needed for main engine startup, a more realistic assumption for aircraft emissions purposes would be to base the fraction of aircraft that rely on gate base systems on the system usage rate for currently equipped gates at LAX.

Moreover, perhaps as a result of the assumption of universal use of gate based power, the SEIR assumes an emission factor of zero for all APU. While the impact of this assumption is buffered by the assumption of limited APU usage, APUs are still assumed to operate for seven minutes, at the time of main engine startup and shut down, and emissions during this period should be fully considered. Further, if the APU usage rate is corrected to better reflect actual gate based system usage, APU emissions could increase to 40 minutes or longer for a wide bodied aircraft, a level which would more properly reflect maximum short term emissions rates and maximum short term ambient concentration impacts. Without inclusion of APU emissions, it appears that the SEIR's air quality analysis is flawed.

#### 5. The SEIR Relies on Outdated Load Factors for Off Road Equipment.

While the SEIR utilizes revised emissions factors derived from ARB's OFFROAD Model to assess the emissions impacts of off road construction and other equipment, it does not similarly employ revised operational load factors. Instead it relies on load factors derived from the CEQA Air Quality Handbook published in 1993. As considerable information has been collected in the last decade, relying on load factors from 1993 is likely to skew the air quality analysis in ways it is not possible to anticipate without the provision of relevant data.

#### 6. The SEIR's Air Quality Analysis Omits Heavy Duty Trucks From Its Fleet Mix.

Perhaps the most surprising omission from the SEIR's air quality analysis is from the assumed fleet mix for vehicles on all airport roadway links, set forth in SEIR, App. S-4, Attachment J, which lacks any accounting for heavy duty truck travel. As Alternative D includes 3.1 million square feet of cargo space on airport property, not to speak of the cargo space that may be utilized off airport by cargo carriers; as Federal Express and other cargo carriers operate substantial fleets of heavy duty diesel trucks; and as heavy duty diesel trucks are large emitters of NO<sub>x</sub> and other pollutants, omission of heavy duty trucks from the on road fleet mix will have a substantial impact on the estimation of NO<sub>x</sub> emissions from Alternative D and other build alternatives which may render the SEIR's air quality analysis inadequate.

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#### D. The SEIR, Like the DEIR, Improperly Defers the Requisite Conformity Analysis.

The SEIR acknowledges the applicability of Federal conformity requirements, as set forth in Clean Air Act, 42 U.S.C. § 7506, and its implementing regulations, but, like the DEIR, defers both the conformity analysis and potential conformity determination to a final EIR/EIS. Such an approach makes it impossible for the public to comment constructively on either potential emission mitigation measures or the conformity process, since these processes and their result will be released for comment only after the underlying decision making has been finalized.<sup>7</sup>

Moreover, the absence of a draft conformity analysis in the SEIR has more fundamental impacts. The Clean Air Act specifies, in pertinent part, that "no department, agency, or instrumentality of the federal government shall engage in, support in any way or provide financial assistance for, license or permit, or approve, any activity which does not conform to an implementation plan after it has been approved..." Clean Air Act § 7506(c)(1). Without at least a preliminary conformity analysis, it is impossible to document Alternative D's potential compliance or noncompliance with state air quality implementation plan (or verification that the project is already included in the State Implementation Plan). Absence of at least a draft conformity analysis at this stage of the Project's documentation violates the most fundamental goal of CEQA, i.e., "to encourage informed public information and decision making," and, consequently, may constitute a fatal flaw in the SEIR.

#### V. THE SEIR'S ANALYSIS OF SURFACE TRAFFIC IMPACTS IS INCOMPLETE.

The SEIR's analysis of Alternative D's surface traffic impacts, like the more global analysis of Alternatives A through C in the DEIR: (1) omits analysis of certain critical intersections, and reaches conclusions based on data absent from the SEIR, or inconsistent with data contained in other planning documents for the same areas; (2) omits analysis of the traffic impacts, either beneficial or detrimental, of proposed off airport FlyAway terminals; (3) provides incomplete explanation of the Project's trip generation potential, including trip distribution and its potential impact on Inglewood; (4) fails to explain the way in which the proposed mitigation for the traffic impacts of construction, and the ultimate buildout of the Northside project, will be effectively implemented; and (5) fails to address the direct as well as cumulative traffic and parking impacts on Inglewood of the construction and subsequent utilization of the GTC.

<sup>7</sup> Inglewood hereby reserves its right to comment on the Draft and Final Conformity Analyses and/or determination for the Project.

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#### A. The SEIR's Analysis of Baseline, as Well as Current, Intersection Traffic Levels Lacks Analytic Support.

The SEIR's analysis of 1996 and 2001 updated baseline intersection traffic levels, for comparison with Alternative D's influence on traffic impacts at selected intersections, omits or obscures critical information which makes verification of the SEIR's conclusions difficult, if not impossible.

#### 1. The SEIR's Conclusions Regarding the Continuing Relevance of the 1996 Baseline for Traffic Purposes is Unsupported.

SEIR, Section 4.3.2.3 contains an analysis of 38 intersections, updating traffic conditions reflected in the 1996 environmental baseline, apparently for the purpose of determining the continuing applicability of the 1996 base year. The updated data purportedly show a "combined" average annual growth rate for all intersections analyzed of "approximately 1.5%" and "1%" for the a.m. and p.m. peak hours respectively." SEIR, Section 4, p. 4-244. On that basis, the SEIR concludes that: (1) the traffic growth rate is consistent with general population growth rate in the area; that it is a "small" growth rate; and (3) 1996 is still the applicable environmental base condition.

The above conclusions are problematic. First, no background data are provided to support them. Second, the analysis purports to be of "combined intersections", but no methodology is set forth to explain the means by which the intersections were "combined" for statistical purposes, or, more fundamentally, the meaning of the term "combined" (e.g., statistically, arithmetically, other). Since the essence of traffic analysis is the determination of differential traffic impacts at different intersections, and as no such analysis is set forth in the SEIR, the integrity of this "combined" approach remains unestablished.

Third, as a result, there is no data with which to verify the SEIR's conclusion regarding consistency with the growth rates of the surrounding area, nor can the SEIR's conclusion that this is a small growth rate be substantiated. In fact, assuming the 1% growth rate in a.m. and p.m. peak hours is accurate; and assuming (for ease of computation only) the "combined" traffic at all 38 intersections totals 10,000 cars in each peak hour, the increase in the number of cars over the designated five year period is 510, or over 5%. Thus, even if 5% is deemed "small", if the total number of peak hour vehicles substantially exceeds 10,000, which it is more than likely to do, the actual traffic growth will not be small, casting doubt on the utility of the 1996 baseline for traffic comparison purposes.

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#### 2. The SEIR's Analysis of Traffic Impacts at Individual Off-Airport Intersections Conflicts with That of Other Contemporaneously Prepared Environmental Documents for Other Projects in the Same Area.

The SEIR was not prepared in a vacuum. It acknowledges that other projects are being planned and will be carried out contemporaneously with Alternative D. The environmental documentation for one of those cumulative projects, the Village at Playa Vista, was published as late as August, 2003. A comparative analysis of the Playa Vista EIR with the SEIR reveals significant discrepancies between the analyses of what are substantially the same relevant areas.

For example, the Playa Vista EIR identified two intersections not mentioned in the SEIR: (1) Centinella at La Brea; and (2) La Brea at Manchester, both apparently within the analysis area for the SEIR. Both intersections were identified as level of service F for both a.m. and p.m. hours, even without the Project. Since both the LAX and Playa Vista projects are geographically proximate, the baseline traffic analysis should use substantially the same assumptions and data, with the same results.

However, even intersections that are analyzed in both the SEIR and the Playa Vista EIR had notably different volume to capacity ratios and levels of service. The SEIR contains a table of the projected traffic in 2008 for Alternative D. The Playa Vista EIR provides similar information for the horizon year 2010. The following Table compares the levels of service for those two projections.

TABLE 1  
COMPARISON  
LEVEL OF SERVICE PROJECTIONS

Intersection	A.M. Peak		P.M. Peak	
	LAX	Playa Vista	LAX	Playa Vista
Aviation - Arbor Vitae	D	B	B	D
La Cienega - Arbor Vitae	E	B	E	C
Aviation - Manchester	F	F	D	E
La Cienega - Manchester	C	E	D	E
Interstate 405 NB - Century	B	F	A	B

The discrepancies in projected levels of service, i.e., the lower levels of service reflected in the Playa Vista EIR, are not explained by any data or analysis contained in the SEIR.

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**B. The SEIR Contains No Analysis of the Traffic Impacts of the "FlyAway" Terminals.**

The SEIR indicates that a series of new "FlyAway" locations are incorporated into Alternative D. Section 4.3.2.9.2 states that "the development of several new FlyAway away remote terminals is proposed to reduce the amount of vehicle traffic associated with travel to and from LAX," and that development of the "FlyAway" remote terminals would depend largely on the existing use and land use setting of the proposed site. The SEIR does not, however, designate the location of those proposed "FlyAway" remote terminals, nor does it analyze their impacts on traffic, either at LAX, or at their remote sites. Further, the SEIR does not indicate the amount of traffic which would be diverted from LAX by the use of these remote facilities.

Finally, the SEIR does not acknowledge that the use of remote sites does not eliminate the effects of traffic, but simply moves them to another location. As one of the suggested locations for a "FlyAway" terminal is in Inglewood, Inglewood has a cognizable interest in the anticipated traffic impacts of the use of remote sites, and as they are an integral strategy of Alternative D, the designated information is not "too speculative" to provide for public review at this point.

**C. The SEIR Fails to Adequately Analyze the Trip Generation Potential of Alternative D, its Construction, or its Projected Ancillary Development At, among Others, LAX Northside.**

The SEIR fails to address at least three issues fundamental to the analysis and projection of Alternative D's trip generation potential.

First, the SEIR does not explain why, with roughly the same passenger and cargo activity, the No Project alternative and Alternative D generate different trip levels. The EIR states that facilities that comprise Alternative D were designed to serve an activity level similar to the scenario adopted by Southern California Association of Governments for the 2001 Regional Transportation Plan. This is an activity level of 78.9 million annual passengers. The No Project alternative assumes 78.7 million annual passengers. Nevertheless, even with the roughly equivalent numbers of passengers, a.m. and p.m. peak hour traffic volumes with Alternative D are projected to decrease, while they are projected to increase under the No Project alternative.

Second, the SEIR fails to explain the way in which a fundamental traffic mitigation measure, the trip cap on the Northside project, can be effectively implemented. The entire off-airport surface traffic assessment turns on the conclusion that there will be less traffic in the future as a result of the Project than there will be if the Project is not approved. The basis for this prediction is the reduction in traffic for "collateral trips". For example, for Alternative D, p.m.

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on this entitlement. Thus, the SEIR's projection that the Northside project, while remaining at the same density but, in some undisclosed manner, generating fewer trips than it would have before Alternative D, is unsupported.

Finally, the SEIR appears to double count the traffic benefits of the trip cap. On the one hand, the SEIR relies on the mechanism of "land acquisition" for a reduction in traffic of 2,150 vehicles per hour in the a.m. peak hour, and 1,973 vehicles per hour in the p.m. peak hour. On the other hand, the SEIR contemplates that "space would be available in the LAX Northside development to accommodate compatible businesses displaced by Alternative D [land acquisition]", SEIR, p. 3-49. The SEIR, thus, subtracts traffic from peak hour totals due to land acquisition; relocates the "compatible" businesses to the Northside project; and, ultimately, imposes a trip cap that allegedly accounts for additional traffic reduction, even though the reduction in traffic attributable to the acquisition of certain businesses is apparently mooted by their relocation to the Northside development. By that means, the SEIR takes advantage of two potential mitigation measures: (1) the traffic reduction due to elimination of certain businesses; and (2) the traffic reduction due to the Northside project trip cap, neither of which, the SEIR acknowledges, may ultimately be realized.

**D. The SEIR Fails to Adequately Document the Mitigation of Off-Airport Construction Traffic Impacts.**

The SEIR is emphatic that "... the project would be managed to ensure that there would not be any notable construction-related traffic generated by the project during those critical [a.m. and p.m. peak] hours." SEIR, p. 4-264. [Emphasis added.] In fact, the SEIR claims that construction traffic would be actually eliminated during the a.m. and p.m. peak hours, and virtually eliminated during the airport peak hour.

The SEIR, however, contains no discussion of the way in which "management" ensures this beneficial hourly redistribution of construction traffic. For example, there is no explanation of the way in which 2,449 employee trips will arrive by 7:00 a.m. but there will be no truck arrivals or departures until 11:00 a.m. Similarly, there is no explanation of the way in which "management" will ensure that there are no truck trips between 4:00 p.m. and 7:00 p.m., while allowing 120 trips per hour between 7:00 p.m. and midnight. Further, there is no indication of the way in which "management" will ensure that construction related truck trips will not divert onto residential surface streets in the vicinity of the project, absent constant monitoring by police or other kinds of security.

In short, the mitigation measures for construction related traffic are conceptual at best. Absent more information concerning the way in which they will be implemented and enforced, proposed mitigation measures, while generous in origin, must be considered largely infeasible.

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peak hour passenger and related trips are anticipated to increase by 1,198. However, there is a projected reduction of 7,825 collateral trips, resulting in a net decrease in trips of 6,627.

The source of the collateral trip reduction is, apparently, the change in the land use for the projected Northside and Continental City projects. SEIR, Appendix S-2b provides the basis for the projected reduction in collateral trips.

	A.M. Peak			P.M. Peak		
	No Project	Alt. C	Alt. D	No Project	Alt. C	Alt. D
Northside	7,217	5,922	3,922	7,131	4,423	4,421
Continental City	5,323	0	0	5,348	0	0
Manchester Square	0	212	212	0	233	233
TOTAL	12,540	4,134	4,134	12,479	4,656	4,654

The issue associated with the "collateral trip" reduction is the discretionary actions needed to modify the allowable land uses on the Northside and Continental City properties.

SEIR Section 4.2, Land Use, sets forth a "master plan commitment" that states:

"to the maximum extent feasible, all [Q] conditions from City of Los Angeles Ordinance No. 159,526 that address the LAX Northside project area will be incorporated by LAWA into the Zoning Code Amendment and LAX Master Plan implementing Ordinance for the Westchester south side 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 south side project will insure that the level of environmental protection afforded by the full set of LAX Northside project [Q] conditions is maintained."

"CEQA requires agencies to implement feasible mitigation measures or alternatives identified in the EIR." *Fairview Neighbors, supra*, 70 Cal.App.4th at 243. Further, as set forth above, "it is improper for lead agencies to defer formulation of possible mitigation measures by simply requiring future studies to see if mitigation may be feasible." *Id.* at 244. Thus, the suggestion that the trip cap on the Northside project, the principal mitigation measure for Alternative D's off airport surface traffic impacts, may, at some future time, for reasons as yet undisclosed, be deemed infeasible, is unacceptable under CEQA.

In fact, it is readily ascertainable even now that the trip cap may not, in fact, be feasible. First, both the Northside and Continental City projects have approved entitlements, allowing 4.5 million square feet of development in the Northside project alone. Alternative D has no impact

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**E. The SEIR Does Not Address the Way in Which Traffic Impacts from Utilization of the GTC Independently, or Cumulatively With Construction Traffic, Will be Mitigated.**

The SEIR acknowledges that the GTC is located as close as 1,000 feet across the I-405 freeway from residences in the City of Inglewood, and, further, that the GTC will be the "primary access point for all passenger drop-off and pick-up and vehicle parking", SEIR, p. ES-19, under the assumptions of Alternative D. The SEIR further acknowledges that vehicles would access the GTC from, among others, eastbound Century Boulevard, and that direct access to Century Boulevard would be available for west bound traffic. SEIR Section 4.3.1.6.1.2, p. 4-226, 227. It is, therefore, reasonable to assume that the greatest preponderance of all LAX-bound traffic (847,394 vehicles in the year 2000, SEIR, Table S4.3.1-2) will terminate as close as 1,000 feet from the homes of Inglewood citizens. Moreover, the SEIR further acknowledges that demand for parking will exceed parking capacity under Alternative D, SEIR, Table S4.3.1-7, p. 4-233. Nevertheless, the SEIR gives short shrift to the potential surface street impacts of travelers looking for parking in lots that are already full, as well as those reluctant to pay the price of parking on City owned lots, or attempting to avoid delays in accessing crowded parking facilities.

As important, the SEIR fails to fully address the construction traffic impacts on proximate surface streets in Inglewood. While it acknowledges that "when the ITC comes on line, there is expected to be a substantial shift in airport traffic patterns", SEIR, Section 4.3.2.6.2.2, p. 264, and that "the SEIR's general approach and methodology does not account for construction traffic for the three primary peak hours", SEIR, Section 4.3.2.6.2.2, p. 264 [emphasis added], the SEIR does not similarly acknowledge the same potential impact resulting from the opening of the GTC. Instead, it states only that "the facility is not expected to be opened until after 2008, at which time most of the final mitigation plan should be in place." SEIR, Section 4.3.2.6.2.2., p. 264 [emphasis added].

The SEIR misses the point. The only mitigation offered is that "the project would be managed to ensure that there would not be any notable construction related traffic generated by the project during those critical hours." SEIR, Section 4.3.2.6.2.2., p. 4-264, 265. Therefore, the SEIR does not offer sufficient firm mitigation to compensate for the potential adverse impacts arising from the normal but unanalyzed operation of the GTC, let alone the cumulative surface traffic impacts arising from Project construction, which is anticipated to last a minimum of seven years and perhaps as many as 12-13 years after the 2008 anticipated completion of the GTC.

In summary, the SEIR ignores Alternative D's surface traffic impacts on Inglewood, arising not only from traffic accessing the GTC, but from parking and construction traffic as well.

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VI. THE SEIR'S ATTEMPT TO COMPLY WITH THE FEDERAL ENVIRONMENTAL JUSTICE PROGRAM IS PATENTLY INADEQUATE.

The Environmental Justice Section [Section 4.4.3] of the SEIR falls far short of the mark for compliance with the Federal Environmental Justice Program. Executive Order 12898 and the Department of Transportation's ("DOT") implementing order, DOT Order 5610.2, require that, in the planning and development of any program or activity receiving Federal financial assistance, project proponents must not only identify disproportionately high and adverse environmental and health risk effects of the project on minority and low-income populations, but also ensure that those effects are avoided, minimized or mitigated. [DOT Order 5610.2, 5.d; 6.b.(2)]

DOT Order 5610.2 further mandates that DOT programs and activities that will have a disproportionately high and adverse effect on populations protected by Title VI be carried out only if, among other things: (1) alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable, taking into account the social, economic and environmental effects of avoiding or mitigating the adverse effects [DOT Order 5610.2 § 7.c]; and (2) alternatives that would have less adverse effects on protected populations (and still satisfy the need for the program) would either (i) have other adverse social, economic, environmental or human health impacts that are more severe, or (ii) involve increased cost of extraordinary magnitude. [Order 5610.2, § 7.d.(2)]. "The findings, determinations and/or demonstration made in accordance with [DOT Order 5610.2, Section 7] must be appropriately documented, normally in the environmental impact statement . . ." DOT Order 5610.2 § 7.(E)

The SEIR acknowledges that the LAX Master Plan Project will have overwhelmingly disproportionate Land Use and Relocation, Airport Noise, Air Quality and Health Risks impacts on minority and low-income communities located east of LAX, specifically including the City of Inglewood. [SEIR, Section 4.3.3]. However the SEIR: (1) fails to address project alternatives that would reduce or avoid those impacts; (2) incorrectly concludes that construction noise impacts will not fall disproportionately on minority and low-income communities east of LAX; (3) fails to propose a viable jobs benefit program to compensate for the Project's adverse environmental impacts including those of construction which will in fact fall disproportionately on minority and low-income communities; and (4) fails to explore mitigation measures which would have fewer disproportionate adverse environmental impacts on minority and/or low-income communities located east of the Airport. In addition, Section 4.4.3.4 states that no Master Plan Commitments for environmental justice are proposed. [SEIR, p. 4-138]

In Section 4.4.3.6, the SEIR states that LAX will work with the FAA and affected communities to develop mitigation programs and if, after those programs receive further input, the FAA concludes that disproportionately high and adverse human health and environmental effects on minority and low-income populations would still occur, "findings under the DOT

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Order would have to be made prior to project approval and the Final EIS/EIR would disclose those findings." [p. 4-335] However, as set forth above, it is "improper for lead agencies to defer formulation of possible mitigation programs by simply requiring future studies to see if mitigation may be feasible." *Fairview Neighbors*, supra, 70 Cal. App. 4<sup>th</sup> at 244. Moreover, the SEIR does not need additional studies as it already concludes unequivocally that, despite the proposed mitigation, the adverse environmental and human health impacts of the Project, under any alternative, will fall disproportionately on minority and low-income communities east of the Airport. [See, e.g., SEIR, pp. 4-321, 4-323, 4-424, 4-329]

Finally, the SEIR relies in part on a Memorandum of Understanding ("MOU") between Los Angeles and Inglewood for compliance with the mitigation requirements of the Environmental Justice Program [p. 4-337]. The SEIR does not disclose, however, that the MOU, which addresses measures involving residential noise insulation, air conditioning and studies to improve compliance with over-the-ocean takeoff and night-time over-ocean procedures, is terminable at will, by either City, and will expire by its own terms in February, 2011, at least four, and more likely 10 years before final implementation of the Project. Therefore, MOU, like the remainder of the suggested mitigation measures, does not create a sufficient commitment to Inglewood to comply with the mandates of Executive Order 12898 and DOT Order 5610.2.

A. The SEIR Fails to Adequately Address Avoidance or Minimization of the Project's Adverse Environmental and Health Risks Impacts Which Would Fall Disproportionately Low Income and Minority Communities Including Inglewood.

The SEIR acknowledges that the Project will have overwhelmingly disproportionate adverse impacts on Inglewood, a predominately minority and low-income community, in the areas of Land Use and Relocation, Airport Noise, Air Quality and Health Risks. The SEIR fails, however, to address avoidance or minimization of those impacts.

Environmental Justice Section 4.4.3.5.1 acknowledges that noise impacts associated with all alternatives will fall disproportionately on minority and low-income communities and that, under Alternative D, by Year 2015, approximately 93 percent of those newly exposed to high noise levels [4,030 residents] will be minority and/or low-income residents [SEIR, p. 4-324], and 85 percent of those newly exposed to single event noise awakening [15,340 residents] would be located within minority and/or low-income communities. [SEIR, p. 4-324].

The effects of aircraft noise on public schools will also fall on schools located predominantly within minority and/or low-income communities. Eleven of the 12 public schools that will be newly exposed to the adverse impacts of increased aircraft noise levels or the 94 dB SEL noise contour by 2015 are located within the Inglewood Unified School District. [SEIR, p. 4-324]

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Despite recognition of these severely disproportional noise impacts on minority and low-income communities, including Inglewood, and an acknowledgment that proposed mitigation will be inadequate where, after sound insulation, minority and low-income communities will still be faced with adverse effects of high outdoor noise levels [SEIR, p. 4-329], the SEIR does not address avoidance or minimization of those impacts, as required by the Federal Environmental Justice Program.

For example, Environmental Justice Section 4.4.3.5.1, Relocation of Residences or Businesses, states that, under Alternative D, "No residential acquisition is proposed, and the number of businesses that would need to [be] acquired and relocated would be reduced to 38." [emphasis added]. In that terse sentence, the SEIR eliminates from consideration a viable means for avoiding Project impacts on low-income and minority communities. As neither LAX nor its surrounding communities can be conveniently moved, the feasible option is to move those residents who are adversely impacted.

Moreover, the SEIR is internally inconsistent on this issue. Land Use Mitigation Measure MM-LU-1 calls for mitigation of land uses that would be rendered incompatible by the noise impacts of the Project by means of sound insulation or acquisition of residences, schools, hospitals and churches within the highest CNEL measurement zone. [SEIR, p. 5-19] Mitigation Measure MM-RBR-2 calls for coordination with Inglewood to identify residential land uses where acquisition and conversion to compatible uses is contemplated or deemed appropriate. [SEIR, p. 4-339] Acquisition of residences for the purpose of converting residential to more compatible uses, and thus avoiding noise impacts on affected minority communities, necessarily implies relocation of displaced residents of the acquired properties.

Further, Mitigation Measure RBR-1, which applies to all alternatives, proposes preparation of a Residential and Business Relocation Plan and expansion the current relocation program. [SEIR, p. 5-6] The SEIR's relocation objectives include informing Project area residential occupants [in Spanish and other languages] about matters such as relocation assistance and benefits, replacement housing and housing referrals, notices to vacate, displaced persons assistance, applications and claims for relocation benefits, evictions and property management, and grievance procedures for relocatees. [SEIR, pp. 5-6 - 5-7] In direct contradiction to RBR-1, however, Section 4.4.3.5.1 disclaims any residential relocation plans, and fails to mention, much less address, avoidance or minimization of relocation impacts on minority and low-income residents, as required by Federal Environmental Justice statutes.

Finally, Section 4.4.3.5.2 states that the environmental impacts of air quality under Alternatives A, B and C have not materially changed, but, that under Alternative D, airport activity would be focused in areas at the east side of the airport, resulting in greater emissions east of the airport [SEIR, p. 4-329]. Most of those effects would remain adverse following implementation of proposed mitigation measures. Specifically: minority and low-income

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populations may be more severely affected because they may be more susceptible to asthma and other chronic respiratory illnesses trigger by the high O<sub>3</sub> levels in the area; children within minority communities may be particularly susceptible to health effects of PM<sub>10</sub>, ozone and NO<sub>2</sub>, and thus may be more severely affected than other communities exposed to equivalent level of those pollutants; and children living in poverty who lack access to adequate health care may be especially at risk. [SEIR, p. 4-330]

Despite these acknowledged severe project impacts, and perhaps because of the further claim of the purported utility of proposed aggregate air quality mitigation measures, the SEIR fails to explore further minimization of specific effects, by feasible means such as committing to air condition homes and schools affected, see *Los Angeles Unified School District*, supra, 58 Cal.App.4th at 1029-30, or relocating impacted populations.

B. The SEIR's Proposal to Provide Job Benefits to Minority And/or Low-Income Communities Is Inadequate Where it Is Contingent on FAA Approval of the Use of Airport Revenues and Ignores the Projected Decrease in LAX Related Jobs under Alternative D.

DOT Order 5610.2 § 6.b.(2) requires that measures be proposed to provide offsetting benefits and opportunities to enhance communities, neighborhoods and individuals affected by DOT programs. The "Benefits" section (unnumbered) of the SEIR states that jobs are one of the economic benefits directly and indirectly attributable to LAX [p.4-339], and that LAX is working to create job recruitment, job training and job placement programs that will enable local youths and adults to more easily access jobs at and around LAX in the future. [SEIR, p. 4-339 - 4-340] However, the jobs related proposal is a house of cards where: (1) adoption and implementation of job recruitment, training and placement programs are subject to FAA approval of the use of airport revenue to fund such activities; and (2) even if use of airport revenues is approved for recruitment and job training, job placement under Alternative D will be difficult, where the SEIR acknowledges that Alternative D would have no meaningful contribution to job growth. [SEIR, p. 4-351]

The SEIR proposes to expand existing programs and create new programs at its Jobs Outreach Center which would be primarily focused on minority and/or low-income residents located east of LAX, including Inglewood. [SEIR, p. 4-340] Inglewood, as acknowledged in the SEIR is already disadvantaged with respect to employment at LAX, where only 2,304 (3.9%) of the 59,000 badged employees at LAX reside in Inglewood. [SEIR p. 4-339, fn. 100]. The SEIR's job creation proposal contains some giant loopholes. For example, funding for the proposed jobs related programs is totally contingent upon FAA approval of diversion of airport revenues for that purpose. The SEIR contains no evidence that LAX has made application for FAA approval, provides no information to the public on the likelihood that FAA approval will be granted, and offers no alternative plan for funding jobs programs if the FAA does not approve

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the use of airport revenues for jobs programs. In other words, if the FAA does not approve the use of airport revenues, the entire jobs program collapses.

Even if funds are approved by the FAA, and local minority and low-income residents are trained in aviation related skills, job placement under Alternative D will be difficult, where Alternative D would result in a net decrease of approximately 23,000 jobs within a ten-mile radius of LAX by 2015 [SEIR, p. 4-339]. Alternative D is projected to support roughly the same level of employment as the No Action/No Project Alternative in 2015, and would have no meaningful contribution to job growth [SEIR, p. 4-351].

C. The SEIR's Conclusion That Construction Impacts Would Not Fall on Minority Communities Is Unsupported by Any Analysis of the Project's Cumulative Noise Effects.

The SEIR's conclusion that construction noise effects would not fall on minority and/or low-income communities [SEIR, p. 4-333] is unsupported by any analysis of the cumulative effects of the Project's ground traffic, aircraft and construction noise on communities located east of LAX. In reaching that conclusion, the SEIR makes the erroneous assumption, as set forth in detail above, that road traffic and aircraft noise will drown out construction noise, and that construction noise impacts on Inglewood residents will therefore be less than significant. However, as also set forth in more detail above, the SEIR's reliance on this "ratio theory" to discount the effects of construction noise improperly masks the palpable adverse impacts of Project construction on communities to the east of the airport, particularly where Alternative D proposes more construction on the eastern portion of the airport, which, in turn, results in hitherto unanalyzed construction noise, air quality and traffic impacts.

D. No Effective Mitigation is Provided to Ameliorate the Project's Adverse Impacts.

Despite the SEIR's acknowledgment that the project will have a grossly disproportionate impact on minority communities, it contains few measures, and no certain, binding commitments to ameliorate impacts of construction or Project implementation on affected communities including Inglewood. Such measures should include, but not be limited to:

I. OPERATIONAL MITIGATION.

In addition to all other operational mitigation specified in the DEIR and SEIR, the Part 161 Application to the FAA should be expanded to provide that no operations shall take place over Inglewood between the hours of 11:00 p.m. and 6:00 a.m.; and that where "over-water" operations are not feasible for reasons of wind, weather or other safety related conditions during those hours, operations will either be held in place, in the case of departures, or sent to other airports in the case of arrivals.

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2. NOISE COMPATIBILITY PLANNING AND IMPLEMENTATION.

(a) COMPLETION AND EXPANSION OF RESIDENTIAL SOUND INSULATION PROGRAM - A firm, binding commitment to: (1) provide funding to complete the existing residential sound insulation program provided in the ANMP and MOU between Inglewood and Los Angeles; (2) expand that program to include residences in the 60 CNEL contour and the 94 dB SEL "awakening" contour as set forth in the SEIR; and (3) maintain 45 dB interior noise levels over time in all properties subject to the residential sound insulation program, including, but not limited to, replacement of equipment and improvements that malfunction due to age or environmental factors, or become obsolete due to increases in noise levels applicable to the properties.

(b) RELOCATION OF SCHOOLS - A firm, binding commitment, not contingent on the results of future studies, to relocate schools currently and newly impacted by noise resulting from the implementation of the project to sites specified by Inglewood;

(c) IMMEDIATE SOUND ATTENUATION OF ALL SCHOOLS, CHURCHES AND OTHER PUBLIC PLACES THAT CANNOT BE RELOCATED - A firm, binding commitment to sound attenuate, not contingent on further studies, all of the schools identified as impacted by the project in any way that cannot be relocated, as well as noise impacted churches and other public gathering places including medical and rehabilitation facilities;

(d) LOCATION OF A FLY AWAY FACILITY - A firm, binding commitment to locate a fly away facility at the proposed location of the corner of Prairie Avenue and Century Boulevard in Inglewood;

(e) ADDITIONAL ROAD AND STREET IMPROVEMENTS - A firm, binding commitment to improve streets used heavily for access to LAX and the new remote fly away facilities including, but not limited to, Century Boulevard, Manchester Boulevard, Arbor Vitae Street and Florence Avenue;

(f) GENERAL PLAN - Binding commitment to provide funding for the development of a General Plan for the City of Inglewood to supersede its currently outdated land use element, and enable Inglewood to plan compatibly with airport operations;

(i) CENTURY BOULEVARD SPECIFIC PLAN - Development of a Specific Plan for the half mile length of Century Boulevard between La Cienega Boulevard and Inglewood Avenue in order to exploit its unique location to create a focused airport-patron environment predominantly composed of hotel and restaurants, with supportive retail and office uses, thus enhancing the primary portal into LAX from the freeway;

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(ii) FUNDING FOR CENTURY BOULEVARD CORRIDOR IMPLEMENTATION PROJECT - A firm, binding commitment to provide funding to complete the major study and improvement design for the Century Boulevard corridor, particularly between La Cienega and Prairie Avenue, including conversion of currently noise impacted single and multi-family residential buildings to commercial uses;

(iii) BUSINESS PARKS - A firm, binding commitment to provide planning and development funds for business and industrial parks, consistent with the development study currently underway by HNTB and the recently completed economic impact analysis by Kosmont Partners, along Century Boulevard between I-405 and Prairie Avenue, with specific emphasis on the area closest to the new GTC;

(iv) PUBLIC PARKS, GOLF COURSE, NATURE CENTER - A firm, binding commitment to provide funding for conversion of incompatible residential and other uses, other than those redeveloped for commercial purposes to public parks, a municipal golf course, and/or nature center;

(v) BRANDING, SIGNAGE AND WAY FINDING - A firm, binding commitment to provide adequate signage for those accessing LAX and the amenities of the City of Inglewood including Hollywood Park and Daniel Freeman and Centinella Hospitals.

(vi) LIBRARIES - A firm, binding commitment to fund the replacement of libraries to be impacted by the project, and the expansion of Inglewood's library system to accommodate increased student populations;

(vii) YMCA - A firm, binding commitment to fund the replacement of the existing YMCA at 102<sup>nd</sup> Street and Prairie Avenue;

(viii) HEAD START CHILD DEVELOPMENT FACILITIES - A firm, binding commitment to fund the development of new childcare and education centers in compliance with the requirements of the new General Plan;

(ix) SENIOR CITIZEN HOUSING - a firm, binding commitment to fund new senior housing and assisted living communities consistent with the requirements of the new General Plan.

(g) PROVISION OF FUNDS FOR ACQUISITION AND RELOCATION - A firm, binding commitment to provide funding for the acquisition of all properties falling within any of the criteria of significant noise impact in the SEIR and of funding for relocation housing and expenses;

(h) JOB TRAINING - A firm, binding commitment to begin immediate training of Inglewood residents in: (a) construction related skills necessary to participate in the construction phase of the project; and (b) skills necessary to obtain long term employment at LAX, including, but not limited to, the creation of a new vocational school dedicated to preparing students for careers in aviation industries and emerging hi-tech industries of aviation maintenance, as required in concept by the MOU;

(i) FUNDS FOR JOB TRAINING - A firm, binding commitment to provide local funding for jobs training programs, either to augment Federal funds provided for training, or to fund the training program in its entirety if the FAA does not authorize the use of airport revenue for training purposes;

(j) MODIFICATION OF THE MOU - A firm, binding commitment to extend the MOU at least through the year 2015, concurrent with the implementation of the LAX Master Plan, including, but not limited to, the abrogation of the requirement to dedicate aviation easements; acknowledgment that easements as yet unrecorded will not be re-recorded at the expiration of the MOU, and the reconveyance of all easements previously recorded.

3. ADDITIONAL RESEARCH.

In addition to all other studies specified in the DEIR and SEIR, a study be conducted of the incidence of air pollutants, resulting from aircraft operations, traffic and other sources related to LAX, and their health effects, both generally and on residences of the City of Inglewood specifically.

In summary, while Inglewood appreciates the efforts that have been made by Los Angeles to cope with the difficult problems of limitation of airport operations and environmental compatibility with surrounding communities, more clearly needs to be done to remedy the problems that fall squarely on the shoulders of Inglewood and particularly its low income and minority residents. Inglewood looks forward to continuing its ongoing cooperation with Los Angeles in fostering both economic growth and improved quality of life for all citizens of Los Angeles and its neighboring communities.

Inglewood thanks Los Angeles for this opportunity to comment.

Sincerely,

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## ATTACHMENT 1

DRAFT ENVIRONMENTAL IMPACT STATEMENT/  
ENVIRONMENTAL IMPACT REPORT,  
LOS ANGELES INTERNATIONAL AIRPORT  
PROPOSED MASTER PLAN IMPROVEMENTS -  
COMMENTS RE: ALTERNATIVES A THROUGH C

DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE LOS ANGELES  
INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY

COMMENTS OF CITY OF INGLEWOOD, CITY  
OF CULVER CITY, CITY OF ONTARIO AND  
COUNTY OF SAN BERNARDINO

## EXHIBIT 1B

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The following constitutes comments, 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"),<sup>1</sup> and Alternatives A through C presented therein.

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 LAX Master Plan and Draft EIS/EIR fail to satisfy applicable law because they do not conform to other relevant plans;
- (VII) the Draft EIS/EIR fails to adequately specify mitigation measures or methods to enforce them;

<sup>1</sup> The FAA and Los Angeles shall, for the remainder of these comments, be referred to collectively as "Project Proponents".

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(VIII) 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;

- (IX) the Draft EIS/EIR does not meet environmental justice requirements; and
- (X) the Draft EIS/EIR fails to adequately account for human health risks.

**I. THE DRAFT EIS/EIR DOES NOT PROPERLY DESIGNATE THE BASELINE FOR ANALYSIS.<sup>2</sup>**

The specification of a baseline for comparison with Project impacts is a critical component of analysis under CEQA, because without an accurate specification of the baseline, "analysis of impacts, mitigation measures and project alternatives becomes impossible." County of Amador v. El Dorado County Water Agency, 76 Cal.App.4th 931, 953 (1999). A central concept of CEQA is that "a baseline figure must represent an environmental condition existing on the property prior to the project." Save Our Peninsula Committee, et al. v. Monterey County Board of Supervisors, et al., 87 Cal.App.4th 99, 124 (2001). The regulations implementing CEQA, 14 Cal. Code Regs. § 15000, et seq., ("CEQA Guidelines") are specific as to the definition of "prior to the project":

"An environmental impact report must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published, or, if no Notice of Preparation is published, at the time the environmental analysis is commenced . . . This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." CEQA Guidelines § 15125(a).

While the courts have taken the position that the "date for establishing a baseline cannot be a rigid one", Save Our Peninsula Committee, supra, 87 Cal.App.4th at 125, they have also held unequivocally that "an EIR must focus on impacts to the existing environment, not hypothetical situations", County of Amador, supra, 76 Cal.App.4th at 955. The baseline for analysis in the Draft EIS/EIR does not meet these tests.

<sup>1</sup> 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.

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**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.

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. 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.<sup>3</sup> In short, the

<sup>3</sup> 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

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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.

**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.

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.<sup>4</sup>

analysis, it is impossible to ascertain the degree of distortion that may have occurred through the use of these alternate baselines.

<sup>4</sup> 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

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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.

**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.

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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.<sup>5</sup>

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.

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

and weather. These items are also introduced and incorporated into the ACARS report as a delay factor.

<sup>5</sup> 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)

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FAA Air Traffic Control, on the other hand, computes delay based on actual delay time en route. An arriving aircraft is considered delayed only if the aircraft is held en route to the destination for 15 minutes or more at any given moment during the flight. It is possible that these aircraft could be held at more than one interval during a flight. However, if each holding period does not exceed the 15 minute threshold, no delay is recorded, even though the total delay might well be in excess of 15 minutes. Further, inbound delay is kept separate from outbound delay. A departing aircraft is not counted as delayed until: (1) the average taxi time for the airport; (2) the time from the gate to the runway; and (3) 15 minutes have cumulatively elapsed. Air Traffic Control delays do not consider airline schedules or internally generated delays in their reporting system. The majority of Air Traffic Control delays are as a result of weather and not system capacity. Finally, the Department of Transportation grades airline performance on the time of arrival at the destination airport within 14 minutes of the scheduled arrival time. The Master Plan utilizes none of those benchmarks. Thus, the Master Plan fails to adequately explain the basis for its demand/capacity/delay analysis.

**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.

**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

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long pre-date the commencement of the environmental process; (2) current schedules were not used (although available), the assumptions concerning a typical day's traffic are substantially unsupported; and (3) not all of the aircraft operators were considered, the assumptions concerning a typical day's traffic are substantially unsupported.

#### 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.

#### 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.

#### D. The Master Plan's Model Omits Critical Variables.

Another crucial issue revolves around variables the Master Plan fails to include in its model. Specifically these include: (1) the capacity of the airspace beyond the Airport Terminal Control Area ("TRACON"); and (2) gate capacity for future scenarios.

#### 1. The Master Plan Should Have Considered Airspace Capacity Beyond The Airport's Terminal Area Airspace.

According to the Master Plan, airspace considerations were limited to entry (and exit) from the Airport's TRACON airspace. (Master Plan, § 2.1.1, page II-2.3.) The failure to consider airspace capacity beyond that point is a material omission from the analysis. This is because the majority of aircraft delays are absorbed in the en route environment before an aircraft

arrives in TRACON airspace. By modeling only the terminal area, the results of the model are skewed for both arriving and departing aircraft. For departing aircraft, if the model does not consider the inherent constraints of the en route air traffic system, including differences in aircraft performance and the impacts of other air traffic transiting the area for other airports, the departure flow pictured in the model will remain unconstrained and aircraft can take off at a constant, predetermined rate. When reaching the boundary, the aircraft are dropped from the scenario, and the model does not further consider constraints of the en route system which naturally impact the TRACON airspace. Unfortunately, this unconstrained flow scenario is not normally possible in today's complex air traffic control system.

Similar problems exist in modeling arrivals without consideration of airspace outside the TRACON. Inbound aircraft are assumed, in the Master Plan model, to be at the entry point of terminal airspace when required by the model. Aircraft proceed inbound at a set speed, reduce speed at a predetermined point, land and proceed unimpeded to their gate. This is not a reasonable representation of a typical aircraft arrival. In fact, there is almost no likelihood that aircraft can be delivered to the terminal inbound fix at a rate consistent with the model's assumptions.

Instead, the Master Plan's arrival model appears to have been developed to insure that an arriving aircraft would be at the inbound fix at the specific time required in order to maximize the arrival rate for the airport. Although Air Traffic Control consistently tries to keep the aircraft sequenced as closely as possible "in-trail", it is not possible to consistently space aircraft a set distance apart for extended periods of time. The availability of aircraft to fit into the sequence, aircraft speeds, the mix of large and small aircraft, a lack of demand, aircraft deviations due to weather, in-trail restrictions though an en route sector or in-trail restrictions required for an airport approach control facility and other variables cause the in trail spacing of arrival aircraft to be inconsistent. As a result of these and many other factors, there is unused capacity in each of these arrival sequences. In summary, the Master Plan's failure to adequately consider constraining factors outside the TRACON airspace calls into question the validity of the model's result.

#### 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.<sup>6</sup> (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

<sup>6</sup> Performance measures contained in the Master Plan, § 2.5.1, include "outbound ground delay" which, in turn, appear to include gate related variables such as "gate push-back delay". This performance measure was apparently used in the modeling of existing gate operations but not future ones. (Master Plan, § 2.5.1, page II-2.97)

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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.

#### 3. The Master Plan Should Have Considered Currently Implemented Air Traffic Procedures.

While the Master Plan acknowledges the existence of the current Dual Civer 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 Civer 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 Civer Arrivals results in an exaggeration of existing delay and a consequent exaggeration of the Project's delay reducing, and capacity enhancing benefits.

#### 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.

## 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 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; (2) the Draft EIS/EIR improperly equates the direct and cumulative impacts of surface traffic; (3) the Draft EIS/EIR provides inadequate information regarding the Northside/Westchester Southside Project; (4) the Draft EIS/EIR transportation planning horizon is improperly attenuated; and (5) the Draft EIS/EIR lacks a mitigation monitoring program detailing implementation of mitigation measures for the impacts of surface traffic.

#### A. 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.

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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/El Segundo	0.981(E)	0.835(D)	-.146
Aviation/Rosecrans	0.915(E)	1.121(F)	.206
Highland/Rosecrans	0.714(C)	1.069(F)	.335
Sepulveda/El Segundo	0.840(D)	0.869(D)	.029
Sepulveda/Mariposa	0.776(C)	0.730(C)	-.046
Sepulveda/Rosecrans	1.238(F)	1.220(F)	-.018
Vista Del Mar/Grand	0.755(C)	0.749(C)	-.006
Vista Del Mar/Imperial	0.821(D)	0.465(A)	-.356

\* In Master Plan Table II 7.2 the first column heading is apparently mislabeled

Moreover, the "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.

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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. It is important, therefore, that the Draft EIS/EIR traffic analysis include projected phasing of the anticipated improvements relative to the additional traffic resulting from airport use. This should include a discussion of the phasing of airport improvements as they pertain to traffic generation with respect to the circulation improvements used in the Adjusted Environmental Baseline. Limitations should be placed on airport traffic generation if anticipated circulation improvements off-airport do not occur. Once the Adjusted Environmental Baseline is accepted as accurate and the conditions to achieve it are assured, the next issue concerns the significance of surface traffic impacts and the mitigation measures needed to reduce those impacts.

**B. 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.<sup>7</sup> 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.

<sup>7</sup> "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))

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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-8.3) 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

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Intersection <sup>8</sup>	Existing V/C(LOS)	Adjusted Baseline V/C(LOS)	Alternative C (w/air) V/C(LOS)	Difference (w/ Existing)	Difference (w/ Adjusted)
Aviation/El Segundo	0.835(D)	1.097(F)	0.865(F)*	+ .050	+ .007
Aviation/Rosecrans	1.121(F)	1.164(F)	1.171(F)	-.022	-.264
Highland/Rosecrans	1.069(F)	1.211(F)	0.947(G)	+ .292	-.029
Sepulveda/El Segundo	0.869(D)	1.190(F)	1.161(F)	+ .073	+ .031
Sepulveda/Mariposa	0.730(C)	0.772(C)	0.803(D)	-.023	-.032
Sepulveda/Rosecrans	1.220(F)	1.275(F)	1.243(F)	-.023	-.189
Vista Del Mar/Grand	0.749(C)	0.918(E)	0.729(C)	-.022	-.195
Vista Del Mar/Imperial	0.465(A)	1.098(F)	0.903(E)	-.038	-.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.<sup>9</sup>

**C. 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.

<sup>8</sup> Change in V/C Rates of .01 defines significant impact for intersections at LOS F (Draft EIS/EIR, p. 4-291).

<sup>9</sup> 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.

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	AM PEAK			PM PEAK		
	Adjusted Baseline	No Project	Alternative C	Adjusted Baseline	No Project	Alternative C
Northside	0	7,217	3,922	0	7,131	4,423
Continental City	0	5,323	0	0	5,348	0
Manchester Square	0	0	212	0	0	233
Total	0	12,540	4,134	0	12,479	4,656

The issue here is the same as that concerning the Adjusted Environmental Baseline, i.e., the actions needed to insure that the reduction is achieved. The principal question is what specific discretionary actions are required to modify the allowable land uses in the Northside Project and in Continental City property, and how will compliance be assured?

The land use component of the Draft EIS/EIR and Condition LU-1 in Chapter V, Environmental Action Plan, presents a "Master Plan commitment" that:

"To the maximum extent feasible, all [Q] conditions . . . from the City of Los Angeles Ordinance No. 159,526 that address the Northside project area will be incorporated by LAWA into the Zoning Code Amendment and LAX Master Plan Implementing Ordinance for the Westchester Southside Project. Accepting that certain conditions may be updated, revised, or determined infeasible as a result of changes to the LAX Northside project, the final [Q] conditions for the Westchester Southside Project will ensure that the level of environmental protection afforded by the full set of LAX Northside projects [Q] conditions is maintained." (Draft EIS/EIR, Chapter V, page 5-2).

Since this traffic reduction is critical to the projected Master Plan trip generation, the detail associated with this property needs to be firmly established. It is unacceptable to assume that certain conditions may be "updated, revised or determined infeasible" if they are necessary to bring about the decrease in collateral trips upon which the Master Plan projections are based. While there are some discussions of the Northside/Westchester Southside Project in the Draft EIS/EIR's purpose and need chapter and Master Plan, Appendix Q, these are brief, general presentations lacking in specificity as to the actions needed to commit the City to limit these uses.

The importance of this lack of specificity in the definition of Project actions, as they relate to the Northside/Westchester Southside Project, is that there is no commitment by Los Angeles to insure that the traffic reduction represented by the changes in allowable land use will occur. The surface traffic capacity for the Project claimed through the reduction of traffic

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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 arterials and the San Diego Freeway. 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.

Finally, the Draft EIS/EIR pays little or no attention to the traffic impact of vehicles used by construction workers. It states that construction employees will work in three shifts, and that the second shift will arrive before the first shift ends (Draft EIS/EIR, page 4-319). Using simple math, it appears that at some points during the day, parking would have to be provided for more than 8,000 workers when these two shifts overlap. While remote parking areas are suggested for construction employees, they are as far away as Palmdale, Van Nuys and Ontario (Id.). The likelihood of construction workers using such remote parking is slim to none. Therefore, the mitigation measure is largely useless. However, even if remote parking were utilized to any extent, the Draft EIS/EIR fails to discuss the traffic impacts of the shuttles which would bring the construction workers from these remote locations to the airport. In short, even though construction is expected to last for 14 years, the Draft EIS/EIR contains little, if any, analysis of the impacts of construction worker traffic which will take place on the entire street/freeway system 6 or 7 days a week during that period.

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.<sup>11</sup> As a

<sup>11</sup> 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

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generation from the Westchester Southside Project is significant. Without a more adequate demonstration of the Master Plan's ability to achieve that reduction, and a concrete commitment to meeting those goals, the Draft EIS/EIR will remain inadequate.

#### D. 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.<sup>10</sup> 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.

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. Therefore, the further into the future conditions are projected, the greater the effect of the proposed Master Plan improvements on traffic.

#### E. 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.

<sup>10</sup> 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.

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consequence of the above omissions, the Draft EIS/EIR's analysis of construction traffic impacts is materially deficient.

#### F. 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.

### III. THE DRAFT EIS/EIR NOISE ANALYSIS UNDERSTATES THE PROJECT'S AIRCRAFT NOISE IMPACTS.

#### A. The Draft EIS/EIR minimizes the Project's noise impacts by artificially inflating the Environmental Baseline.

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

period anticipated in the Draft EIS/EIR.

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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.

#### B. The Draft EIS/EIR Fails to Satisfy Applicable Law Because it Improperly Analyzes the Health Effects of Aircraft Noise.

##### 1. The Draft EIS/EIR Must Consider the Health Effects of Aircraft Noise.

The Draft EIS/EIR must fully consider all of the adverse health effects of aircraft noise. LAWA admits that its LAX Master Plan will create increased noise impacts upon the residents of the City of Inglewood. "Under Alternative C, which does not add a new runway, a decrease in noise exposure would occur in the City of El Segundo and the community of Del Aire with increases in portions of the community of Westchester and the City of Inglewood." Draft EIS/EIR Section 4.24.2 page 4-1040. There is strong scientific evidence of the adverse health effects of noise pollution on humans. Studies have shown clear health effects on animals, and these studies indicate the certainty of such effects on humans as well.

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In other words, LAWA takes the position that the absence of a specific threshold absolves it from having to address this issue in any meaningful way in the Draft EIS/EIR. Instead, LAWA focused on overall noise exposure caused by its expansion plan. "Since it is not possible to quantify noise health impacts for a population, such as the people who live in the vicinity of an airport, this analysis focused by necessity on quantifying overall noise exposure." Draft EIS/EIR Section 4.24.2 page 4-1039.

LAWA's admitted inability to fully analyze the Health Effects of Aircraft Noise itself renders the planned expansion violative of existing law. LAWA improperly fails to consider the admitted potentially significant adverse health effects of noise. "Significant and unavoidable impacts associated with aircraft noise are expected to occur. Such noise exposure is considered to pose a potential significant and unavoidable impact relative to health effects of noise, to the extent there is such a relationship between the two." Draft EIS/EIR Section 4.24.2 page 4-1050.

"The U.S. Environmental Protection Agency (USEPA) has taken the following position: 'Research implicates noise as one of several factors producing stress-related health effects such as heart disease, high blood pressure and stroke, ulcers and other digestive disorders. The relationship between noise and these effects has not yet been quantified.'"

Draft EIS/EIR Technical Report 14b. Health Effects of Noise Technical Report. No Master Plan Commitments for the health effects of noise are proposed. Draft EIS/EIR Section 4.24.2 page 4-1046. LAWA must fully examine the health effects of aircraft noise in order to fulfill the requirements of NEPA and CEQA.

##### 2. The Draft EIS/EIR NEEDS TO ADDRESS Aircraft Noise Interference with Classroom Activities and Sleep.

The Draft EIS/EIR fails to adequately address the interference of aircraft noise upon classroom activities and sleep. Interference with classroom activities and sleep are two of the most sensitive impacts of aircraft noise. LAWA admits the problem of interference with classroom activities, but fails to analyze this problem to the degree required under CEQA. According to LAWA:

"Interference with classroom activities and learning from aircraft noise has been the subject of much recent research. Several studies have been performed, including studies at LAX, London's Heathrow Airport, and Munich International Airport. These studies indicate that a relationship between aircraft-related noise and learning effects does exist, but that additional research is required to clarify how close the relationship is and at what noise levels the relationship appears. The relationship has been

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"A study sponsored by the EPA, constituting one of the most notable studies of animal noise exposure, examined cardiovascular effects of noise on monkeys. This research demonstrated that monkeys subjected to industrial noise at levels between 85 to 90 dba for several months developed significant elevations of systolic and diastolic blood pressure. It is particularly notable that these changes persisted long after exposure ceased, demonstrating that noise has a chronic effect on blood pressure."

Fred M. Svinth, Illingworth & Rodkin, Inc. "The Effects of LAX Aircraft Noise on Local Communities," January 2001, p. 9, attached hereto as Exhibit "I". LAWA admits that such studies exist and that noise has effects, but refused to seriously consider such reports. Instead, LAWA simply concludes that such studies are controversial and, therefore, that no in-depth analysis is required.

"Some studies suggest that there are indicators that high noise levels, particularly from aircraft, may have a detrimental effect on the cardiovascular system, mortality rates, birth defects, achievement scores, psychiatric admissions, sleep disturbance, and overall psychological well being; others show no conclusive evidence of these effects. However, the results of such studies continue to be controversial and are not accepted by the general scientific community at this time. Specifically, the scientific community has cited methodological and epidemiological problems with the studies and none of the studies has gained the universal acceptance from researchers that would allow them to be used as a basis for impact assessment."

Draft EIS/EIR Section 4.24.2 page 4-1041.

However, LAWA argues that it is impossible to "quantify" the relationship between noise and adverse human health effects. LAWA argues that no "threshold of significance" exists:

"Although there is consensus that noise has some health effects, there is no agreement as to the degree of the effects or the level at which they become significant. The scientific community and regulatory agencies have not developed numerical thresholds beyond which the health effects of noise are considered to be significant."

Draft EIS/EIR Section 4.24.2 page 4-1046.

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particularly difficult to document due to the confounding factors of background noise, school quality, and socioeconomic status. Additional research is being performed to try to account for these factors."

Draft EIS/EIR Section 4.24.2 page 4-1043. Similarly, LAWA admits but dismisses summarily the very real problem of sleep disturbance caused by aircraft noise. LAWA states:

"Generally, laboratory studies have shown considerably more disturbance than field studies, perhaps due to the subject's lack of familiarity with the location and experience. Sleep disturbance studies have also involved the collection of cumulative data from subjects.... A review of existing studies and literature indicates that additional research is required to clarify the relationships between aircraft-related noise and sleep disturbance."

Draft EIS/EIR Section 4.24.2 page 4-1044.

LAWA tries to minimize the sleep disturbance caused by aircraft operations at LAX. LAWA states, "LAX undertakes a different operational procedure for takeoffs and landings between midnight and 6:30 a.m. These 'over-ocean' procedures route both arrivals and departures over Santa Monica Bay, directing aircraft noise away from residential areas to the east of LAX during nighttime hours." Draft EIS/EIR Section 4.24.2 page 4-1045. However, due to constraints caused repeatedly by weather conditions, residents of Inglewood and other nearby communities are subjected to late night overflights. The Draft EIS/EIR fails to adequately analyze these issues.

#### 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<sup>(2)</sup>). The absence of a conformity analysis necessarily renders the following comments preliminary.

<sup>12</sup> "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)).

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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,<sup>11</sup> 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. 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 proneous) minimization of the difference in emissions between baseline conditions and those of the Project.

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

<sup>11</sup> The Preferred Alternative lengthens and reconfigures runways, adds a new West Terminal, and improves traffic flow.

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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.

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<sub>x</sub>. For example, at a commonly utilized reverse thrust mode time of 15 seconds, increased NO<sub>x</sub> emissions would be equivalent to the NO<sub>x</sub> produced by increasing overall takeoff time by 35 percent (0.7 minutes plus 0.25

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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.

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

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minutes versus 0.7 minutes). Since takeoff accounts for about 35 percent of total aircraft NO<sub>x</sub> (Draft EIS/EIR, Technical Report 4, Attachment C), the overall aircraft NO<sub>x</sub> 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.

D. The Applicability of the Construction Equipment NO<sub>x</sub> Standard is Overstated.

The Draft EIS/EIR states that only construction vehicles meeting a 2.5 grams per brake horsepower-hour (g/bhp-hr) NO<sub>x</sub> standard will be used for airport construction projects by 2005 (Draft EIS/EIR, Technical Appendix G, page 3). Furthermore, this requirement will be phased in between 2001 and 2005, beginning at 20 percent of vehicles and increasing at a rate of 20 percent per year. This "requirement" raises several concerns as it is applied to the construction equipment emissions analysis in the Draft EIS/EIR.

First, the 3.0 g/bhp-hr NMHC+NO<sub>x</sub> standard (that is the basis for the 2.5 g/bhp-hr NO<sub>x</sub> 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 NO<sub>x</sub> at levels around 4.0 g/bhp-hr (an exact value is not possible since the standard is again expressed as NMHC+NO<sub>x</sub>, 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

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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.

#### E. General Emission Factors for Offroad Equipment are Underestimated.

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.<sup>14</sup> A quick comparison indicates that CARB OFFROAD model and EPA NONROAD model GSE (average) emission rates (for the same equipment activity distribution assumed in the EIS/EIR) are, for diesel equipment, from 7 to 13 times greater for VOC, 5 to 10 times greater for PM, 5 to 9 times greater for CO, 4 to 5 times greater for NO<sub>x</sub>, and 4 to 5 times greater for SO<sub>2</sub>. For gasoline GSE, the models produce average emission rates 10 to 20 times greater for VOC, 1 to 6 times greater for PM, 15 to 16 times greater for CO, 6 to 9 times greater for NO<sub>x</sub>, and 2 to 4 times greater for SO<sub>2</sub>. The impact of using outdated emission rates is clearly significant and should be reevaluated if realistic air quality impacts are to be derived.

<sup>14</sup> This situation may be improved in the latest version of EDMS, which was released subsequent to the completion of the Draft EIS/EIR.

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develop PM emission factors for aircraft<sup>15</sup> produces estimates that are not consistent with previous PM emission testing results.<sup>16</sup>

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.<sup>17</sup> 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,

<sup>15</sup> The International Civil Aviation Organization ("ICAO") emissions certification process for aircraft does not include PM, so alternative emission factor estimation approaches are required.

<sup>16</sup> Adjustments not employed in the Draft EIS/EIR may compensate for most of this deficiency.

<sup>17</sup> This calculation is based on data presented in the Draft EIS/EIR (Technical Report 4, Attachment H).

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#### 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.

#### 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.

#### 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

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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<sub>x</sub>) modes of operation since the same high temperature, high pressure conditions that give rise to high NO<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> (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<sub>x</sub> relation as a means to estimate aircraft takeoff PM emission rates for each of the engines with NO<sub>x</sub> 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.<sup>18</sup>

<sup>18</sup> 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

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I. Aircraft SO<sub>x</sub> Emissions are Underpredicted.

The Draft EIS/EIR relies on version 3.2 of the EDMS model to predict aircraft SO<sub>x</sub> emissions (Draft EIS/EIR, Technical Appendix G, page 4). This model underestimates aircraft SO<sub>x</sub> 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 SO<sub>x</sub> mass and fuel sulfur mass). To the extent that the Draft EIS/EIR already demonstrates potential ambient SO<sub>x</sub> concerns, those concerns will be exacerbated by this underprediction.

J. The Assumption of Gate-Based Power and Air for All Aircraft is Questionable.

The Draft EIS/EIR assumes that 100 percent of air carrier gate power and conditioned air needs will be satisfied by gate-based electrically powered systems as opposed to fossil fuel powered auxiliary power units (APU) or GSE (Draft EIS/EIR, Technical Appendix G, page 10). Experience has shown that even under conditions where gate-based equipment is available, not all airlines or aircraft will utilize it consistently. This seems to be especially true for quick-turnaround airlines such as Southwest. Although the assumption of 100 percent availability and usage affects the no action and action scenarios equally, it is important from an ambient air quality perspective to account for the full range of expected emissions. Without some definitive airport policy that gate-based systems (both power and air) be used and that any on-board APU be shut down until needed for main engine startup, the Draft EIS/EIR would present a more realistic assessment of aircraft emissions if it adjusted the percentage of gate-based system usage to match currently observed use rates at the Airport.

K. APU Emission Factors for SO<sub>x</sub> and PM Not Considered.

APU emission factors for both SO<sub>x</sub> 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. SO<sub>x</sub> 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.

17 for an aggregate LTO). Nevertheless, significant differences would still exist on a mode specific basis.

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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.<sup>19</sup> It can be deduced from the included emissions estimates for aircraft taxing 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<sub>x</sub> emission rates are low during taxiing, the amount of time spent in taxi mode results in a significant taxi contribution to overall NO<sub>x</sub> 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.

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.

<sup>19</sup> 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.

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N. The Draft EIS/EIR Fails to Satisfy Applicable Law Because it Does Not Adequately Address the Impact of Toxic Air Pollutants.

1. The Draft EIS/EIR Lacks A Proper Baseline Regarding Air Toxics.

The Draft EIS/EIR does not contain a proper baseline for air toxics emissions from LAX and LAX-related sources. As a result, it does not adequately address the effects of toxic air pollutants upon human health, including the health of the residents of the City of Inglewood.

CEQA requires that an EIR includes a description of the environment in and around the project at the time of the Notice of Preparation. CEQA Guidelines §15125(a). Such a description, or baseline, serves as the basis for the EIR's analysis of the environmental impacts of a project. CEQA also requires that detailed analysis of the potential environmental impacts from each of the projects contained in the aviation alternatives cannot be deferred to subsequent environmental documents. Public Resources Code § 21100; *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182. The Draft EIS/EIR does not contain an adequate basis from which to determine the current impact on human health of air toxics emitted by LAX. "The HHRA did not evaluate impacts of toxic air pollutants associated with current airport operations." Calkins Phase I Report, p. 8. As noted by Mr. Calkins, this oversight means that LAX does not provide a sufficient baseline from which to draw later conclusions. Without a baseline, LAX cannot adequately assess the environmental effects of its plans to expand LAX.

2. LAWA Failed To Properly Study Toxic Air Emissions.

The Draft EIS/EIR does not properly study toxic air emissions related to LAX. LAWLA's Health Risk and Air Toxics evaluation is deficient due to the failure to organize and complete a study, such as the Air Quality and Source Apportionment Study, prior to the release of the Draft EIR/EIS. The Air Quality and Source Apportionment Study are not yet complete. This study will shed important information on the health impacts to the surrounding community as well as identify mitigation measures. It will also determine the contribution of various airport-related activities on selected air pollutant concentrations in relation to those pollutants caused by other, non-airport sources in the surrounding community without the Source Apportionment study. LAWLA cannot assess the incremental impact of LAX operations on local air quality. Therefore, LAWLA has failed to investigate this area fully before preparing the Draft EIS/EIR. A prudent course of action would be to place any LAX expansion plans on hold until completion of this study. This would allow proper consideration of the serious human health issues addressed in this study. Without this study, the Draft EIS/EIR will not withstand scrutiny under CEQA and NEPA.

3. LAWLA's Health Risk Assessment Does Not Adequately Factor Time as a Variable.

The Health Risk Assessment in the Draft EIS/EIR should be extended to consider a longer time period. There do not appear to be any tables or data in this Draft EIS/EIR on cancer and non-

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cancer health risks for any year after 2015. However, the operation of the expanded airport during those latter years may well have continuing impacts on the residents of the surrounding communities. Health impacts are often seen in the resident population over a much longer time span than the 15-20 years assessed in the Draft EIS/EIR tables. Other major planning assessments, such as the RTP (2025) and the AQMP (2030), examine impacts of their action over a much longer time frame. Calkins Phase II Report p. 22. The Health Risk Assessment in the Draft EIS/EIR should be extended to conform to this model.

4. LAWLA's Study Of Air Pollutants Fails to Consider Relevant Issues.

It is unclear in the Draft EIS/EIR what LAWLA's criteria are for determining net change in chronic and acute hazard indices for air pollutants. LAWLA does not include the criteria pollutants in this analysis, and this is a critical, indeed fatal, omission. The results of the Source Apportionment study, which was only recently initiated, would have provided valuable input to assessing criteria (NAAQS) as well as various toxic air pollutant impacts on health, if it were available to the LAWLA at the time of preparation of the Draft EIS/EIR. The Draft EIS/EIR also appears to ignore the incremental cancer and non-cancer risks to people who do not "receive a certain hazard level criterion." Calkins Phase II Report p. 22. These issues must be addressed and resolved in the Draft EIS/EIR.

V. THE DRAFT EIS/EIR DOES NOT MEET THE REQUIREMENTS FOR ALTERNATIVES ANALYSIS OF EITHER CEQA OR NEPA.

A. The Draft EIS/EIR Alternatives Analysis Does Not Conform to the Requirements of CEQA.

The LAX Master Plan and Draft EIS/EIR fail to conform to CEQA because they do not properly consider alternatives to expansion at LAX. Proposals that entail expansion at other airports instead of LAX should have been analyzed and considered. Instead of considering only three "build" alternatives, each of which called for massive expansion of LAX (in comparison to a flawed No Action/No Project Alternative), LAWLA and the FAA should have considered alternatives that included expansion and/or construction at Ontario Airport, El Toro Marine Corps Air Station, Palmdale Airport and March Air Force Base.

In discussing alternative locations for a project, the CEQA Guidelines state, "The key question and first step in analysis is whether any of the significant effects on the project would be avoided or substantially lessened by putting the project in another location." CEQA Guidelines § 15126.6(f)(2). The CEQA Guidelines further state:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or

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substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project."

CEQA Guidelines §§ 15126.6(a), (f).

According to LAWA, its "preferred" alternative, Alternative "C", causes fewer substantial impacts to the environment surrounding LAX than its other alternatives, "A" and "B." However, the impacts that it does cause are substantial. Moreover, the analysis does not consider whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location, as required by CEQA Guidelines, Section 15126.6(f)(2) cited above. The CEQA Guidelines state that alternatives that cause less environmental harm must be considered. Accordingly, inasmuch as the Draft EIS/EIR fails to consider another location, i.e., Ontario, Palmdale, El Toro, etc., the Draft EIS/EIR fails to follow the CEQA Guidelines.

Feasible alternatives to massive expansion of LAX do exist. The Guidelines set forth a number of factors to consider when determining whether or not an alternative is feasible.

"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)."

CEQA Guidelines section 15126.6.

Considering these feasibility factors in connection with expansion at LAX illustrates why the LAX Master Plan and the Draft EIS/EIR are not consistent with CEQA. LAX is located in the midst of a heavily populated residential area. The area is not well suited for the airport operations that currently exist, let alone massive expansion. LAX is economically viable, but expansion of LAX offers little, if any, additional economic benefit regionally when compared to other expansion scenarios considered by the planning body for Southern California, the Southern California Association of Governments ("SCAG"). "Southern California Aviation Industry Impact Analysis," CIC Research, Inc., July 11, 2000, p. v, attached hereto as Exhibit "C". The LAX Master Plan contemplates massive construction at LAX because, as it stands today, the infrastructure at LAX is not sufficient to handle the expanded operations in the plan. In reality, however, this places LAX in a similar position to that of every other airport in the area. If LAX

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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 address nor incorporate the capacity or delay reduction efficiencies gained through this procedure in any of its modeling.<sup>21</sup>

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)<sup>22</sup>

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 runways at the Airport can accommodate the heaviest and largest aircraft in the fleet under prevailing circumstances today.

<sup>21</sup> 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.

<sup>22</sup> 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)

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is to expand, massive construction will have to take place. The LAX Master Plan is simply not consistent with other plans, in particular SCAG's 2001 Regional Transportation Plan ("RTP") (see below for further discussion) and the 1999 and 2001 Air Quality Maintenance Plan's ("AQMP's"). Lastly, the LAX Master Plan virtually ignores the regional approach to airport expansion, by failing to fully analyze any alternative that does not call for massive expansion at LAX. Given the fact that LAWA owns several of the other airports in the region meets or exceeds the feasibility of expansion of LAX, when considering the factors mandated by CEQA.

#### B. 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.<sup>23</sup>

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."<sup>24</sup>

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

<sup>23</sup> 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).

<sup>24</sup> *Id.*

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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 as 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.

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.

#### VI. THE LAX MASTER PLAN AND DRAFT EIS/EIR FAIL TO SATISFY APPLICABLE LAW BECAUSE THEY DO NOT CONFORM TO OTHER RELEVANT PLANS.

Federal regulations require that all airport development conform to local plans. The FAA's Airport Environmental Handbook clearly states that any airport plan must conform to the local air emissions plans:

"Section 176(c) of the Clean Air Act Amendments of 1977 states in part that no Federal agency shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to a State Implementation Plan after it has been approved or promulgated under section 110 of that Act. It is FAA's responsibility to assure that Federal airport actions conform to state Plans for controlling area wide air pollution impacts."

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Airport Environmental Handbook, Chapter 5, p. 12. In addition, the Airport Environmental Handbook states that the 1982 Airport Act requires that Airport Improvement Program applications for projects involving airport location, runway location, or a major runway extension shall not be approved unless the governor of the state in which the project is located certifies that there is a "reasonable assurance" that the project will be located, designed, constructed, and operated in compliance with applicable air and water quality standards. Airport Environmental Handbook Chapter 5 p. 14. Finally, the FAA's Airport Environmental Handbook states that all airport development must conform to local plans:

"For all airport development there shall be evidence to support the following Airport Improvement Program grant assurances as required by the 1982 Airport Act.

- (a) The project is reasonably consistent with existing plans of public agencies for development of the area (section 509(b)(1)(A));
- (b) Fair consideration has been given to the interest of communities in or near the project location (section 509(b)(4)); ...
- (d) Appropriate air and water quality certificates have been or will be obtained for projects involving airport location, runway location, or a major runway extension (section 509(b)(7))."

Airport Environmental Handbook, Chapter 9, p. 3.

The LAX Master Plan and Draft EIS/EIR fail to conform to two key local plans. How the Master Plan and EIS/EIR fail to conform is discussed in the two paragraphs that immediately follow. However, it should be noted as an initial point that since the Master Plan and EIS/EIR fail to conform to two key local plans, they violate Section (a) referred to immediately above.

First, the LAX Master plan fails to conform to the relevant Air Quality Maintenance Plan. Mr. David Calkins, an expert in air emissions planning and compliance issues, reviewed the LAX Master Plan and Draft EIS/EIR. His reports are attached hereto as Exhibits "E" and "F". In his report, Mr. Calkins states, "Review of Chapter 4.6 found several inconsistencies in LAWA's reference to the conformity and SIP planning process." Calkins Phase I Report, p. 11.

Second, Mr. Calkins has found that the Draft EIS/EIR fails to conform to the Regional Transportation Plan ("RTP") in at least eight different ways. These differences are discussed in detail below. In addition to the Federal law requirements discussed above, under CEQA an EIR must discuss any inconsistencies between the proposed project and applicable general plans and

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regional plans. CEQA Guidelines § 15125(d). The Draft EIS/EIR fails to meet these requirements.

#### A. The LAX Master Plan Fails to Conform to the Air Quality Maintenance Plan.

The LAX Master Plan does not conform to the local air pollution reduction plan. Southern California is designated a "non-attainment area"<sup>28</sup> under the 1990 Clean Air Act. Therefore all major projects must be constructed with assurance to the Federal Government that the project fits into the current air pollution reduction plan, known as the Air Quality Maintenance Plan ("AQMP"). See Calkins Phase II Report pp. 11-12. Mr. Calkins has determined that the LAX Master Plan Draft EIS/EIR fails to conform to the relevant AQMP in regards to the following:

1. Emission Inventory - the 2001 AQMP, currently in development, will require changes to the Draft EIS/EIR's emission inventory.
2. Mitigation Measures - LAWA's failure to commit to specific mitigation measures in the Draft EIS/EIR inhibits development of the 2001 AQMP.
3. Baseline Issues - use of the "adjusted" environmental baseline for off-airport traffic impacts does not allow comparison of the Draft EIS/EIR alternatives with current conditions, but actually compares the alternatives to a future condition.
4. Aircraft Mix - the Draft EIS/EIR assumes an aircraft mix of mostly jumbo airliners, in conflict with the adopted 2001 RTP calculations, which will cause differences in projected emissions between the Draft EIS/EIR and the AQMP.
5. Stationary Source Emissions - LAWA's alternatives do not take into account the increase in nearby, off-airport stationary source emissions, despite LAWA's assertions to the contrary; thus, it cannot conform to the regional plan.
6. Ground Support Equipment - LAWA failed to follow the California Air Resources Board's ("CARB") latest off-road emission model when concluding that emissions for future Ground Support Equipment would be zero.

Calkins Phase II Report at 13-14. These are serious conformance problems that must be first detailed, then remedied by LAWA before any action can be taken on the LAX Master Plan or its Draft EIS/EIR.

<sup>28</sup> A "non-attainment area" has monitored air pollution levels in excess of the National Ambient Air Quality Standards ("NAAQS").

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#### B. The LAX Master Plan Fails to Conform to SCAG's 2001 Regional Transportation Plan.

The LAX Master Plan does not conform to the local Regional Transportation Plan ("RTP"). The Southern California Association of Governments ("SCAG") is the main planning body for Southern California. At least every three years, SCAG adopts a RTP for the area, which sets forth its plan for the foreseeable future, usually 25 years. SCAG adopted a new RTP in April 2001. This RTP replaced SCAG's previous plan, which was adopted in 1998. The Final RTP has not yet been formally released, but its contents in most areas relevant to LAX are known.

As discussed in the Calkins Phase II Report, attached as Exhibit F, the LAX Master Plan Draft EIS/EIR fails to conform to the RTP as follows:

1. Projected Passenger Load - the LAX Master Plan Draft EIS/EIR projects LAX handling over 92 million annual passengers ("MAP") in 2015; the RTP limits LAX to handling what is considered to be its current physical capacity of 78 MAP.
2. On-Road Emissions Factors - The Draft EIS/EIR utilizes EMFAC2000, but the RTP uses emission factors based upon EMFAC7G. This inconsistency makes it quite difficult to compare the air quality impacts of the Draft EIS/EIR upon the RTP.
3. Different Model Years - The Draft EIS/EIR models years 2005 and 2015, but the RTP models 2025 as its model year.
4. Market Incentives - There are significant differences between the two plans in choice of market incentives, which causes potential conflicts between the two plans.
5. Aircraft and Passenger Characteristics - These differ in regards to projected aircraft types and passenger growth during the relevant periods.
6. Cargo Handling Projections - The Draft EIS/EIR projects much larger cargo handling for LAX than that planned for in the RTP.
7. High Speed Rail Projections - The Draft EIS/EIR rejects this project as too speculative, but the RTP bases projections on passenger and cargo demand in part upon the inclusion of this transportation mode.
8. Funding Projections - The RTP does not include the Ring Road, 105 Freeway extension, or 405 Freeway Connector Projects in its funding projections. The

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Draft EIS/EIR plans for funding of all these projects, presumably from Federal Highway funds.

Calkins Phase II Report at pp. 9-10.

LAWA's failure to even discuss these issues is a serious deficiency in the Draft EIS/EIR. The Draft EIS/EIR cannot be acted upon until it is modified to conform to the RTP, assuming that it is possible to do without simply scratching the entire analysis and starting over. If it is possible to salvage some small part of the plan, such as the mitigation measures, then the Draft EIS/EIR must be reissued for public comment.<sup>29</sup>

#### VII. 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.

#### A. The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

CEQA Guidelines §15126.4(a)(1)(B) mandates that the "[f]ormulation of mitigation measures should not be deferred until some further time." While the Draft EIS/EIR acknowledges the existence of significant unmitigable impacts, it also states that, "A final package of design features, Master Plan Commitments, and Mitigation Measures will be developed ... The resulting Environmental Action Plan will be published in the Final EIS/EIR." (Draft EIS/EIR, Executive Summary, pp. ES-30) By deferring to the Final EIS/EIR to reveal the mitigation measures, the public's opportunity comment will have been attenuated.

#### 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

<sup>29</sup> When new significant information becomes available after the public review period, Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5 required re-circulation of an EIR prior to certification.

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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.

### VIII. 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.<sup>24</sup>

<sup>24</sup> 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.

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racess, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies." Cal. Pub. Res. Code § 72001. The California Environmental Protection Agency is charged with the responsibility to "[p]romote enforcement of all health and environmental statutes within its jurisdiction in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state." Cal. Pub. Res. Code §72000(b). These requirements imposed on LAWA the responsibility to consider the impacts of LAX expansion on lower income and minority communities.

Several of the communities surrounding LAX, and to the east of LAX, in particular, contain predominantly minority populations and lower income populations. The Draft EIS/EIR contains a demographic analysis of the communities surrounding LAX that will be impacted by the LAX Master Plan. LAWA analyzed seventy census tracts, comprising parts of the City of Los Angeles, El Segundo, Inglewood, Hawthorne, and unincorporated areas of Los Angeles County. Draft EIS/EIR, Appendix F, Environmental Justice Technical Report, pp. 5-6. Fifty-four of the seventy census tracts within the study area are considered to be predominantly minority. A tract is so defined when more than fifty percent of the population is minority. *Id.* at 10.

Similarly, thirty-three of the seventy census tracts within the Impact Study Area are considered to be low-income. Low-income is defined as having more than 15% of the resident population below the poverty level. *Id.* Thirty-two of the thirty-three census tracts identified as low-income are predominantly minority. *Id.* at 15.

LAWA's analysis shows that the distribution of minority and non-minority populations may cause differential impacts between these two groups:

"This data reveals a readily discernible pattern of minority and low-income communities in the areas surrounding LAX. While the areas to the north and south of LAX are predominantly non-minority, the area east of I-405 within the study area is predominantly minority. Furthermore, within these areas east of I-405 minority populations are heavily concentrated: 39 of the 70 minority census tracts with the study area have minority percentages greater than 90 percent. The uneven distribution of minorities throughout the study area, as evidenced by the data showing that most census tracts have less than 20 percent or greater than 90 percent minorities, increased the potential for differential impacts on minorities and non-minorities."

*Id.*

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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 FAA<sup>25</sup> 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.<sup>26</sup> In fact, even the FAA has even pressed the need for instituting technological improvements at airports to combat the runway incursion issue.<sup>27</sup>

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.

### IX. THE DRAFT EIS/EIR IS INSUFFICIENT AS A MATTER OF LAW BECAUSE IT DOES NOT SATISFY ENVIRONMENTAL JUSTICE REQUIREMENTS.

#### A. The Master Plan and EIS/EIR Unfairly Burden the Minority and Lower-Income Communities Surrounding LAX in Violation of Federal and California Law.

Federal law requires that each federal agency "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (Executive Order 12898, February 11, 1994). Environmental Justice is also a requirement of California law. Cal. Pub. Res. Code §72000-72001. Under California law Environmental Justice means "the fair treatment of all people of all

<sup>25</sup> 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.

<sup>26</sup> "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.

<sup>27</sup> 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.

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Minority and low-income populations are and have been disproportionately burdened by the impacts of LAX long before the massive expansion planned under the LAX Master Plan:

"[M]inority and low-income residential communities within the study area are currently concentrated east of LAX, separated from the airport by predominantly commercial and industrial airport-related land uses and the I-405 freeway. In contrast, residential areas of El Segundo and Playa Del Rey/Westchester, to the immediate north and south of the airport, do not have high concentrations of minority and low-income populations. LAX has always had an east-west runway configuration to take advantage of the prevailing wind pattern and to maximize efficient use of airspace. The combination of the long-standing runway orientation and more recent changes in the demographic patterns in the area around LAX means that minority and low-income residential communities are directly under the primary arrival flight path. The primary impacts on minority and low-income communities from current airport operations are therefore most associated with aircraft noise and air emissions. While residential areas of El Segundo and Playa Del Rey/Westchester directly adjacent to the airport are also exposed to high levels of side-line noise, the areas of exposure are much smaller in comparison to the noise-impacted residential communities to the east."

*Id.* at 16.

Inglewood is one of the predominantly minority communities located east of LAX which receives a disproportionate share of the impacts of LAX. Inglewood's population is 46.4% African-American, 46% Hispanic, 4.1% White, 1.6% Multi-racial, 1.1% Asian, 0.3% Pacific Islander, 0.2% Native American, and 0.2% Other. California Department of Finance, Demographic Research Unit, California State Census Data Center, Census 2000, "Table Two, Population by Race/Ethnicity, Incorporated Cities by County, p. 5, attached hereto as Exhibit "A". In addition, a large percentage of the low-income census tracts in LAWA's study area are located in Inglewood. Draft EIS/EIR, Appendix F, Environmental Justice Technical Report, Figure 3, "Low-Income Census Tracts Within the Study Area."

LAWA's plan for massive expansion of LAX unfairly burdens the minority and lower-income communities surrounding LAX. LAWA failed to consider alternatives that would have shifted burdens away from minority or low-income populations, or that would at least have distributed the burdens and benefits of expansion more equitably. Instead of planning for massive expansion of LAX, LAWA should have considered alternatives to massive expansion of LAX.

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LAWA admits that its Master Plan for expansion of LAX imposes a disproportionate burden of noise impacts upon persons of color and/or low income, and that it does not know if the Plan also imposes a disproportionate burden of toxic air emissions on those same groups. LAX Master Plan Draft EIS/EIR, Chapter 4.4.3 Environmental Justice, p. 4-395. As discussed in the report of Dale Hattis, PhD, attached hereto as Exhibit "B," if LAWA had chosen to seriously consider alternatives that did not include massive expansion at LAX, LAWA would have been able to consider alternatives that would reduce the human health risk overall and spread the environmental burden more equitably among the general population of Southern California. Hattis Report p. 3. Dr. Hattis observes:

"The framing of the options for analysis in the current draft is exclusively focused on engineering changes. Future "demand" for air services is estimated from a single set of assumptions about future population and economic growth in Southern California, and future national average costs of air travel in revenue per seat-mile, and then "build" options are designed to meet this projected "demand" either in full or in part. There is no apparent recognition or analysis of the possibility that at least some of the growth in "demand" for air services could be shifted to outlying airports downwind of major population concentrations (or out of the South Coast Air Basin entirely, in the case of connecting flights) by changes in economic pricing such as airport user fees. Such economic measures might not completely avoid the need to expand capacity at LAX, but they seem worthy of explicit consideration at least as supplements to the existing engineering options..."<sup>48</sup>

Hattis Report p. 3.

For these reasons, LAWA should have considered alternatives to massive expansion of LAX. Dr. Hattis notes three specific reasons why such an analysis of alternatives should take place: (1) User fees, in addition to re-directing demand, could be used for mitigation measures; (2) This approach would allow LAWA to slow growth at LAX, which would allow expansion at a much slower pace, which, in turn, will reduce congestion and, therefore, the significant impacts on the environment from construction; and (3) without such fees the real beneficiaries could be the airlines rather than the flying public. Hattis Report p. 3. LAWA should immediately and seriously consider other alternatives and analyze them to the same degree that it analyzed Alternatives A, B, and C in its current Master Plan. Anything less fails to adequately address Environmental Justice, as required by law.

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of Total Direct Job Impacts of the LAX Master Plan Alternatives, By County and City, 2015," p. 96. Compared to the year 1996, the City of Inglewood shows a net increase of only 489 jobs in "LAX-Related Employment" if LAWA adopts Alternative C. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 48, "LAX-Related Employment in the South Bay and North Bay Cities and Communities For the LAX Master Plan EIS/EIR Alternatives, 1996, 2005, and 2015," p. 97. Conversely, the environmental burdens of LAX fall most directly upon those living in its immediate vicinity, like Inglewood. LAWA should make firm commitments to take all reasonably practical steps to ensure that a proportionate share of the economic benefits of LAX also reach those communities. Under the LAX Master Plan, according to LAWA's own jobs projections, that does not occur.

**D. The Economic Benefits Of The LAX Master Plan Are Not Proportionate to the Environmental Burdens it Imposes on Surrounding Minority and Low Income Communities.**

LAWA should share the economic benefits that flow from LAX with the surrounding communities to the same degree that the environmental burdens are borne by those communities. Offsetting environmental burdens with economic benefits is an important part of Environmental Justice: "In making determinations regarding disproportionately high and adverse effects ... mitigation and enhancement measures ... and all offsetting benefits to the affected minority may be taken into account." Department of Transportation Order 5610.2 - Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, April 15, 1997. Firm commitments in this regard should be made by LAWA in the Draft EIS/EIR. For example, regarding increased cargo capacity at LAX, the Draft EIS/EIR states:

"It is possible that some of the increased demand [for cargo handling] could be met nearby in Inglewood where the City's General Plan indicates a priority for expanding existing industrial firms and providing increased employment opportunities while mitigating residential areas significantly impacted by aircraft noise."<sup>49</sup>

Draft EIS/EIR "Induced Socio-Economic Impacts," Section 4.5, page 4-446.

Although it acknowledges the potential symbiosis of cargo expansion for LAWA and Inglewood, the Draft EIS/EIR fails to incorporate a reasonable and proportionate distribution of the economic benefits of LAX expansion. If the burdens of LAX expansion are to be thrust upon the City of Inglewood, fair treatment requires that efforts be made to direct potential benefits to the communities impacted by those effects--effects that are significant and cannot and will not be mitigated. The proposed redevelopment along Century Boulevard is a good first step in this direction; however, more needs to be done. LAWA should make concrete commitments to address this issue, and its failure to do so renders the EIS/EIR insufficient as a matter of law.

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**B. The EIS/EIR Fails to Disclose LAWA's Economic Gain from the Proposed Expansion at the Expense of Surrounding Minority and Low Income Populations.**

The LAX Master Plan Draft EIS/EIR fails to disclose the increased revenues that LAWA and the City of Los Angeles expect from the massive expansion plan, or that it comes at the expense of local low income and minority communities. As Dr. Hattis notes:

"[T]here are some glaring omissions of important effects from the economic impact analysis. Economic impacts are assessed in terms of changes in employment, and overall economic activity, for the South Coast as a whole, Los Angeles County, and the City of Los Angeles. Changes in on-airport employment are also described, as are the expected capital costs of the various policy options. Unaccountably, there does not seem to be any readily locatable presentation of expected effects on operating revenues and costs for the major economic actors that are directly affected by the proposed project LAWA itself, the City of Los Angeles as owner and taxing authority, and the airlines. Projections of these expected impacts must exist. Moreover, they are highly relevant to judgments of the equity (fairness) of the distribution of expected good and bad effects on the different policy options for different groups, including an expanded Environmental Justice analysis."<sup>50</sup>

Hattis Report p. 6.

LAWA and the City of Los Angeles stand to reap tremendous financial benefits from LAX expansion. Since these benefits are not specified, the comparative benefit to local low income and minority communities--or the lack thereof--cannot be and has not been evaluated. LAWA must disclose these figures for a meaningful analysis of the relative benefits and burdens to be considered.

**C. The Master Plan Creates a Disproportionate And Unfair Distribution of Incremental and Total Direct Job Impacts.**

The LAX Master Plan does not fairly distribute new jobs among local minority and low-income communities. According to LAWA's own economic analysis, cities in the "Primary LAX Area" (El Segundo, Hawthorne, Inglewood, Del Aire and Lennox) receive only 3.8% of the incremental "direct jobs" at LAX due to expansion. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 46, "Distribution of Incremental Direct Job Impacts of the LAX Master Plan Alternatives, By County and City, 1996-2015", p. 95. This same area also receives only 3.4% of the total direct job impacts from LAX in 2015. LAX Master Plan Draft EIS/EIR, Economic Impacts Technical Report, Table 47, "Distribution

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**X. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES HUMAN HEALTH RISKS.**

**A. LAWA's Study does not Adequately Factor Time as a Variable.**

LAWA analyzes environmental health impacts for two years - 2005 and 2015; however, the environmental health impacts will occur over time. Accordingly, LAWA's analysis inaccurately minimizes certain risks and fails to consider numerous cumulative impacts,

Further, as noted by Dr. Hattis, "2005 does not represent even the peak year for construction-related impacts." Hattis Report p.4. In fact, emissions of particulate matter in year 2004 are expected to be more than twice those in 2005 (approximately 44,000 lbs/day versus 19,000 lbs/day). For a proper analysis, LAWA should "analyze and express impacts in terms of both peak-year and integrated bottom-line measures of effect over a reasonably foreseeable extended time over which the facilities will be built and operated," Hattis Report p. 4.

**B. The Draft EIS/EIR Fails to Adequately Delineate Health Risks.**

The increased health risks associated with the LAX Master Plan should be set forth with more clarity and specificity in the Draft EIS/EIR. Impacts are expressed primarily in terms of "significance" of effects for the most exposed individual, or, when considering certain carcinogenic effects, in terms of the areas or numbers of people exposed to concentrations expected to exceed a 1/100,000 lifetime incremental cancer risk criterion or an unusual criterion for non-cancer effects of a hazard index of 5. Hattis Report p. 4. However, the usual criterion used in many impact assessments under other environmental statutes, including Superfund, is a hazard index of 1.5.<sup>51</sup> Id. Dr. Hattis notes:

"These ways of expressing health impact results are of some relevance because they help the audience judge the fairness of the burden of extra risk imposed for residents of the areas most affected by the project options. However, exclusive definition of impacts in terms of the area or number of people who receive an increment of risk or (for non-carcinogenic agents) exposure to pollutants from LAX-related sources alone that is deemed to exceed a single bright line of 'significance' ignores the incremental cancer and non-cancer risks to people who do not happen to be moved across such a criterion level. Further, these ways of summarizing impacts can not, by themselves, give decision-makers

<sup>50</sup> The difference between a hazard index of 1 and 5 is fivefold in the toxicity-weighted concentrations of the pollutants covered by the index in terms of risk. The fraction of people who suffer irritation and other non-cancer effects is likely to be larger than fivefold, depending on the shape of the dose response relationship.

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and the public a sufficient description of the overall health impacts to arrive at a reasoned judgment of whether the mix of economic, human health, and environmental impacts of the proposed "build" option is more desirable overall than the comparable impacts of other options. The current analysis of economic activity describes projected aggregate changes in jobs and overall economic activity for the City of Los Angeles, Los Angeles County, and the whole Southern California area. To be comparable with these aggregate economic impacts, aggregate measures of health impacts must be created and the current artificial limitation of the study area for quantifying air pollution impacts must be transcended.<sup>14</sup>

Hattis Report pp. 4-5.

Decision-makers and the public should be informed of the differences among options in overall cases of cancer that are expected to arise over the lifetimes of the individuals exposed over particular periods of construction and operation of the proposed facilities. This should be done for the entire geographic area of the South Coast Air Basin that receives incremental changes in exposures. Hattis Report p. 5. Human health impacts can and should be expressed in aggregate incremental cancer cases, aggregate incremental deaths, aggregate incremental hospitalizations and aggregate incremental asthma effects for the entire Los Angeles basin associated with the LAX Master Plan. Hattis Report p. 5. These calculations are certainly feasible and would inform the decision makers and the public of the true human health effects of the project. Until this is done, the document is deficient in addressing this topic.

**C. The Draft EIS/EIR Fails to Consider Health Risks on a Regional Basis.**

The Draft EIS/EIR's human health risk assessment should study risks created by the Master Plan in the entire Southern California region, not simply in those areas immediately surrounding LAX. Failure to so conceal the advantages in terms of health risks from expanding other airports instead of LAX. As Dr. Hattis notes:

"Were the analysis expanded to include some options shifting additional air service to outlying airports (as recommended above), continued use of the more localized health impact analysis method would cause analysts to miss important benefits that would accrue from placing emissions downwind rather than upwind of the major population centers of the Los Angeles area."

Hattis Report p. 5. Restricting the environmental impact analyses to the immediate LAX area and the options considered only to expansion of LAX prevents considering the relative burdens of LAX expansion on minority and lower-income communities versus expansion of air service at other airports. The City of Inglewood appears to be substantially included in the

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existing boundaries of the air dispersion modeling study, but it is important to have impacts broken down by various political jurisdictions covering the most affected communities. Hattis Report pp. 5-6. LAWA's current approach on this risk assessment fails to fully capture all relevant data.

**D. LAWA Failed to Conduct a Sensitivity Analysis of Its Human Health Risk Assessment.**

LAWA failed to conduct a sensitivity analysis of its health risk assessment. This failure means that the health risk assessment does not attempt to assess and communicate uncertainties in a quantitative way. Whether through sensitivity analysis, or use of a more sophisticated model, such analysis can be and is used to inform interested parties of the uncertainties in key results. Hattis Report p. 6. One aspect of the modeling that needs such analysis is the assumed behavior responses of airlines to increasing delays as the intensity of usage of airport facilities increases. Id. This variable affects "capacity" calculations, emissions estimates and economic results. LAWA should perform such sensitivity analysis of its methods and conclusions.

**XI. CONCLUSIONS.**

Based on the above analyses, 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; 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. Absent further revision of the analyses set forth in the Draft EIS/EIR as set forth above (*Center Sensible Planning, Inc. v. Board of Supervisors*, 122 Cal.App.3d 813, 822 (1981)), the public will have been denied its statutorily mandated opportunity to test, assess and evaluate the new data and conclusions contained in the Draft EIS/EIR, and to make informed judgments as to their validity, in direct contravention of CEQA requirements.

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**DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE LOS ANGELES  
INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY**

**COMMENTS OF CITY OF INGLEWOOD, CITY  
OF CULVER CITY, CITY OF ONTARIO AND  
COUNTY OF SAN BERNARDINO**

**EXHIBIT 2**



**CHEVALIER, ALLEN & LICHMAN LLP**  
Attorneys at Law  
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June 17, 2008

By Facsimile and U.S. Mail  
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City of Los Angeles  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Re: Notice of Preparation of Draft Environmental Impact Report (SCH No. 1997061047) - Los Angeles International Airport Specific Plan Study

Dear Mr. Glasgow:

The following are the comments of the Cities of Inglewood and Culver City ("Cities") concerning the Notice of Preparation ("NOP") for the Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS"). The NOP commences the environmental review of the implementation of five development activities at LAX, including construction of the Ground Transportation Center ("GTC"), Automated People Mover ("APM") from the GTC to the Central Terminal Area ("CTA"), and associated on-site road improvements; demolition of Terminals 1, 2 and 3; and reconfiguration and separation of Runways 6L/24R and 6R/24L on the North Runway Complex (these activities, taken together will be referred to as "Project"). Cities regard the Project as a component of a more comprehensive expansion plan, including, but not limited to, construction of Midfield Satellite Terminal, a Crossfield Taxiway, and additional gates at the Tom Bradley International Terminal ("TBIT").

As a threshold issue, please be advised that Cities respond to Question No. 2, NOP, p. 2, as follows: neither City falls within the category of "responsible agency" or "trustee agency," as those terms are defined in 14 Cal.Code Regs. §§ 15096, 15381, and 15386.<sup>1</sup> Please be further advised that the following comments concerning significant environmental issues raised by the Project, alternatives and mitigation measures are necessarily preliminary, due to the attenuated

<sup>1</sup> CEQA's implementing regulations will be referred to throughout these comments as "CEQA Guidelines".

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character of the NOP. Cities therefore reserve their right to supplement these comments in response to future environmental documents.

Finally, Cities attach to these comments as Exhibit A "Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR" ("Guiding Principles"). Exhibit A represents the general approach to evaluation of the proposed development offered jointly by Petitioners in the case of *City of El Segundo, et al. v. City of Los Angeles, et al.*, Riverside County Superior Court Case No. RIC 426822, the settlement of which gave rise to the Project.

I. THE "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" RESULTS IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The NOP states that the SPAS EIR will be a Supplemental EIR tiered from the LAX Master Plan EIR (NOP, p.4), "providing new or revised analyses of the environmental impacts specific to the alternatives associated with the SPAS EIR..." LAWA, in its NOP for the Crossfield Taxiway Project (which was almost contemporaneous with the publication of this NOP), justified expedited environmental review on the premise that adequate environmental review was already completed during the prior Master Plan environmental review.

While the Legislature has directed local agencies to "tier" EIR's whenever feasible..., the utility of tiering is limited to those situations where the individual projects are consistent with the larger project such as the approved Master Plan project which has already been environmentally reviewed. "Tiering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on the 'big picture' and can then use streamlined CEQA review for individual projects that are consistent with such...[first tier decisions]..." *Koster v. County of San Joaquin*, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

Despite the fact that the "approved Master Plan" remains in place, many of its most salient features, such as off-site ticketing facility; closure of the CTA to surface traffic; and movement of Runway 6R/24L 340 feet to the south, thus necessitating the restructuring of Terminals 1 through 3, have been replaced by the Project currently being evaluating under this NOP. These radical changes significantly differ from the projects and environmental impacts originally evaluated in conjunction with the approved Master Plan. As an example, the proposed movement of Runway 6R/24L 340 feet north is a radical departure from the movement contemplated in the Master Plan, possibly impacting, among other things, the size and location of the noise contours and the Runway Protection Zone ("RPZ"). This change in preference, including the City of Los Angeles' decision to effectively eliminate the options of moving

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Runway 6R/24L 340 feet south, demolition of Terminals 1 through 3, and movement of passenger check-in off site, severely attenuates the previous attributes of Alternative D. Thus, it is questionable that the original Master Plan project, characterized as Alternative D, actually exists as an alternative for purposes of the environmental and development process.

In short, the significant differences between Alternative D, the "No Project/No SPAS Alternative (Approved Master Plan)," and the actual "No Project Alternative" raises the question of what is left of the original Master Plan, in terms of viable project alternatives, to make tiering an appropriate option. Given these circumstances, the Cities question the appropriateness of the "tiering" of the NOP projects upon the Master Plan EIR.

II. THE NOP'S PROJECT DEFINITION IS INCOMPLETE.

The five components of the Project being environmentally reviewed are apparently derived from the Stipulated Settlement between Petitioners in *El Segundo, et al. v. City of Los Angeles* ("Settlement"), § V which provides for "potential alternative designs, technologies, and configurations for the LAX Master Plan program that would provide solutions to the problems that the yellow light projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the 'Alternative Projects')." Stipulated Settlement, § V.D.2.

First, it should be noted that the Project's five components actually boil down to only two: (1) the North Airfield Reconfiguration; and (2) the proposed GTC. This is because the APM and onsite road improvements are necessitated by, and part and parcel of, the proposed GTC. It also appears, according to the description of the various components and their alternatives in the NOP, that the APM and onsite road improvements would only occur for the purpose of linking the GTC and CTA. Thus, if the GTC were not built (the existing condition), the ancillary transportation improvements would not occur either.

In addition, the options relating to the demolition of Terminals 1 through 3 are constrained to "yes" or "no". As there is no off-site ticketing facility proposed, as there was in Alternative D, there is, in reality, no "yes" option, because such an option would effectively obliterate 30% of the airport's terminal capacity, without any potential replacement.

Moreover, at least one of the two remaining components, the North Airfield Runway Reconfiguration, is inextricably linked to other projects either in planning or ongoing at LAX, but excluded from the NOP's current project definition. For example, it has long been conceded by LAWA that one of the principal purposes of the North Airfield Reconfiguration is to provide

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sufficient runway separation to allow unencumbered access by New Large Aircraft ("NLA"), expected to begin service at LAX in 2010, and thereby to equalize operations between the two runway complexes. The Crossfield Taxiway Project, being evaluated concurrently but separately with this NOP, has substantially the same purpose, i.e., to allow free access for NLA's and effective passage between the South and North Airfields (Crossfield Taxiway NOP, p. 4).

For purposes of CEQA review, a "project" is "the whole of an action which has potential for resulting in either a direct physical change to the environment or a reasonably foreseeable indirect change." CEQA Guidelines § 15378(a). "A public agency may not divide a single project into smaller individual projects in order to avoid its responsibility to consider the environmental impacts of the project as a whole." *Sierra Club v. Wastside Irrigation District*, 128 Cal.App.4th 690, 698 (2005).<sup>2</sup>

Here, the synergistic impacts of the various projects is beyond question. The Crossfield Taxiway is a necessary component of access to and from the North Airfield with impacts that are not addressed in this NOP. Similarly, the new midfield satellite terminal, and the gate additions at the TBIT are intimately related to the changes in the North Airfield Complex, as the new, associated taxiway system appears to encourage expedited access from the North Airfield Complex, without which the North Airfield Complex would become a victim of the same airfield gridlock that LAWA now purports to foresee for the whole airport, if the Project is not implemented.

Although "where the second activity is independent of, and not a contemplated future part of, the first activity, the two activities may be reviewed separately, even though they may be similar in nature," *Sierra Club*, 128 Cal.App.4th at 699, i.e., have independent utility, that circumstance does not exist here. Even now, the above specified projects are moving forward at the same time, toward a single, connected goal, the enhancement of the LAX airfield capacity, with particular emphasis on NLA serving the international market. It is therefore Cities' position that the various planned projects should be included in the Project Definition for the NOP and evaluated in the same EIR.

<sup>2</sup> The National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.*, ("NEPA"), under which this Project must also be reviewed in order for LAWA to obtain Federal funding for its implementation, further requires that the environmental analysis of multiple actions must be included in a single document: "when the record raises 'substantial questions' about whether there will be 'significant environmental impacts' from the collection of anticipated projects." *Klamath-Siskiyou Willamette Center v. BLM*, 387 F.3d 989, 999 (9<sup>th</sup> Cir. 2004).

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III. THE EIR'S CUMULATIVE IMPACT ANALYSIS SHOULD AT MINIMUM INCLUDE ALL PROJECTS NOT INCLUDED IN THE SPAS.

Even if, for argument's sake, the myriad of projects currently planned or being implemented at LAX were not part of a larger project "the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect," CEQA Guidelines § 15165. "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.

It is beyond dispute that the complex of projects at issue in this NOP are "closely related" both to each other, as well as to other "present", or, at minimum, "reasonably foreseeable future" projects such as the Midfield Satellite Terminal and the Crossfield Taxiway. Their collective scope, however, requires more than a simple "comment". If the projects are not evaluated as part of the same project, substantially the same attention should be paid to their impacts in the cumulative impacts analysis. Absent the requisite attention to the collective effects of the myriad of projects that are or will shortly be implemented to enhance "throughput rate", i.e., capacity, FAA Advisory Circular 150/5060-3, page 1, on the LAX airfield, the EIR will be inadequate.

IV. THE NOP FAILS TO ADDRESS SURFACE TRAFFIC IMPACTS RESULTING FROM THE PROJECT.

Cities are concerned about the Project's potentially significant impacts on surface traffic, not merely in areas immediately contiguous to LAX, but also on routes frequently traveled to get there. Cities are already suffering from the surface traffic generated by current operations, most, if not all, of which remains unmitigated. As passenger traffic and capacity at LAX increases, so does traffic on the surface streets and interstates (I-405, I-105) used to access it. As the traffic on the freeways becomes more congested, travelers exit these freeways seeking alternative routes which usually end up being the surface streets of Inglewood, Culver City and Westchester, in particular Sepulveda Blvd.(N/S) as far north as Stauson Ave. & Centinela Ave.; La Cienega (N/S) from Centinela to Imperial Highway; as well as Manchester and Century Blvds. (E/W) and Imperial Hwy. (E/W).

The proposed Project has the potential to cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. It may easily exceed the level of service standard established by the county Congestion Management Agency for designated roads and highways; cause a substantial increase in hazards; and increase demand for

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off-street parking. This increased surface traffic also has strong potential to adversely affect the infrastructure of the streets, as well as air quality, in neighborhoods in the proximity of the airport as well as throughout the region. Those impacts must be addressed in the EIR, not only because they are a direct result of the Project individually, but also because there will be additional contributions from other projects, "past, present and reasonably foreseeable" cumulatively.

In addressing such impacts, it is important that consideration is given to appropriate avoidance and mitigation measures that take into consideration the "actual" traffic patterns and impacts on the surface traffic in Cities and neighboring communities. Cities strongly urge LAX to develop effective surface traffic mitigation such as that previously proposed in detail during the SPAS process, including, but not limited to, an additional off ramp on the northbound 405 freeway south of LAX ("Lemoix off ramp") to offload traffic directly into the airport before it enters Culver City, and another off ramp on the southbound 405 freeway directly into the Manchester Square development. It appears the "Keep Access to CTA - Building Transportation Centers at Manchester Square and at Aviation/Imperial and Provide Drop Off/Pick Up Area East of Terminal 1" option, as part of the 100 feet to the North alternative takes traffic off the 405 freeway northbound, but not southbound. The Cities (and their consultants) are looking forward to working closely with LAX on developing and implementing reasonable mitigation measures and alternatives to address surface traffic.

V. THE PROPOSED MOVEMENT OF RUNWAY 6L/24R 340 FEET NORTH HAS SIGNIFICANT CAPACITY AND NOISE ENHANCING POTENTIAL.

The NOP proposes an alternative that moves Runway 6L/24R 340 feet to the North, as well as an extension of approximately 1495 feet west, with the width increased by 50 feet, and a new Modified Group VI parallel center taxiway 520 feet south of relocated Runway 6L/24R and 520 feet north of Runway 6R/24L. The NOP suggests that the planned reconfiguration is designed to address safety issues, e.g., "reduce the risk of runway incursions, enhance the safety of aircraft operations at LAX, and provide a better balance in operations between the North Airfield and the South Airfield."

Leaving aside the obvious, that a firm conclusion on the runway reconfiguration's safety effects cannot be definitively determined until the North Airfield Safety Study, currently being conducted by LAX, is completed and evaluated by the public, analyses performed by consultants on behalf of Cities already indicates that (1) there exist numerous measures that are more efficient in effecting safety goals, such as improved runway lighting and marking, especially since only a small proportion of the total incursions and incidents at LAX occurred on the North Airfield; and (2) the proposed separation has significant capacity enhancing potential,

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particularly that of allowing triple simultaneous arrivals to both the North and South Runway Complexes.

Moreover, the reconfiguration will likely affect the size and location of the noise contours, moving them north and east, beyond the scope of the relatively extensive 1992 noise contour used by LAX for the determination of sound-mitigation construction funding for Inglewood. The reconfiguration may also displace overflights on approach to relocated Runway 6L/24R to the north, thereby bringing increased noise impacts, as well as air quality and other impacts not only to Inglewood, but to Culver City as well. Finally, the NOP gives little attention to the environmental impacts of the original impetus for the runway separation, i.e., to accommodate the NLA which have a wing span of 262 feet and carry up to 800 passengers.

It should be noted that neither NOP Figure 5, nor Figure 11, fully depicts the configuration of the North Airfield, as both omit: (1) the displaced threshold intended for use on Runway 6L/24R, to ensure arrivals at the same runway point as on the current runway length; and (2) the Runway Protection Zones ("RPZ") for both runways. The latter are important because of the constraints on the use of the land that falls within them. Specifically, FAA regulations require that RPZ property belonging to the airport be kept largely clear of structures in order to "enhance the protection of people and property on the ground." FAA Advisory Circular 150/5300-13, § 212. Moreover, to the extent that property within other jurisdictions such as Westchester fall within the RPZ, the ALUCP for LAX may constrain the reuse of such property by its owners, California Public Utilities Code § 21675(a).

In summary, the proposed runway reconfiguration is potentially damaging to Cities. Cities have, instead, offered, in partnership with co-Petitioners El Segundo and ARSAC, and continue to support, the alternative which allows movement of Runway 6L/24R 100 feet to the north. (See, NOP, Figure 11). Petitioners offer this alternative in recognition of LAX's need to facilitate operations on the airfield, but with the equivalent understanding that such improvement need not come at Petitioners' environmental expense. Movement of Runway 6L/24R 100 feet to the north will allow the same runway separation as now exists on the South Runway Complex, the current targeted recipient complex for all NLA traffic, which LAX has deemed "safe" for that purpose. The 100 feet north alternative would, thus, allow precisely the same balance between the runway complexes as that articulated as a primary goal in the LAX Master Plan § 1.1, Goal 7, while, at the same time, providing environmental mitigation to surrounding communities.

In short, the alternative that allows movement of Runway 6L/24R 100 feet to the north offers LAX the same benefits it sought for the South Complex, without either the adverse

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impacts, or potential controversy that will unavoidably accompany the increased capacity, air and surface traffic, and environmental impacts attendant upon movement of Runway 6L/24R 340 feet to the north. Petitioners strongly urge that the alternative of moving Runway 6L/24R 100 feet to the north be adopted as the EIR's preferred alternative.

Cities appreciate this opportunity to comment and look forward to partnering with LAX to implement a mutually acceptable and environmentally sensitive airport development.

Sincerely,

CHEVALIER, ALLEN & LICHMAN, LLP

*Barbara E. Lichman*  
Barbara E. Lichman, Ph.D.

cc: Mayor Roosevelt Dorn, City of Inglewood  
Timothy Wanamaker, City Manager, City of Inglewood  
Cal Saunders, City Attorney, City of Inglewood  
D. Scott Malsin, Mayor, City of Culver City  
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Carol Schwab, City Attorney, City of Culver City  
Dave McCarthy, Deputy City Attorney, City of Culver City

**Petitioners' Overview of Guiding Principles for Environmental Analysis:  
LAX Specific Plan Amendment Study EIR**

*Submitted by Petitioners: City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and Alliance for a Regional Solution to Airport Congestion (ARSAC).*

**Background:** In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the associated Environmental Impact Report (EIR) prepared by Los Angeles World Airports (LAX) under the California Environmental Quality Act (CEQA). These suits were resolved by a 2006 Stipulated Settlement between LAX and Petitioners. In response to the Notice of Preparation (NOP) recently released by LAX for the Specific Plan Amendment Study (SPAS) Draft EIR, Petitioners now jointly submit this overview of principles that should guide LAX in that environmental review process. Petitioners will also submit detailed individual comments.

**LAX's Obligation to Avoid and Reduce Impacts to Surrounding Communities.** As LAX proceeds with refinement and analysis of options as part of the SPAS process, it must continually recognize its obligation to avoid and mitigate impacts to the communities that surround LAX. Options under consideration must be evaluated and ranked based on how they would impact the environment, public health and safety in surrounding communities (e.g., noise, air quality, traffic). All alternatives should be subject to a full and fair evaluation in the SPAS EIR and LAX should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative.

**Continued Consultation with Surrounding Communities.** The alternatives described in the SPAS NOP were developed and selected by LAX during a lengthy consultation process with Petitioners. That consultation process grew out of the 2006 Stipulated Settlement, which states, in relevant part, that "An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC. LAX shall consult with the Committee during each significant step of the LAX Specific Plan Amendment Process." Petitioners wish to recognize LAX's compliance to date with this provision of the Stipulated Settlement. LAX must now ensure that it continues to consult with Petitioners as the EIR process proceeds and the SPAS alternatives are developed in more detail. In particular, LAX should take care to consult with Petitioners regarding the details and analysis of the alternatives supported by any Petitioner.

**Extension of Gate Constraint.** LAX, FAA and the Petitioners all agree that limiting the number of gates at LAX will promote efficient passenger operations and encourage other airports in the Los Angeles basin to increase capacity to serve aviation demand. Accordingly, the long term success of the regional approach to serving aviation demand depends on maintaining appropriate gate constraints at LAX. The 2006 Stipulated Settlement between LAX and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAX to begin reducing the number of operating gates at LAX to 153. This settlement provision is operative through December 31, 2020. As part of the SPAS process, LAX must analyze the continuation of the LAX gate constraints beyond 2020, as well as the possible

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enhancement of those constraints at a level that will efficiently serve up to 78.9 million annual passengers at LAX, while encouraging growth elsewhere in the region, including at the other airports owned and operated by LAX.

**Airfield Balance.** In the NOP, LAX indicates that under the LAX Master Plan, one of its goals is to "provide a better balance in operations between the North Airfield and the South Airfield." Petitioners support this goal and urge LAX to conduct a full analysis of whether and to what extent each of the proposed SPAS alternatives would help achieve better airfield balance. Petitioners agree that total flight operation balance can lead to less operational crowding, which is good for all.

**Regional Approach.** Petitioners strongly support a regional approach to accommodating passenger and cargo aviation demand throughout Southern California. Because the area around LAX is fully developed, and because we must reduce vehicle miles traveled to improve air quality, decrease greenhouse gases, and increase productivity, a regional solution to serving aviation demand is essential. The regional approach, which is fully supported by the Southern California Association of Governments, must be a key component of everything LAX does, including in the SPAS process. LAX should vigorously pursue accommodating aviation demand at Palmdale and Ontario, and work aggressively with other airport operators and local governments to advance the regional approach.

**DEIR Public Review Period.** The NOP indicates that LAX intends to provide just 45 days for public review and comment on the Draft SPAS EIR. In light of the complexity of this project and LAX's tendency to produce lengthy CEQA documents, Petitioners anticipate that 45 days will not be sufficient.

## DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES INTERNATIONAL AIRPORT SPECIFIC PLAN AMENDMENT STUDY

### COMMENTS OF CITY OF INGLEWOOD, CITY OF CULVER CITY, CITY OF ONTARIO AND COUNTY OF SAN BERNARDINO

#### EXHIBIT 3

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November 29, 2010

By E-mail and U.S. Mail  
LAXSPAS@lawa.org

Herb Glasgow  
Chief of Airport Planning I  
City of Los Angeles  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Re: Revised Notice of Preparation of Draft Environmental Impact Report  
(SCH No. 1997061047) - Los Angeles International Airport Specific Plan  
Amendment Study - Comments by Cities of Inglewood and Culver City

Dear Mr. Glasgow:

The following are the comments of the Cities of Inglewood and Culver City ("Cities") concerning the Revised Notice of Preparation ("Revised NOP") for the Los Angeles International Airport ("LAX") Specific Plan Amendment Study ("SPAS").<sup>1</sup> The Revised NOP commences the environmental review of proposed alternatives to the implementation of five development projects at LAX, including a Ground Transportation Center ("GTC"), Automated People Mover ("APM") from the GTC to the Central Terminal Area ("CTA"), and associated on-site road improvements; demolition of Terminals 1, 2 and 3; and reconfiguration and separation of Runways 6R/24R and 6R/24L on the North Runway Complex (these activities, taken together will be referred to as "Project"). Cities regard the Project as a component of a more comprehensive expansion plan, including, but not limited to, construction of Midfield Satellite Terminal, a Crossfield Taxiway, and redesign and addition of gates at the Tom Bradley International Terminal ("TBIT").

As a threshold issue, please be advised that Cities respond to Question No. 2, Revised NOP, p. 2, as follows: Cities do not fall within the category of "responsible agency" or "trustee

<sup>1</sup> Cities of Inglewood and Culver City are Petitioners and Settling Parties in the case of *El Segundo, et al. v. City of Los Angeles, et al.*, Riverside County Superior Court Case No. RIC 426822.

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agency," as those terms are defined in 14 Cal.Code Regs. §§ 15096, 15381, and 15386.<sup>2</sup> Please be further advised that the following comments concerning significant environmental issues raised by the Project, alternatives and mitigation measures are necessarily preliminary, due to the attenuated character of the Revised NOP. Cities therefore reserve their right to supplement these comments in response to future environmental documents.

#### I. THE REVISED NOP STILL CONTEMPLATES "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" WHICH WILL RESULT IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The Revised NOP continues to state, despite Cities' prior comments on the Original NOP concerning the pitfalls of this approach, that the SPAS EIR will be a Supplemental EIR tiered from the LAX Master Plan EIR (NOP, p.5), "providing new or revised analyses of the environmental impacts specific to the alternatives associated with the Yellow Light Project options . . ." Moreover, LAX, in its NOP for the Crossfield Taxiway Project (which was published contemporaneously with the publication of the Original NOP), justified expedited environmental review on the premise that adequate environmental review was already completed during the prior Master Plan environmental review. While the Legislature has directed local agencies to "tier" EIRs whenever feasible, the utility of tiering is limited to those situations where the individual projects are consistent with the larger project such as the approved Master Plan project which has already been environmentally reviewed. "Tiering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on 'the big picture,' and can then use streamlined CEQA review for individual projects that are consistent with such . . . [first tier decisions]. . ." *Koster v. County of San Joaquin*, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

In this case, despite the fact that the "approved Master Plan" remains in place, many of its most salient features, such as the Ground Transportation Center ("GTC"); closure of the CTA to surface traffic; and movement of Runway 6R/24L 340 feet to the south, necessitating the restructuring of Terminals 1 through 3, are being replaced by the Projects currently being evaluated under this Revised NOP. Thus, because of the proposed amendments, the components of the proposed Airport Master Plan differ materially from the project originally evaluated in the approved Master Plan and cannot serve as a "baseline" for analysis. As an example, the proposed movement of Runway 6R/24L 400 feet north is a radical departure from the movement

<sup>2</sup> CEQA's implementing regulations will be referred to throughout these comments as "CEQA Guidelines."

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contemplated in the Master Plan 340 feet south, possibly impacting, among other things, the size and location of the noise contours and the Runway Protection Zone ("RPZ").

Moreover, the inclusion of alternatives reflecting the Yellow Light Projects, the original components of the Airport Master Plan, does not rectify the problem. The Yellow Light Projects are "yellow light" because the Settlement between the parties in the above-referenced action contemplates their replacement.<sup>3</sup> Therefore, the yellow light projects cannot serve as the basis for either the "Existing Condition Alternative,"<sup>4</sup> or the "No Project Alternative" because the Settlement ensures that they do not exist in the Airport Master Plan now, and that they will not in the future.

In short, the significant differences between the "No Project/No SPAS Alternative (Approved Master Plan)," and the actual "No Project Alternative" raises the question of what is left of the original Master Plan, in terms of viable project alternatives, to make tiering an appropriate option. Given these circumstances, the Cities question the appropriateness of the "tiering" of the Revised NOP projects upon the Master Plan EIR.

## II. THE PROJECT DOES NOT CREATE CONDITIONS THAT ENCOURAGE AIRLINES TO GO TO OTHER AIRPORTS IN THE REGION.

Cities submit that the Revised NOP contemplates projects which, when taken together, defy the Settlement's mandate that the SPAS will, among other things, "creat[e] conditions that encourage airlines to go to other airports in the region." Settlement, § V.C. As an example, the Revised NOP acknowledges that the most extreme alternatives for the North Airfield reconfiguration, and particularly the 400 foot north alternative, are explicitly aimed at "accommodat[ing] the largest aircraft types currently in service and anticipated for the future (Group V and Group VI aircraft)." Revised NOP, p. 6, by creating a "Modified Group VI airfield," *Id.*, which can operate the largest aircraft models substantially without operational restrictions. By doing so, Los Angeles World Airports ("LAWA") staff is overtly setting the

<sup>3</sup> See, e.g., Settlement, § V.D.1. ("Potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address . . ." [Emphasis added.]) and Settlement, § V.D.3 ("Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects . . ." [Emphasis added.])

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stage for the exacerbation of the outflow of airline traffic and passengers from other LAWA operated airports, particularly Ontario International Airport ("ONT"), and into LAX.

ONT has lost 22 years of traffic growth since 2007, a loss of \$400 million to the Inland Empire economy and more than 8,000 jobs. Moreover, airlines are continuing to downsize ONT and it lost its last international passenger flight in February, 2010. Certainly, part of the problem can be attributed to the current state of the national economy, but by no means all, as other airports in the region such as Palm Springs, Long Beach and John Wayne actually gained passengers during the period 2000-2009. While passenger traffic at ONT declined 27.7% between the years 2000 and 2009, LAX itself lost comparatively fewer passengers at 9%.

The best explanation lies in ONT's cost structure when compared with that of LAX and surrounding airports, as well as LAWA's de-emphasis on encouraging growth. For example, ONT's airline costs per passenger are higher than at any other secondary airport in Southern California or the United States (the second highest airport costs for Southwest Airlines after New York's LaGuardia). Moreover, L.A.'s Living Wage Ordinance for airport workers add significant cost burden to airlines serving ONT.

Equally important is the LAWA staff's emphasis on supporting LAX. When ONT lost its last international passenger flight, LAWA staff publicly stated that ONT would not receive international flights in the future. In addition, L.A. Airport Commissioners have publicly spoken on the need to make LAX the priority for restoring passenger traffic to the region. To add insult to injury, no credible marketing plan has been introduced for ONT or airports under LAWA sponsorship other than LAX. In 2010, for example, LAWA will spend \$6.4 million marketing LAX, but only \$450,000 marketing ONT.

This trend, and its encouragement by the dramatic reconfiguration of the North Airfield, has impacts not only for the Inland Empire, but for residents living around LAX as well. While the Settlement requires that the SPAS, among other things, "identify specific plan amendments that . . . minimiz[e] environmental impacts on surrounding communities," Settlement § V.C., it is clear that the dramatic reconfiguration of the airfield necessary to accommodate Category VI aircraft will affect the size and location of the LAX noise contours, moving them north and east; potentially displace overflight on approach to the north, and realign Runway Protection Zones at each end of the North Airfield runways, causing additional, hitherto unanalyzed constraints on land use in communities to the north and east.

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## III. THE "REVISIONS" TO THE NOP APPEAR LITTLE MORE THAN JUSTIFICATIONS FOR "PRE-COMMITMENT" TO THE MOST EXTREME ALTERNATIVE(S) FOR NORTH AIRFIELD RECONFIGURATION.

Agencies may not "pre-commit" to project approval because "[a] fundamental purpose of [CEQA review] is to provide decision-makers with information they can use in deciding whether to approve a proposed project . . ." *Laurel Heights Improvement Association v. Regents of the University of California*, 47 Cal.3d 376, 394 (1988) [emphasis in original]. Here, with the exception of some prefatory comments, a substantial component of the changes memorialized in the Revised NOP go to justify adoption of the most draconian alternatives proposed for the reconfiguration of the North Airfield.

First, it should be noted that the Project's five components still actually boil down to two: (1) the North Airfield Reconfiguration; and (2) the proposed GTC. This is because the APM and on-site road improvements are necessitated by, and part and parcel of, the proposed GTC. It also appears, according to the description of the various components and their alternatives in the Revised NOP, that the APM and on-site road improvements would only occur for the purpose of linking the GTC and CTA. Thus, if the GTC were not built (the existing condition), the ancillary transportation improvements would not be necessary.

In addition, the alternatives relating to the demolition of Terminals 1 through 3 are constrained to "yes" or "no." As, under the express terms of the Settlement, alternatives to the GTC must be found and evaluated, there is, in reality, no "yes" option, because such an option would effectively obliterate 30% of the airport's terminal capacity, without any potential replacement.

Moreover, the NOP revisions appear to be largely aimed at justifying the most extreme alternative for reconfiguration of the North Airfield. On the one hand, the Revised NOP dismisses the conclusions of the North Airfield Safety Study ("Safety Study") regarding the purported contribution of the Project to airfield safety.<sup>5</sup> While it is true that the Safety Study did find that the existing runway configuration already provides a high level of safety, it went on to state that the Project could not be justified on safety grounds.

<sup>5</sup> "Completion of LAX North Airfield Safety Study (February 19, 2010), which found that, although the current north airfield configuration provides a high level of safety, changes to the configuration by further separating the runways could create even greater safety and might significantly reduce airport congestion during peak hours." Revised NOP, p. 4.

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Apparently, at least partially relinquishing the safety justification, the Revised NOP emphasizes instead the attributes of a "Modified Group VI airfield . . . designed to accommodate the new generation of wide-bodied airplanes that began to operate at LAX in 2008," Revised NOP, p. 6. The rationale articulated in the Revised NOP is that "the North Airfield configuration set forth in the approved LAX Master Plan [movement of Runway 6L/24R 340 feet south] was designed to accommodate the largest aircraft types . . . reduce the risk of runway incursions, enhance the safety and efficiency of aircraft operations at LAX, and provide a better balance in heavy aircraft operations between the North Airfield and the South Airfield," Revised NOP, p. 6.

In taking that position, the Revised NOP ignores the data arising from the first four years of the Specific Plan Amendment Study process, in which Petitioners participated, and during which it was determined that less extreme alternatives such as movement of Runway 6L/24R 100 feet to the north could also accommodate centerline taxiway and other airfield improvements. Revised NOP, p. 6, increase the length of Runway 24L, *Id.*, and, thus, also reduce the risk of runway incursions, enhance safety and efficiency of aircraft operations and provide a better balance between runway complexes.

In summary, given LAWA's apparent continuing dedication to the attributes of the Project set forth in the approved Master Plan, and reconfirmed in the Original NOP, it appears from the Revised NOP that the Project has fallen victim to the flaw of "pre-commitment" that will render the EIR based on it, inadequate.

## IV. THE EIR'S CUMULATIVE IMPACT ANALYSIS SHOULD, AT MINIMUM, INCLUDE ALL PROJECTS PLANNED OR RECENTLY IMPLEMENTED AND NOT INCLUDED IN THE SPAS.

"The agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect," CEQA Guidelines § 15165. "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).

Here, the synergistic impacts of the various projects is beyond question. The Crossfield Taxiway is a necessary component of access to and from the North Airfield. Similarly, the new Midfield Satellite Terminal, and the reconstruction and addition of gates at the TBIT are intimately related to the changes in the North Airfield complex, as the new, associated taxiway system appears to encourage expedited access from the North Airfield complex, without which

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the North Airfield complex would become a victim of the same airfield gridlock that LAWA now purports to foresee for the whole airport if the Project is not implemented.

It is beyond dispute that the complex of projects currently being implemented or contemplated in the Revised NOP are "closely related" to other "present", or, at minimum, "reasonably foreseeable future" projects such as the Midfield Satellite Terminal and the Crossfield Taxiway. Their collective scope, however, requires more than a simple "comment." As the projects were not evaluated as part of the same project, substantially the same attention should be paid to their impacts in the cumulative impacts analysis. Absent the requisite attention to the collective effects of the myriad of projects that are or will shortly be implemented to enhance "throughput rate", i.e., capacity, FAA Advisory Circular 150/5060-5, page 1, on the LAX airfield, the EIR will not adequately disclose the Project's capacity enhancing potential and concomitant environmental impacts.

V. THE PROPOSED MOVEMENT OF RUNWAY 6L/24R 400 FEET NORTH HAS ADDITIONAL CAPACITY AND NOISE ENHANCING POTENTIAL.

The Revised NOP, after more than five years of discussion of the Specific Plan Amendment, at this late date reveals an entirely new set of alternatives for the North Airfield Reconfiguration that include an even more extreme alternative than the movement of Runway 6L/24R 340 feet north in the Original NOP. This proposed increased runway separation will have a concomitantly increased impact on surrounding communities.

Most notably, the reconfiguration will almost certainly affect the size and location of the noise contours, moving them north and east, beyond the scope of the relatively extensive 1992 noise contour used by LAWA for the determination of sound mitigation construction funding for Inglewood. The reconfiguration may also displace overflights on approach to relocated Runway 6L/24R to the north thereby bringing increased noise impacts, as well as air quality and other impacts, not only to Inglewood but to Culver City as well. Finally, the Revised NOP gives little attention to the potential impacts of the original impetus for the runway separation, i.e., to accommodate the New Large Aircraft ("NLA") which have a wingspan of 262 feet and carry up to 800 passengers.

It should be noted that none of the figures in the Revised NOP depicting the options for reconfiguration of the North Airfield contain the accompanying Runway Protection Zones ("RPZ"). Depiction of RPZs is important because of the constraint on the use of land that falls within them. Specifically, FAA regulations require that RPZ property belonging to the airport be kept largely clear of structures in order to "enhance the protection of people and property on the

Herb Glasgow, Chief of Airport Planning I  
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ground." FAA Advisory Circular 150/5300-13, § 212. Moreover, to the extent that property within other jurisdictions such as Westchester falls within the RPZ, the ALUCP for LAX may dramatically constrain the use of such property by its owners, see, Cal. Pub. Util. Code § 21675(a).

In summary, the revised alternatives for runway reconfiguration in the Revised NOP are, in large part, damaging to Cities. Cities have, instead, offered, in partnership with co-Petitioners El Segundo and ARSAC, and continue to support, the alternative which allows movement of Runway 6L/24R 100 feet to the north. (See, Revised NOP, Figure 7). Petitioners offer this alternative in recognition of LAWA's need to facilitate operations on the airfield but with equivalent understanding that such improvements need not come at Petitioners' environmental expense. Movement of Runway 6L/24R 100 feet to the north will allow the same runway separation as now exists on the South Runway Complex, the current targeted recipient complex for NLA traffic, is sufficient to accommodate a center taxiway to enhance efficiency and expedite movement of the NLAs; and has been deemed "safe" by LAWA for that purpose. The 100 feet north alternative would, thus, allow precisely the same balance between the runway complexes as that articulated as a primary goal in the LAX Master Plan, § 1.1, Goal 7, while, at the same time, providing environmental mitigation to surrounding communities.

In short, the alternative that allows movement of Runway 6L/24R 100 feet to the north offers LAWA substantially the same benefits it sought for the South Complex, without either the adverse impacts or potential controversy that will unavoidably accompany the increased capacity, air and surface traffic, and environmental impacts attendant upon movement of Runway 6L/24R to the north in accordance with the most extreme alternatives proposed in the Revised NOP. Petitioners strongly urge that the alternative of moving Runway 6L/24R 100 feet to the north be adopted as the EIR's Preferred Alternative.

Cities appreciate this opportunity to comment and look forward to partnering with LAWA to implement a mutually acceptable and environmentally sensitive airport development.

Sincerely,

CHEVALIER, ALLEN & LICHMAN, LLP  
*Barbara E. Lichman*  
Barbara E. Lichman, Ph.D.

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cc: Mayor Daniel K. Tabor, City of Inglewood  
Mark Weinberg, Acting City Administrator, City of Inglewood  
Cal Saunders, City Attorney, City of Inglewood  
Mayor Christopher Armenta, City of Culver City  
John Nachbar, City Manager, City of Culver City  
Carol Schwab, City Attorney, City of Culver City

DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE LOS ANGELES  
INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY

COMMENTS OF CITY OF INGLEWOOD, CITY  
OF CULVER CITY, CITY OF ONTARIO AND  
COUNTY OF SAN BERNARDINO

EXHIBIT 4

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September 17, 2012

VIA FACSIMILE ((202)267-5302 AND (202)267-5383)

Ralph Thompson  
Manager, Airport Planning & Environmental  
Program, APP-400  
Attn: Nancy S. Williams  
U.S. Department of Transportation  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, D.C. 20591

Re: Program Guidance Letter - 12-09 - AIP Eligibility and Justification Requirements  
for Noise Insulation Projects

Dear Mr. Thompson:

We represent the City of Inglewood, California, participant in the Los Angeles World Airports ("LAWA") Sound Insulation Program for Los Angeles International Airport ("LAX"), and signator on the 2006 Settlement of *City of El Segundo, et al. v. City of Los Angeles, et al.*, Riverside County Superior Court Case No. RIC426822 ("Settlement"), guaranteeing substantial additional sound insulation benefits for settling parties, the Cities of Inglewood, El Segundo and County of Los Angeles.

This letter concerns the above-entitled Program Guidance Letter 12-09 ("PGL"), published by FAA on August 17, 2012, purporting to amend FAA Order 5100.38C, § 812, and specifically establishing a "second step" of a two-step requirement for AIP eligibility whereby not only must structures be located in the 65 dB CNEL contour (a continuing condition Inglewood does not question here), but also be subject to or exceed 45 dB interior sound levels in habitable rooms even if located within the 65 dB CNEL noise contour.

Please be advised that Inglewood, although it has already complied with the required preliminary steps of providing a detailed report concerning those projects already in process, reluctantly views the PGL as posing some significant due process issues, as well as difficult operational and practical dilemmas.

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Ralph Thompson  
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5100.38C could be construed to include provision for administrative approval of such deviations, the burden such administrative discretion at the Federal level would impose on project implementation at the local level would be substantial and time consuming.

Second, the PGL and its attached revision give short shrift to sound insulation which is approved in a ROD as a mitigation measure for significant noise impacts caused by a Federal project. While the PGL affirms that "airport sponsors have a reasonable period of time to implement substantial multi-year noise insulation projects that were a condition of approval in a ROD..." PGL, § 10, n. 3, it also purports to require that structures covered by the mitigation commitment that no longer "meet the qualifying criteria" must be prepared to show "that flexibility is needed to reasonably fulfill commitments in an environmental record of decision." *Id.* However, the mere requirement of a subsequent discretionary act by FAA to ensure compliance with the express terms of the ROD appears to be, in and of itself, a breach of those contractual commitments.

The potential for such breach is amply illustrated with respect to the above referenced settlement between Inglewood, among others, and LAWA. A substantial commitment was made in that Settlement to comprehensive sound insulation for Inglewood; the City Council approved the Settlement, based on that commitment; and the Court still retains jurisdiction to enforce compliance with the Settlement Agreement. Moreover, the citizens of Inglewood accepted the noise impacts of the LAX expansion project based substantially on that commitment. Nothing in the Settlement, or the prior version of FAA Order 5100.38C, allows withdrawal of funding at FAA's discretion for those residences which can't qualify under the new standard, at least for some "lesser level of noise insulation." FAA Order 5100.38C, 2005, § 812.b.(1).

Finally, while the PGL provides for a minimal level of flexibility in allowing for "special circumstances," presumably such as settlement or ROD commitments, revised Order 5100.38C § 812.d., Table 4, to enhance "neighborhood equity," it also emphasizes that this condition applies where only a "few residences that do not meet the interior noise level requirements are scattered among residences that do meet interior noise level criteria," and affirmatively limits the number of such exceptions to "20 residences total in a phase of the noise insulation program." *Id.* This limitation on numbers of properties diverging from the standard and still entitled to sound insulation, in programs the size of Inglewood's, is no "neighborhood equity" at all.

Among those induced to agree to the Settlement by the prospect of sound insulation are as yet unascertained number of property owners in Inglewood whose properties, because of their location within the expanded 65 dB CNEL contour caused by the project, and because of the owners' earlier responsible private acts of sound insulation, are below an "average" of 45 dB interior noise for all habitable rooms. Inglewood and those property owners correctly understood the Settlement to be governed by the FAA orders and guidance in effect when Inglewood approved it, which would have allowed those properties to be insulated, at least at "a lesser level of noise insulation," Order 5100.38C, 2005, § 812.b.(1). In addition to such justified reliance, those changes FAA seeks to apply to the properties previously approved for the program but as yet waiting to be insulated are "post facto," and, thus, arguably, both constitutionally and legally

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**I. THE PGL DID NOT ALLOW FOR ADEQUATE NOTICE AND COMMENT BY AFFECTED JURISDICTIONS**

Inglewood is concerned about the absence of the notice and comment process for the PGL that would normally accompany the amendment of an order through the official rulemaking process, which includes publication in the Federal Register. The PGL states that Attachment 1 "contains the replacement paragraph 812 Noise Insulation Projects of FAA Order 5100-38C, the AIP Handbook, in its entirety, effective as of the date of this PGL." PGL, p. 2, § 5. However, the law requires that "Each agency shall separately state and currently publish in the Federal Register for the guidance of the public -- (D) substantive rules of general applicability adopted as authorized by law, and statements of general policy or interpretations of general applicability formulated and adopted by the agency; and (E) each amendment, revision, or repeal of the foregoing," 5 U.S.C. § 552(a)(1)(D) and (E) ("Administrative Procedures Act").

The PGL fits directly into the categories covered by the above sections of the Administrative Procedures Act. It is an amendment to a "substantive rule of general applicability," i.e., FAA Order 5100.38C, originally adopted in accordance with regulatory procedures "as authorized by law," including publication in the Federal Register. Moreover, the same publication procedure would be required even if the PGL were not so manifestly regulatory, but were simply "a statement of general policy" or an "interpretation of general applicability."

Perhaps most notably, "except to the extent that a person has actual and timely notice of the terms thereof, a person may not in any manner be required to resort to, or be adversely affected by, a matter required to be published in the Federal Register and not so published." Administrative Procedures Act § 552(a)(1). In this case, neither Inglewood nor any other affected jurisdiction received notice or an opportunity to be heard before the PGL became effective, by its own terms, "as of the date of this PGL." PGL, p. 2, § 5. Despite the absence of the notice and opportunity to be heard so fundamental to due process, Inglewood wants to continue to work cooperatively with FAA and LAWA. Toward that end, Inglewood anticipates that FAA, for its part, will make some accommodation to Inglewood's operational concerns and the practical issues posed by LAWA's and Inglewood's obligations under their 2006 Settlement Agreement as set forth below.

**II. PGL CREATES SIGNIFICANT PRACTICAL ISSUES THAT GO TO THE HEART OF COMPLIANCE**

In addition to its manifest procedural deficiencies, the PGL creates practical problems for jurisdictions responsible for providing their citizens with adequate protection from airport noise impacts. First, the PGL creates the hard standard of 45 dB interior sound level below which a residence's original condition cannot fall and still be eligible for insulation. On its face, the regulation does not provide for any standard deviation, so that a residence that falls even slightly below the facial standard, e.g., 44.5 dB, would arguably be excluded from the insulation program. And even if, for argument's sake, the PGL and its attached revision to FAA Order

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impermissible.

In summary, the PGL "guidance" still leaves open questions with respect to its proper applicability to, and coordination with, the currently existing regulations governing sound insulation projects. Inglewood looks forward to FAA's responses to its inquiries for clarification, and to working with FAA and LAWA to resolve these pending issues.

Sincerely,

**BUCHALTER NEMER**  
A Professional Corporation

By

*Barbara Lichman*

Barbara Lichman

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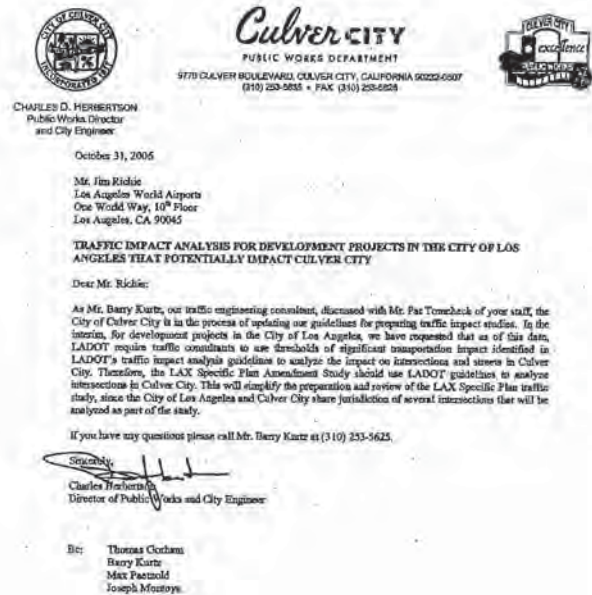


**DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE LOS ANGELES  
INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY**

**COMMENTS OF CITY OF INGLEWOOD, CITY  
OF CULVER CITY, CITY OF ONTARIO AND  
COUNTY OF SAN BERNARDINO**

EXHIBIT 5

SPAS-AL00007



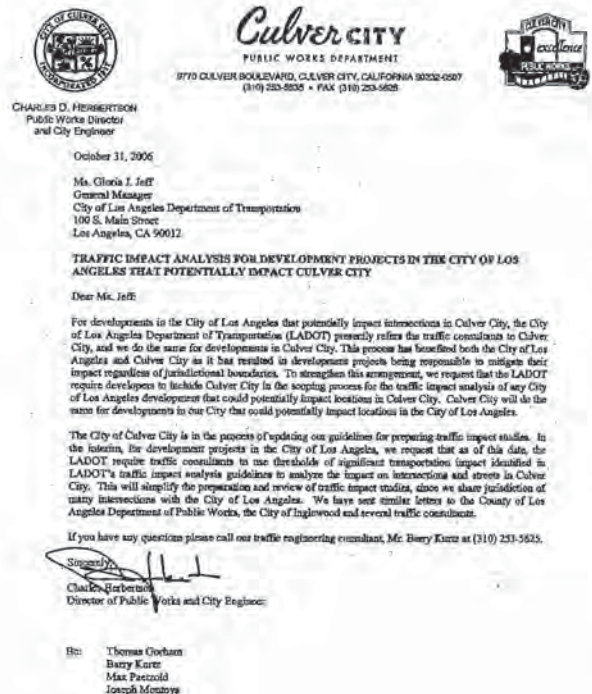
Culver City Employees take pride in effectively providing the highest levels of service to enrich the quality of life for the community by building on our tradition of more than seventy-five years of public service, by our present commitment, and by our dedication to meet the challenges of the future.

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**DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE LOS ANGELES  
INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY**

**COMMENTS OF CITY OF INGLEWOOD, CITY  
OF CULVER CITY, CITY OF ONTARIO AND  
COUNTY OF SAN BERNARDINO**

EXHIBIT 6



Culver City Employees take pride in effectively providing the highest levels of service to enrich the quality of life for the community by building on our tradition of more than seventy-five years of public service, by our present commitment, and by our dedication to meet the challenges of the future.

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Attachments: 101012 LAX DEIR Comments (Lt Diego Alvarez) PDF

**From:** Isabella Barbati [ibarbati@ces.lacounty.gov]  
**Sent:** Wednesday, October 10, 2012 4:06 PM  
**To:** SPASEIR Comments; County Counsel - Exec Asst; County Counsel; Public Works - Exec Asst; Public Works; Lorraine Gonzales; Richard Bruckner; Public Health; Public Health - Exec Asst; Community Dev. Comm. - Exec Asst; Community Development Comm  
**Cc:** Martin Zimmerman; Frank Cheng; Gerardo Ramirez  
**Subject:** Correspondence prepared by Operations and Budget (QEPS)

The attached letter is from William T Fujioka, Chief Executive Officer.

Isabella Barbati  
 Chief Executive Office  
 Operations and Budget (QEPS)  
 213.974.6879  
[ibarbati@ces.lacounty.gov](mailto:ibarbati@ces.lacounty.gov)

Please consider the environment before printing this email.

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County of Los Angeles  
**CHIEF EXECUTIVE OFFICE**

Kenneth Hahn Hall of Administration  
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 (213) 674-1101  
<http://ces.lacounty.gov>

October 10, 2012

Diego Alvarez  
 Facilities Planning Division  
 Los Angeles World Airports  
 One World Way  
 Los Angeles, CA 90045-5803

Dear Mr. Alvarez:

**COMMENTS TO LOS ANGELES INTERNATIONAL AIRPORT SPECIFIC PLAN  
 AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT**

Thank you for the opportunity to submit written comments on the Specific Plan Amendment Study Draft Environmental Impact Report (SPAS Draft EIR) prepared by Los Angeles World Airports (LAWA). The County of Los Angeles supports the modernization of LAX and we are glad to provide these comments to assist in the process. Our complete comments are contained in the attached document. Below is a brief summary highlighting our key issues and questions for your consideration and response:

- **Settlement compliance:** As a signator to the Stipulated Judgment, the County is keenly interested in seeing, as part of this Draft EIR, a discussion that sets forth all of the environmental commitments contained in the Settlement Agreement and illustrates how each commitment is implemented in the proposed SPAS alternatives.
- **The Draft EIR should address a definitive project; selected alternatives do not fulfill the "Rule of Reason."** We believe that a definitive project description at the beginning is necessary to ensure that all environmental impacts of the project are analyzed to avoid a piecemeal approach, and to allow for meaningful public comment. These objectives are not achieved by discussing a group of alternatives and then selecting the project at the end of the process, allowing no remaining time for public input. Moreover, the approach is not consistent with the "Rule of Reason," wherein alternatives set forth in an EIR "shall be limited to ones that would avoid or substantially lessen

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any of the significant effects of the project" per California Environmental Quality Act (CEQA) Guidelines §15126.6(c). This problem is evident in Draft EIR §7.1 which states that the significant unavoidable adverse impacts identified in the EIR (including direct impacts related to air quality, human health risk, traffic, noise, and land use) "pertain to all of the alternatives unless otherwise noted."

- **Passenger and gate provisions are now moot:** Delays and weak economic conditions have largely rendered moot the passenger and gate provisions contained in the Settlement Agreement. Furthermore, gate limits in the FAA Record of Decision may conflict with the Settlement provisions, and it is unclear how inconsistencies would be reconciled.
- **Alternatives should be analyzed in terms of passenger capacity:** It would be helpful for LAWA to present a graphic layout of gates or calculations supporting the stated ratio of passengers to gates. The Draft EIR should offer these data so that reviewers can confirm that any and all of the Master Plan alternatives conform to agreed-upon passenger limitations.
- **The Draft EIR should discuss the relationship between the Ground Transportation Center (GTC), Narrow Body Equivalent Gates and passenger capacity:** The Draft EIR should discuss the passenger capacity of the GTC in Alternative 3 so that reviewers can gauge conformance of proposed alternatives to Million Air Passengers (MAP) limits in the Settlement.
- **The reconfigured terminals should be analyzed in terms of passenger capacity:** As you know, the number of gates correlates directly with passenger capacity. Accordingly, the Draft EIR should identify the location of all gates and detail how aircraft gates will service passengers including remote gates, as well as address type of aircraft, hours of operation, layout and other pertinent factors.
- **Runway capacity increases should be defined for all alternatives:** In order for readers to understand the aircraft and passenger serving capacity of alternatives, the airfield modeling data and a summary of the runway specific aircraft assignments should be provided for each alternative. The Draft EIR should also provide information about the passenger growth-inducing impact of increasing peak hour Instrument Flight Rules (IFR).
- **1995 MAP estimates are outdated:** MAP estimates should be recalculated to account for changing economic conditions, technology, business models, and use of leisure time.

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- **Significant adverse impacts to nine County intersections need to be mitigated:** Individual agencies need to provide evidence where traffic mitigation measures are judged infeasible, or the measures must be funded and implemented. The County Department of Public Works does not agree that the Draft EIR adequately analyzes and discloses the impacts and appropriate mitigations for County intersections. The County requests that LAWA consult and work with its Public Work's engineering staff before finalizing the EIR.
- **Secondary traffic impacts should be studied in this Draft EIR:** The Draft EIR should analyze overall system deficiencies caused by diversion of traffic from significantly impacted intersections to other routes.
- **Mitigation options are suggested:** Additional traffic mitigation measures are suggested for Draft EIR consideration in order to mitigate the significant adverse impacts to County intersections.
- **Noise impacts need further study:** The Draft EIR should show both model and measurement data for the 2009 baseline in order for readers to assess the difference between the two approaches. Further, a 3 decibel (dB) difference should not be discounted in the Draft EIR as less than significant.
- **Noise impacts on Lennox would be influenced by differential use of the north and south runways:** Replacement of Terminals 1, 2 & 3 with linear concourse could increase pressure on the South airfield; the County requests that LAWA guarantee a semi-equal balance of north/south runway selection to protect Lennox from even greater noise impact.
- **Noise impacts on Lennox raise Environmental Justice concerns:** Lennox, a minority community, is the only residential neighborhood around LAX with homes in the 75 dB Community Noise Equivalent Level (CNEL). Environmental justice aspects of this impact merit review under CEQA, including mitigation focused on regionalization and balanced airfield operations.
- **Air emissions from the 405 Freeway should be considered in the air quality assessment:** Draft EIR background air quality analyses did not include readings along eastern boundary where the 405 Freeway is a major pollutant source; readings on eastern boundary should be included in the EIR.
- **Air quality mitigation measures in the Draft EIR are insufficient:** LAWA should revise the Draft EIR to eliminate generalized air quality enforcement language and to incorporate state of the art mitigations.

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- Regionalization is the key to avoiding or reducing significant "unavoidable" adverse impacts: Requirements of the Settlement Agreement §VII and VIII have not been largely addressed by LAWA, although Draft EIR §6.2 demonstrates that regionalization is the key to mitigating the significant 'unavoidable' impacts listed in Draft EIR §7.1. LAWA should address this relationship and adopt regionalization to fulfill its CEQA obligation to mitigate significant impacts with feasible mitigation measures.
- The County strongly supports alternatives that connect LAX to the regional rail system: The lack of an adequate transit system is responsible for some of the most pressing environmental impacts on unincorporated communities around LAX. Alternatives that would provide connections between LAX and the Crenshaw/LAX light rail line or the existing Metro Green Line Station will greatly improve airport access, and at the same time reduce traffic and noise concerns. The EIR should compare the benefits to traffic of transit and transportation mitigation options.

Thank you once again for this opportunity to comment upon this critically important undertaking. The County looks forward to receiving responses to the comments offered herein. We know you are committed to good faith compliance to the requirements of CEQA and to terms of the Settlement Agreement, which will facilitate modernization of LAX, a goal that is shared equally by LAWA and the County of Los Angeles.

Sincerely,

  
WILLIAM T. FUJIOKA  
Chief Executive Officer

WTF:EFS:MKZ  
FCJR:ib

Attachment

c: Each Supervisor  
County Counsel  
Public Works  
Regional Planning  
Public Health  
Community Development Commission

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County of Los Angeles

**Comments on the Los Angeles International  
Airport (LAX) Specific Plan Amendment Study  
Draft Environmental Impact Report (EIR)**

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OCTOBER 10, 2012

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County of Los Angeles

**Comments on the LAX SPAS Draft EIR**

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## 1.0 BACKGROUND AND SUMMARY

### 1.1 Background

During 2001, A.C. Lazzaretto & Associates was retained by the County of Los Angeles (County) to review and comment on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) prepared for Los Angeles World Airports (LAWA) Proposed Los Angeles International Airport (LAX) Master Plan. The 2001 Draft EIS/EIR addressed three build alternatives, a no-build alternative, and the existing setting for the Los Angeles International Airport (LAX) Master Plan.

A.C. Lazzaretto & Associates assembled a team of environmental review experts to review the document for consistency and accuracy. Working in collaboration with County staff, a detailed comment letter was prepared and submitted to LAWA on 28 June 2002. Thereafter, in response to considerable public comment and the terrorist attacks that occurred on September 11, 2001, LAWA suspended work on the earlier EIS/EIR to develop a fourth alternative (Alternative D), the Enhanced Safety & Security Plan. LAWA issued a Supplement to the Draft EIS/EIR for public comment in July of 2003 to update information presented in the Draft EIS/EIR and to integrate Alternative D into the environmental review process. The Supplement offered no response to comments submitted on the 2001 DEIS/EIR.

Following publication of the SDEIS/EIR, the County again retained A.C. Lazzaretto & Associates to review and comment on the revised document, and A.C. Lazzaretto & Associates in turn assembled the team of environmental review experts that had reviewed the 2001 document. The focus of this review was on document consistency, accuracy, and plan changes incorporated since release of the original Draft EIS/EIR. Results of the 2003 SDEIS/EIR review indicated that many of the concerns expressed in the County's earlier comment letter remained, particularly with respect to LAWA's unconvincing efforts to limit growth at LAX and strengthen the role of outlying airports; the County expressed these concerns in a comment letter submitted to LAWA during October 2003. LAWA thereafter prepared a Final EIS/EIR that restated contested points from the earlier 2001 and 2003 Draft EIS/ER documents, with no substantive effort to respond to the many comments and questions raised by the County (as noted in a May 2004 comment letter directed to the Final EIS/EIR).

During August 2004, LAWA released two compromise plans regarding the LAX Master Plan process: the "LAX Plan" (referred to as the "Consensus Plan" and developed through the efforts of Los Angeles City Councilwoman Cindy Miskowski), and an alternative LAX Modernization Proposal (Alternative Plan E-1, developed through the efforts of Councilman Bernard Parks). The County undertook a detailed review to determine the extent to which these plans would resolve seven long-standing concerns:

1. The need to **establish a long-term cap on operations at LAX**;
2. Affirmative steps to **expand the regional airport system** in tandem with LAX;
3. The obligation to **mitigate impacts on Manchester Square related to environmental justice** and neighborhood compatibility;
4. The incorporation of **essential safety and security design features** on and around the airport;
5. The pressing need to **fast track transportation improvements** that will remove airport traffic from local community roadways; and
6. Unambiguous **commitments to comply** with agreed-upon negotiating elements.

The compromise plans offered by Council Members Miskowski and Parks both sought to resolve significant concerns associated with Master Plan Alternative D, as outlined in the Final EIS/EIR. However, neither plan assured that the concerns raised by the County Board of Supervisors would be resolved with respect to future development of LAX.

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In September 2004, LAWA released an Addendum to the Final EIR for the modernization of LAX. The Final EIR Addendum provided additional discussion pertaining to a proposed relocation and property acquisition plan, environmental justice, air quality, a feasibility analysis of the three "Alternative E" proposals, and refinements to the Environmental Action Plan as well as refinements to the LAX Specific Plan for Alternative D. LAWA did not release the Addendum for public review or comment (both would be voluntary under CEQA), and the Los Angeles City Council thereafter certified the environmental documents and approved the project (Alternative D) on December 2004.

During January 2005 a number of lawsuits were filed challenging the City's CEQA approvals. Settlement discussions ensued in an effort to resolve concerns of the County and other agencies and organizations' while providing a clear pathway for LAWA to move forward with the Master Plan Process. The settlement process continued throughout 2005, and in February 2006 the final Judgment Pursuant to Stipulated Settlement (Settlement) was filed with the Superior Court of the County of Riverside.

The Settlement Agreement Recitals note that the "petitioners have long been concerned about the impacts of LAX operations on traffic, noise, human health risks and the quality of life in communities surrounding LAX, as well as the need to limit future growth at LAX through a broad regional effort to meet air transportation demand at other airports in the region." The introduction further notes that the Settlement Agreement is intended to serve in lieu of a court determination of the merits of the parties' claims, and the Court shall retain jurisdiction over enforcement of the mutual obligations specified in the Settlement Agreement.

Pursuant to the Settlement Agreement, the petitioners dismissed all causes of action against the City and LAWA challenging the Master Plan approvals. The City's responsibility under the Settlement Agreement is to minimize environmental impacts of LAX operations, which have been of long-standing concern. The SPAS Draft EIR, however, does not provide detailed analyses that clearly demonstrate to the petitioners how the proposed project alternatives would adequately address the long-standing environmental issues that underlie LAWA's Specific Plan and Settlement obligations.

### 1.2 Summary

The County has examined the SPAS Draft EIR and project alternatives in terms of the commitments contained in the Settlement Agreement and in the Specific Plan. Provided below in Table 1 is a very brief synopsis of key elements of the Settlement Agreement. The County's comments are summarized thereafter (in Table 2) and presented in the sections that follow. Section 8 provides a Glossary of terms and acronyms used herein.

Table 1. SYNOPSIS OF STIPULATED SETTLEMENT REQUIREMENTS

SECTION	SUMMARY OF SETTLEMENT AGREEMENT REQUIREMENTS
I	<b>Settlement Overview</b>
II	<b>Dismissal of Actions, Release of Claims</b>
III	<b>Federal Aviation Administration (FAA) Determination regarding LAWA Expenditures</b>
IV	<b>Passenger Gate Provisions:</b> A. No more than 163 gates through 12/31/25 B. Eliminate 2 Narrow Body Equivalent Gates (NBEG)/year up to 10 total, with a maximum of 153 gates through 12/31/20

\*The Petitioners included the cities of El Segundo, Inglewood and Culver City, the Alliance for a Regional Solution to Airport Congestion (ARSAC), and the County of Los Angeles.

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	Bz. LAWA gets NBEG credits if gates are closed ahead of schedule. C. Bz doesn't apply if fewer than 75 million air passengers (MAP) or if the Master Plan is revised to have 153 gates or less. D. Bz doesn't apply during emergency or peak periods; a maximum of 30 days of peak periods each year. E. Bz doesn't apply to general aviation, charter flights or similar operations, etc. F. LAWA to identify gates to be closed; petitioners may conduct inspections up to 4 times each year. G. The West Satellite Concourse and Automated People Mover no longer classified as "yellow light" projects but as "green light" projects; Specific Plan to be amended with support of Petitioners.
V	<b>SPAS Process</b> A. Process to begin within 60 days of Settlement Agreement. B. LAWA to complete Phase I within 6 months. C. After Phase I is complete, LAWA has 12 months to prepare the SPAS (i.e., the current review) with all required environmental documentation needed to modernize LAX with service capacity up to 78.5 MAP. D. SPAS to focus on Yellow Light issues, security, traffic, aviation, environmental impacts, mitigations. E. LAWA to identify the study methodology per CEQA/NEPA requirements. F. LAWA may simultaneously pursue non Yellow-Light projects while study underway. G. Local agencies to be consulted during CEQA traffic analysis, selecting up to 15 added intersections for analysis, with mitigation for significant impacts and LAWA funding or fair share contribution. H. Final Specific Plan to conform to FAA requirements. I. Security issues to be assessed by experts. J. Specific Plan Advisory Committee to be created (LA City, LA County, El Segundo, Culver City, Inglewood, the Alliance for a Regional Solution to Airport Congestion (ARSAC) and consulted at each major step of process.
VI	<b>Funding of Mitigation Measures</b> LAWA to fund Mitigation Measures provided FAA authorizes use of airport revenue funds.
VII	<b>Regional Airport Working Group</b> LAWA to invite FAA, the Southern California Assn. of Governments (SCAG), 5 Counties (LA, San Bernardino, Orange County, Ventura County, Riverside County) and airport operators to participate in regional airport working group working toward regional distribution of air traffic. Group shall (a) coordinate with Southern California Regional Airport Authority (or equivalent), (b) consider Regional Airport Authority JPA; and (c) support appropriate legislation; LA City to retain control of LAX, Ontario (ONT), Palmdale & Van Nuys airports.
VIII	<b>Regional Strategic Planning Initiative</b> LAWA to develop a Regional Strategic Planning (RSP) initiative to encourage expanded passenger & cargo use of Ontario & Palmdale airports, with annual reports & marketing strategies. First RSP due by 31 Dec 2006.
IX	<b>Outreach to Airport Neighbors</b> LAWA to join working group with ARSAC & Council District 11 to recommend to the Board of Airport Commissioners (BOAC) how to better respond to neighbors' concerns and enhance relations. Key goals: <ul style="list-style-type: none"> <li>• Effectively share info regarding LAWA &amp; LAX Projects</li> <li>• Identify and work with community to address LAWA neighbors' concerns re: operations at LAX</li> <li>• Coordinate LAWA staff responsibilities for responding to complaints with LAWA staff &amp; follow-up to verify that they've been addressed</li> <li>• Work with neighbors &amp; elected officials to resolve community issues &amp; review stakeholder liaison position.</li> </ul>
X	<b>Aviation Easements</b> A. LAWA to refrain from requiring aviation easements as precondition for funding mitigations. B. Where acoustics are inadequate to achieve sound levels, (1) an easement may be required if the home was built after 1989, (2) if built before 1989 & exposed to 75+ Community Noise Equivalent Level (CNEL), LAWA may require an easement at Fair Market Value, and (3) easements must conform to Caltrans format. C. Eligible homeowners must authorize & confirm sound installation & acknowledge extent of mitigation. D. Prior easements and agreements are not a part of the settlement provisions. E. Future zone changes that create noise-impacted parcels shall have aviation easements in place.
XI	<b>West Employee Parking Structure</b> LAWA to prepare a project EIR for the West Employee Parking project before any approvals are granted.

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XII	<b>LAX Connection to Green Line</b> LAWA to study ways to connect LAX to Green Line; results due within a year of the Settlement (by February 2007).
XIII	<b>Enforcement</b>
XIV	<b>Extraordinary Financial Situations</b>
XV	<b>Miscellany</b>

Table 2. SUMMARY OF LOS ANGELES COUNTY COMMENTS ON SPAS DRAFT EIR

ISSUE	BRIEF COMMENT SUMMARY	SEE SECTION
The EIR should Show how alternatives achieve Settlement commitments	The Draft EIR needs to provide a detailed analysis that sets forth all of the environmental commitments in the Settlement and shows how each is implemented in the proposed SPAS alternatives.	1.0
Under CEQA an EIR must be Addressed to a "Project" (not a series of alternatives), and the selected Alternatives violate the Rule of Reason	The Draft EIR offers a "discussion of the objectives associated with completion of the SPAS process" without identifying a preferred alternative as the true project; this approach leads to an incomplete analysis and is improper under CEQA. Moreover, the nine Alternatives described in this EIR do not fulfill the "Rule of Reason" because the significant adverse impacts are shared by all alternatives whereas the Rule of Reason calls for selection of alternatives that would avoid or lessen project impacts.	2.0
Passenger & Gate Provisions are Moot	Delays and economic conditions have rendered moot the Settlement passenger and gate provisions. Furthermore, gate limits in the FAA Record of Decision (ROD) may conflict with Settlement provisions; it is unclear how inconsistencies would be reconciled. All should be updated.	3.0
Alternatives Must be analyzed in terms of Passenger Capacity	LAWA has never presented a graphic layout of gates or calculations supporting the stated ratio of passengers to gates; the Draft EIR should offer these data.	3.1
Relationship of GTC, NBEG and MAP	Alternative 3 includes construction of a massive remote terminal (the GTC) that would replace terminals now located in the Central Terminal Area (CTA). The Draft EIR needs to discuss the passenger capacity of the GTC and the potential for the GTC to replace the need for NBEGs so that reviewers can gauge conformance of proposed alternatives to MAP limits and other terms and commitments contained in the Settlement.	3.2
The Capacity of Reconfigured Terminals should be Assessed	The reconfigured linear terminal in Alternative 3 introduces new variables into the assessment of passenger capacity. These variables must be explained and analyzed as part of the Draft EIR. It also needs to analyze how north airfield improvements will change runway usage and aircraft types, in turn impacting passenger capacities at LAX.	3.3
Runway Capacity Increases should be defined for all Alternatives	In order for readers to understand the aircraft and passenger serving capacity of the alternatives, the Draft EIR must include the airfield modeling data and a summary of the runway specific aircraft assignments for each alternative. The Draft EIR should also provide information about the passenger growth-inducing impact of increasing peak hour IFR. These data will facilitate assessment of the full passenger carrying capacity associated with each alternative.	3.4

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1995 MAP estimates are now outdated	MAP estimates should be recalculated to account for changing economic conditions, technology, business models, and use of leisure time.	3-5
Significant Impacts to 9 County Intersections must be Mitigated	Individual agencies need to provide evidence where traffic mitigation measures are judged infeasible, or the measures must be funded and implemented	4-1
Secondary Traffic Impacts require Study in this DEIR	The Draft EIR must analyze overall system deficiencies caused by diversion of traffic from significantly impacted intersections to other routes.	4-1
Suggested Traffic Mitigation Options	Additional measures are offered for Draft EIR consideration to mitigate significantly impacted County Intersections.	4-3
Noise impacts require further study	The Draft EIR must show both model and measurement data for the 2009 baseline to assess the difference between the two approaches and identify potential biases, and a 3 decibel (dB) difference should not be discounted as less than significant.	5.0 and 5.1
Differential use of the north & south runways impacts noise levels in Lennox.	Replacement of Terminals 1, 2 & 3 with linear concourse could increase pressure on south airfield. County requests that LAWA guarantee a semi-equal balance of north/south runway selection to protect Lennox from even greater noise impact.	5-2
Environmental Justice requires Balanced Airfield Operations to reduce Lennox noise	Lennox, a minority community, is the only residential neighborhood around LAX with homes in the 75 dB CNEL. Environmental justice aspects of this impact ment review under CEQA, including mitigation focused on regionalization and balanced airfield operations.	5-3
Regionalization is a Viable means to reduce Noise and Air Quality Impacts	Regionalization must be included in the mix of mitigation measures. Most of the measures in the current mitigation plan are based on voluntary actions, and the benefits from departure pattern changes, if approved, are negligible in terms of overall noise level reductions.	5-4
Air Quality impacts require further study in the Draft EIR	Draft EIR background air quality analyses omitted readings along the eastern boundary, where the 405 Freeway is a major pollutant source; readings on eastern boundary should be included in the background measurements provided in the Draft EIR.	5-5
Air Quality mitigations are weak and outdated	LAWA should revise the EIR to eliminate nebulous air quality enforcement language and to incorporate state of the art mitigations.	5-6
Regionalization is key to reducing significant 'unavoidable' adverse project impacts	Requirements of Settlement §VII & §VIII have been virtually ignored by LAWA. Draft EIR §5.2 demonstrates that regionalization is key to mitigating the significant 'unavoidable' impacts listed in Draft EIR §7.1. LAWA must disclose this relationship and pursue Regionalization to fulfill its CEQA obligation to reduce significant impacts with feasible mitigation.	6.1 and 6.2
The County Strongly Supports Alternatives that Connect LAX to the Regional Rail System	The construction of the Crenshaw/LAX light rail line with a stop at LAX will greatly improve airport access, at the same time reduce traffic and noise concerns. Please provide clarification as to the Metro connections and/or improvements associated with each of the potential SPAS alternatives.	7.0

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## 2.0 DISCUSSION OF VARIOUS ALTERNATIVES AS THE "PROJECT" DOES NOT COMPLY WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The Draft EIR (DEIR), which is delineated a "Program EIR", describes the project as a "discussion of the objectives associated with the completion of the SPAS process; the specific characteristics of the SPAS alternatives considered and carried forward for evaluation in the EIR; and the SPAS alternatives considered, but rejected from further consideration." DEIR, p. 1-45.

Such a "discussion" does not qualify as a project under CEQA. Therein, a project is defined to mean "an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (Public Resources Code section 21065.) A "discussion of alternatives" can have no impact. It is the development of the alternative as a project that would have the impact. Moreover, Public Resources Code §21080.5 states that "the phrase 'carrying out or approving a project' shall include the carrying out or approval of a plan for a project that expands or enlarges an existing publicly owned airport by any political subdivision..." But, the DEIR does not analyze a plan. In short, while a project can be a plan, it is not a discussion of various plans.

The DEIR is essentially a "project alternatives" section to an EIR required by CEQA Guideline §5126.6, which requires analysis of a reasonable range of alternatives to the project. A table in the DEIR "presents a preliminary evaluation of the relationship between each project objective and each SPAS alternative. A more detailed evaluation of that relationship will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearing process." (DEIR 1-26) Delaying the choice of the project among alternatives (as opposed to choosing an alternative as the initial project) does not comply with CEQA. While a project may be refined as part of the CEQA process (e.g., due to comments), it appears the intent is not to allow the initial choice of the project to be identified from the group of alternatives until the end of the process.

A definitive project description at the beginning is necessary to ensure that all environmental impacts of the project are analyzed, avoid a piecemeal approach, and allow for meaningful public comment. None of those objectives are achieved by discussing a group of alternatives and then picking the project at the end of the process, which allows no time left for public input. Moreover, the approach undermines the 'Rule of Reason' wherein alternatives set forth in an EIR "shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project". (CEQA Guidelines §5126.6(c)). This shortcoming is particularly evident in the list of significant unavoidable adverse project impacts. As identified in Draft EIR §7.1, the significant unavoidable impacts identified in the EIR "pertain to all of the alternatives unless otherwise noted" and include direct impacts related to air quality, human health risk, traffic, noise, and land use.

In sum, selecting the project at the end of the process turns CEQA on its head. The problem of defining the project as a discussion of alternatives is highlighted by the following statement in the DEIR with respect to project impacts: "All of the SPAS alternatives would result in lower GHG emissions from aircraft operations... than would occur in 2025 without the project." If the "project" as defined in the DEIR is a discussion, that statement makes no sense. Rather, it implies that the "project" is really one of the alternatives. Failure to identify which of the alternatives is the real project until the end detrimentally impacts the ability of the public to comment on the specific project. It also would preclude LAWA from relying on the EIR as a program EIR, as it seems to intend. Instead, once selecting its alternative, LAWA would then need to do a new EIR on that alternative as the master project in order to use or rely upon that EIR for the subsequent projects developed under that alternative.

→ LAWA should revise the current SPAS DEIR so that the project incorporates a chosen set of improvements to meet the seven objectives set forth in pages 2-3 through 2-5 of the DEIR. LAWA should present all other options as alternatives to the proposed project.

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### 3.0 SETTLEMENT SECTION IV PASSENGER GATE PROVISIONS HAVE BEEN RENDERED MOOT

A careful review of the Draft EIR points to the need for additional relevant environmental information about passenger service levels and gates. The information is required to verify that LAWA and the City of Los Angeles are fulfilling their obligations to the petitioners under the Settlement Agreement, and to fulfill the full disclosure requirements of CEQA. Moreover, it appears that economic conditions have rendered moot key provisions contained in Settlement §IV.

#### 3.1 Airport passenger capacity should be analyzed and disclosed for each Alternative

The mainstay of the 2005 Settlement Agreement between petitioners and LAWA is a cap of 78.9 Million Air Passengers (MAP) through benchmark years 2015 and 2020 (when the Settlement expires). The ostensible controlling factor is to limit LAX to using 163 aircraft passenger gates (153 by 2015 if 75 MAP is achieved). The following table from the LAWA website displays passenger levels starting in 1994.

Table 3: LAX PASSENGER LEVELS 1994-2011

Year	Departing	Arriving	Total
1994	25,812,087	25,238,188	51,050,275
1995	27,234,353	26,674,870	53,909,223
1996	29,167,947	28,811,617	57,979,564
1997	30,313,688	29,828,900	60,142,588
1998	30,826,859	30,388,853	61,215,712
1999	31,298,944	31,080,627	62,379,571
2000	33,836,077	33,467,105	67,303,182
2001	31,007,930	30,598,274	61,606,204
2002	28,181,481	28,042,362	56,223,843
2003	27,544,606	27,438,231	54,982,837
2004	30,343,873	30,260,695	60,604,568
2005	30,649,324	30,840,074	61,489,398
2006	30,500,130	30,540,336	61,040,466
2007	31,244,261	31,194,322	62,438,583
2008	29,930,985	29,884,661	59,815,646
2009	28,288,211	28,232,632	56,520,843
2010	29,605,542	29,463,867	59,069,409
2011	30,923,005	30,939,947	61,862,952

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Examination of Table 3 demonstrates that passenger levels in 2011 are essentially the same as they were in 1998, and approximately 10% below levels of 2000. Passenger levels increased 4.7% in 2011 and are increasing at a similar rate thus far in 2012. Even if this accelerated rate of growth persists (which is unlikely), LAX will not reach the 78.9 MAP level until 2027. SCAG, FAA and industry sources are forecasting more moderate growth rates, indicating that levels may not reach 78.9 MAP until well beyond 2020. Furthermore, the SPAS Draft EIR is based on an increase of 316 in operations between 2009 and 2025 (based on extrapolating the daily aircraft operations figures appearing on Draft EIR Table 4.30 1-7 as shown in Table 3) which would bring the total to only 74.01 MAP in 2025.

Table 4, based on Draft EIR Table 4.30 calculates the 2025 MAP by extrapolating the 1493 daily operations and 56.52 MAP from 2009. The 2025 MAP projection of 74.01 may be somewhat low owing to a slight increase in the use of larger aircraft, but still the 2025 MAP level is far below the 78.9 MAP included in the Settlement Agreement. Based on this analysis, it is probable that limitations in the Settlement Agreement are not in danger of being exceeded. However, it is beneficial to maintain a cap on the growth of LAX within the Settlement timeframe.

Table 4. DAILY AIRCRAFT OPERATIONS BY AIRCRAFT TYPE FOR 2009 & 2025 FORECASTS\*

	NJT	SJT	SNB	LNB	SWB	LWB	NLA	TOTAL
2009	158	259	610	207	87	151	1	1463
% of total	11%	18%	42%	14%	6%	10%	0%	
2025	146	244	743	383	218	294	29	1955
Change	-11	85	133	176	131	143	28	492
% of total	-8%	33%	38%	20%	16%	20%	2000%	31%
TOTAL	7%	18%	38%	14%	11%	10%	1%	

The Settlement Agreement also includes a provision that the proposed gate limitations will not "restrict access in LAX below those disclosed in the FAA Record of Decision (ROD) for the No Project and Approved Project Scenario for 2015." The ROD indicates that the No Project scenario would be 78.7 MAP. The FAA ROD does not specifically indicate the Project Scenario for 2015, and the FAA ROD makes no mention of gates. Furthermore, Settlement § IV.A and §IV.B trigger the restrictions on gate levels only when and if passenger levels at LAX exceed 75 MAP. Since it is highly unlikely that LAX will reach that level before 2020 (when the Settlement is scheduled to expire) the gate restrictions also are rendered moot.

To reduce environmental impacts, the County's objectives related to the LAX Master Plan include limiting the ultimate service level of LAX to 78.9 MAP, a figure derived in part from forecasts conducted by LAWA in 1995 indicating demand at LAX would be 98 MAP in 2015. Clearly, given the above data, those forecasts have proven to be wide of the mark. The primary mechanism for achieving this is a limit of 153 NBEG.

→ Passenger and gate provisions should be updated to reflect delays and economic conditions that have rendered moot the provisions contained in the Settlement. Furthermore, gate limits in the FAA Record of Decision (ROD) may conflict with Settlement provisions. LAWA should specify how inconsistencies will be resolved in terms of the access limits in FAA's Approved Project Scenario for 2015 and the gate limitations contained in the Settlement Agreement.

\* NJT=non-jet aircraft; SJT=small jet aircraft; SNB=small narrow body aircraft; LNB=long narrow body aircraft; SWB=small wide body aircraft; LWB=large wide-body aircraft; NLA=new larger aircraft.

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### 3.2 The Draft EIR should reexamine the ratio of passengers to equivalent gates

LAWA has never presented calculations relating to the MAP/Gate ratio, and neither the Master Plan nor the current Draft EIR contains algorithms supporting the ratio of passengers to gates, as indicated in the ACL & Associates' 2004 report. Numerous variables complicate the ability of aircraft loading gates to serve passengers, and many of these variables are airport-specific (e.g., size, location, terminal layout, hours of operation, etc.). The Settlement uses the term NBEG to link gates to passenger capacity, but there is no single recognized science for this ratio and the term is not contained in the Settlement definitions. Moreover, there is no established consensus on the number of gates currently in use at LAX, nor the types of gates, nor their status in terms of NBEG. (Wikipedia lists 108 gates attached to the nine terminals). The Settlement states there were 163 gates at LAX, and this number includes every conceivable aircraft parking spot on the airfield (in the words of the Settlement: "wherever passengers will board and exit an aircraft"). In the 2004 report, ACL indicated the true number of gates was closer to 133 as reported in the Master Plan document itself. Because the number of gates correlates directly with passenger capacity, the Draft EIR should disclose in graphic form the location of every extant aircraft gate for each alternative or combined alternative. Considering that LAWA has been operating LAX continually for over 75 years, this task should be easily accomplished. To offer some comparison of the variable relationship between MAP and the number of gates, Table 5 presents current conditions at the highest passenger volume U.S. airports as of 2011:

Table 5. 2011 MAP, NUMBER OF GATES & MAP/GATE RATIOS FOR U.S. AIRPORTS  
(Source: Airport Operating Council International and Wikipedia)

AIRPORT	2011 MAP	GATES	MAP/GATE
Atlanta	92.4	206	448,544
Chicago O'Hare	66.7	192	347,396
LAX	61.8	108	572,222
Dallas Fort-Worth	57.7	231	249,784
Denver	52.8	152	347,368
John F. Kennedy (New York City)	37.7	153	183,444
San Francisco	49.8	102	489,000

A review of Table 5 indicates LAX is currently utilizing its gates to process passengers at a much higher rate than other comparable airports. (Table 5 has not been corrected for NBEG, and the number of gates at LAX was set at 108 according to Wikipedia which lists only "contact" gates, that is, attached to a terminal.) The high figure for LAX is likely due to the use of remote gates. This comparison is presented only as an indication of the type of analysis that needs to be completed by the Master Planning team.

→ The Draft EIR must provide information for each of the proposed alternatives in sufficient detail to assess the potential capacity of each of the proposed gates to serve passengers given the type of aircraft, the hours of operation, the physical layout of the terminal waiting lounges and other factors pertinent to the analysis. This information must be included in the Draft EIR as part of the Project Description and assessed in the Growth Inducing analysis with respect to gate and capacity limitations contained in the Settlement Agreement.

→ In conjunction with the gate/MAP analysis, and because the number of aircraft gates is a determining factor for the enforcement of passenger constraints, each alternative must reveal exactly where each gate will be located and the capacity or design function of each gate (e.g., Narrow Body, Long Narrow Body, Large Wide Body, New Large Aircraft, etc.). This will enable reviewers of the Draft EIR to ascertain the number of passengers each alternative is capable of serving. The Draft EIR must also disclose the passenger-carrying capacity of all remote gates, particularly in light of the

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widespread use (at LAX and other major airports) of remote gates that rely on buses or foot travel to link passengers to the terminal.

→ Alternative 3 includes construction of what is essentially a massive remote terminal known as the GTC. This facility would replace terminals now located in the Central Terminal Area (CTA) and provide passenger processing and baggage check in. Passengers and baggage would flow to aircraft via an Automated People Mover and via a baggage tunnel. The Draft EIR should discuss the passenger-serving capacity of the GTC and the potential that the GTC could replace the need for NBEGs.

### 3.3 Capacity of the reconfigured terminal in Alternative 3 must be assessed

Alternative 3 would replace the piers at terminals 1, 2 and 3 with a singular linear terminal, and would replace vehicle parking in the Central Terminal Area with terminal facilities. The reconfigured terminal area and the addition of a GTC inject vastly different variables into the equation predicting air passenger capacity. There are substantial capacity differences between a linear terminal, such as exist at John Wayne Airport, and the pier terminals now existing at LAX terminals 1, 2 and 3. Linear terminals allow free flow of passengers between gates, provide flexible passenger enplaning and deplaning, provide flexible aircraft parking, and possess other advantages. The Draft EIR should assess these variables in order to compare existing passenger capacity with the passenger capacity of proposed alternatives. In general, linear terminals provide more capacity than pier terminals because of the ease of entry through security, the absence of bottlenecks at the pier entry point, and the free flow of passengers through the lounge areas.

→ For the reasons enumerated above and because the number of gates is the seminal factor of the Settlement, the capacity of the reconfigured terminal spaces must be assessed in terms of NBEG. The EIR must assess these variables in order to compare existing passenger capacity with the passenger capacity of proposed alternatives.

### 3.4 Runway capacity increases must be defined for all Alternatives

Alternatives 1 through 7 include various improvements to the north airfield, all designed to increase aircraft flow and safety. They also increase the peak hour Instrument Flight Rules (IFR) capacity of the north airfield. Peak hour IFR capacity is a key measure of the ability of a runway system to serve aircraft operations. Such information is not included in the DEIR. The inclusion of this information in the Draft EIR is critical to understanding the capacity of the proposed physical improvements. The FAA provides guidance to assessing airfield capacity in AC 150-5060-2 and the analysis is supported by a variety of advanced modeling techniques. Draft EIR Table 4.20-1-7 includes a footnote indicating the use of 2011 SIMMOD model runs and Integrated Noise Model (INM) output files. (SIMMOD is a sophisticated airfield modeling computer program; details are available at <http://web.mit.edu/aerostol/www/labs/AATT/reviews/simmod.html>.) The Noise section of the Draft EIR uses INM to generate noise contours and other noise impact levels.

While the technical appendices may include detailed runway use information, the Draft EIR does not include easily accessible tables indicating how many aircraft are assigned to each runway for each build alternative. Although projected noise contours are significantly larger under the build alternatives, the Draft EIR provides only one table in the Noise section that lists daily operations per aircraft type.

→ In order for readers to understand the aircraft and passenger serving capacity of the alternatives, the Draft EIR must include the airfield modeling data and a summary of the runway specific aircraft assignments for each alternative. (At the time of our review, the web version of the Draft EIR included no link to the appendices where this information may be located.) Furthermore, the Draft EIR should provide information regarding the passenger growth-inducing impact of increasing the peak hour IFR.

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Together, these data will enable reviewers to assess the full passenger carrying capacity that could feasibly be associated with each alternative.

### 3.5 The Master Plan forecasts are outdated and inaccurate and need to be redone

The Master Plan forecasts developed by LAWA in 1995 have not stood the test of time. These forecasts projected 98 MAP and 3.6 MAT (Million Annual Tons) of cargo at LAX for 2015. Recent levels, despite 4-5% increases in 2011 and 2012, are 61 MAP and 1.7 MAT. In 2009, levels were 67 MAP and 2.0 MAT. Thus, not only have the high forecasts not been achieved, levels have decreased 10% to 20%. As stated above, the Draft EIR itself uses a forecast of approximately 74 MAP in 2025. Thus, while it is obvious that the Draft EIR is using forecasts that are vastly different from the ones used in the original Master Plan EIR, there is no discussion or revelation regarding these new forecasts. Recent forecasts by SCAG, FAA and the airline industry also indicate a rate of increase much less than envisioned in the 1995 Master Plan. Much has occurred in the world since 1995 including not only 9/11 and the Great Recession, but also a vast difference in how business is conducted and how income is distributed. The introduction of the Internet and computer interconnectedness (as documented in Thomas Friedman's book, "The World is Flat") have reshaped the global economy. The U.S. economy is in a state of flux with no clear direction, and North American airlines are operating on very thin margins (0.5%) with uncertain forecasts for future revenues.

Accommodating LAWA's 1995 forecasts formed the Purpose and Need of the original Master Plan and its constituent projects. The FAA ROD that certified the EIS also cites accommodating these forecasts as the Purpose and Need for the Master Plan. The Settlement Agreement is based on these outdated and discredited forecasts, as are the follow-on Specific Plan Amendment and its Draft EIR.

→ Considering that the 1995 passenger demand forecasts comprise the fundamental basis for development of the proposed project alternatives, it is important that the current Draft EIR disclose the new forecasts and their underlying assumptions.

### 4.0 THE SPAS PROCESS DOES NOT FULFILL TRAFFIC COMMITMENTS CONTAINED IN SETTLEMENT IV.G. AND FAILS TO COMPLY WITH CEQA

#### 4.1 SPAS Alternatives would significantly impact nine County intersections yet mitigation (partial) is provided for only one of these intersections.

The County Department of Public Works does not agree that the Draft EIR adequately analyzes and discloses the impacts and appropriate mitigations for County intersections. The County requests that LAWA consult and work with its Public Works engineering staff before finalizing the EIR. The study area for the traffic analysis includes over 100 intersections. Table 6 lists the 40 intersections that are all or partially in the County, and notes the impact analysis findings for each. Mitigation is proposed in those cases where LAWA considers the improvements to be feasible, also shown in Table 6.

Table 6. INTERSECTIONS IN LA COUNTY IMPACTED BY SPAS PROJECT ALTERNATIVES

NO.	INTERSECTION	JURISDICTION	IMPACT (Y/N)	MITIGATION
1	Admiralty Way & Ball Way	LA County	No	NA
2	Admiralty Way & Fiji Way	LA County	No	NA
3	Admiralty Way & Mindanao Way	LA County	No	NA
4	Palawan Way & Admiralty Way	LA County	No	NA
5	Via Marina & Admiralty Way	LA County	No	NA

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20	Aviation Blvd & West 120th	El Segundo/LA County	No	NA
21	Lincoln Blvd & Ball Way	Caltrans/LA City/LA County	No	NA
23	Centinela Ave & Jefferson Blvd	LA City/LA County	No	NA
27	La Tijera Blvd & Centinela Ave	LA City/LA County	YES	Not Feasible
36	La Cienega Blvd & Century Blvd	Inglewood/LA City/LA County	YES	Not Feasible
52	52 Inglewood Ave & El Segundo Blvd	Hawthorne/LA County	No	NA
53	La Cienega Blvd & El Segundo Blvd	Hawthorne/LA County	No	NA
56	Lincoln Blvd. & Fiji Way	Caltrans/LA City/LA County	No	NA
63	Hawthorne Blvd & Lennox Blvd	LA County	YES	Not Feasible
67	La Cienega Blvd & Imperial Hwy	LA City/LA County	No	NA
75	I-405 NB Ramps (e/o La Cienega Blvd) & Imperial Hwy	Caltrans/Hawthorne/LA County	No	NA
76	Inglewood Ave & Lennox Blvd	LA County	YES	Not Feasible
86	La Brea Ave/Overhill Dr & Stocker St.	LA County	YES	Not Feasible
87	La Brea Ave & Slauson Ave.	LA County	YES	Partial
89	La Cienega Blvd & Lennox Blvd	LA City/LA County	No	NA
91	La Cienega Blvd NB Ramps & Slauson Ave.	LA County	No	NA
92	La Cienega Blvd SB Ramps & Slauson Ave	LA County	No	NA
93	La Cienega Blvd & Stocker St.	LA County	YES	Not Feasible
94	La Cienega Blvd & 111th St.	LA City/LA County	No	NA
95	La Cienega Blvd & West 120th St	LA County	YES	Not Feasible
97	La Cienega Blvd & I-405 SB Ramps (e/o Century Blvd)	Caltrans/LA City/LA County	No	NA
98	La Cienega Blvd & I-405 SB Ramps (n/o Century Blvd)	Caltrans/LA City/LA County	No	NA
109	Lincoln Blvd & Mindanao Way	Caltrans/LA City/LA County	No	NA
119	119 Ocean Ave/Via Marina & Washington Blvd	LA City/LA County	YES	Not Feasible
120	Overhill Dr & Slauson Ave.	LA County	No	NA
122	Palawan Way & Washington Blvd	LA City/LA County	No	NA
140	SR-90 WB Ramps & Slauson Ave	Caltrans/Culver City/LA County	No	NA
167	La Cienega Blvd. & 104 <sup>th</sup> St.	LA City/LA County	No	NA
173	Western Ave & Imperial Hwy	LA County	YES	Not Feasible
175	Vermont Ave & Manchester Ave	Caltrans/LA City/LA County	No	NA
176	Vermont Ave & Century Blvd	LA City/LA County	No	NA
177	Vermont Ave & Imperial Hwy	LA City/LA County	No	NA
185	Crenshaw Blvd & Rosecrans Ave	Gardena/Hawthorne/LA County	No	NA
190	Western Ave & El Segundo Blvd	Gardena/LA County	No	NA
192	Vermont Ave & El Segundo Blvd	LA City/LA County	No	NA

NA = Not Applicable; e/o= east of; n/o=north of; s/o=south of

Table 7 lists nine intersections located wholly or partially in the County that would experience significant adverse impacts from the project. At only one of these 9 intersections is LAWA proposing to reduce the impacts to less than significant levels; mitigation for the remaining 8 significantly impacted intersections has been found infeasible by LAWA. Table 7 outlines forecast service levels and LAWA's proposed mitigation for these nine significantly impacted intersections:

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Table 7. COUNTY INTERSECTIONS SIGNIFICANTLY IMPACTED BY THE SPAS ALTERNATIVES

LOCATION	LEVEL OF SERVICE	MITIGATION
36. La Cienega Blvd & Century Blvd	F	No Feasible Mitigation
63. Hawthorne Blvd & Lennox Blvd	D	No Feasible Mitigation
76. Inglewood Ave & Lennox Blvd	D	No Feasible Mitigation
86. La Brea Ave/Overhill Dr & Stocker St.	F	No Feasible Mitigation
87. La Brea Ave & Slauson Ave	F	Partial
93. La Cienega Blvd & Stocker St	F	No Feasible Mitigation
95. La Cienega Blvd & W. 120th St	D	No Feasible Mitigation
119. Ocean Ave/Via Marina & Washington Blvd	F	No Feasible Mitigation
173. Western Ave & Imperial Hwy	E	No Feasible Mitigation

With few exceptions, the impact findings apply to all five alternatives (1, 2, 4, 8 and 9). Some of the impacted locations show Level of Service (LOS) D operating conditions, but are identified as being impacted by the project based on LA County criteria for a significant contribution to the volume/capacity ratio when the with-project LOS is D (which is generally considered an adequate LOS, however the impact is caused by the high project contribution).

Of primary concern are the locations at LOS E or F without identified mitigation, which six of the County intersections fall into this category. The traffic study identifies potential mitigation measures for each location, but deems them infeasible due to "policy" considerations such as needing additional right-of-way, sidewalk adjustments, or impacting other modes of travel.

→ Based on review of the SPAS Draft EIR, it appears that the feasibility findings represent LAWA's interpretation of each jurisdiction's assessment. The County requests that LAWA modify/clarify the following:

- Did LAWA extend to Los Angeles County the offer to fund or provide fair-share mitigation for the significantly impacted County intersections?
- What evidence can be provided that the County rejected potential mitigation measures as infeasible?
- When did LAWA provide the County with an opportunity to select intersections for the Draft EIR analysis, and which intersections did the County submit to LAWA for this purpose?

→ Given the potential magnitude of the deficiencies noted in Table 7, it is important that the affected jurisdictions either verify the finding of infeasibility or be given an opportunity to consider implementation of the identified improvements (or other appropriate improvements) with necessary funding or fair-share contributions by LAWA. This is critical because the Settlement Agreement requires LAWA to "contribute its fair share for each mitigation measure to the implementing agency."

#### 4.2 The Draft EIR does not address overall system deficiencies associated with significant adverse effects

The foregoing discussion points to significant, unmitigated, direct adverse impacts to eight County intersections, and partial mitigation at one County intersection. LAWA does not propose full mitigation for any of the 9 significantly impacted County intersections. The fact that demand is forecasted to exceed capacity at these critical County intersections clearly indicates that some amount of traffic will divert to other routes. These traffic diversions will cause indirect impacts and overall system deficiencies throughout the region.

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→ It is incumbent upon the Draft EIR to identify and analyze system-wide deficiencies caused by traffic diverted from significantly impacted intersections, and undertake additional efforts as needed to evaluate the mitigation measures for feasibility in coordination with the affected jurisdictions.

#### 4.3 The Draft EIR must consider additional measures to reduce traffic impacts

Within the larger context, there are certain locations where potential mitigation measures are available and should be evaluated within the Draft EIR.

→ Provided below is a list of intersections and recommended potential mitigation measures and/or analyses that merit thorough evaluation in the Draft EIR:

- 27. La Tijera Boulevard & Centinela Avenue: The DEIR makes a finding that the addition of a second southbound left-turn lane (which would mitigate the project impact) is physically feasible, but has policy constraints (narrowing sidewalks and impacts to alternative transportation modes). The County has not evaluated this finding in coordination with the City of Los Angeles recognizing that the projected LOS D may be considered acceptable by the City.
- 36. La Cienega Boulevard & Century Boulevard: This intersection is a critical location as far as airport accessibility is concerned. Right-of-way is constrained by large office buildings on the northeast and southwest corners, which are not constrained by buildings and where consideration should be given to opportunities presented by right-of-way acquisition from these parts of the intersection. The Cities of Inglewood and Los Angeles share this intersection.
- 63. Hawthorne Boulevard & Lennox Boulevard: This intersection has some physical constraints, but could potentially be improved with the removal of the north-south median, restriping with minor sidewalk adjustments, and lane width reductions. The potential for such improvements should be the subject of a more detailed evaluation, recognizing that the projected LOS D could be considered acceptable by the City.
- 76. Inglewood Avenue & Lennox Boulevard: Improvements as noted in the SPAS are physically feasible at this location, but would result in the loss of on-street parking. Since the projected performance is LOS D, these improvements are recommended if the high project contribution to this location is of concern (as determined through communications between the City and the County).
- 86. La Brea Avenue/Overhill Drive & Stocker Street: This five-legged intersection is projected to operate at LOS F. An identified mitigation measure is to add a southbound through lane, which would require sidewalk modifications and potentially some right-of-way. Since this intersection is adjacent to open space, the feasibility of such an improvement should be evaluated to determine the extent of constraints to obtaining additional right-of-way.
- 93. La Cienega Boulevard & Stocker Street: The DEIR declared improvements at this location as infeasible due to right-of-way constraints, even though there are no buildings in the vicinity. A recent SCAG study is referenced, indicating potential project participation in future improvements if and when something is identified; this should be pursued with a projected LOS F, with possibly some initial improvements identified.
- 95. La Cienega Boulevard & W. 120th Street: While a potentially feasible mitigation measure is identified for this location (may require some right-of-way or sidewalk adjustment), the LOS D that is forecast may be considered acceptable.

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- 119. Ocean Avenue/Via Marina & Washington Boulevard: Because of the physical constraints, the finding of "economic and policy infeasibility" would appear to be realistic. Mitigation would require some form of system approach for the Marina Del Rey area, with potential participation by the project.
- 173. Western Avenue & Imperial Highway: The improvement identified at this location (addition of a separate eastbound right-turn lane) has the potential for a functional right turn lane, which may require some restriping and minor sidewalk adjustment. This improvement could be pursued as a means of alleviating the projected LOS E.

#### 5.0 ADDITIONAL STUDIES AND MITIGATION ARE NEEDED TO REDUCE NOISE AND AIR QUALITY IMPACTS ASSOCIATED WITH THE SPAS ALTERNATIVES

Noise impacts have been a consistent concern to the County and the planned growth to 78.9 MAP by 2025 (from the 56.5 MAP in the year 2009 baseline) adds to that concern. The increased passenger levels would be accommodated by an increase of 30% in average daily aircraft operations, and accompanied by a 40% increase in passenger traffic (using larger capacity aircraft).

As discussed in §2 of this Comment Letter, LAX passenger traffic has been relatively flat near 60 MAP for almost 20 years and it may be optimistic to anticipate attainment of the 78.9 MAP cap by 2025. The economic downturn of the last 5 years has adversely impacted business and leisure travel such that extrapolation of the airline passenger growth trend has been distorted. Therefore, it may take longer than forecast to reach the passenger cap.

No dramatic improvements in aircraft emissions or noise levels are anticipated in the future fleet compared to existing conditions. As a result, a slower rate of growth will spread out the impact horizon but will not likely affect the final impact profile. However, one implication of a possibly delayed build-out timeframe is that building LAX "convenience" improvements (e.g. passenger processing systems, customs, etc.) will induce passenger traffic growth that might have used alternative airports had the improvements been better phased to match actual MAP growth.

In other words, the proposed improvements may undermine regionalization of air service, which is contrary to LAWA's Settlement commitment to encourage the growth of passenger activity at underutilized LAWA-owned commercial airports in the region. Monopolizing or cannibalizing of demand retards airport regionalization. This is a central and long-standing point of concern for Los Angeles County and communities around LAX, as discussed more fully in Section 6 below.

#### 5.1 Noise impacts require further study in the SPAS Draft EIR

While the Draft EIR noise analysis methodology is based on approaches that are recognized as industry standards, the analysis still falls short. An extensive level of effort was given to achieve full public disclosure of noise impacts, particularly from aircraft operations. The methodology description further outlines the possible shortcomings of relying completely on a computer model, even when the input data has been very carefully developed (as in this case). The fact that the FAA requires use of the Integrated Noise Model (INM) for noise impact analysis obscures the fact that the noise contour maps show an exact delineation of impacted versus not impacted uses when the actual location has a substantial margin of uncertainty. The methodology description notes that there may be differences between modeled results and measured noise levels resulting from both uncertainties in each approach as well as possible biases in either technique but no values are presented that would allow for public understanding of the possible range of modeling uncertainty. For full disclosure, it would be instructive to show in the Draft EIR

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both model and measurement data for the 2009 baseline case to determine the typical difference between the two approaches and to see if there are any distinct biases in those differences.

The methodology description notes that there is a 95% confidence level that the model-measured levels will be within 3 to 5 decibels of each other. However, decibels are a logarithmic progression. For an identical noise-generation scenario, it takes twice as many events to increase noise levels by +3 dB. A fleet of 2,000 identical aircraft in identical operation would generate a +3 dB increase above the same scenario with 1,000 identical aircraft because  $10 \times \log(2000/1000) = +3$  dB. The discussion notes that a +3 dB difference between modeling and measurement is not necessarily a significant difference. The County believes that a 2,000 aircraft per day difference is a significant difference and should be analyzed accordingly.

#### 5.2 Differential use of the north and south airfields may play a key role in noise impacts

The selection of a blanket aircraft noise threshold of significance of a +1.5 dB CNEL increase where noise-sensitive areas are exposed to levels exceeding 65 dB CNEL ignores the fact that a +1.5 dB CNEL increase at a 65 dB CNEL baseline is less of an issue than a +1.5 dB CNEL increase above a 75 dB CNEL baseline. A sliding scale threshold that recognizes the difference in impact severity as a function of the baseline would be more instructive and useful. With regard to a +1.5 dB increase, all things being equal, it requires a 41% increase in identical noise generating events to achieve a corresponding +1.5 dB noise level increase. While a 1.5 dB change would be almost undetectable under ambient conditions, the modification in the physical environment that might cause that change can be very large. For example, the noise level from 140,000 cars per day is only +1.5 dB higher than from 100,000 per day, but 40,000 more cars could create a major traffic impact even if the noise increment is barely detectable.

Besides the anticipated MAP growth (which may or may not occur within the adopted planning horizon), unincorporated areas east of Runways 7/25, most heavily impacted by airfield noise compared to any community in southern California, are also sensitive to any change in runway utilization patterns. Runway and flight track selection has been performed by a computer model and it is not possible to independently verify future utilization patterns. The Lennox community is mainly impacted by the aircraft landing on 25L, and to a certain extent by run-up and initial take-off roll by aircraft on Runway 28R. There is likely a preference by airlines based in Terminals 4-8 to use the south airfield closest to their gates. The Draft EIR does not include a preliminary gate assignment map if Terminals 1, 2 and 3 are demolished and a linear concourse is built; however greater pressure on using the south airfield can be expected with increased north/south gate asymmetry under this alternative.

→ The Draft EIR should include a preliminary gate assignment map if Terminals 1, 2 and 3 are demolished and a linear concourse is built, and analyze the potential for greater pressure on south airfield use in conjunction with increased north/south gate asymmetry.

#### 5.3 Environmental justice requires consideration of balanced airfield operations to reduce noise impacts on the community of Lennox

As part of the Draft and Final EIR, LAWA should guarantee a semi-equal balance of north/south runway selection similar to a mitigation measure for airfield operations as a means of protecting Lennox and other unincorporated communities from even greater noise impacts. This recommendation is reinforced by the issue of environmental justice: almost 90% percent of the Lennox community, which is the only residential neighborhood around LAX having some homes within the 75 dB CNEL noise contour, is a predominantly minority community and is the most heavily impacted. It is the only community with an additional school potentially noise-impacted above baseline conditions for most SPAS alternatives. Noise protection for this community should be a priority item consistent with LAWA's commitments in the Settlement Agreement.

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→ The Draft EIR should identify noise protection for Lennox as a priority consistent with LAWA's commitments in the Settlement Agreement, as well as CEQA's requirements for lead agencies to consider whether environmental and public health burdens associated with a project might disproportionately impact certain communities.

#### 5.4 Regionalization is a viable means for reducing impacts to noise and air quality

Only one noise mitigation measure vaguely hints at regionalization as a viable means for reducing impacts when it acknowledges that a "reduction in aircraft operations" would have a noise control benefit. Contrary to the Settlement Agreement, the proposed LAX improvements would likely serve as a disincentive for airlines to shift flights to Ontario or for passenger service to start up again from Palmdale. Unless there is a coupling of LAX improvements with economic incentives for airlines to shift some flights to other LAWA airports, no significant change at under-utilized Ontario or non-utilized Palmdale is expected. Regionalization must be included in the mitigation measure mix because most of the measures in the current mitigation plan are based on voluntary actions and benefits from departure pattern changes, which are negligible in terms of overall noise level reductions.

→ Regionalization must be included in the mix of mitigation measures since most measures in the current plan are based on voluntary actions benefits from departure pattern changes, which are negligible in terms of overall noise level reductions.

#### 5.5 Air quality impacts require further study in the SPAS Draft EIR

The Draft EIR predicts that significant unavoidable air quality impacts will occur during construction activities for all SPAS alternatives, and for all pollutants, using SCAQMD-recommended CEQA significance thresholds. Significant levels of emissions of SO<sub>x</sub>, PM-10 and PM-2.5 are calculated to derive from increased airport operations to achieve a 78.9 MAP service level. Acute toxic air contaminant (TAC) exposure associated with acrolein in jet engine exhaust at the airport fence-line is calculated to exceed the generally accepted hazard index for that TAC.

The analytical approach used to evaluate site-specific impacts was to calculate airport-related emissions associated with each alternative (but not combined alternatives), perform a dispersion analysis, superimpose the predicted concentration upon the background, and then compare the combined exposure to acceptable incremental thresholds or to ambient air quality standards. It would appear, however, that the analysis did not consider the 405 Freeway as a major source of air pollution upwind of homes, schools and other sensitive land uses. This is a significant oversight because the freeway carries roughly 330,000 vehicles per day during a peak month on segments near LAX with strongly prevailing west to east winds. Peak airport activity impacts are shown to be at the eastern property line for most pollutants and most alternatives. The impact analysis is remiss in using background concentrations measured in Westchester to characterize the non-airport baseline in communities directly east of the freeway; LAWA should modify the Draft EIR to include a supplemental set of background measurements set at the eastern property boundary.

→ The air quality impact analysis is remiss in using background concentrations measured in Westchester to characterize the non-airport baseline in communities directly east of the freeway; LAWA should modify the Draft EIR to include a supplemental set of background measurements set at the eastern property boundary near the 405 Freeway.

#### 5.6 Air quality mitigation measures are weak and outdated

The air quality impact mitigation discussion relies heavily on commitments made during the adoption of the LAX Master Plan EIR. Some of these measures are nebulous, lack force, outdated, and contain no contingency measures if parts of the mitigation menu prove to be infeasible. Caveats such as "as soon as possible, to the extent

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feasible, minimum practical, encourage, promote, if feasible" should be reviewed to verify feasibility and, where feasibility is uncertain, provide back-up measures that are equally effective. Measures that reference smog alerts are outdated; there has not been a second-stage smog alert in more than 20 years, so agreeing to stop work is a meaningless mitigation measure. Limiting engine idling to ten minutes has generally been replaced to five minutes consistent with state law for on-road trucks. The use of outdated and ineffective air quality mitigation measures is inexcusable in light of the Draft EIR determination that impacts on air quality, greenhouse gases and human health risks will all be significant, adverse and 'unavoidable.'

→ The air quality mitigation plan should eliminate outdated mitigation measures and include state-of-the-art commitments, including use of a specified percentage of low emissions engines in heavy equipment to reduce off-site migration of ozone precursors and carcinogenic diesel particulate matter.

#### 6.0 LAWA HAS NOT PURSUED SETTLEMENT COMMITMENTS TO SUPPORT REGIONALIZATION OF AIR SERVICE

The Settlement Agreement includes two separate sections that outline LAWA's obligation to take the lead in promoting regional airports other than LAX. The two sections are summarized below:

- **Section VII-Regional Airport Working Group:** LAWA shall invite the FAA, SCAG, the Counties of Los Angeles, Orange, Ventura, Riverside and San Bernardino, and airport operators in the Los Angeles region to participate in a regional airport working group to make plans to achieve a regional distribution of air traffic demand. The regional working group will consider a framework for coordinating all airport master planning and facility construction consistent with the adopted SCAG Regional Aviation Plan. For the purposes of effectuating a regional approach to southern California's air transportation needs, the regional group shall consider (1) coordinating with the southern California Regional Airport Authority or its successor; (2) the feasibility of entering into a joint powers agreement to create a regional airport authority, and/or (3) supporting legislative efforts to create such an authority. Notwithstanding the above, the City of Los Angeles and LAWA shall maintain financial and operational control of LAX, Ontario, Palmdale and Van Nuys Airport.
- **Section VIII-Regional Strategic Planning:** LAWA shall develop a regional strategic planning initiative to encourage the growth of passenger and cargo aviation activity at underutilized LAWA-owned commercial airports in the region (currently ONT and Palmdale). The regional strategic planning initiative will be prepared annually and will describe potential marketing strategies, potential opportunities for increased utilization of under-utilized facilities and other techniques by which LAWA will coordinate and support regional strategic planning for LAWA-owned commercial airports in the region. The first regional strategic planning initiative will be prepared by December 31, 2006.

The issue of regionalization has always been central to the petitioners' concerns, and appropriately so. Regionalization of passenger demand is the cornerstone for long-term mitigation of impacts on surrounding neighborhoods associated with expanded service at LAX.

#### 6.1 Regionalization of air service is the key to reducing significant adverse SPAS impacts to less than significant levels

SPAS Draft EIR Section 6.2 discusses LAWA's commitments to regionalization of air service, and the mitigation value of regionalization. That commitment, pursuant to the Settlement Agreement, was that this SPAS study would identify Specific Plan Amendments "creating conditions that encourage airlines to go to other airports in the region." (SPAS Report, p. 9) With respect to LAWA's commitments, §6.2 of the DEIR notes that Specific Plan §7.H calls for LAWA to undertake passenger and airline surveys and studies the results of which would help LAWA

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identify actions to encourage airlines to provide domestic passenger service at other airports in the region. This same discussion goes on to say that it is not possible to identify those actions, because they would be determined by results of the surveys and studies. In other words, the Draft EIR does not assess results of these studies because LAWA has not fulfilled this requirement of the Settlement Agreement or Specific Plan.

Absent study and survey results, the Draft EIR instead offers a programmatic review that identifies five airports potentially capable of receiving 'some aspect of activity shifted from LAX': Burbank, Long Beach, John Wayne, Ontario and Palm Springs. Palmdale is not included on this list because 'no airline has successfully sustained a sufficient passenger base to maintain operations there, even with LAWA subsidies.' The Draft EIR states that increased future activity levels at the remaining airports is already contemplated in the 2012 and 2008 SCAG Regional Transportation Plans and associated environmental documents, implying that SCAG is responsible for activity at airports in the region. It is important to recognize, however, that actions by SCAG and other agencies do not relieve LAWA of its obligations under the Settlement Agreement and Specific Plan §7.H.

The Draft EIR then outlines, at a programmatic level, the environmental benefits at and around LAX that might be associated with regionalization of air passenger service, key portions of which are summarized in Table 8 below:

Table 8. SIGNIFICANT 'UNAVOIDABLE' ADVERSE IMPACTS THAT WOULD BE MITIGATED AT LAX THROUGH AIR SERVICE REGIONALIZATION

IMPACTS LISTED AS SIGNIFICANT & UNAVOIDABLE IN SPAS Draft EIR §7.1	MITIGATION BENEFITS THAT WOULD RESULT FROM REGIONALIZATION AS LISTED IN Draft EIR §6.2
AIR QUALITY & GREENHOUSE GAS EMISSIONS	Air Quality and Greenhouse Gas emission impacts associated with flights, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
HUMAN HEALTH RISKS	Human health risks associated with toxic air contaminant emissions associated with flights, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
LAND USE COMPATIBILITY	Land use incompatibility impacts associated with noise-sensitive uses would be shifted to the other airport regions and thereby reduced around LAX.
NOISE	Noise associated with aircraft, construction and airport-related traffic would be shifted to the other airport regions and thereby reduced at and around LAX.
TRAFFIC	Vehicle trips to, from and within the airport would be shifted to the other airport regions and thereby reduced at and around LAX.
UTILITIES	Impacts on utility and service systems including solid waste would be shifted to the other airport regions and thereby reduced at and around LAX.

→ The potential environmental benefits of air service regionalization (noted in SPAS Draft EIR §6.2 and summarized in Table 8) correspond exactly to the discussion of significant adverse environmental impacts that LAWA claims (in SPAS Draft EIR §7.1) cannot be mitigated to less than significant levels: Air Quality, Greenhouse Gas Emissions, Human Health Risks, Land Use Compatibility, Noise, Traffic and Utilities. This highlights the critical necessity to create conditions that actually encourage use of other airports, not just doing studies; the Draft EIR must be revised to reflect this priority.

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#### 6.2 LAWA has not honored its commitments to air service regionalization

Despite the significant mitigation potential associated with regionalization, LAWA has made only token efforts to fulfill the regionalization requirements contained in the Settlement Agreement and Specific Plan. In Settlement §VII, LAWA agreed to invite FAA, SCAG, airport operators and the counties of Los Angeles, San Bernardino, Orange, Ventura and Riverside to participate in a regional airport working group that would join forces to achieve regional distribution of air traffic. This group was going to coordinate with the Southern California Regional Airport Authority (reactivated in 2005), consider creation of a Regional Airport Joint Powers Authority, and support appropriate legislation. In practice, however, this group met briefly during 2006 and then disbanded and LAWA has taken no substantive steps whatsoever to fulfill this commitment.

In Settlement §VIII, LAWA agreed to develop a Regional Strategic Planning Initiative to encourage expanded passenger & cargo use of Ontario and Palmdale airports, with annual reports & marketing strategies. LAWA did hire a director to oversee this effort and several strategies were discussed, but the effort fell apart in its infancy and LAWA has not taken steps to revive the RSP initiative.

During the 6 years since the Settlement was finalized, Ontario Airport has made numerous efforts to gain greater control over its destiny. Recently, cities and counties in the Inland Empire have formed the Ontario International Airport Authority in a renewed attempt to gain control of Ontario Airport and to attract more passengers and airline service. The San Bernardino County Board of Supervisors on August 28, 2011 unanimously approved a new government agency to oversee L.A./Ontario International Airport. The August 2011 vote established the Ontario International Airport Authority as a joint-powers arrangement with the City of Ontario, which has been steadily pressuring LAWA to turn the airport over to local officials, and Ontario City Council members subsequently voted to approve the new agency.

The five-member authority includes Ontario City Council members Alan D. Wagner and Jim Bowman as well as San Bernardino County Supervisor Gary Dvitt, whose district includes the cities of Chino, Chino Hills, Montclair, Ontario and a portion of Upland. Formerly the mayor of Ontario and Chairman of the Board of Supervisors, Dvitt is also a past president of SCAG and a current board member of the San Bernardino Associated Governments, the transportation planning agency. Goals of the newly created JPA are to help Ontario Airport rebound from the economic downturn of recent years while positioning itself for long-term growth.

SCAG has endorsed the transfer of control of this facility to the City of Ontario, and the Ontario JPA continues to seek support from the City of Los Angeles and from LAWA. However, the City and LAWA have steadfastly refused to relinquish control to Ontario and continue to assert that the lack of service to Ontario is attributable to the economy and the decisions of airlines. In September 2012 the City of Los Angeles again rejected offers by Ontario to take control of the airport, citing the diversion of funds from LAWA as the basis for their decision.

It is evident that the weak economy has impacted air service at regional airports throughout and beyond southern California. And it is true that Ontario International Airport has seen a pronounced decline in passengers, as have other regional air facilities throughout and beyond southern California, including LAX. The brief hiatus in air travel demand could have enabled LAWA and the City of Los Angeles to devote even greater attention to pursuing their commitments (per Settlement Sections VII and VIII, and Specific Plan Section 7.H) so that the framework for successful regionalization would be firmly in place when air travel demands rebound in future years. LAWA and the City have failed to take advantage of this opportunity.

Instead, LAWA has ignored these most essential commitments and now seeks to label as 'unavoidable' the significant adverse impacts on air quality, human health, greenhouse gas emissions, noise and traffic associated with the proposed SPAS alternatives. Regionalization of air service can effectively mitigate these impacts and

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LAWA has the obligation – as Lead Agency under CEQA, as signator to the 2006 Settlement Agreement, and as author of the Specific Plan – to ensure that this is accomplished to the fullest possible degree.

## 7.0 THE COUNTY STRONGLY SUPPORTS ALTERNATIVES THAT CONNECT LAX TO THE REGIONAL RAIL SYSTEM

The lack of an adequate transit system is responsible for some of the most pressing environmental impacts on unincorporated communities around LAX. Several identified components (including the construction of the Crenshaw/LAX light rail line with a stop at LAX and the construction of an ITC at Continental City with a pedestrian bridge to the existing Metro Green Line Station) will greatly improve airport access, and at the same time reduce traffic and noise concerns. The Draft EIR is not entirely clear, however, as to which of the Alternatives would include these components.

Draft EIR Table 4.6-7 provides a discussion of potential measures set forth by the California Office of the Attorney General to reduce greenhouse gas emissions (GHG). One of the stated Land Use measures is to 'incorporate public transit into the project's design' (page 4-426). The accompanying discussion states, "With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the Intermodal Transportation Facility (ITF) (Alternatives 1, 2, 8 and 9), the Ground Transportation Center (GTC) and ITC (Alternative 3), and the elevated/dedicated busway or Automated People Mover (APM) that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8 and 9).

It appears, however, that the connection to the future LAX/Crenshaw Metro Light Rail Station is also part of Alternative 3 and that Alternative 3 would additionally include a pedestrian bridge connection to the Metro Green Line. Draft EIR 14.9.6.3 (Alternative 3) states, "Alternative 3 reflects the improvements of the approved LAX Master Plan (i.e., Alternative D) and consists of the implementation of all components of the LAX Master Plan, including the Yellow Light Projects. The components that are pertinent to the land use analysis include the...construction of an ITC at Continental City with a pedestrian bridge to the existing Metro Green Line Station; development of a CONTAC at Lot C; development of two APM systems connecting the ITC, GTC, CONRAC, and CTA, with a planned connection to the future Metro LAX/Crenshaw Light Rail Train Station." The foregoing contrasts subtly with the discussion contained in Table 4.6-8 (GHG Reduction Measures from the Governor's Office of Planning and Research), where one of the stated Land Use and Transportation measures is to 'incorporate...public transit into the project design' (page 4-426). The accompanying discussion states, "With the exception of Alternative 4, all of the SPAS alternatives include facilities that can improve and encourage transit use at the airport, such as the ITF (Alternatives 1, 2, 8 and 9), the GTC and ITC (Alternative 3), and the elevated/dedicated busway or APM that would connect the CTA to the ITF and the future LAX/Crenshaw Metro Light Rail Station (Alternatives 1, 2, 8 and 9).

In addition to clarifying proposed transit improvements, it would be helpful if the EIR would analyze the overall transportation benefits of potential ground transportation improvements (including the full range of mitigation options—proposed and rejected) in comparison with the transportation benefits associated with proposed SPAS transit improvements (as linked to various SPAS alternatives). Further a more detailed micro-simulation might facilitate assessment of the complex secondary impacts noted in Section 4 of our comment letter (concerning traffic impacts and mitigation commitments).

In closing, we again emphasize that the County is strongly supportive of any SPAS alternatives that would enhance the direct connections between LAX and Metro's Light Rail Lines (including the Crenshaw/LAX Line and the Metro Green Line), as well as future connections to the regional rail system. The County also supports measures to increase local bus service to the airport terminals, perhaps through enhancement of the existing bus terminal at Lot C or a new terminal at Aviation and Century Boulevards. The County thanks LAWA for its consideration of the

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transit recommendations herein, as well as the traffic recommendations contained in Section 4 of this comment letter.

→ Please provide clarification as to the Metro connections and/or improvements associated with each of the potential SPAS alternatives.

→ Please provide an analysis that contrasts the transportation benefits associated with proposed transit improvements with the transportation benefits of proposed and rejected traffic mitigation measures.

## 8.0 ACRONYMS AND ABBREVIATIONS

Table 9 provides a list and explanation for the acronyms and abbreviations used in this comment letter.

Table 9. ACRONYMS AND TERMS USED IN THIS DOCUMENT

ACRONYM OR TERM	EXPLANATION
ACL	A.C. Lazzaretto and Associates, consultant to the County of Los Angeles for review of the SPAS Draft EIR.
ARSAC	Alliance for a Regional Solution to Airport Congestion
CEQA	California Environmental Quality Act (for projects requiring approval by agencies in the state of California)
CNEL	Community Noise Equivalent Level (a weighted measurement of sound)
dB	Decibel
EIR/DEIR	Environmental Impact Report, Draft Environmental Impact Report
FAA	Federal Aviation Administration
GTC	Ground Transportation Center
IFR	Instrument Flight Rules
INM	Integrated Noise Model, used to generate noise contours and other noise impact data
LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LNB	Long Narrow Body aircraft
LOS	Level of Service, used to measure the effectiveness of transportation facilities
LWB	Large Wide Body aircraft
MAP	Million Air Passengers
MAT	Million Annual Tons, used to measure cargo usage
NBEG	Narrow-Body Equivalent Gates
NEPA	National Environmental Policy Act (for projects requiring federal agency approval)
ONT	Ontario International Airport, owned by LAWA
ROD	Record of Decision (approval documentation required under NEPA)
RSP	Regional Strategic Planning, to encourage regionalization of air services
SCAG	Southern California Assn. of Governments, preparer of the Regional Aviation Plan
Settlement	Final Judgment Pursuant to Stipulated Settlement, February 2006.
SIMMOD	A sophisticated airfield modeling computer program
SPAS	Specific Plan Amendment Study

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*In search for a better future and a better way.*



Stanley W. Kucianian  
Director

Steve Silverman  
Chief Deputy

Greg Jones  
Deputy Director

October 10, 2012

Mr. Diego Alvarez  
Facilities Planning Division  
Los Angeles World Airports  
1 World Way, Rm. 218  
Los Angeles CA 90043-5303

Dear Mr. Ryan:

### DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR) FOR THE LOS ANGELES INTERNATIONAL AIRPORT (LAX) SPECIFIC PLAN AMENDMENT STUDY (SPAS)

The Los Angeles County Department of Beaches and Harbors has the following comments on the Draft Environmental Impact Report (Draft EIR) for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS):

The Off-Airport Transportation traffic study indicates on Page 4-1301, the project would have a significant impact at the intersection of Lincoln Boulevard and Washington Boulevard. The report states, "The addition of a southbound through lane would fully mitigate the project at this location. However, adding a southbound through lane would require widening of the southbound approach and departure...is considered infeasible...No other feasible improvements have been identified to fully mitigate the project impact...Therefore, this impact would remain significant and unavoidable..." We disagree that there are no other feasible mitigation measures. Costco also had an impact on the Lincoln/Washington intersection and was required to pay Culver City \$1.5 million towards the SR90 Connector Road to Admiralty Way project to mitigate their impact. Similarly, this project should contribute towards the SR90 Connector Road to Admiralty Way project to mitigate this project's impact or contribute to Admiralty Way improvements, since Admiralty Way serves as a "relief valve" to Lincoln Boulevard when it reaches capacity.

Table 4.12.2-25 shows in the PM peak hour Admiralty/Fiji LOS A, Admiralty/Mindanao LOS B and Admiralty/Palawan LOS B. These levels of service show less congestion than the levels of service in recent previous traffic studies. Provide the backup data to verify these levels of service.

All the intersections of Lincoln Boulevard near Marina del Rey show worse levels of service after the project, except the intersection of Lincoln/Mindanao shows no change in the PM peak hour. This appears to be an error. Provide the backup data to verify these levels of service.

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Mr. Alvarez  
October 03, 2012  
Page 2 of 2

We have also sent you these comments via e-mail.

If you have any questions, please call Barry Kurtz at (310) 821-0793.

Very truly yours,

JOHN KELLY, DEPUTY DIRECTOR

*Charlotte Miyamoto*  
Charlotte Miyamoto, Chief  
Planning Division

JK:CM:BK  
ym

c. Dean Lehman, Los Angeles County Department of Public Works  
John Walker, Los Angeles County Department of Public Works

SPAS-AL00009





## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: AUGUST 25, 2012Name: William Lowell E. Julia BullardOrganization: HOME OWNERAddress: 10615 BUFORD AVE LENEXA, CA 90304

Comment:

(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I WOULD LIKE TO KNOW WHY WE HAVE NOT  
GOTTEN OUR NOISE ABATEMENT MONEY THROUGH  
PROMISED LAST OCTOBER 2011 WHEN WE SIGNED  
THE PERMISSION FOR THEM TO FLY OVER OUR HOUSE.  
WHEN I ASKED HER WHEN I SIGNED THE PAPER  
SHE SAID MOST LIKELY IN FEBRUARY 2012. IT  
DID NOT HAPPENED, WHO'S RESPONSIBLE FOR GETTING  
IT DONE? IT IS IRRESPONSIBLE FOR IT NOT BEING  
DONE.

8/25/12

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00001

Denny Schneider  
LAX-Community Noise  
Roundtable  
Chair

Noise complaints/air track/ reports at:  
www.LAWA.org - Noise Mgmt/LAX  
or call 424 64-NOISE  
Denny@WeLiveFree.com  
Voice: 213 641-4199  
Mobile: 213 625-1817



## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/2012Name: See Attached card

Organization:

Address:

Comment:

(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

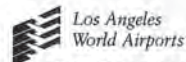
Where are the flood mixes used for each  
alternative in the Air Quality analysis?

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00002



## COMENTARIO EN FORMA ESCRITA

## BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL PLAN ESPECIFICO DE LAX.

Por favor escriba de una forma legible.

Fecha: 08/25/2012Nombre: Jorge Leonel RecinosOrganización: "LAXQD"Domicilio: 8621 - OSCAR AVE LAXA 90044

Comentario:

(Por favor formula su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

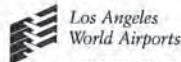
Estoy muy feliz por el proyecto de la  
expansión del aeropuerto pero pido  
que al mismo tiempo quiero que se fijen  
en los sueldos de cada trabajador  
es por debajo del mínimo y eso no  
 alcanza para vivir, que se expa-  
nda el aeropuerto pero como si los  
trabajadores que estamos sufriendo  
la pobreza del aeropuerto

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm.

SPAS-PC00003



## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/2012Name: Ryan Garner

Organization:

Address: Santa Monica, CA

Comment:

(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

- Traffic in Central Terminal Area  
is a disaster.
- + Need a ~~more~~ multi-modal solution  
desperately (i.e. rail, bus, all grade-  
separated)
- I strongly support Alternative 3 for  
traffic = ground transportation access

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00004





Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 08/05/12  
Name: ALICK BOYDAEIS  
Organization: HOME OWNER  
Address: 7542 W 85TH ST.

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Unless you move south of Runway 24L  
The noise patterns over Westchester  
and Playa Del Rey & surrounding  
community will increase so much more  
than currently. People cannot stay in  
their homes that have been sound proofed,  
for 24 hrs per day. When today's quiet  
planes fly to and from Runway 24R one  
cannot hear anything but the aircraft's  
engines roaring. Stay further south  
of Runway 24L or else buy out every home  
owner all the way to Manchester.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00005



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/12  
Name: Edward Cellakian  
Organization: Homeowner  
Address: 337 Water Street St. PDR

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

The toolbar mitigation makes sense - though  
there is no attempt to mitigate the 105 backwa.

Moving the runway north and claiming that this  
will not affect noise is ridiculous. The reality is  
that more air traffic will be on the North Runway.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00006



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/2012  
Name: JONATHAN GAT  
Organization:   
Address: LOS ANGELES CA 90045

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

CHANGES AND MODERNIZATION MUST ~~HAPPEN~~ TAKE PLACE.  
TOO MUCH OF THE FACILITY IS OUT OF DATE.  
I THINK THE IDEA OF A CONSOLIDATED CAR RENTAL  
FACILITY IS A GOOD ONE.  
A SINGLE-LINEAR TERMINAL ON THE NORTH SIDE IS  
PROBABLY A VERY EFFICIENT ALTERNATIVE.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00007



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/12  
Name: GARY N. SCHNEIDER  
Organization:   
Address: 12630 BONAVILLE AVE., L.A., 90066

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I LIVE IN DEL REY, A NEIGHBORHOOD JUST NORTH  
OF PLAYA VISTA. IN RECENT YEARS, I HAVE EXPERIENCED  
MASSIVE INCREASES IN NOISE LEVELS FROM LAX. ANY  
THOUGHT OF MOVING THE NORTH RUNWAY 1200-390' FURTHER  
NORTH WOULD MAKE LIFE & LIVING INTOLERABLE.  
→ IT IS OUT OF THE QUESTION TO THINK OF ←  
RELOCATING THE NORTH RUNWAY FURTHER NORTH.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00008





Los Angeles  
World Airports

# COMENTARIO EN FORMA ESCRITA

BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL  
PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible.

Fecha:

8/24/12

Nombre:

ANGELA M. AGUILAR

Organización:

SEIU

Domicilio:

1567 Al-pal-m-AV. DIAKTO

Comentario:

(Por favor formula su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

Yo hablo ENSAÑEN NARDINA  
Y me gustaria que Modernizara  
El Aeropuerto de ontario  
pues yo libe aya y biato todos  
los dias para LAX.  
Y me gustaria trabajar serca  
de donde vivo pues son dos oras  
de camino y por que Noey trabaja  
cerca de ontario ES pero  
que quisiera mas serando  
El Aeropuerto de ontario  
y ganar un salario justo  
No. queremos con Contratistas sucios

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm

SPAS-PC00009



Los Angeles  
World Airports

# COMENTARIO EN FORMA ESCRITA

BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL  
PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible.

Fecha:

8/25/2012

Nombre:

RAMON AGUILAR

Organización:

WORK HOUS

Domicilio:

12018 PARMEELE AV

Comentario:

(Por favor formula su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

VORAMON ESTOY DE A CUBRIDO  
CON LA ANPELACION DE LA AEROPUEA  
TO  
PERO TAMBIEEN QUIBIERA QUE  
NOS ALLUDEN ATENDER MAS  
BENEFICIOS PARA LOS TRABAJA  
DORES, YO EPSE ATRABAJAR  
EL 94/212 MISALARIO APENAS  
LEJA A 1335 POR OTA  
ES PERAMOS ALLUDA

Ramon Aguilar

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm

SPAS-PC00010



Los Angeles  
World Airports

# COMENTARIO EN FORMA ESCRITA

BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL  
PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible.

Fecha:

8-24-12

Nombre:

Guadalupe Rivas

Organización:

SEIU

Domicilio:

323 1/2 N. Alexandria Ave LA. CA 90004

Comentario:

(Por favor formula su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

Mi familia y yo estamos de acuerdo con  
la expansion o modernización de LAX porque  
ba a crear trabajos a numerosas familias pero  
siempre y cuando allan trabajos justos con  
beneficios para salir adelante en el futuro  
no queremos a Contratistas sucios que solo  
ellos quieren llevarse nuestro dinero a la  
bolsa asi les pedimos que sean justos,  
todas para vivir en paz y armonia.

Gracias.

Att.

(Signature)

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm

SPAS-PC00011



Los Angeles  
World Airports

# WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print

Date:

8-25-12

Name:

SANDRA BRAH

Organization:

Long Beach - AASAC

Address:

8712 YORKTOWN

Comment:

(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

★ LEAVE THE NORTH AIRFIELDS AS IS - FIX THE  
PERMITS & GROUND TRANSPORTATION  
QUIT INTRUDING INTO THE WESTCHSTER COMMUNITY  
(HOMES & BUSINESS DISTRICT)

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00012





Los Angeles  
World Airports

# COMENTARIO EN FORMA ESCRITA

## BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible:

Fecha: 8/25/12

Nombre: Alberto Rodriguez

Organización: SEIU

Domicilio: 3906 Josephine St Lynwood CA 90262

Comentario:  
(Por favor formule su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

Yo. Apollo al proyecto de expansión del aeropuerto 100/00, yo soy un trabajador del Aeropuerto por 12 años durante este tiempo he visto que las Compañías no cumplen con las regulaciones de la Ciudad de Los Angeles no nos dan un salario digno, una aseguranza que cubra con nuestras necesidades, yo les pido que favor que hagan cumplir a estas Compañías y que recuerden que el trabajador merece respeto, A horn Mañana y siempre Gracias

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm.

SPAS-PC00013



Los Angeles  
World Airports

# COMENTARIO EN FORMA ESCRITA

## BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible:

Fecha: 08/25/12

Nombre: Crissel Rodriguez

Organización: ZELY-USWA

Domicilio: 312 W Lora St Montebello CA 90640

Comentario:  
(Por favor formule su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

I am not in favor with the current plans of expansion at LAX. As an organizer and supporter of workers at LAX I have found that this modernization project is an insult for the citizens around LAX that live in poverty stricken areas. ~~There~~ As a global studies major I have studied how developing countries often have a company operating within its villages and everything around the company, the city, cities, the infrastructure is in shambles. When I drive through the streets of Inglewood and Hawthorne I ~~see~~ am dismayed that citizens like next to a billion dollar hub and receive no economic rewards. It is time to reconsider how resources are distributed and these modernization projects continue to be part of the problem, rather than the solution.

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm.

SPAS-PC00014



Los Angeles  
World Airports

# WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print:

Date: 8/25/12

Name: Mary Jean Baca

Organization:

Address: 8140 Barrisley Ave L.A., CA 90048

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

1) Intermodal Transportation facilities included in Alternatives 8 and 9 would transfer all the traffic currently associated with the car rentals into one area closer to home.

second choice would be  
2) Alternative 2 which addresses safety concerns without increasing the impact on Westchester area.

3) terminals should be improved without adjusting runways therefore alternative 2 is preferable.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00015



Los Angeles  
World Airports

# WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print:

Date: AUG 25, 2012

Name: PATRICIA COJUE

Organization:

Address: 7907 WEST 80TH ST, Playa Del Rey, CA 90243

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

BEEN  
I HAVE HEARING FOR SEVERAL YEARS THAT LANDING ADGG AIRCRAFT NOW REQUIRES NON STANDARD OPERATIONS IF THIS IS DONE FREQUENTLY, WHY IS THAT NOT THE ST DOESN'T THAT BECOME THE STANDARD OPERATION

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00016





Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: \_\_\_\_\_

Name: Anonymous

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I am not in favor of moving north  
runway north as in Alternative 1, 5 & 6.  
NASA study commented that no changes  
need to be made for safety.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00017



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/25/2012

Name: JACQUELINE HAMILTON

Organization: JUSKEGGE ARMEN, INC.

Address: P.O. Box 90892, L.A., CA 90009

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

THE RE-DESIGN PROTECT FOR LAX NEEDS TO INCLUDE ONGOING  
SAFETY PROCEDURES FOR THOSE OF US WHO HAVE HAD FAMILY  
MEMBERS AND THEIR INFORMATION DISPLAYED AT THE AIRPORT.  
THIS INCLUDES SAFETY FROM CRIMES SUCH AS FIDELITY THEFT,  
THEFT, MAIL FRAUD, ROBBERY, ILLEGAL STRIKING AND HARASSMENT,  
VEHICLE BREAK-IN AND THEFT, ILLEGAL CONFISCATION OF  
OWNED AND INTERLOD ITEMS, ETC., ALSO ILLEGAL HARASSMENT,  
AND ATTEMPTS TO CORRUPT <sup>OUR</sup> CLEAR BACKGROUND RECORDS BY LAW  
ENFORCEMENT. PLEASE NOTIFY THOSE OF US WHO WERE SEVERELY  
VICTIMIZED BY CRIME IN LIVING IN THE MANCHESTER SQUARE AREA  
OF THE LAX AREA, THE STATUS OF OUR RELOCATION AWARDS,  
BECAUSE WE HAD TO RELOCATE DUE TO MAINTAINING OUR SAFETY,  
ESPECIALLY FROM DERANGED CRIMINALS COMMITTING RACIALLY MOTIVATED  
AGGRAVATED ASSAULT AND CRIMINAL TERRORISM THREATS

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00018



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8-25-12

Name: KARY LOPUS

Organization: \_\_\_\_\_

Address: 7016 Earldown Ave, PDR

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Financial Impact: For each alternative  
please explain how it will be funded  
specifically: what is the total projected  
cost for ea. alternative?  
- what % of that cost is the  
responsibility of the  
airlines - what % is  
added to ticket fees  
what % will be funded  
by bonds, etc.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00019



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

What is the required buffer zone  
between the operational airport  
& the residential area?

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00020





Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/28/12

Name: Michael Mitchell

Organization: MGS

Address: P.O. Box 8903 Anaheim CA 92812

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

E-2.2 page 12

1.2. 98455000 I.T.F.

out of County & Long distance V.A. will go to IN side CTA.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00021



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/28/12

Name:

Organization:

Address:

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Posters 4.1-4.3 did not identify incompatible uses that are non-residential, such as places of assembly/parks, schools, child care centers etc). Not sure if this was left out because there are no such uses within the runway protected zones

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00022



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/28/12

Name: MARK R. NAY

Organization: HNTB Architecture

Address: 601 W. 5TH ST. SUITE 100, L.A. CA 90071

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

This effort has been thoroughly researched and analyzed. The thoroughness of the approach, to 1. options and recommendations. This process needs to be completed soon to facilitate the much needed modernization & safety improvements. I support this plan.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00023



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: AUGUST 28, 2012

Name: BOB NEWSON

Organization: HNTB

Address: 601 W. 5TH ST, LA 90071

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

WE SUPPORT THE MISSION and INTENT OF THE SPAS OBJECTIVES:

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00024





Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: Aug 28, 12

Name: BRENDA UNDERWOOD

Organization: \_\_\_\_\_

Address: 9742 HINDRY PLACE

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I like alternative 4, 5, 6, or 7

I would like to have the water tunnel back on Manchester Square that ~~water~~ waters the lots.

To many people living in campers in Manchester Square!

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00025

Comments of Robert L. Rodine at Public Hearing for Draft EIR on LAX SPAS

Thank you. I'm Robert Rodine. My firm, The Polaris Group, provides economic and financial consulting, in part to the aviation industry.

In a few short years LAX, in spite of enormous private investment in our region, has descended to become the airport that was ranked #2 among the worst by Travel & Leisure Magazine in April 2012. That puts LAX just 1 above the anchor, LaGuardia, and below #3 from the bottom, Philadelphia.

In this ranking of 22 airports LAX was ranked at the bottom of the list for impression of safety standards, 21<sup>st</sup> in Check-in/Security and Cleanliness, and was generally characterized as worn out, having outdated infrastructure and being overcrowded and subject to delays.

If we don't want to become a Detroit we need to step up and make LAX Modernization our constant mantra. Not just in appearance but in functionality as well. In the words of Commissioner Torres-Gil we can't "forget that we are not just serving the community and the stakeholders around the Airport..." LAX is "serving 20 million plus residents in Southern California as well as uncounted millions that depend on us internationally..." and "this Airport is a critical economic engine of Los Angeles."

The June 18, 2012, SPAS report to the BOAC enumerated 7 Integrated and Standalone Airfield Alternatives that will move us toward the Modernization of our Airport that is so gravely needed. It is crystal clear, from the chart included on page 7 of the Report, that Alternative 5, representing the relocation of Runway 24 R 350 feet northward is the one Alternative that does the most in meeting "all planning objectives to the greatest extent." In view of this I strongly urge that this Alternative 5 be designated as "The Preferred Alternative" in the final EIR.

THE POLARIS

GROUP  
FINANCIAL CONSULTING

ROBERT L. RODINE  
PRINCIPAL CONSULTANT

- ECONOMIC IMPACT STUDIES
- FINANCIAL MODELING AND BUSINESS PLANS
- CASH FLOW AND PROFIT IMPROVEMENT

TEL 818-789-7319 FAX 818-789-1218  
polaris@polargroup.com  
SPAS-PC00026  
18649 TUSTIN STREET  
DOWNEY, CA 90240



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/28/12

Name: Nate Cherry

Organization: RTKL

Address: \_\_\_\_\_

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

HOW DO THE PLAN'S ~~PROVIDE~~ EVALUATE OFFSITE GROWTH IN THE AREA RELATED TO SPECIFIC INDUSTRIES THAT BENEFIT FROM CLOSE PROXIMITY TO THE AIRPORT (BIOMEDICAL, LOGISTICS, ETC...)

WE ARE TOLD THAT GROWTH PROJECTIONS ARE BASED UPON SCAG NUMBERS...

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00027



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/28/12

Name: Nate Cherry

Organization: RTKL

Address: \_\_\_\_\_

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

HOW DO THE ALTERNATIVES ANTICIPATE GROWTH IN CARGO THRUPUT? DO THEY WEIGH RELATIVE BENEFIT OF <sup>VARIOUS</sup> IMPROVEMENTS ~~AND~~ TO ROAD AND OTHER INTERMODAL CONNECTIONS?

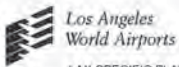
Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00028





## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print

Date: 8/28/2012  
 Name: David Roberts  
 Organization: Candidate for Council District 9 (2013)  
 Address: 512 1/2 W. 31st Street LA CA 90007

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

The modernization of LAX is crucial to the economic vitality for not only the City of Los Angeles but the greater Southern California region. The jobs created during the construction will address the historically high unemployment rates in the construction industry. Project Labor Agreements (PLAs) will ensure that 30% of the construction jobs created will be targeted to some of this region's most distressed communities including South Los Angeles where unemployment rates exceed 25%. ~~which is a major issue~~

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm

SPAS-PC00029



## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print

Date: 8/28/2012  
 Name: JACQUELINE HAMILTON  
 Organization: TURKKEE AIRMEN, INC. ETC.  
 Address: P.O. Box 90897, L.A., CA 90089

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

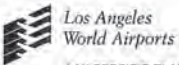
BESIDES AIRCRAFT MOVEMENT SAFETY ISSUES IN REGARDS TO PUBLIC SAFETY NEEDS TO BE ADDRESSED. IN LIVING IN THE MANCHESTER SQUARE AREA FROM 2001 - 2006 AND DURING THIS TIME WORKED FOR THE COMPANY UNICAM SYSTEMS, INC. MAINLY AND SOME OTHERS. I ALSO AM THE DIRECTOR OF WWII USAAF TURKKEE AIRMAN AND PILOT LT. JOHN L. HAMILTON WHOSE PHOTO AND INFORMATION WAS DISPLAYED IN THE MURAL PAINTED BY SPAN STAKES, THIS IS ON PERMANENT DISPLAY AT A MUSEUM IN PALM SPRINGS. DURING THE TIME OF MY RESIDENCY IN THE MANCHESTER SQUARE AREA I WAS VICTIMIZED SEVERELY BY CRIME INCLUDING, THEFT, IDENTITY THEFT, MAIL FRAUD, STALKING, AGGRAVATED ASSAULT, HARASSMENT, VEHICLE BREAK-IN & THEFT, AND OTHER CRIMES THAT CAUSED SEVERE LOSS, AND EMPLOYMENT DISPLACEMENT. THE LAXD OFFICER WHO WAS HANDLING THE CRIME VICTIMIZATION, OFFICER THOMAS WICKS IS NOW RETIRED BUT WE HAVE NOT RECEIVED STATUS AND RESTITUTION FUNDS OWED AS WELL AS OUR RELOCATION AWARD OWED IN THIS CRIME VICTIMIZATION.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00030



## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print

Date: 8/28/12  
 Name: Michael Mitchell  
 Organization: Mickey's Space Ship Shuttle  
 Address: P.O. Box 8703 Anaheim CA 92812

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

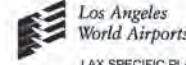
#1 & 2 plan  
 Page 4-1091. For IMF It states Scheduled Service to move out of CTA. The Scheduled Service to O.C. Santa Maria, Santa Barbara, Oxnard, Antelope Valley, should stay in the CTA Not move out to the IMF. Only the Super Shuttle, plane time & Fly Away should go to the IMF. The Long Distance Scheduled Buses & Long Distance Vans should stay in the CTA.  
 Do not change Scheduled Service Companies in the CTA. Keep them as they are now. Much better decision. Please call us.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00031



## WRITTEN COMMENT

## LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print

Date: 8/28/12  
 Name: Michael S. Mitchell  
 Organization: Terrestrial Trolley Co. dba Mickey's Bus Co.  
 Address: Mickey's Space Ship Shuttle P.O. Box 8703 Anaheim CA 92812

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Attached Comments to SPAS

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00032



Spas meetings are not announced to local transportation companies.  
Please have meetings on how the past companies are to be involved with LAX.

These companies have been here for decades and pay loop fees and do not cost any subsidized loss of money.

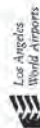
Please allow us information on how we will be treated in the new design.

We go long distances out to 75 miles to Santa Barbara, Palmdale, the Marine Base. Our first stops are 35 miles off airport property. Please allow us to know with meetings on how we are to be treated in the future with your plans.

Please do not let the off shore monopoly transportation companies push us out of service we are a very important support system for when they are to big to fail and we keep the prices in check for the passengers needs and necessities. thank you Mickey's Space Ship Shuttle.

SPAS-PC00032

Where are we in this plan?



## SPAS Alternatives Summary

### Alternative Designation

### Integrated Alternatives

Alternative 1

Alternative 2

Alternative 3

Alternative 4

### Standalone Airfield Alternatives

Alternative 5

Alternative 6

Alternative 7

### Standalone Ground Transportation Alternatives

Alternative 8

Alternative 9

### Former References or "Description"

"260' N" with "SPAS Ground Option A"

"No Increased Separation" (NIS) with "SPAS Ground Option A"

Master Plan/ "Alternative D"

"No Yellow Light Projects"

"350' N"

"100' N"

"100' S"

"Consolidated Rent-A-Car Facility with Busway" / Option B

"Consolidated Rent-A-Car Facility with Automated People Mover" (APM) / Opt. C

All SPAS Report and Draft EIR Results are Preliminary

SPAS-PC00032

TO: The BOAC of LAWA. The fly away to the valley is ok, The other fly away services should be estopped,

### Provisions of the U.S. Code That Prohibit Diversion of Airport Revenues to Non-Airport Purposes, 49 U.S.C. 47101-47133

#### Section 47101(a)(13).

**Airports should be as self-sustaining as possible** under the circumstances existing at each particular airport and in establishing new fees, rates, and charges, and generating revenues from all sources, airport owners and operators **should not seek to create revenue surpluses that exceed the amounts to be used for airport system purposes** for which airport revenues may be spent under section 47107(b)(1)....

## FAA rule for airport operators

**The airport owner is obligated to the Government to ensure that the facilities of the airport are made available to the public on fair and reasonable terms without unjust discrimination. Any lease or agreement granting the right to serve the public on the premises of an airport so obligated should be subordinate to the authority of the owner to establish sufficient control over the operation to guarantee that patrons will be treated fairly. This applies not only to the purveyors of aeronautical services but to restaurants, shops, parking lots, ground transportation, and any establishment retaining commodities and/or services to the public.**

SPAS-PC00032

TO: The Honorable LAWA Airport Commissioners and Director Gina Maria

page 1

The Fly Away is not self-sustaining against FAA rules.

The Fly Away is a non-airport event and is a diversion of funds against FAA rules. Regionalization of airports has happened and the volume of passengers is lowest in 20 years. For 32 years the local companies have taken passengers without any cost to LAX, in all the destinations that the Fly Away and more. This would have saved LAX about 30 million dollars if the Fly Away had not started in 2006 and the 10 million dollars a year that the Fly Away took in transportation money from the public riding it would be in the hands of local drivers and not the over seas corporations that the Fly Away has subsidized with so much money. That money would help in the stores and businesses in the local area in Los Angeles and not France.

I have handed in a survey with hundreds of persons signing that they want Mickey's Space Ship Shuttle's Service. This was handed in a few years ago and Sandy Miller has them on file. We go long distances over 75 miles to the Marine Base in Orange County with a first drop off airport point of 35 miles. There are 8 scheduled service companies like ours that have been here for over 20 years at the scheduled service green stop. We expect that all the LAWA Commissioners and the wonderful President and Vice President and Director will allow these smaller and locally owned companies to be grand fathered into the plan of the CTA in the future of LAX to stay in service with the many hundreds of thousands of passengers that are loyal to us from the long distance areas we serve like Santa Barbara, Palmdale, Santa Maria, and the Marine Base. Companies like ours offer the public a not putting all your eggs in one basket design that the wonderful Director Gina Maria has warned about with other events in LAX. We agree with her and support her help to the local L.A. businesses. If you only have large fortune five hundred companies like Veolia that is from France and the Fly Away which is also owned over seas via L.A., Texas, Phenix, New York, Delaware over to Ireland. Many large companies go bankrupt and the airport is stuck without any recourse. This is why the free services that pay the loop fees to the airport and give a profit to the airport without any RFP's and loss of money are valuable to the airport. They are self sustaining which the Fly Away is not by a long run, and the people are use to them over the decades and do not want to change. The Clifton Moore design of the CTA is perfect it is safe for a car bomb would only effect one terminal and if you collected all the people at one place like the design for over in West Chester it would be centered in one place for everyone and more dangerous for a car bomb. The way it is designed now it is spread out and as the vehicles service the passengers they are within 45 seconds curb & gone and the passengers love it and why fix something that is not broken.

The Fly Away is a dead horse that cost an arm and a leg. Give this all back to the local companies like Super Shuttle and Prime Time and keep the money here in L.A. Think of the passengers not the contractors giving money to the mayor. Passengers first. The Valley run has been around the for 32 years and is now a loss of 4 1/2 million dollars a year including the parking facility. The parking facility is built and cannot be taken back but the contract for service can be stopped and given to the many on-call services like Super Shuttle and Prime Time Shuttles that are always on the way from the valley and would take over the fly away operation for free due to 400 vans that need to come back to LAX. This would take the cars off the street and add the people to vans

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

SPAS-PC00032



that come back anyway. This is a more efficient use of vans returning, the parking structures use, and CTA would be without large 48 passenger buses that average the size of the vans of 6 passengers giving more space in the airport for cars, less pollution, terrible noise from the large cng engines, also the money given to the van drivers of 15 million dollars a year taken away by the fly away given over seas would help the local economy and the vans they owned would be in better mechanical service since they have to maintain them themselves, as well as the passengers would have a way to go back and forth to the airport at a now basis since they only walk up to the CSR on the curb and load onto the vans to get back to their cars in the valley.

You may say we are keeping the money in the U.S.A. now with the new company Bauer's Limousine Service Inc. PSC - 8361 from San Francisco. The Decision from last year moving some authority to L.A. area does not have LAX airport on the decision like all the other Scheduled Service Companies. The fact that this is a foot note in the decision shows that it appears as the same owners are involved over seas but have made a deal in New York to transfer it all to Bauer just as they did in past with other AKA's. Note foot note with the usual suspected words of trade secrets that allows hide the over seas trick of a tax dodge, so to speak, or legal tax dodge.

1 The ruling provides that the confidential information will remain under seal for a period of two years from the date of the ruling. During this period the information shall not be made accessible or disclosed to anyone other than (a) Commissioners and Commission staff; (b) other parties to this proceeding who have executed a reasonable nondisclosure agreement with Applicant; or (c) upon further order or ruling of the Commission, the assigned Commissioner, the assigned ALJ, or the ALJ then-designated as Law and Motion Judge. If Applicant believes that further protection of this information is needed after two years, it may file a motion stating the justification for further withholding the information from public inspection, or for such other relief as the Commission rules may then provide. The motion must be filed no later than 30 days before the expiration of the protective order.

So this did not go out to bid just as the first bid for the Fly Away in 2006 it went to the one bid company that had made the deal to transfer in New York City as I was told by Mr. Bauer on the phone last Friday. This company appears to be the same over seas AKA design as coach america, gray line, california charters, airport bus of bakersfield, disneyland express, tour coach, starline, vip tours, etc. all having another name and as you have been shown before on an IRS receipt all owned by Banies Pickwick LTD in Ireland. What the mother Corporation does is not buy the new company they ask them to allow them to trade stock let them stay in place to run it and then they control it just as if nothing happened. They have done this over and over with many companies and I would suggest this is happening again here. Why don't you ask them to let you the LAX commissioners read the hidden secret trade information in the puc decision for why would you let a confidential fact go if you are giving them 15 million dollars. You see with local companies before the new fortune five hundred big boys hit town we did all this for nothing and you got paid for our loop fees and the public had phones at the baggage area so they could call us free and everyone could happily go out get right on and not have to go to over seas companies because they had no choice because the French company took over all the advertisement on the airport and helped there other French buddies Veolia by taking all the courtesy phones out of the terminals and make

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

SPAS-PC00032

the public have less information that discriminated the local companies out of a lot of business, until the public caught on and now know to call by cell phone and do it. The Phone board that is touch screen just as it was in 1997 is not used and should be taken out and the courtesy phones put just in to help those that have ADA, are hard of hearing, are speaking other languages and will work when the electricity is off which the new JCD advertisement ones that are way out side the baggage area do not and the whole thing was to control public info and help their French buddies veolia transportation and Gray Line being the only companies seen by the public. This is unfair competition. The fly away had helpers on the curb for the first few years, they are gone now. This is illegal and also unfair competition and discrimination of marketing. Some how the Karma seems to come back on them for this. While I am thinking of it JC Decaux makes 120 million dollars a year and gives LAX some of this. But why job this out just to rent signs, can't the city do this and save 120 million dollars going over seas. Why can't LAX put up signs for 120 million dollars and not give it to them. This all seems so easy to give money over seas all the time. Why? We all know why down deep. But it will take time and remember Leland Wong? Cities are going bankrupt and the Fly Away is losing millions. Shut it down now. Our smaller 9 passenger buses are the best size and safer as well and take up very little room in the CTA with the emissions of a private car at most. We also use cng. The amount of load of persons unless it is a large charter is less than 9 passengers so why the big buses? It does not make sense. Let Super Shuttle do this and Prime Time and the Scheduled buses that have been doing it for decades. We pay loop fees and without money flying away to france for nothing. To us local companies it is a huge mistake to do the fly away and since 2006 it has taken 60 million dollars from the local companies in fares and you have given them 80 million with a \$35 million loss not including the parking lot in the valley for 33 million so this has lost 120 million dollars not including parking totally from local business and taxes. Commissioner Zifkin called it Alice in wonder land. How much do you need to know? It has been 6 years, in another 6 years 240 mill.

We have families that work hard helping people going to Orange County from all over the world many taking us 8 or 10 times in a row from Australia, New Zealand, Canada, Tahiti, Hawaii, England, they use us all the time over and over, please allow them to do what they want and let us service them. They do not want to ride big buses that are by fact easier to catch sicknesses on because of the amount of persons, are so dangerous there are people killed on the big buses every day. They are the dangerous way to travel the world. google bus wrecks and see why you should never ride one. Ever.

USA TODAY found at least 42 deaths of motor coach occupants and drivers were not reported using NHTSA's standard definition of a motor coach from 1995 to 2009, the most current year for which data are available. Since 2003, 32 fatalities were not included, which represents a 24% increase from the 133 deaths the agency counted.

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

SPAS-PC00032

## Network Status

### 2011 Financial Summary By Site

	Van Nuys	Union Station	Westwood	Irvine	Network
Ridership	833,475	430,915	99,796	16,362	1,380,548
Transportation Costs	(\$874,878)	(\$126,217)	(\$534,975)	(\$416,324)	(\$2,152,994)
Cost/ Bus Passenger	(\$1.05)	(\$0.29)	(\$5.36)	(\$25.48)	(\$1.56)
VNY Facility Costs	(\$1,832,864)				(\$1,832,864)
VNY Cost/Pass.	(\$3.25)				(\$2.89)

2011 Loss 4 Million dollars per year. \$3985,858  
2011 → 4 Million Loss

NOTE: Since financial information for December 2011 was unavailable, summary is based on data from December 1, 2010 through November 30, 2011. Total network cost includes an additional \$200,000 in depreciation costs for buses not assigned to a specific FlyAway site.

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SPAS-PC00032

## LAX → Westwood FlyAway®

### Westwood FlyAway 4-Year Financial History

	FY 07 - 08	FY 08 - 09	FY 09 - 10	FY 10 - 11	4-Year Total
Bus Contract	2,594,457	2,857,706	1,626,893	1,349,325	8,531,147*
Advertising	450,000	50,000	50,000	50,000	600,000
LAWA Administration Costs	51,000	51,000	51,000	51,000	204,000
<b>Total Costs</b>	<b>3,095,457</b>	<b>2,958,706</b>	<b>1,727,893</b>	<b>1,449,325</b>	<b>9,335,147</b>
Bus Revenue	330,988	447,716	485,395	417,378	1,681,477
<b>Total Income / (Deficit)</b>	<b>(2,764,469)</b>	<b>(2,510,990)</b>	<b>(1,242,498)</b>	<b>(1,031,947)</b>	<b>(7,853,670)</b>
Ridership	111,487	128,912	104,079	110,937	455,415
<b>Total Cost per Passenger</b>	<b>(\$24.80)</b>	<b>(\$19.48)</b>	<b>(\$11.94)</b>	<b>(\$9.30)</b>	<b>(\$16.81)</b>

\* Includes \$103,795 for two weeks of bus service in FY 08 - 07

Westwood = \$10 Million Loss  
+ 2012

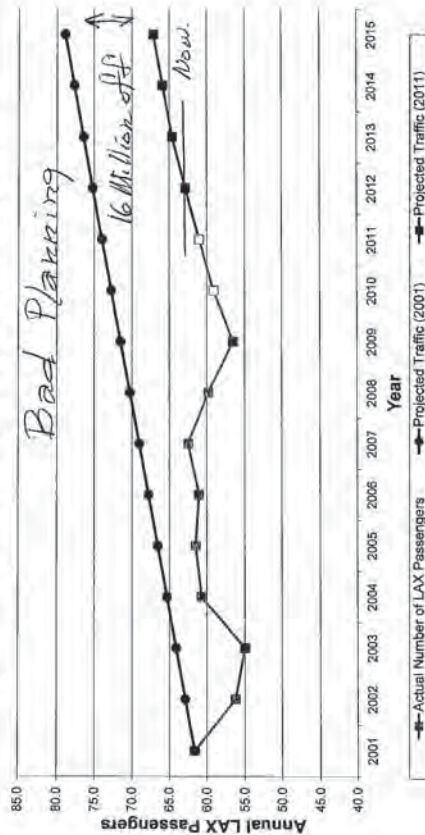
1 of 7

SPAS-PC00032



## LAX Passenger Demand

Annual LAX Passengers - Actual and Projected



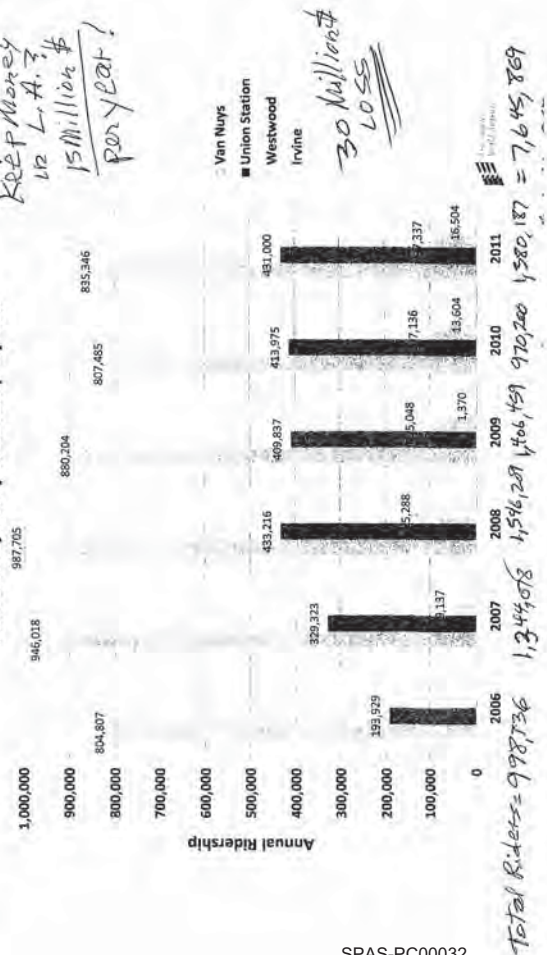
3

SPAS-PC00032

every year owned:  
 Fly Away Takes 10 Million dollars away from  
 Local Companies in Irvine & Costa Mesa  
 TAX payers in 2011 (\$4,658,459) today it's  
 Give these routes back and save 15 million per year

Stop Fly Away  
 Keep Money  
 in L.A.  
 15 Million \$  
 per year!

Annual FlyAway Ridership by Site



SPAS-PC00032

IF this happens to L.A. what happens to LAX?

### Compton on brink of bankruptcy

The city is the latest to fall victim to questionable financial practices. It could run out of money by the end of the summer.

The state of these cities underscores the complexity of the fiscal crisis roiling California municipalities this year, with Stockton and Mammoth Lakes already in Chapter 9 bankruptcy. While ballooning public pensions and falling property tax revenues have hit many cities hard, bad accounting practices and improper use of funds have also taken a toll. In many cases cities resorted to these measures because they could not balance their books or raise revenues but were loath to make cuts. A recent grand jury report found that the High Desert city of Victorville used a series of disparate, possibly illegal measures to stave off insolvency. Those included dipping into sanitation funds to help keep the city's treasury afloat, loaning water agency funds to bail out the city's electric utility and siphoning \$2 million in airport bond funds to buy land for a city library.

UPDATE 3-San Bernardino, California, files for bankruptcy with over \$1 bln in debts

In late July, San Bernardino reported it had \$56 million in indebtedness payable from its general fund, the main budget, including payments on a \$50 million pension bond. There is an additional \$195 million in unfunded pension obligations, \$61 million in unfunded retiree healthcare, and \$40 million of workers compensation, compensated absences and general liabilities.

In the past two months, the cities of Stockton and Mammoth Lakes have also filed for Chapter 9 bankruptcy protection, a special bankruptcy provision for municipalities.

Stockton, which like San Bernardino has suffered from the housing crash that was particularly acute in southern California, filed for bankruptcy in June, becoming the largest U.S. city to do so.

Other cities in California are also in deep fiscal trouble and more could file for bankruptcy.

SPAS-PC00032

LAX Legal Department beware:

### Municipal bond suit can go forward Justices let stand ruling that fraud law covers Denver bonds

May 20, 1997 | By Lyle Denniston | Lyle Denniston, SUN NATIONAL STAFF

WASHINGTON -- The Supreme Court cleared the way yesterday for investors to sue city governments for securities fraud in the sale of municipal bonds. Without comment, the court refused to review a federal appeals court ruling that said Congress did not intend to exempt cities from the 1934 law that bans deception in the sale of securities. The combined city-county government of Denver sought to head off lawsuits by purchasers of the bonds that it sold seven years ago as a way to raise money for a new international airport. The bond buyers, arguing that the bond prices were inflated because the local government had failed to reveal serious problems when it reported on construction progress, claimed fraud under the Securities Exchange Act. Last fall, the federal appeals court in Denver ruled that while the 1934 law does not explicitly give private investors the right to sue municipal bond issuers, such a right exists by implication. The law against securities fraud, the appeals court said, outlaws manipulation or deception by "any person." Noting that brokers who deal in municipal securities are subject to investor lawsuits, the appeals court said that such legal risks extend to local governments as well.

SPAS-PC00032



(415) 703-2183



May 28, 2008

File: PSC-5244

Mr. Michael S. Mitchell  
Mickey's Space Ship Shuttle  
P.O. Box 8903  
Anaheim, CA 92812

Dear Mr. Mitchell:

You inquired whether a passenger stage corporation is a "public utility" under the law. The answer is yes.

Public Utilities Code Section 211 provides that every passenger stage corporation is a "common carrier." Under Public Utilities Code Section 216(a), "public utility" includes every "common carrier." Therefore, passenger stage corporations are public utilities.

The above code sections are attached.

Very truly yours,

PAUL WUERSTLE, Manager  
Transportation Enforcement Branch  
Consumer Protection and Safety Division

SPAS-PC00032

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## FAA rule for airport operators

*The airport owner is obligated to the Government to ensure that the facilities of the airport are made available to the public on fair and reasonable terms without unjust discrimination. Any lease or agreement granting the right to serve the public on the premises of an airport so obligated should be subordinate to the authority of the owner to establish sufficient control over the operation to guarantee that patrons will be treated fairly. This applies not only to the purveyors of aeronautical services but to restaurants, shops, parking lots, ground transportation, and any establishment retaining commodities and/or services to the public.*

Advertisement is an attempt to persuade potential customers to purchase a brand at a certain price. Spam like unrequested information. The courtesy phone board was requested by the public only information of options available to the public with certificates of need and necessity given to the carrier from the State of California. A public utility by law.

Advertisement that was not requested was illegal for 32 years by airport property LAW. The difference here at hand is public request for information verses public non requested information.

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This is the reason our public utility is denied service to the new phone board. The public is denied the prices and awareness of how to get out of the airport based on the amount of money it produces for the airport. This is discrimination to small businesses in the airport and unfair competition and against the American way. For 50 years many of the BOAC in the past have owned small companies like ours and they were allowed to compete on this phone board with public information with over seas consolidation monopolies in the past equally. In fact they did not want these sort of companies in the past owning all the airports services at all. In fact they did not want advertisement on the airport to confuse the public at all. Congress and the FAA state that at least %10 of all the companies must be small business using the airport.

### U.S. Code Collection 47107.

(a) General Written Assurances.- The Secretary of Transportation may approve a project grant application under this subchapter for an airport development project only if the Secretary receives written assurances, satisfactory to the Secretary, that (1) the airport will be available for public use on reasonable conditions and without unjust discrimination, similar use of the airport will be subject to substantially comparable charges.

The Emphaas here is the airport will be available for public use on reasonable and without unjust discrimination and comparable prices.

The present phone board is unjust public discrimination and unreasonable comparable prices.

To state that we have to be charged \$32,000 vs/ \$300 dollars a year is unreasonable for the public information phone board that is touch screen and doesn't work any way half the time is unreasonable.

To say that you have to make money to put us out of business with no calls now verses 300 per week before is unreasonable. When you give the monopoly 20 million dollars of the publics money on a complete failure design as the fly away to ucla and down town and then buy the 5 million dollars worth of buses that was not in the original rigged bids, as well as let a parking lot be torn up just after you resurfaced it, as well as throw 25 million dollars into consulting for terminal design and then say they never ask the new tenants if they wanted it and they do not, which is a loss of 25 million dollars to the public and then you want to take away an equal right of public information that has been here since 1976 that as mister Gil has stated if it works do not fix it, is taken out and only has access to the most expensive exclusive consolidated over seas monopoly services on it, is not reasonable. Lay on top of this that Ben Laden's attorney runs it in appearance and it is French and Irish and Saudi Arabian owned and pays no taxes in the U.S.A. as well as out of state license plates that inoculate them from any city tax for entering the airport. This is unreasonable.

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TO The BOAC, Mayor, Executive Director with legal team for off shore invasion of LAX Public money p.1

The empowerment and opportunity of infant industry is being stymied. The focus is taking advantage of the rules to help the monopoly vs, rules that help the public and allow the small companies to empower the public with fair and honest competition without price fixing allowing favorable and appropriate propitious designs that favor the average public as well as the overseas monopolies with gold.

LAWA is allowing moral mistortune, by deregulation of the phones to go to highest bidders and snuffing out the competition of the non-cartel monopoly aggregate, trampling on the publics price competition and allowing the cartel price fixing to the highest bidder for advertising not respecting the public utilities of the State that were given by courtesy to the public in order to allow the prices to all the public equally for the public by law - information about public state transportation. The idea of what LAWLA wishes for is out side of the constitution of the USA is a big problem for the non-lobbying cartel overseas investors that own all the major private ownership of those routes that make a profit and are obtaining free money from the public taxes for those routes that lose money allowing them profit from both sides of their mouth. This 10 million dollar loss this year alone for the public financed cartel owned fly away expansion is money taken from the parking, fees from the other private companies loop fees that have always paid for the courtesy phones in the past and the public loss of information given to the JDC French advertising company that allows for the lowest transportation prices to be hidden given to the big pigs at the troff - hiding the lower prices with this iron curtain voodoo economics with foxes in charge of all the chicken houses here at the airport taking money from the employees that deserve more than the off shore cartel with the millions of dollars in lobby and donations to the mayor whom I blame now for all of this intervention in the past great men that ran this airport and now the limited knowledge of the new commissioners and the Landside makes it impossible to go against the conflicting data that is given the new green horn airport chiefs and easy money for overseas and no help for the rights of the local infant industry and public. The airport is specific to help the one overseas money grabbing with no brakes and the spontaneous attitude of the Director to instruct the Legal and management to defend the big shot monopoly with Airport Bus of Bakersfield, Disney Resort Express, CUSA, PCST LLC, on the Irish side of the monopoly owned by Baines Pickwick, and Super Shuttle, JDC, and who knows if they own Prime Time and Road Way on the French side of the Monopoly with the Yellow cab in the valley etc. etc. ergo: Bankrupt any American company that helps the public have a choice of price. This is to eliminate risk for the cartel and hurts the public with out help on the horizon, making a ruling class in the airport handed over by the new do any thing for the big money management of LAWLA. This is against the founding fathers and the past great management of LAWLA with Mr. Goldberg and Clifton Moore. Sustained power and greed and orgy of overseas lobby success and speculated behavior of deregulation of the fair business practices and using of the publics city management to give uneven playing fields of advertisement and rules and regulations and distorting principles of the founding fathers. The lack of patriotism to the American way with the manipulated overseas invasion of the transportation market and ignoring the liberty and justice for all employees of the airport and ignoring the local American companies. Taxation without representation. Using this city money and give it to make breach of giving all the city money to swindle the money

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to stop pollution with 4 persons on a 48 passenger bus every 15 minutes 24/7 with everyone paid to look the other way with deposits for the mayor and all the look the other way people here in this room. This has happened to S&L scams, and the bailouts and it is we the people not we the overseas investor monopoly that pays everyone off to give them the 10 million dollar loss for the stupid fly away that no one rides to the airport. People that fly are rich, not bus riders. These figures are mostly employee riders that you should just give them the 10 million of this lost money this year and let them live better. This is better than unfairly giving all the diverted money off the airport against the FAA law and that it is not the wheels of justice rolling. The nonsustaining fly away takes money from the local businesses taxes from our loop fees and the parking fees from the public and gives it to Orange County offices of CUSA, PCST LLC that goes right off shore to Ireland. The real human beings here in the airport working need this money more than these overseas rip off scams with the mistress corporation from France that is advertising only the monopoly mostly for free and has caused a wall for the public to see the price fixing. When the airport is run by the corporation then this is facism. Using the flag for a fig leaf to hide the peoples right for these corporation to steal every thing in this airport. The agnostic attitude to smaller than 10 million dollar losses companies or non overseas socialized companies over american workers here at lax or businesses here in LAX, as a political bent on helping and protecting the overseas monopoly horizontal roll up, as if it were a RICO action that is required by the city and FAA. This is a bucket swap for someone and it is not the public. appropriate market forces are under attack with this new epidemic of authoritarian overseas aggregate companies known as an anti-trust monopoly that has taken over the ground system of LAWA. This is Fraud. It is greed added with losses backed by the city that lose 10 million a year and it is treated as a normal system design, even though the FAA has diversion of funds and nonsustaining without discrimination or unreasonable treatment to the public and local businesses by law. when you have bad ethics it runs good ethics out of the airport like MSSS. Then you are in the midst of one company holding the airport hostage with no other choice and buy or die ride economics. The taking away of the public information to all companies that were treated as a courtesy to the public and was not considered advertisement for 32 years. Things that are hard to value like the fly away is a way of coning the city out of lots of money on what is called the growing unknown success. But in the past these routes have all failed in the market place in the past many times. This information being hidden from anyone except those that are very well informed over many years like myself, allows the information to protect the public to be heard. Fraud is deceit, create trust and betraying the trust. Significant accounting fraud is going on because they all know these routes will not work. The idea that it is doing what is expected is a lie as Landside states. They thought this would work right away. The idea that 16 of these routes are in the works is a great fraud. opposition caused by opportuness. The only felicitous feature is the Brown Act left here for us and as the Director Lindsay has stated, "are you here to make more noise". This lack of respect and elitist attitude that the most money a company has makes them the best choice for future projects is discrimination and non american. The public's money should be best spent for the public good, not to the most elite in other airports that have already gone under with the same monopoly of advertisement and transportation monopoly. The people vote and what they get for this vote is now a great concern to me

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here in LAWA. I see a great deterioration and see the voting publics money being thrown away to overseas monopoly organized with the help of the new LAWA states of service of the public. It is very important to consider that the workers and public services are being deprived of a better way to do things. In direct counter distinction to the public is losing the ability to inform themselves with the state public utilities available to them by State court Certification of the State of California by Public Utilities Judges that are very concerned with fair treatment to the public and the businesses that are certified. This concern is now under attack in a big way in the state airports being taken over with a cartel of advertising and transportation partnerships that are taking the prices and choices of the public away from them being protected by the conflict of interest of management of the airports being protectors of the new monopolies and using government and city lawyers to protect the invasion from overseas that allows all the money given to transportation to be privatized and socialized in a way that is profitable to both systems of transportation and the same company in both making great profits, while the public has great losses with local businesses being forced out of business with the new changes in rules and regulations that protect the overseas monopoly invasion and protect it from local competition. This is un-American and the money going out of the country without tax is a sin to the country, and economic treason. This pushing equivocal new non-American designs out for off shore money grabs of public money and watering down the public local businesses. This activity was never even considered in the past presidents, commissioners, and directors. The investigation of the facts of the past history were equivocal. The information given as facts of the past in the directors Lindsey's letter to me is not what they are tried to be made with this letter. The mingling together of present events and past interpretations of what was thought in the past are not true. The similar designs of the past are made to look as if they were not as wise as todays giving all the power and business overseas to a monopoly design with an off shore USA tax dodge as well as an out of state license city tax dodge and the loss of public money to the amount of 10 million per year cash with the fly away new routes, with a loss of the publics right to true and comprehensive price of transportation. The pathological usual attention to the overseas monopoly taking over the airport is of great shock to the past very open and free market in the past here in LAX when Clifton Moore, Johnnie Chochran, Mr. Greenberg, and President Chick ran the airport. The small business and the local economy was of great importance then as well as the sustaining of the operations to pay for its self. The idea of advertisement was banned so as to not abuse the passengers. Now we have gone to the opposite to take even the public information away, block and charge for it. This is ultimate confusion as quasi help for the public by hiding the prices of trips and only having the most rich big brand cartel visible to the public with wrongful discrimination of information to the public never heard of in the past before the monopoly minded new director of landside and the airports new wave of overseas manipulation of the publics money to be given out with millions lost to the off shore monopoly that has cheated it's way to the top with code 851 violations and Section 10 violations of the state and lawa contracts, being ignored with our calls to enforce the rules, only to be threatened with new rules to put us out of the airport in 2012 to make room for the empty buses that lose millions on millions a year and will lose 50 million more the way the plan is now set in time. Holding 500 million in limbo for the backing money. Our company has to be self sustaining and fight LAWA to service.

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This is so short sighted it has to be considered a RICO act in harmony with the company off shore and the on shore new heads of LAWA cookie cutting the airport as Texas and San Francisco and O.C. which remember o.c. means organized crime. This is taking all the free market away and secretly putting in a monopoly every where with persons in power seeking higher office on the long run feeding the monopoly to get those large money grabs for the up and coming positions it seems that they dream of, taking the eye off the idea of protecting the public from a loss of millions of dollars. What else could make these frail humans do such a bad mistake as this here in LAWA. What could lead them to the point that Mrs. Chick states, LAWA is ripe with corruption. Her great husband was president here and they know what is going on. They can see that you all here are either giving away the farm or just do not see what is happening and to weak to fight it with the mast of the ship bent towards the monopoly interest. Will Rogers stated, "we will never have true civilization until we have learned to recognize the rights of others". When the director of the airport states to me, "are you going to make more noise today!" This sums up the attitude of the respect for the public around here and the lack of seeing, the lack of justice paid to the public and small business now in LAWA. I feel that some of you should be replaced to better the publics chances for respect to constitutional truth and saving money to the local american economy and not giving it to tax dodge monopoly cookie cutter invasion cartels that take over our american airports one after another with conflict of interest insiders taking jobs that allow the foxes in the hen house. The hubris superiority of saying are you going to make noise today shows the lack of humility and discrimination of the directors attitude to pay attention to the public. This statement is to show that even the highest around here are not as concerned with the humility of the employees and the small businesses here in the airport. The diversion from the constitution of tribal drums for this overseas pirate off shore invasion of LAX ground transportation with public contracts from inside the city trojan horse lobby to the mayor master plan scam and conflict of interest landside plundering the local infant industry rights, with the directors protection of the invasion of the public information to side only to the monopoly owned companies like super shuttle, fly away, airport bus of Bakersfield, Disneyland Express, CUSA, CC, CUSA PCST LLC and the JCD advertisement tribe of one ownership over seas coups of one off shore corp. invasion of the airport Ground Transportation is a great loss to the public for transportation cost, congestion of the airport CTA, Puts more diesel fumes in the CTA, with large buses and 4 persons on them every 15 minutes, all coming in at once to make it look like the other companies should be kicked out to make room for this great loss of tax money. This is an issue that political naughtiness, cocky supercilious pride, and pomp cannot float overseas owner ship of the airports most important home land security, transportation in LAX. The ownership history of this monopoly has been ignored even though fraud is rampant in the history of the off shore invasion court papers. The fact that others have done everything is not the best reason to do anything. Humans use to be cave men. This does not mean we should stay cave men. To give away all the tax money lost from the country to the overseas companies that escape the tax fees of USA with the off shore tax dodge and city tax dodge with out of state license that is all a fake way to say the local scheduled buses are going out of state. Sure they are. This stops the city tax in the airport. I am here to make noise, the noise of god. That It is a sin to do what you do for you are hired to do the exact opposite that you are

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appointed to do, unless the mayor just wants the invading monopoly to give him money to run for more power to give themselves. Elude the fraud is the major grift and scheme with the tactic of public money for the losing routes and privately own the routes in the airport that make money with help from inside the airport political matrix with subterfuge and rules with a tax dodge ruse, to take as much money out of the usa and put it in the off shore banks keeping the money from recycling in the local area of Los Angeles. The main office being in Orange County and trying to move the fly away down to O.C. Irvine so they can help the Los Angeles public pay for the losses of the private disneyland area runs. They are very good at this and have been at it since 1990 when Daniel Boulange took over the Gray Line Group that is the name of the whole monopoly as well as CHOCO from the Gulf area according to the court papers of chapter 11 cases of Ground system Inc. and Gray Line/Star Line Chapter 11 cases, as well as ABC bus vs. Baines Pickwick LTD in Santa Anna court house records. The facts show that the power from inside the airport is very strong as you can see the defense from the director and Landside protection of the monopoly fraud by the LAWA insiders building a bulwark at all times and straining the infant industry owned in America with tax base here in the country being positioned as antagonist to the monopoly holy grail of the new airport power tribe for off shore drumming. This is a new fashion here in LAX. In the past Mr. Greenberg, Clifton Moore, president Chick were for American companies and keeping the money here in the city to help the people here in Los Angeles, not giving all the public money 10 million dollars of total loss to empty buses that do not do what they say they do. Give them another year with 20 million more is crazy and we are given the freedom to have to only talk to the persons at the curb at the airport which rules have been proposed to fine us thousands of dollars by Mr. Blagi for just talking about our prices at the curb which is the only place we are allowed to communicate since you have told Travelers Aide to not give out our information and taking the phones away from the terminals of our by law public utility with a letter from the CPUC state manager stating this is by law a public utility and the airport takes the phones out and wants \$25,000 for the public to find out prices and services. This is discriminating to the public and our company. This is unfair competition and unjust enrichment of the monopoly take over of the airport with a great loss of choice of transportation and loss of money to the public with our \$8 cheaper travel cost as well as the 10 million dollar loss for this year to the lack of interest in the past record of the fly away routes that have failed in the past many times and the bold failure being ignored over and over giving more and more money to a big off shore hole that is a lobby toxic dump. To put all the possible transportation companies and destinations that are public utilities by law, on a phone board as used for 32 years that is ADA perfect, helps those with language problems, emergency phones for anyone to obtain information with the electricity off at the airport unlike the new touch screen kind that is trumpeted as new and better, when for 7 years they were already used in all terminals and taken out for being too complicated and broken down a lot as I have shown in SNA with months of this new design being out of service. This causes the big brand monopoly to thrive and tax money in america to tank. The old phones were something the new ones are not, efficient, almost damage proof with wire cords, easy for anyone from anywhere in the world and for 32 years the law of the airport was no advertisement. Now all of a sudden it is the new scam to say they are the best ever and new and modern. This is a lie. This shows the lack of acumen of the

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**NEW ITEM:** Mickey's space ship shuttle's economic death penalty.

**JCDcaux (JCD)** French owned

Inoculated from any American laws and legal actions due to over seas?

**Invasion of public's rights to California State Public Utility Commission Ground Transportation in Federal Airport owned by a Public Municipality. Advertisement was illegal for 32 years and the public information act protects the public by allowing a free market to ground transportation and by law state public Authorized Ground Transportation. The Certification of said public service is not advertisement it is part of the Public Information Act Resource. Question-how does L.A. Inc. advertisement company attachment play in this over seas tax dodge advertisement company. (JCD) How is this attached to the off shore Fly Away owned by PCST LLC through and Baines Pickwick LTD. of Ireland.**

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BOAC, welcome to misplaced priorities. Big over seas monopoly over local growth and public need. The favoritism to the monopoly is against the law, FAA, City Charter, CPUC, and Federal Constitution. P1

The contractors have the heads of the airport on their side. Every creep in design goes for gifts to the monopoly of Veolia, ( Gray Line ), Super Shuttle, Airport Bus of Bakersfield, Fly Away, Coach America, California Coach, CUSA, PCST, Disneyland Express, and the many other dba's that the monopoly owns from France along with JCD advertisement being the information side of this monopoly all being given free advertisement, first contact curb topology, free buses, free transmissions, millions of dollars of advertisement all over the city streets with flags, posters radio, & free phones.

The fly away is now losing at least 9 million a year for 5 years now, and has now been loaded down with the attempt to add more losing routes that will fail and have failed in the past with bankruptcy at least twice in the past with more passengers passing through LAX.

The curbs are shut down now for a month not being used at all terminals without any use at all by anything being a waste of curb area for nothing. The new business is business attitude is the do what you can to favor the monopoly over seas and let the local companies fail as soon as possible. Our company is not notified and ask to participate in the meetings and the monopoly companies are. Ryan stated in the last full meeting that they had meetings with the companies. We were not given the chance to participate. This is as usual discrimination and a paradigm of concepts that are one sided for those that give the mayor the most money. The contracts for the fly away have been to only one company and given 5 million dollars in buses, millions in advertisement, that was not in the original bid that was rigged and protested by our company that did not go to hearing. This is unjust and shows the lack of interest for honest and fair treatment. The lack of consideration for our company and fairness has made us lose a great deal of money since the Director has taken over the airport and destroyed the balance of the last 32 years of equal information to the public to allow fair market with prices being given over the courtesy phones in every terminal. These phones allowed ADA persons an easy way to also communicate.

The conflict of interest of the BOAC's President being recused for the 2 billion dollar bond is wrong. All contracts should also be studied to see if any LAX money from any contractor or lawyer of any contractor goes through the presidents bank. All over seas accounts should also be investigated to see if Veolia or any accounts from Veolia from Israel. Any accounts from Veolia from their ownership of trains, water departments, super shuttle, disney express, fly away, or any money made by all contracts from any where going through the BOAC's presidents bank from any where.

Mickey's Space Ship Shuttle is doing 1/3 of the business it was before the new business is business attitude of giving all the designs in favor to the overseas monopoly. This is wrong to allow to happen and it is against President Obama's wishes that you do this. We ask that you reconsider the small businesses of LAX and stop this crime of dishonest discrimination and lack of concern for fairness.

Michael S. Mitchell - LAXPOLITICS.COM

Economic profiling of LAX. Initiating the design of putting out of service local small businesses and favoritism to the making of to big to fail, overseas monopoly rigged bids, and conflict of interest banking in retaliation for the public disclosure of the waste of money for the fly away and mis use of office. The gross privatization of winning business in the airport and subsidizing the losses is a fact in LAX.

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STATE OF CALIFORNIA  
PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3289

ARNOLD SCHWARZENEGGER, Governor

(415) 703-2183



May 28, 2008

File: PSC-5244

Mr. Michael S. Mitchell  
Mickey's Space Ship Shuttle  
P.O. Box 8903  
Anaheim, CA 92812

Dear Mr. Mitchell:

You inquired whether a passenger stage corporation is a "public utility" under the law. The answer is yes.

Public Utilities Code Section 211 provides that every passenger stage corporation is a "common carrier." Under Public Utilities Code Section 216(a), "public utility" includes every "common carrier." Therefore, passenger stage corporations are public utilities.

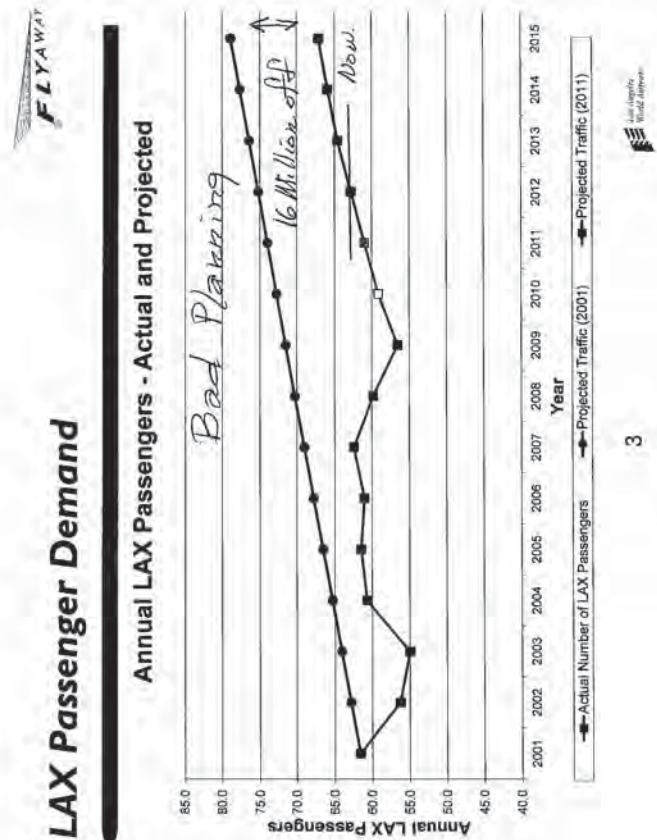
The above code sections are attached.

Very truly yours,

*Paul Wursterle*

PAUL WUERSTLE, Manager  
Transportation Enforcement Branch  
Consumer Protection and Safety Division

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The Fly Away is not self-sustaining against FAA rules.

The Fly Away is a non-airport event and is a diversion of funds against FAA rules.

Regionalization of airports has happened and the volume of passengers is lowest in 20 years. For 32 years the local companies have taken passengers without any cost to LAX, to all the destinations that the Fly Away had more. This would have saved LAX about 30 million dollars if the Fly Away had not started in 2006 and the 10 million dollars a year that the Fly Away took in transportation money from the public riding it would be in the hands of local drivers and not the over seas corporations that the Fly Away has subsidized with so much money. That money would help in the stores and businesses in the local area in Los Angeles and not France.

I have handed in a survey with hundreds of persons signing that they want Mickey's Space Ship Shuttle's Service. This was handed in a few years ago and Sandy Miller has them on file. We go long distances over 75 miles to the Marine Base in Orange County with a first drop off airport point of 35 miles. There are 8 scheduled service companies like ours that have been here for over 20 years at the scheduled service green stop. We expect that all the LAWA Commissioners and the wonderful President and Vice President and Director will allow these smaller and locally owned companies to be grand fathered into the plan of the CTA in the future of LAX to stay in service with the many hundreds of thousands of passengers that are loyal to us from the long distance areas we serve like Santa Barbara, Palmdale, Santa Maria, and the Marine Base. Companies like ours offer the public a not putting all your eggs in one basket design that the wonderful Director Gina Marie has warned about with other events in LAX. We agree with her and support her help to the local L.A. businesses. If you only have large fortune five hundred companies like Veolia that is from France and the Fly Away which is also owned over seas via L.A., Texas, Phoenix, New York, Delaware over to Ireland. Many large companies go bankrupt and the airport is stuck without any recourse. This is why the free services that pay the loop fees to the airport and give a profit to the airport without any RFP's and loss of money are valuable to the airport. They are self sustaining which the Fly Away is not by a long run, and the people are use to them over the decades and do not want to change. The Clifton Moore design of the CTA is perfect it is safe for a car bomb would only effect one terminal and if you collected all the people at one place like the design for over in West Chester it would be centered in one place for everyone and more dangerous for a car bomb. The way it is designed now it is spread out and as the vehicles service the passengers they are within 45 seconds curb & gone and the passengers love it and why fix something that is not broken.

The Fly Away is a dead horse that cost an arm and a leg. Give this all back to the local companies like Super Shuttle and Prime Time and keep the money here in L.A. Think of the passengers not the contractors giving money to the mayor. Passengers first.

The Valley run has been around for 32 years and is now a loss of 4 1/2 million dollars a year including the parking facility. The parking facility is built and cannot be taken back but the contract for service can be stopped and given to the many on-call services like Super Shuttle and Prime Time Shuttles that are always on the way from the valley and would take over the fly away operation for free due to 400 vans that need to come back to LAX. This would take the cars off the street and add the people to vans

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

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that come back anyway. This is a more efficient use of vans returning, the parking structures use, and CTA would be without large 48 passenger buses that average the size of the vans of 6 passengers giving more space in the airport for cars, less pollution, terrible noise from the large cng engines, also the money given to the van drivers of 15 million dollars a year taken away by the fly away given over seas would help the local economy and the vans they owned would be in better mechanical service since they have to maintain them themselves, as well as the passengers would have a way to go back and forth to the airport at a now basis since they only walk up to the CSR on the curb and load onto the vans to get back to their cars in the valley.

You may say we are keeping the money in the U.S.A. now with the new company Bauer's Limousine Service Inc. PSC - 8361 from San Francisco.

The Decision from last year moving some authority to L.A. area does not have LAX airport on the decision like all the other Scheduled Service Companies. The fact that this is a foot note in the decision shows that it appears as the same owners are involved over seas but have made a deal in New York to transfer it all to Bauer just as they did in past with other AKA's. Note foot note with the usual suspected words of trade secrets that allows hide the over seas trick of a tax dodge. so to speak, or legal tax dodge.

1 The ruling provides that the confidential information will remain under seal for a period of two years from the date of the ruling. During this period the information shall not be made accessible or disclosed to anyone other than (a) Commissioners and Commission staff; (b) other parties to this proceeding who have executed a reasonable nondisclosure agreement with Applicant; or (c) upon further order or ruling of the Commission, the assigned Commissioner, the assigned ALJ, or the ALJ then-designated as Law and Motion Judge. If Applicant believes that further protection of this information is needed after two years, it may file a motion stating the justification for further withholding the information from public inspection, or for such other relief as the Commission rules may then provide. The motion must be filed no later than 30 days before the expiration of the protective order.

So this did not go out to bid just as the first bid for the Fly Away in 2006 it went to the one bid company that had made the deal to transfer in New York City as I was told by Mr. Bauer on the phone last Friday. This company appears to be the same over seas AKA design as coach america, gray line, california charters, airport bus of bakersfield, disneyland express, tour coach, starline, vip tours, etc. all having another name and as you have been shown before on an IRS receipt all owned by Banies Pickwick LTD in Ireland. What the mother Corporation does is not buy the new company they ask them to allow them to trade stock let them stay in place to run it and then they control it just as if nothing happened. They have done this over and over with many companies and I would suggest this is happening again here. Why don't you ask them to let you the LAX commissioners read the hidden secret trade information in the puc decision for why would you let a confidential fact go if you are giving them 15 million dollars. You see with local companies before the new fortune five hundred big boys hit town we did all this for nothing and you got paid for our loop fees and the public had phones at the baggage area so they could call us free and everyone could happily go out get right on and not have to go to over seas companies because they had no choice because the French company took over all the advertisement on the airport and helped there other French buddies Veolia by taking all the courtesy phones out of the terminals and make

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

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the public have less information that discriminated the local companies out of a lot of business, until the public caught on and now know to call by cell phone and do it. The Phone board that is touch screen just as it was in 1997 is not used and should be taken out and the courtesy phones put back in to help those that have ADA, are hard of hearing, are speaking other languages and will work when the electricity is off which the new JCD advertisement ones that are way out side the baggage area do not and the whole thing was to control public info and help their French buddies veolia transportation and Gray Line being the only companies seen by the public. This is unfair competition. The fly away had helpers on the curb for the first few years, they are gone now. This is illegal and also unfair competition and discrimination of marketing. Some how the Karma seems to come back on them for this.

While I am thinking of it JC Decaux makes 120 million dollars a year and gives LAX some of this. But why job this out just to rent signs, can't the city do this and save 120 million dollars going over seas. Why can't LAX put up signs for 120 million dollars and not give it to them. This all seems so easy to give money over seas all the time. Why? We all know why down deep. But it will take time and remember Leland Wong? Cities are going bankrupt and the Fly Away is losing millions. Shut it down now. Our smaller 9 passenger buses are the best size and safer as well and take up very little room in the CTA with the emissions of a private car at most. We also use cng. The amount of load of persons unless it is a large charter is less than 9 passengers so why the big buses? It does not make sense. Let Super Shuttle do this and Prime Time and the Scheduled buses that have been doing it for decades. We pay loop fees and without money flying away to France for nothing. To us local companies it is a huge mistake to do the fly away and since 2006 it has taken 60 million dollars from the local companies in fares and you have given them 60 million with a \$35 million loss not including the parking lot in the valley for 33 million so this has lost 120 million dollars not including parking totally from local business and taxes. Commissioner Zifkin called it Alice in wonder land. How much do you need to know? It has been 6 years, in another 6 years 240 mil.

We have families that work hard helping people going to Orange County from all over the world many taking us 8 or 10 times in a row from Australia, New Zealand, Canada, Tahiti, Hawaii, England, they use us all the time over and over, please allow them to do what they want and let us service them. They do not want to ride big buses that are by fact easier to catch sicknesses on because of the amount of persons, are so dangerous there are people killed on the big buses every day. They are the dangerous way to travel the world. google bus wrecks and see why you should never ride one. Ever.

USA TODAY found at least 42 deaths of motor coach occupants and drivers were not reported using NHTSA's standard definition of a motor coach from 1995 to 2009, the most current year for which data are available. Since 2003, 32 fatalities were not included, which represents a 24% increase from the 133 deaths the agency counted.

Michael S. Mitchell CEO Mickey's Space Ship Shuttle PSC 5244

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FLY AWAY

## Network Status

### 2011 Financial Summary By Site

	Van Nuys	Union Station	Westwood	Irvine	Network
Ridership	833,475	430,915	99,796	16,362	1,380,548
Transportation Costs	(\$874,878)	(\$126,217)	(\$534,975)	(\$416,924)	(\$2,152,994)
Cost/Bus Passenger	(\$1.05)	(\$0.29)	(\$5.36)	(\$25.48)	(\$1.56)
VNY Facility Costs	(\$1,832,864)				(\$1,832,864)
VNY Cost/Pass.	(\$2.25)				(\$2.89)

2011 Loss 4 Million dollars per year. \$985,858  
2011 → 4 Million \$ Loss

NOTE: Since financial information for December 2011 was unavailable, summary is based on data from December 1, 2010 through November 30, 2011. Total network cost includes an additional \$200,000 in depreciation costs for buses not assigned to a specific FlyAway site.

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# LAX → Westwood FlyAway®



## Westwood FlyAway 4-Year Financial History

	FY 07 - 08	FY 08 - 09	FY 09 - 10	FY 10 - 11	4-Year Total
Bus Contract	2,594,457	2,657,706	1,626,893	1,348,325	8,531,147*
Advertising	450,000	50,000	50,000	50,000	600,000
LAWA Administration Costs	51,000	51,000	51,000	51,000	204,000
<b>Total Costs</b>	<b>3,095,457</b>	<b>2,958,706</b>	<b>1,727,893</b>	<b>1,449,325</b>	<b>9,335,147</b>
Bus Revenue	330,988	447,716	485,395	417,378	1,681,477
<b>Total Income / (Deficit)</b>	<b>(2,764,469)</b>	<b>(2,510,990)</b>	<b>(1,242,498)</b>	<b>(1,031,947)</b>	<b>(7,653,670)</b>
Ridership	111,487	128,912	104,079	110,937	455,415
<b>Total Cost per Passenger</b>	<b>(\$24.30)</b>	<b>(\$19.48)</b>	<b>(\$11.94)</b>	<b>(\$9.30)</b>	<b>(\$16.81)</b>

\* Includes \$103,766 for two weeks of bus service in FY 06 - 07

Westwood = \$10 Million Loss  
2012

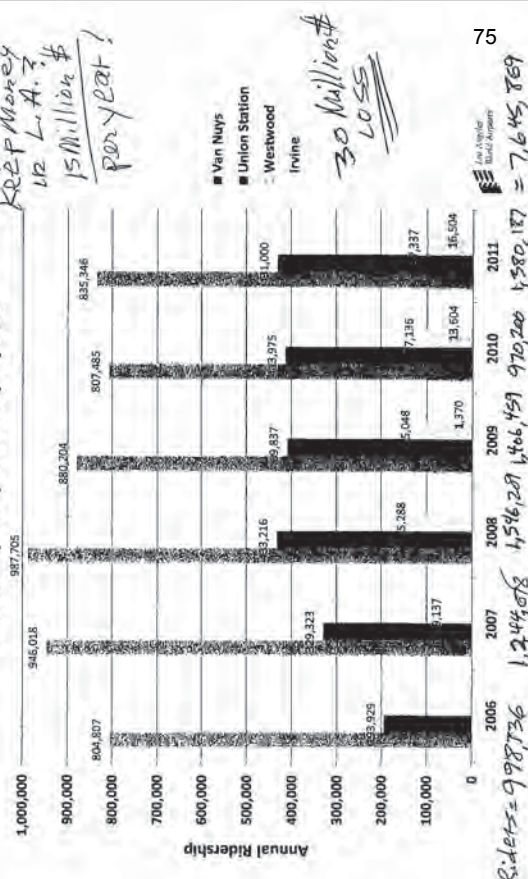
Source: 2011 LAX Westwood Flyaway Management Report

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OVERSEAS OWNED:  
FLYAWAY Takes 10 Million dollars away from  
Local Companies in Income & Cost LAX  
Ridership TAX payer since 2011 (\$4,658,458) take it!  
Give these routes back and save 15 million per year

## Annual FlyAway Ridership by Site



75

Total Ridership = 998,736  
1,344,078  
1,546,201  
1,461,459  
970,200  
1,580,187 = 7,645,869

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IF this happens to L.A. what happens to LAX?

## Compton on brink of bankruptcy

The city is the latest to fall victim to questionable financial practices. It could run out of money by the end of the summer.

The state of these cities underscores the complexity of the fiscal crisis roiling California municipalities this year, with Stockton and Mammoth Lakes already in Chapter 9 bankruptcy. While ballooning public pensions and falling property tax revenues have hit many cities hard, bad accounting practices and improper use of funds have also taken a toll. In many cases cities resorted to these measures because they could not balance their books or raise revenues but were loath to make cuts. A recent grand jury report found that the High Desert city of Victorville used a series of disparate, possibly illegal measures to stave off insolvency. Those included dipping into sanitation funds to help keep the city's treasury afloat, loaning water agency funds to bail out the city's electric utility and siphoning \$2 million in airport bond funds to buy land for a city library.

UPDATE 3-San Bernardino, California, files for bankruptcy with over \$1 bln in debts

In late July, San Bernardino reported it had \$56 million in indebtedness payable from its general fund, the main budget, including payments on a \$50 million pension bond. There is an additional \$195 million in unfunded pension obligations, \$61 million in unfunded retiree healthcare, and \$40 million of workers compensation, compensated absences and general liabilities.

In the past two months, the cities of Stockton and Mammoth Lakes have also filed for Chapter 9 bankruptcy protection, a special bankruptcy provision for municipalities.

Stockton, which like San Bernardino has suffered from the housing crash that was particularly acute in southern California, filed for bankruptcy in June, becoming the largest U.S. city to do so.

Other cities in California are also in deep fiscal trouble and more could file for bankruptcy.

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LAX Legal Department beware:

## Municipal bond suit can go forward Justices let stand ruling that fraud law covers Denver bonds

May 20, 1997/By Lyle Denniston | Lyle Denniston, SUN NATIONAL STAFF

WASHINGTON — The Supreme Court cleared the way yesterday for investors to sue city governments for securities fraud in the sale of municipal bonds. Without comment, the court refused to review a federal appeals court ruling that said Congress did not intend to exempt cities from the 1934 law that bans deception in the sale of securities. The combined city-county government of Denver sought to head off lawsuits by purchasers of the bonds that it sold seven years ago as a way to raise money for a new international airport. The bond buyers, arguing that the bond prices were inflated because the local government had failed to reveal serious problems when it reported on construction progress, claimed fraud under the Securities Exchange Act. Last fall, the federal appeals court in Denver ruled that while the 1934 law does not explicitly give private investors the right to sue municipal bond issuers, such a right exists by implication. The law against securities fraud, the appeals court said, outlaws manipulation or deception by "any person." Noting that brokers who deal in municipal securities are subject to investor lawsuits, the appeals court said that such legal risks extend to local governments as well.

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The empowerment and opportunity of infant industry is being stymied.

The focus is taking advantage of the rules to help the monopoly vs. rules that help the public and allow the small companies to empower the public with fair and honest competition without price fixing allowing favorable and appropriate propitious designs that favor the average public as well as the overseas monopolies with gold.

LAWA is allowing moral misfortune, by deregulation of the phones to go to highest bidders and snuffing out the competition of the non-cartel monopoly aggregate, trampling on the public's price competition and allowing the cartel price fixing to the highest bidder for advertising not respecting the public utilities of the State that were given by courtesy to the public in order to allow the prices to all the public equally for the public by law - information about public state transportation. The idea of what LAWA wishes for is out side of the constitution of the USA is a big problem for the non-lobbying cartel overseas investors that own all the major private ownership of those routes that make a profit and are obtaining free money from the public taxes for those routes that lose money allowing them profit from both sides of their mouth. This 10 million dollar loss this year alone for the public financed cartel owned fly away expansion is money taken from the parking, fees from the other private companies loop fees that have always paid for the courtesy phones in the past and the public loss of information given to the JDC French advertising company that allows for the lowest transportation prices to be hidden given to the big pigs at the trough - hiding the lower prices with this iron curtain voodoo economics with foxes in charge of all the chicken houses here at the airport taking money from the employees that deserve more than the off shore cartel with the millions of dollars in lobby and donations to the mayor whom I blame now for all of this intervention in the past great men that ran this airport and now the limited knowledge of the new commissioners and the Landside make it impossible to go against the conflicting data that is given the new green horn airport chiefs and easy money for overseas and no help for the rights of the local infant industry and public. The airport is specific to help the one overseas money grabbing with no brakes and the spontaneous attitude of the Director to instruct the Legal and management to defend the big shot monopoly with Airport Bus of Bakersfield, Disney Resort Express, CUSA, PCST LLC, on the Irish side of the monopoly owned by Baines Plckwick, and Super Shuttle, JDC, and who knows if they own Prime Time and Road Way on the French side of the Monopoly with the Yellow cab in the valley etc. etc. ergo: Bankrupt any American company that helps the public have a choice of price. This is to eliminate risk for the cartel and hurts the public with out help on the horizon, making a ruling class in the airport handed over by the new do any thing for the big money management of LAWA. This is against the founding fathers and the past great management of LAWA with Mr. Goldberg and Clifton Moore. Sustained power and greed and orgy of overseas lobby success and speculated behavior of deregulation of the fair business practices and using of the public's city management to give uneven playing fields of advertisement and rules and regulations and distorting principles of the founding fathers. The lack of patriotism to the American way with the manipulated overseas invasion of the transportation market and ignoring the liberty and justice for all employees of the airport and ignoring the local American companies. Taxation without representation. Using the city money and give it to make breach of giving all the city money to swindle the money

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to stop pollution with 4 persons on a 48 passenger bus every 15 minutes 24/7 with everyone paid to look the other way with deposits for the mayor and all the look the other way people here in this room. This has happened to S&L scams, and the bailouts and it is we the people not we the overseas investor monopoly that pays everyone off to give them the 10 million dollar loss for the stupid fly away that no one rides to the airport. People that fly are rich, not bus riders. These figures are mostly employee riders that you should just give them the 10 million of this lost money this year and let them live better. This is better than unfairly giving all the diverted money off the airport against the FAA law and that it is not the wheels of justice rolling. The nonsustaining fly away takes money from the local businesses taxes from our loop fees and the parking fees from the public and gives it to Orange County offices of CUSA, PCST LLC that goes right off shore to Ireland. The real human beings here in the airport working need this money more than these overseas rip off scams with the mistress corporation from France that is advertising only the monopoly mostly for free and has caused a wall for the public to see the price fixing. When the airport is run by the corporation then this is fascism. Using the flag for a fig leaf to hide the peoples right for these corporation to steal every thing in this airport. The agnostic attitude to smaller than 10 million dollar losses companies or non overseas socialized companies over american workers here at lax or businesses here in LAX, as a political bent on helping and protecting the overseas monopoly horizontal roll up, as if it were a RICO action that is required by the city and FAA. This is a bucket swap for someone and it is not the public. appropriate market forces are under attack with this new epidemic of authoritarian overseas aggregate companies known as an anti-trust monopoly that has taken over the ground system of LAWA. This is Fraud. It is greed added with losses backed by the city that loss 10 million a year and it is treated as a normal system design, even thought the FAA has diversion of funds and nonsustaining without discrimination or unreasonable treatment to the public and local businesses by law. when you have bad ethics it runs good ethics out of the airport like MSSS. Then you are in the midst of one company holding the airport hostage with no other choice and buy or die ride economics. The taking away of the public information to all companies that were treated as a courtesy to the public and was not considered advertisement for 32 years. Things that are hard to value like the fly away is a way of coning the city out of lots of money on what is called the growing unknown success. But in the past these routes have all failed in the market place in the past many times. This information being hidden from anyone except those that are very well informed over many years like myself, allows the information to protect the public to be heard. Fraud is deceit, create trust and betraying the trust. Significant accounting fraud is going on because they all know these routes will not work. The idea that it is doing what is expected is a lie as Landside states. They thought this would work right away. The idea that 18 of these routes are in the works is a great fraud. opposition caused by opportuneness. The only felicitous feature is the Brown Act left here for us and as the Director Lindsey has stated, "are you here to make more noise". This lack of respect and elitist attitude that the most money a company has makes them the best choice for future projects is discrimination and non american. The public's money should be best spent for the public good, not to the most elite in other airports that have already gone under with the same monopoly of advertisement and transportation monopoly. The people vote and what they get for this vote is now a great concern to me

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here in LAWA. I see a great deterioration and see the voting public's money being thrown away to overseas monopoly organized with the help of the new LAWA states of service of the public. It is very important to consider that the workers and public services are being deprived of a better way to do things. In direct counter distinction to the public is losing the ability to inform themselves with the state public utilities available to them by State court Certification of the State of California by Public Utilities Judges that are very concerned with fair treatment to the public and the businesses that are certified. This concern is now under attack in a big way in the state airports being taken over with a cartel of advertising and transportation partnerships that are taking the prices and choices of the public away from them being protected by the conflict of interest of management of the airports being protectors of the new monopolies and using government and city lawyers to protect the invasion from overseas that allows all the money given to transportation to be privatized and socialized in a way that is profitable to both systems of transportation and the same company in both making great profits, while the public has great losses with local businesses being forced out of business with the new changes in rules and regulations that protect the overseas monopoly invasion and protect it from local competition. This is un-American and the money going out of the country without tax is a sin to the country, and economic treason. This pushing equivocal new non-American designs out for off shore money grabs of public money and watering down the public local businesses. This activity was never even considered in the past presidents, commissioners, and directors. The investigation of the facts of the past history were equivocal. The information given as facts of the past in the directors Lindsey's letter to me is not what they are tried to be made with this letter. The mingling together of present events and past interpretations of what was thought in the past are not true. The similar designs of the past are made to look as if they were not as wise as today's giving all the power and business overseas to a monopoly design with an off shore USA tax dodge as well as an out of state license city tax dodge and the loss of public money to the amount of 10 million per year cash with the fly away new routes, with a loss of the public's right to the true and comprehensive price of transportation. The pathological usual attention to the overseas monopoly taking over the airport is of great shock to the past very open and free market in the past here in LAX when Clifton Moore, Johnnie Cochran, Mr. Greenberg, and President Chick ran the airport. The small business and the local economy was of great importance then as well as the sustaining of the operators to pay for its self. The idea of advertisement was banned so as to not abuse the passengers. Now we have gone to the opposite to take even the public information away, block and charge for it. This is ultimate confusion as quasi help for the public by hiding the prices of trips and only having the most rich big brand cartel visible to the public with wrongful discrimination of information to the public never heard of in the past before the monopoly minded new director of landside and the airports new wave of overseas manipulation of the public's money to be given out with millions lost to the off shore monopoly that has cheated it's way to the top with code 851 violations and Section 10 violations of the state and laws contracts, being ignored with our calls to enforce the rules, only to be threatened with new rules to put us out of the airport in 2012 to make room for the empty buses that lose millions on millions a year and will lose 50 million more the way the plan is now set in time. Holding 500 million in limbo for the backing money. Our company has to be self sustaining and fight LAWA to service.

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This is so short sighted it has to be considered a RICO act in harmony with the company off shore and the on shore new heads of LAWA cookie cutting the airport as taxes and san francisco and O.C. which remember o.c. means organized crime. This is taking all the free market away and secretly putting in a monopoly every where with persons in power seeking higher office on the long run feeding the monopoly to get those large money grabs for the up and coming positions it seems that they dream of, taking the eye off the idea of protecting the public from a loss of millions of dollars. What else could make these frail humans do such a bad mistake as this here in LAWA. What could lead them to the point that Mrs. Chick states, LAWA is ripe with corruption. Her great husband was president here and they know what is going on. They can see that you all here are either giving away the farm or just do not see what is happening and to weak to fight it with the mast of the ship bent towards the monopoly interest. Will Rogers stated, "we will never have true civilization until we have learned to recognize the rights of others". When the director of the airport states to me, "are you going to make more noise today?" This sums up the attitude of the respect for the public around here and the lack of seeing, the lack of justice paid to the public and small business now in LAWA. I feel that some of you should be replaced to better the public's chances for respect to constitutional truth and saving money to the local american economy and not giving it to tax dodge monopoly cookie cutter invasion cartels that take over our american airports one after another with conflict of interest insiders taking jobs that allow the foxes in the hen house. The hubris superiority of saying are you going to make noise today shows the lack of humility and discrimination of the directors attitude to pay attention to the public. This statement is to show that even the highest around here are not as concerned with the humility of the employees and the small businesses here in the airport. The diversion from the constitution of tribal drums for this overseas pirate off shore invasion of LAX ground transportation with public contracts from inside the city trojan horse lobby to the mayor master plan scam and conflict of interest landside plundering the local infant industry rights, with the directors protection of the invasion of the public information to side only to the monopoly owned companies like super shuttle, fly away, airport bus of Bakersfield, Disneyland Express, CUSA, CC, CUSA PCST LLC and the JCD advertisement tribe of one ownership over seas coupe of one off shore corp. invasion of the airport Ground Transportation is a great loss to the public for transportation cost, congestion of the airport CTA, puts more diesel fumes in the CTA, with large buses and 4 persons on them every 15 minutes, all coming in at once to make it look like the other companies should be kicked out to make room for this great loss of tax money. This is an issue that political haughtiness, cocky supercilious pride, and pomp cannot float overseas owner ship of the airports most important home land security, transportation in LAX. The ownership history of this monopoly has been ignored even though fraud is rampant in the history of the off shore invasion court papers. The fact that others have done everything is not the best reason to do anything. Humans use to be cave men. This does not mean we should stay cave men. To give away all the tax money lost from the country to the overseas companies that escape the tax fees of USA with the off shore tax dodge and city tax dodge with out of state license that is all a fake way to say the local scheduled buses are going out of state. Sure they are. This stops the city tax in the airport. I am here to make noise, the noise of god. That it is a sin to do what you do for you are hired to do the exact opposite that you are

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TO The BOAC, Mayor, Executive Director with legal team for off shore invasion of LAX Public money p.5

appointed to do, unless the mayor just wants the invading monopoly to give him money to run for more power to give themselves. Elude the fraud is the major gift and scheme with the tactic of public money for the losing routes and privately own the routes in the airport that make money with help from inside the airport political matrix with subterfuge and rules with a tax dodge ruse, to take as much money out of the usa and put it in the off shore banks keeping the money from recycling in the local area of Los Angeles. The main office being in Orange County and trying to move the fly away down to O.C. Irvine so they can help the Los Angeles public pay for the losses of the private disneyland area runs. They are very good at this and have been at it since 1980 when Daniel Boulange took over the Gray Line Group that is the name of the whole monopoly as well as CHOCO from the Gulf area according to the court papers of chapter 11 cases of Ground system Inc. and Gray Line/Star Line Chapter 11 cases, as well as ABC bus vs Baines Pickwick LTD in Santa Anna court house records. The facts show that the power from inside the airport is very strong as you can see the defense from the director and Landside protection of the monopoly fraud by the LAWA insiders building a bulwark at all times and straining the infant industry owned in America with tax base here in the country being positioned as antagonist to the monopoly holy grail of the new airport power tribe for off shore drumming. This is a new fashion here in LAX. In the past Mr. Greenberg, Clifton Moore, president CHick were for American companies and keeping the money here in the city to help the people here in Los Angeles, not giving all the public money 10 million dollars of total loss to empty buses that do not do what they say they do. Give them another year with 20 million more is crazy and we are given the freedom to have to only talk to the persons at the curb at the airport which rules have been proposed to fine us thousands of dollars by Mr. Blagi for just talking about our prices at the curb which is the only place we are allowed to communicate since you have told Travelers Aids to not give out our information and taking the phones away from the terminals of our by law public utility with a letter from the CPUC state manager stating this is by law a public utility and the airport takes the phones out and wants \$25,000 for the public to find out prices and services. This is discriminating to the public and our company. This is unfair competition and unjust enrichment of the monopoly take over of the airport with a great loss of choice of transportation and loss of money to the public with our \$6 cheaper travel cost as well as the 10 million dollar loss for this year to the lack of interest in the past record of the fly away routes that have failed in the past many times and the bold failure being ignored over and over giving more and more money to a big off shore hole that is a lobby toxic dump. To put all the possible transportation companies and destinations that are public utilities by law, on a phone board as used for 32 years that is ADA perfect, helps those with language problems, emergency phones for anyone to obtain information with the electricity off at the airport unlike the new touch screen kind that is trumpeted as new and better, when for 7 years they were already used in all terminals and taken out for being too complicated and broken down a lot as I have shown in SNA with months of this new design being out of service. This causes the big brand monopoly to thrive and tax money in America to tank. The old phones were something the new ones are not, efficient, almost damage proof with wire cords, easy for anyone from anywhere in the world and for 32 years the law of the airport was no advertisement. Now all of a sudden it is the new scam to say they are the best ever and new and modern. This is a lie. This shows the lack of acumen of the

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**NEW ITEM:** Mickey's space ship shuttle's economic death penalty.  
**JCDecaux (JCD)** French owned  
 inoculated from any American laws and legal actions due to over seas?  
**Invasion of public's rights to California State Public Utility Commission Ground Transportation in Federal Airport owned by a Public Municipality. Advertisement was illegal for 32 years and the public information act protects the public by allowing a free market to ground transportation and by law state public Authorized Ground Transportation. The Certification of said public service is not advertisement it is part of the Public Information Act Resource. Question-how does L.A. Inc. advertisement company attachment play in this over seas tax dodge advertisement company. (JCD) How is this attached to the off shore Fly Away owned by PCST LLC through and Baines Pickwick LTD. of Ireland.**

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HOAC, welcome to misplaced priorities. Big over seas monopoly over local growth and public need. The favoritism to the monopoly is against the law, FAA, City Charter, CPUC, and Federal Constitution, P1

The contractors have the heads of the airport on their side. Every creep in design goes for gifts to the monopoly of Veolia, ( Gray Line ), Super Shuttle, Airport Bus of Bakersfield, Fly Away, Coach America, California Coach, GUSA, PCST, Disneyland Express, and the many other dba's that the monopoly owns from France along with JCD advertisement being the information side of this monopoly all being given free advertisement, first contact curb topology, free buses, free transmissions, millions of dollars of advertisement all over the city streets with flags, posters radio, & free phones.

The fly away is now losing at least 9 million a year for 5 years now, and has now been loaded down with the attempt to add more losing routes that will fail and have failed in the past with bankruptcy at least twice in the past with more passengers passing through LAX.

The curbs are shut down now for a month not being used at all terminals without any use at all by anything being a waste of curb area for nothing. The new business is business attitude is the do what you can to favor the monopoly over seas and let the local companies fail as soon as possible. Our company is not notified and ask to participate in the meetings and the monopoly companies are. Ryan stated in the last full meeting that they had meetings with the companies. We were not given the chance to participate. This is as usual discrimination and a paradigm of concepts that are one sided for those that give the mayor the most money. The contracts for the fly away have been to only one company and given 5 million dollars in buses, millions in advertisement, that was not in the original bid that was rigged and protested by our company that did not go to hearing. This is unjust and shows the lack of interest for honest and fair treatment. The lack of consideration for our company and fairness has made us lose a great deal of money since the Director has taken over the airport and destroyed the balance of the last 32 years of equal information to the public to allow fair market with prices being given over the courtesy phones in every terminal. These phones allowed ADA persons an easy way to also communicate.

The conflict of interest of the BOAC's President being recused for the 2 billion dollar bond is wrong. All contacts should also be studied to see if any LAX money from any contractor or lawyer of any contractor goes through the presidents bank. All over seas accounts should also be investigated to see if Veolia or any accounts from Veolia from Israel. Any accounts from Veolia from their ownership of trains, water departments, super shuttle, disney express, fly away, or any money made by all contracts from any where going through the BOAC's presidents bank from any where.

Mickey's Space Ship Shuttle is doing 1/3 of the business it was before the new business is business attitude of giving all the designs in favor to the overseas monopoly. This is wrong to allow to happen and it is against President Obama's wishes that you do this. We ask that you reconsider the small businesses of LAX and stop this crime of dishonest discrimination and lack of concern for fairness.

Michael S. Mitchell - LAXPOLITICS.COM

Economic profiling of LAX, initiating the design of putting out of service local small businesses and favoritism to the making of a big to fail, overseas monopoly rigged bids, and conflict of interest banking in retaliation for the public disclosure of the waste of money for the fly away and miss use of office. The gross privatization of winning business in the airport and subsidizing the losses is a fact in LAX.

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TO: The BOAC of LAWA. The fly away to the valley is ok. The other fly away services should be estopped.

#### **Provisions of the U.S. Code That Prohibit Diversion of Airport Revenues to Non-Airport Purposes, 49 U.S.C. 47101-47133**

##### **Section 47101(a)(13).**

**Airports should be as self-sustaining as possible** under the circumstances existing at each particular airport and in establishing new fees, rates, and charges, and generating revenues from all sources, airport owners and operators **should not seek to create revenue surpluses that exceed the amounts to be used for airport system purposes** for which airport revenues may be spent under section 47107(b)(1)....

The fly away is losing at least 5 million dollars per year not including the 5 million in new buses you are going to buy them in the future. To ignore this is preposterous concerning your self sustaining as possible rule of the FAA.

The fly away loses 1 million dollars from the valley. Per year.

It loses 2 million dollars from down town. Per year.

It loses 2.5 million dollars from UCLA. Per year. This has been 2 years of loss. By Dec. 2008, you will lose 10 million dollars. Stop this mess.

The amount of cars and flights are down by %30 because of gas.

The reason for the fly away has died and the loss of 5 million a year is of no standing now to keep going. If one were to be as self sustaining as possible under the circumstances existing at this particular time, the airport needs money for more important things now. The valley service should be the only service that stays in position to see if it will carry the 1 million dollar loss/ yr. This is worth the gamble in the days of troubled times and the rest should be put on the back burner so as not to throw away money to a total loss, and the future of the airports income is decreasing fast. The money should be spent on landing traffic lights and terminals for the new airlines so as to attract the new over seas airlines with safety, not advertising to the 80,000 students that go home for christmas every year. This never changes. The idea that these big diesel buses are less carbon print than cars is crazy. They are worse. They have made more than 47 tons of pollution. They do there own weight every 11 years. They are 40,000 pounds. They run about 8 of these so they do more pollution than the cars that Landside states is replaced by the buses. I proved this in one of my hearings with the CPUC. Gas prices has stopped cars anyway.

SPAS-PC00032



## FAA rule for airport operators

*The airport owner is obligated to the Government to ensure that the facilities of the airport are made available to the public on fair and reasonable terms without unjust discrimination. Any lease or agreement granting the right to serve the public on the premises of an airport so obligated should be subordinate to the authority of the owner to establish sufficient control over the operation to guarantee that patrons will be treated fairly. This applies not only to the purveyors of aeronautical services but to restaurants, shops, parking lots, ground transportation, and any establishment retaining commodities and/or services to the public.*

Advertisement is an attempt to persuade potential customers to purchase a brand at a certain price. Spam like unrequested information. The courtesy phone board was requested by the public only information of options available to the public with certificates of need and necessity given to the carrier from the State of California. A public utility by law.

Advertisement that was not requested was illegal for 32 years by airport property LAW. The difference here at hand is public request for information verses public non requested information.

SPAS-PC00032

R. BUCKMINSTER FULLER

BOX 808 CARBONDALE, ILLINOIS 62901 U.S.A.

816-437-8084

March 1  
1968

To Whom it may concern:

I have extraordinary confidence in the integrity and importance of thought of Michael S. Mitchell.

He shares with me the awareness of <sup>the</sup> individual's significance, as of value only as it is effectively committed to the service of other humans. He shares my thought that we may be most effective on the behalf of others when we refrain from trying to alter the others and confine our efforts to reforming the environment to render it just more propitious for humanity.

Sincerely yours

Buckminster Fuller

SPAS-PC00032

There is no scarce curb in the LAX Central Terminal Area, there is a scam to monopolize it for special interest monopoly plans to take over the airport and privatize it for greed and political gain doing away with all other competition from any local companies from within, with selfish motivated staff and management that does not care about "FAA", "City Charter", "CPUC State" and "Federal constitution Law". The FAA states that the operator of the airport must try only to sustain not profit from the public. The idea that the new coupe states we must run this airport like a business. This is against FAA law. To divert funds to a ground transportation system is a diversion of funds that is a great loss called the fly away. It is money fly away for empty buses congestion and now the whole airport is being redesigned for this failure buy pushing all the local companies into failure by raising the prices for services to make them go broke while they compete with the public money given to the monopoly that is given them by the public from the BOAC and the director. To promise force failure and subsidize over seas monopolies is illegal RICO acts. To raise the loop fees, fees for phones, change the curb design to allow the monopoly owned services to cheat the public out of a fair market making fixed prices due to lack of info and interaction with local van competitors is discrimination which is against FAA rules. For the airport to plan failure for local businesses is illegal and a conflict of interest when they compete with the local companies with a government service. This is a conflict of interest. The new temperament and commitment of the new designs is failure for local companies inherently. Where is the constitution of the USA being respected, the promise of fair treatment and fair market for the public use. The law of the land is on our side but the BOAC and Director is ignoring the law. Where is our promise of progress with the attack on our rights by the new designs for failure. Our American promise is lost with the new ideas of only big money being rewarded with every turn and failure for every local company. The Fly Away is a total failure, leave the airport alone - it works fine without you. Please help us stay in business so that all the airports transportation is not all eggs in one basket.

"Revolution by design and invention is the only revolution tolerable to all men, all societies, and all political systems anywhere."



SPAS-PC00032



Little Bird = BOAC, Director, & Staff - Public money owned by city given away to monopoly free buses & rig bid contracts.

Big Coo Coo bird = Over seas Monopoly Friends of above bank and construction buds L.A. Inc., JCD advertisement LLC & Orange Curtain friends with airport on wheels. Giving all L.A. money to Orange County where the main office outside of Texas maintains the power, private contracts make money public loses 30 million and makes money? Getting to big to fail soon forcing all competition out of LAX. Where's the beef for L.A.? *Fuller*

SPAS-PC00032



BAINES  
Ry L  
D. B. B.



## Starline/Grayline Inventory

Starline  
4800 Staunton Ave.  
Los Angeles, CA 90058

Rights, Title and interest in the name and goodwill of Starline sightseeing Tours and Grayline Tours Inc.

Rights, Title and interest to the leasehold rights to 4800 Staunton Avenue, Los Angeles, CA 90058; building and land

Rights, Title and interest to any and all leasehold rights and/or contractual rights of Starline Sightseeing Tours and Grayline Tours Inc. including any and all buses, vans, trucks, automobiles and the contractual rights to their interest in Western Stage Coaches, Pacific Tours, VIP Tours, Roberts Holiday and Airport Coaches and any and all other contractual rights in companies.

## Unidentified Room

- 1 First Aid Kit
- 1 Casio 10 key machine
- 1 IIT Serial 55102RRC telephone
- 1 keyboard - 404APC21
- 1 computer Micro Q 306K406260
- 2 disk drive
- 1 Epson printer LQ7010 serial #138004988
- 1 4 drawer file cabinet
- 1 Brother Fax Machine 150M serial #41302675
- 1 Ricoh-Rapicom 200/R206110252
- 1 Ever Vision CD 0080111
- 1 Fax
- 1 Keyboard AGI FCC#C168AVE
- 1 TFC telephone 551033LL
- 1 Mobil Pager phone CM14K
- 1 Casio 10 key machine 3215544
- 1 Boston Electrical Pencil Sharpener -1256778
- 1 2 drawer file cabinet
- 1 Minolta copy machine - 1671531
- 1 Johnson page machine FCC #A49072420650 Serial #0121165
- 1 Motorola pager ESN 4027 A1
- 1 Motorola model #FLN9047A 2 way radio
- 1 27 drawer file card cabinet
- 1 wall clock
- 1 Toshiba color television 22608104
- 2 desks
- 1 Mr. Coffemaker
- 1 Sanyo Microwave
- 1 large Safe (by Major ) #8852287
- 1 Safe - Star TS #316431

*Airport Coaches is  
Complete Design/land  
Bus line sold off  
Share to Dublin  
Ireland to  
Baines Pichewick  
owned by LEO  
DANIEL/Bohage*

EXHIBIT 2-1

SPAS-PC00032

KENDRA YOUNGREN  
C.T CORPORATION SYSTEM  
111 EIGHTH AV  
NEW YORK, NY - 10011

OR#: 1028845

## FICTITIOUS BUSINESS NAME STATEMENT

File No. 2006500011  
The following person(s) is (are) business as:  
COACH AMERICA, 2001 & 2  
Manchester, Anaheim, CA 92802  
CUSA PCSTC, LLC, Delaware,  
2005 S. Manchester, Anaheim  
92802

This business is conducted by a  
single company.  
The registrant(s) commenced to  
transact business under the fictitious  
name on or before the date of  
4/17/2006

I declare that all information  
contained in this statement is true and correct. (A  
false statement is a crime under the  
Penal Code, Section 186.10, and  
CUSA PCSTC, LLC  
c/o CHANG LENTZSCH, Manager  
This statement was filed with the  
Clerk of Orange County on September  
2006

NOTICE: This Fictitious Name Statement  
expires five years from the date  
filed in the office of the County Clerk.  
If the Fictitious Business Name is  
not renewed before that time,  
the filing of this statement does  
not authorize the use in this state  
of the Fictitious Business Name in violation  
of the rights of another under Federal,  
state, or common law (See Section 186.10  
of the Penal Code, and the Business and  
Professions Code, Sections 186.10, 186.11, 186.12, 186.13, 186.14, 186.15, 186.16, 186.17, 186.18, 186.19, 186.20, 186.21, 186.22, 186.23, 186.24, 186.25, 186.26, 186.27, 186.28, 186.29, 186.30, 186.31, 186.32, 186.33, 186.34, 186.35, 186.36, 186.37, 186.38, 186.39, 186.40, 186.41, 186.42, 186.43, 186.44, 186.45, 186.46, 186.47, 186.48, 186.49, 186.50, 186.51, 186.52, 186.53, 186.54, 186.55, 186.56, 186.57, 186.58, 186.59, 186.60, 186.61, 186.62, 186.63, 186.64, 186.65, 186.66, 186.67, 186.68, 186.69, 186.70, 186.71, 186.72, 186.73, 186.74, 186.75, 186.76, 186.77, 186.78, 186.79, 186.80, 186.81, 186.82, 186.83, 186.84, 186.85, 186.86, 186.87, 186.88, 186.89, 186.90, 186.91, 186.92, 186.93, 186.94, 186.95, 186.96, 186.97, 186.98, 186.99, 186.100, 186.101, 186.102, 186.103, 186.104, 186.105, 186.106, 186.107, 186.108, 186.109, 186.110, 186.111, 186.112, 186.113, 186.114, 186.115, 186.116, 186.117, 186.118, 186.119, 186.120, 186.121, 186.122, 186.123, 186.124, 186.125, 186.126, 186.127, 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STARLING/GRAYING  
Stimulus LA918151536m  
6/1/92 Consulate  
LA 91-81550 8/2m  
and 92-Last Flying  
Contract Worker.  
Dec. 23-92 Gutter  
Chattell-7/94/92  
Month (3/1/93)  
Personal Background & P  
2001 KCS Grosser Baker  
with 1/60 of 1986  
A took over Management.  
to Paul Connell  
1/18/00 OL Ann.  
Dec 12-93 Grayling  
sumo GSI  
5/25/94 report 7  
6/8/94 Took over  
Roberts Holiday  
Life  
FRESSALE  
Nov 14/94 P  
VAD 3/94  
Provision Picknicks  
Monopoly  
Dec 14/94 City  
EC 14300  
Filed  
Complaint  
against CUSA  
World  
Global LRA  
Seleman  
ground VIP  
Western States  
Shasta-Propietaria  
Bureau Picknicks  
VS  
C&S of CA  
Mickey's Space Ship  
K88-10-054  
88-Application  
D. 89-11-003  
GSI & ACE  
Protect.  
A 92-07-054  
2nd Amended Application  
12/6/92  
Controlled  
Hearing  
Apr. 12/93 do Bureau  
Paid - 7,712.00 + 86.10  
Sold to  
Sept 15/94 J. de B.  
Controlled  
9/6/94 Roberts  
Holiday, via  
Western Stage in  
GSE Plot.  
9/6/94 Trustee  
converts to GSI  
officers in flight?  
9/14/94 ACE  
GSE one  
How close  
9/14/94  
ACE gets  
FESOK &  
Sells  
Chase  
Pete Wink  
GSI of ACE  
GSI Plan

by the Public Utilities Code and therefore is required to receive authorization from the Public Utilities Commission prior to acquiring control of the Reorganized Debtor. The Motion filed by the Plan Agent fails to indicate whether such authorization has been sought or received by Gray Line or its principals.

Further, pursuant to Public Utilities Code Section 854, Gray Line is prohibited from taking control of the Reorganized Debtor without prior Public Utilities Commission authority. Section 854 states in pertinent part:

"(a) No person or corporation, whether or not organized under the laws of this state, shall acquire or control either directly or indirectly any public utility organized and doing business in this state without first securing authorization to do so from the commission. . . Any such acquisition or control without that prior authorization shall be void and of no effect. . . ."

As Section 854 states, without prior Public Utilities Commission authorization, the transfer by the Plan Agent to Gray Line and its principals is void and of no effect. Therefore, ACI requests that prior to the Motion being considered by the Court, that the Court require that the mandatory Public Utilities Commission authorization be received by Gray Line.

This is an attempt by the Plan Agent and Gray Line to avoid compliance with Public Utilities Commission requirements before transferring control of the Reorganized Debtor. Further, if the Motion is granted and Gray Line takes control of the Reorganized Debtor without Public Utilities Commission authorization, then the creditors of the Reorganized Debtor are in danger of receiving nothing under the Plan of Reorganization pursuant to Public Utilities Code Section 854. This is inequitable and should not be tolerated by

DOI: 10.1002/ajb.a

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SPAS-PC00032

F. THE MANAGEMENT OF THE REORGANIZED DEBTOR BY SHAREHOLDERS IS NOT PERMITTED UNDER THE ORDER CONFIRMING THE PLAN

The present Board of Directors including Boulange, Sapir, Acklay and Grossenbacher all are either shareholders of the Reorganized Debtor or owners of a company holding shares in the Reorganized Debtor. Therefore, pursuant to the Confirmed Plan, they cannot manage or be involved in management decisions regarding the Reorganized Debtor. This is an attempt by the Plan Agent to transfer management of the Reorganized Debtor in violation of the Court's Order confirming the Plan. As specifically stated in the Plan at page fifteen, paragraph F, "...before the Final Payment Date, shareholders will receive no dividends nor may they participate in corporate governance of the Reorganized Debtor." Therefore, the Plan Agent's request for approval of compensation to these Board Members should be denied and the Plan Agent should be required to appoint a Board that complies with the requirements of the Plan.

9. THE TRANSFER OF THE ASSETS OF THE REORGANIZED DEBTOR TO GRAY LINE IS A VIOLATION OF THE CALIFORNIA PUBLIC UTILITIES CODE

The Plan Agent's transfer of the assets of the Reorganized Debtor to Gray Line is a violation of Sections 852, 854 and 1031 of the California Public Utilities Code.

Public Utilities Code Section 852 states in pertinent part:

"No public utility, and no subsidiary or affiliate of, or corporation holding or controlling interest in, a public utility, shall purchase or acquire, take or hold, any part of the capital stock of any other public utility, organized or existing under or by virtue of the laws of this state, without having been first authorized to do so by the commission; . . ."

In the present action, Gray Line is a public utility as defined

## CENTRAL DISTRICT OF CALIFORNIA

—o0o—

In Re: ) Case No. SA90-01359-JR  
 )  
 GROUND SYSTEMS, INC., ) Santa Ana, California  
 dba AIRPORT COACH, ) Monday, May 16, 1994  
 ) 11:30 A.M.  
 Debtor. )  
 ) Chapter 11

Hearing on Plan Agent's  
motion filed 4/25/94 for  
order:

(1) Approving proposed compensation for new board members; and (2) Approving acceptance by Plan Agent of enhancements to second amended plan of reorganization

TRANSCRIPT OF PROCEEDINGS  
BEFORE THE HONORABLE JOHN E. RYAN  
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES:

For Plan Agent:

JEFFREY W. BROKER  
Lobel, Winthrop & Broker  
19800 MacArthur Boulevard  
Suite 1100  
Irvine, CA 92715  
(714) 476-7400

For Airport Cruiser, Inc.:

JEFFREY B. GARDNER  
Saxon, Brewer, Solomon  
& Kincannon  
4400 MacArthur Boulevard  
Suite 400  
Newport Beach, CA 92660-2035  
(714) 851-9111



Filed 5/20/99

CERTIFIED FOR PUBLICATION  
IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT  
DIVISION THREE

BAINES PICKWICK LIMITED,

Plaintiff and Respondent,

v.

THE CITY OF LOS ANGELES,

Defendant and Appellant.

B122940

(Super. Ct. No. BC143086)

APPEAL from a judgment of the Superior Court of Los Angeles County.

Florence-Marie Cooper, Judge. Reversed and remanded.

James K. Hahn, City Attorney, Jerry Montgomery, Assistant City Attorney, and  
Dorothy Berry, Deputy City Attorney, for Defendant and Appellant.

Craig S. Elkin for Plaintiff and Respondent.

Exhibit 2 - Daniel Boulange - CEO of Gray Line. Please note:

3rd page, under Major Completed Projects handed into judge Ryan at the Chapter 11, Federal Bankruptcy case when he bought the Disneyland Bus Line from Chuck Aloe and his wife, or stole it as they say, his resume states he worked in 1979 to 1982 on a 100 kilometer freeway called Al Sulayil-Najran Road office in Riyadh, Saudi Arabia, also from 1980 to 82, he worked on 2 mosques buildings and military buildings amounting to 230,000,000 dollars worth of projects. This road and mosque projects were projects that were managed by Ben Laden the well known secret enemy of the USA at the time. This to me flies a red flag to do business with as well as to put all eggs in one basket with his monopoly, even if all the airports in the world have done business with him. I know him and he has told me I am the biggest crook you have ever met aren't I, and I stated yes you are Mr. Boulange. He has kept us in court with fraudulent briefs for 10 years keeping us out of services that were based on complete lies. He stated there was to much competition in the scheduled service at LAX as we applied for the up grade of our license. We latter found out he owned all the companies as a monopoly that he claimed was competing. This was fraud and he now owns the whole city politics some how, still we fight his monopoly but now he has the INSIDERS of lax doing it for him some how. This monopoly shall some day fall for it is built on lies. We hope that the BOAC has the integrity to see it all. Some day this house of cards will fall. Try and save your self from this mess, it is really hard core fraud in the biggest way. If you ignore this you will be libel for RICO acts from what my lawyer thinks. I challenged this in PUC filings and he has dismissed an application of a ZORF because he could not prove the authority to have changed ownership legally. So I have already proved that he is guilty or he would not have dismissed his application to raise the price of his bus fares at that time which would have made him about 1 or 2 million dollars more a year. I would say that this shows that he cannot prove he owns what he is CEO of. He states that CHCO owns it. No one knows who that is. I handed in the court papers that stated he does not know who owns CHCO. No one knows who owns it if he states this in court himself? You think the Fly Away is owned through long beach, anaheim, to Texas, to New York, to Delaware LLC to Baines Pickwick. Note how all the companies are attached to LLC's that no one knows the other LLC's that take them over seas.

The past history of all these donations to political parties and mayors etc. are large and as this has happened it gets more and more weird that this all comes from Ben Laden's home town and it appears as if he was without a doubt his lawyer.

This is a red flag to me, hugh. Please take notice this is not playing around.

I know this guy and I was in court with him with my friend dr. Hector for 10 years. We are afraid of him for he has stated he would kill anyone that cost him money to me. I take a great risk to talk about this. But the public should be protected. Please help. Micheal S. Mitchell

Note: Find a private detective report that we did on him to show he is the person that is in control of Gray Line and all the other companies that he has monopolized.

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DANIEL BOULANGEGENERAL BACKGROUND

International Expertise in all facets of Real Estate and construction management and construction law.

CAREER HIGHLIGHTS

1993 - Present Chief Executive Officer of The Gray Line Tours Co. and all subsidiaries.

1984 - Present President Tekno Development, Inc.(Construction) Beverly Hills, CA

1980 - 1983 President of Maurice Delens/I.C.A. a consortium of companies involved in major construction projects in Saudi Arabia.

1980 - 1983 President of I.C.A., a construction company involved in major road and construction projects in Saudi Arabia.

1976 - 1979 Counselor at Law for Belgian Construction Companies, working abroad and in particular the Gulf area (Saudi Arabia)

Member of the Board of Directors of the following construction companies:

- Eurofin, in Zottegem, Belgium
- N.V. International Contractors Association.
- Joint Venture M. Delens - I.C.A.
- N.V. Pelvaco.
- N.V. Mesdagh & Co.

Counselor at Law of the following Saudi Arabian construction companies:

- Reem Corporation, in Riyadh
- Baraka Corporation, in Riyadh

1970 - 1975 Attorney At Law: Liege, Belgium. Specialist in Construction Law and dealt with Contractors, Builders and Architects.

Education: Doctorate in Law - University of Liege, Belgium.

Daniel BOULANGEGENERAL BACKGROUND

International Expertise in all facets of Real Estate and construction management and construction law.

CAREER HIGHLIGHTS

January, 1984 through Present PRESIDENT TEKNO-DEVELOPMENT, INC; TEKNO DESIGN, INC. (Architecture); TEKNO VENTURES, INC. (Construction) with Offices in Beverly Hills, California.

1980-1983 PRESIDENT OF MAURICE DELENS/I.C.A. a consortium of companies involved in major construction projects in Saudi Arabia.

1979-1980 PRESIDENT OF I.C.A., a construction company involved in major road and construction projects in Saudi Arabia.

1976-1979 COUNSELOR AT LAW for Belgian Construction Companies, working abroad and in particular the Gulf area (Saudi Arabia).

MEMBER OF THE BOARD OF DIRECTORS of the following construction companies:

- Eurofin, in Zottegem, Belgium.
- N.V. International Contractors Association.
- Joint Venture M. Delens - I.C.A.
- N.V. Pelvaco.
- N.V. Mesdagh & Co.

COUNSELOR AT LAW of the following Saudi Arabian construction companies:

- Reem Corporation, in Riyadh.
- Baraka Corporation, in Riyadh.

1970-1975 ATTORNEY AT LAW : Liege, Belgium. Specialist in Construction Law and dealt exclusively with Contractors, Builders and Architects.

EDUCATION Doctorate in Law - University of Liege, Belgium.

Exhibit 2

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Exhibit 2

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DANIEL BOULANGE  
MAJOR COMPLETED PROJECTS

YEAR	PROJECT/PRINCIPALS	VALUE
1979	AL HADITHA BORDER POST/Customs facilities, warehousing, Governmental Offices and associated public works. Border between Jordan and Saudi Arabia. International Contractors Association, Riyadh, Saudi Arabia.	\$12,000,000
1979/1980	AL SULAYIL-NAJRAN ROAD/100 Km. road between Saudi Arabia and Yemen. Major earthmoving and bridge construction operation International Contractors Association, Riyadh, Saudi Arabia.	\$35,000,000
1980/1982	AL SULAYIL MILITARY ACADEMY/ Al Sulayil, Saudi Arabia Construction of a new city consisting of housing, military facilities and mosque as well as related public works to maintain 3,000 military personnel and their families. Joint Venture: Maurice Delens/ I.C.A., Riyadh, Saudi Arabia	\$195,000,000
1980/1982	KASSIM MILITARY ACADEMY/Kassim Saudi Arabia. Construction of a new city consisting of housing, military facilities and mosque as well as related public works to maintain 2,500 military personnel and their families. Joint Venture : Maurice Delens/ I.C.A., Riyadh, Saudi Arabia	\$155,000,000
1985/1986	16 Unit Condominium - Los Angeles, CA/ 4 story over subterranean / Tekno Development Inc.	\$ 3,750,000
1986-1987	46 Unit Luxury Condominium Development, adjacent to L'Hermitage Hotel, on Burton Way in Beverly Hills, Ca. Joint Venture Haseko Townhomes Inc. & Tekno Development, Inc.	\$21,830,000

1987-88	21 Unit Luxury Condominium Development. Historical rehabilitation in Hancock Park area of Los Angeles, CA. Joint Venture Haseko Townhomes, Inc. & Tekno Development, Inc. Gold Nugget Grand Award Historical Preservation Grand Award.	\$7,650,000
1988-89	10 Unit Luxury Condominium Development, on Burton Way in Beverly Hills, CA. Joint Venture Haseko Townhomes, Inc. Tekno Development, Inc.	\$5,300,000
1988-89	27 Unit Luxury Condominium Development, on Maple Drive in Beverly Hills, CA. Joint Venture Haseko Townhomes, Inc. & Tekno Development, Inc.	\$26,000,000
1989-90	45 Unit Luxury Condominium Conversion, on Rossmore Avenue in Hancock Park, Joint Venture Haseko Townhomes, Inc. & Tekno Development, Inc.	\$19,950,000
1989-91	77 Unit Luxury Condominium Conversion, on Ocean Avenue in Los Angeles, Joint Venture Haseko Townhomes, Inc. & Tekno Development, Inc.	\$65,000,000
Total		\$546,480,000

Exhibit  
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Page 3

Exhibit 2  
SPAS-PC00032



FRANK COONIS INVESTIGATIONS, INC.

360 N. Sepulveda Blvd., Suite 1089 • El Segundo, California 90245  
(310) 647-2800 • Fax: (310) 647-2862 • State License PI 8820 & 21147

May 17, 2001

Roxborough, Pomerance & Nye  
Doreen M. Ribakoff, Esquire  
10866 Wilshire Blvd., #1200  
Los Angeles, CA 90024-4336  
(310) 470-1869

Fax: (310) 470-9648

Re Subject: Daniel Boulange  
Your Ref: Mickey's Space Ship Shuttle  
Our File: 43347  
Service: Special Investigation

Dear Mr. Ribakoff:

Pursuant to your request for information this office has conducted the initial requisite inquiries to determine the assets of your subjects.

We have confirmed that the CEO, as registered with the California Department of Corporations for Ground Systems, Inc. is Daniel Boulange. The Registered Agent for Service of Process is Kari Nelson, 917 E. Gene Autry Way, Anaheim, CA 92805. There is no record reflecting that Kari Nelson is an attorney and she is not registered as a member of the California State Bar.

We were able to find three (3) Fictitious Business Name filings under Ground Systems, Inc. in Los Angeles County. These names are: Airportbus, filed under document number 479800, dated March 26<sup>th</sup>, 1996; Airport Coach, filed under document number 0544428, dated April 4<sup>th</sup>, 1996, and Airportbus, renewed under document number 137752, dated January 25<sup>th</sup>, 2001. Additionally, we were able to locate Fictitious Business Name Statements in both Los Angeles and Orange Counties reflecting The Airport Bus with the registered owner as Daniel Boulange, 917 E. Gene Autry Way, Anaheim, CA 92805.

Airportbus.com, is the World Wide Web address for airportbus. This world wide web site has a registrant of: The Work Station (AIRPORTBUS-DOM), 917 E. Gene Autry Way, Anaheim, CA 92805, US. The Domain Name is, AIRPORTBUS.COM. The Administrative Contact, Billing Contact is listed as: Boulange Daniel, (800)4945-0800, almrth@FIRSTWORLD.NET, Airport Bus, 917 E. Gene Autry Way, Anaheim, CA 92805, US, 714-932-8900, Fax - 714-932-4736.

A search on these telephone numbers revealed that (604) 923-8800 is a Pacific Bell Wireline system phone that is no longer in service. A subsequent search regarding (714) 932-4736 revealed

that it is a facsimile line that is registered as a business line for Airport Coach. The physical location of this telephone is 917 E. Gene Autry Way, Anaheim, CA 92805.

AIRPORTBUS.COM reflects 78 hotels in the Disneyland / Buena Park area as "Hotels Served by Airport Bus". Many of these hotels have links from the airportbus.com site to their own. By following the links, we found that there is service called TravelHero.com where hotel reservations can be made on-line with a major credit card. Disneyland Hotel Concierge related that she was not familiar with TravelHero but that she was familiar with Airportbus. Marvina not only confirmed that the bus services the hotel, she provided an additional telephone number of (949) 960-0300. This telephone number is forwarded to a call phone answered by a male who simply says "hello".

We were able to confirm that airportbus.com is an "affiliate site" of TravelHero.com. According to Dave Pearsall (407) 993-9444, an affiliate earns 25% of the commission earned by TravelHero for each sale made via the affiliates web site or link. TravelHero.com is registered by the Aaron Corporation (TRAVELHERO-DOM), 7201 B. Camelback Rd., Scottsdale, AZ 85251.

Daniel Boulange is listed as the Registered Agent For Service of Process for the following California business entities:

The Gray Line Tours Company	C0116270	Suspended
Tekno Development, Inc.	C1221629	Suspended
Tekno Ventures, Inc.	C1396441	Suspended
Tekno Design, Inc.	C1436061	Suspended
Tekno Energy, Inc.	C1472710	Suspended

In addition, your subject Boulange has been either directly or indirectly connected to the following California Business Entities:

Starline Sightseeing Tours, Inc.	C0619012	Suspended
Starline Tours of Hollywood, Inc.	C1380892	Active
Starline Tours USA, Inc.	C2089823	Active
Super Sonic Tours and Travel, Inc.	C0933500	Suspended

Mr. Boulange has a lengthy history of being the defendant in civil litigation, of having Federal, State and County Tax Liens, and is not the registered owner of any real property. Mr. Boulange, the Yatch Teknokart (official number 959 436), Her Engines, Tackle, Furniture, Apparel, in Rem were the defendants of U.S. District Court, Central District of California Case No. 96-CV-67533 wherein your subject became the judgment debtor to Deere Credit, Inc. in the amount of \$74,959.79 in 1979. There is a second Central District Case wherein your subject was the defendant, cross-complained, and all actions were dismissed with prejudice. This second case no is 93-CV-4341.



Mr. Boulange is married to ~~Adrienne Y. Boulange~~, who is listed as co-debtor on many of the Tax Liens. Our confidential sources have located a financial relationship for your subjects spouse. This relationship is however marked at the source as ~~Adrienne Boulange Only~~. We have not located any employment for Mrs. Boulange to date. This relationship is with:

Wells Fargo  
11836 San Vicente Blvd.  
Los Angeles, CA 90049

This account has a current balance of ~~00000000~~. It is important to note that Mrs. Boulange uses both ~~Adrienne~~ and ~~Adrienne~~ and that the above is not a typographical error.

Our confidential sources have also located a financial relationship for your subject Daniel Boulange. This relationship is at:

Bank of America  
460 N. Beverly Drive  
Beverly Hills, CA 90210

This account has a current balance of ~~00000000~~.

This is NOT a final report.

Sincerely,  
FRANK COONIS INVESTIGATIONS, INC.

  
Matthew A. Garrison  
Private Investigator

MAG:mag/and  
Cc: 43347

Consumers are not protected. The BOAC do not understand CPUC rules and regulations with the advertisement advantages being unregulated as well. As in the past with equal treatment to the public advantage having equal information to use as well as the CPUC regulations that are ignored by LAWA. This causes off shore monopoly and price fixing without regulations of the market to control and allow a fair free market. Regulatory staff is oppressive to our company and is undermining our rights to free market and city charter contract rights. Over seas cartels have no rules.



Regulatory staff states the Ground Transportation must be run like a business. Not like it has for the last 32 years. It must pay for the fly away fees if this is true or shut it down. It must be strictly managed. Competition is American. Note: The congestion is lack of training of drivers and times for buses all the same time. Look at way this driver parks with 5 people on board with 48 passenger bus?

Run like a business against FAA rules, FAA = Sustain only. Airport no diversion of funds reasonable non-discriminational action. Training vs enforcement bias.

Oppression by over indulgence of monopoly design enthusiasm. Use of phones by fly away, 500k to fly away, unethical advantage with phone, gouging prices, LLC to city with JCD advertising? Get what they can get against FAA rules, 42Kvs32Kvs25K price for IVC. Gouging local companies out of service. Used in SNA and Other airports is no excuse for same mistakes here at LAX.

Just because the other airports do something wrong is no reason to do anything. Look what happen with the banks with monkey see monkey do!

Rules and Regulations, violations of the monopoly: Only one service per airport, top, psc on-call, scheduled, Limo, cab, off shore owned.

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All these buses should be 5 minutes apart, and park straight, no curb problem! No



design science is the problem. All these companies are owned by same over seas. Over seas, Anaheim, airport Texas, see world monopolies, veola, cusa, pcut, yellow cab, Super Shuttle, Limo's, Disneyland Express, Airport bus of Bakersfield, Fly Away.

Fly Away illegal since 1994 for sure to ?  
Disneyland Airport Bus illegal since 1994  
President of Commission 22 buses at world cup.  
Rigged bid, Two bids same company, Owned both companies.  
Changed names of companies in contract.  
Illegal corp. off shore not registered with state since 1994 to today.  
Illegally owned, and run 851 CPUC codes, Section 10 LAWA.

#### FLY AWAY

Loss of funds, Diversion, History of loss proves weakness of investment and the recession and loss of passengers to airlines is sure total loss and bail out need. Off shore ownership makes no law or insurance to over seas company. using credit card for UCLA for the 4 passengers that ride it? Big deal. Money for fly away vs/ money for something else like employees \_ best for public. Why is any of the fly away best for the public, it takes us out that helps the prices from being fixed and raised. Irvine total loss, UCLA total loss, Union station total loss. Cheaper to allow employees to pool and not take buses that keep Union schedule 1/2 full. It is cheaper to car pool for all the LAX employee's not support the fly away losses. 5 Million in new buses were not in bid, automatic billing 500K was not in bid. Bias to help specific contractor. The advertisement losses for empty buses are a joke to support the JCD advertisement companies over seas banks and partner now L.A. Inc. diversion scams.

Donations to all mayors from monopoly companies in all cities involved with contract settlement. Buying the monopoly fly away into airport. Fly Away does not stop traffic, nor carbon foot print, nor congestion in airport. It is all lies. Empty buses losing a lot of money do nothing for parking lot income, nor CTA advantage for any reason. It is a complete failure. It must have been done for local money given by the monopoly to all the local political donations they got for allowing this settlement. It is an invasion to force out local companies. No other company would even take this contract but the monopoly Gray Line and it was known ahead of time that this force monopoly would get it all. This is rigged bidding at it's worst obviousness. The public has been cheated with this as well as the local companies that are being forced out of services to allow them to take over the parking lot management, cab management, construction through directors friends, as well as all ground transportation with cabs, buses, vans, and soon to be all the same as all the other airports they have invaded in the world. This is a world invasion team that bribes it's way with great donations to power the way into control of the public services that lose money and privatize what they want that makes money. It is part of the bank inclusion as well to make sure all bases are covered I am sure. Olay!

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Ethical set up of framing congestion to regulate us out. All big monopoly buses go in at same time on purpose. The zone to take income from passenger cars will help a lot. The airport is designed to make money for police tickets and congestion. Congestion is management problem not design problem. Paint road top! Phone boards why change what works? Smaller vehicles why change what works?

#### Fly Away

Good will  
Free phones to all monopoly companies  
Travelers Aides help  
Advertisement on terminal luggage racks  
City paid curb loaders that trim tab people  
Training tickets and warnings  
claim congestion for buses that are empty  
Leave bus and go to bath room  
3 big buses are empty and expensive  
Dangerous fires  
Off shore has no insurance  
No unions and low wages  
Fired for forming unions  
Monopoly past to 1976  
Made smaller  
Should use our size!

#### Mickey's

oppression  
loss of 1000 passengers per month  
No help and phone cost \$42K per year  
No information any where.  
45 second rule ticket by police if talking,  
suspension and strict no upstairs dropoff  
45 seconds no talking.  
Small vans take up very little room  
Small van little expense.  
Best record with 800 vans.  
1.5 million for 9 passengers.  
Family like owned  
Rules increase hardships by Biagi.  
CPUC states smaller better, Biagi no.  
made bigger to put out of business  
11 seats and weight over 6K lbs.

The addition of 5 million dollars of weak toy buses that he claims will last 12 years is a lie and you will have to pay for the maintenance for them soon, they have already been on the road side many times that I have seen. This will cost millions more.

Gas vans that take 9 passengers take same space as personal car and take out more persons with less space. They have same carbon foot print as personal car, why make them have CNG if they are same as car but take out up to 9 cars at a time? The gas van keeps rental cars off the street and private cars out of the airport and stops carbon in this regard. The private car of millions per year going through the airport is proof that the shared ride vehicle saves smog and cars on the road. The less than 6K pound vehicle has less pollution than the bigger buses that create congestion for nothing for the average load factor is about 5 persons per airline per pick up per 2 rounds of the CTA for long distance scheduled buses. The 6k load is also needed to go on city streets that we do in smaller towns that have pipes under the road. This is a law and we have to use the 9 passenger van. Regulation department will try to make vehicles that are the best size not available so that it will price us out of the market to the larger \$500,000 dollar size vehicles that are to big for this service. They use to big a vehicle for the fly

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The Chief poltruk overseeing the loyalty of all workers to go along with the desired plan of domination of the Fly Away over the local companies that are not part of the monopoly cartel now in power with contracts over seas and tax dodges and bail outs. Landside is much like the Central executive committee that over sees the union or workers at the office of Landside that scares the office into a mind set of Fly Away only success with very deep fear of loss of their jobs if caught talking to me about help. The well being of the fly away and off shore monopoly does not depend on its success because it is standing on the coat tails of Regulatory staff much like a Soviet apparatchik. To big to fail implementation. The city is now acting as if it were a communistic higher ranking business with the duty of the fly away that no one wants to ride. It is deliberating to the local companies as the Regulatory staff dismantles the advantages of the past that allowed equal treatment. Such as the ground transportation phone board, Travelers Aide information distribution being equal, along with the rules and regulations being fair and equal treatment. The new proposed rules are biased and strict beyond being fair and equal. What is training warnings in the fly away is taking a wrecking ball to the local companies especially the smaller infant industries that are growing and keeping the monopoly in check with price fixing. The CPUC is for competition and Mr. Biagi is for monopoly. To stop monopolies is the reason the CPUC was born in the State of California. The city is now going the opposite direction of this not allowing fair and equal competition as mandated by the state. MR BIAGI is destroying the defensive capability of the local companies to allow the out of state and over seas powers to take over the airport with divide and conquer tactics that take away slowly the ability for the monopoly to seize and take over the airport with out unions and mainly back by city money on top of it. This is a coupe of the airport by an over seas triumph that overthrows the complete public right to free trade and fair market forces. It is ripe with corruption in this regard. False records at Landside. The records show that airport coach and airport cruiser were all one company as airport bus and post and gray line are all one company and now super shuttle is all one company this has all been denied along the time line that is now common knowledge. This was also done at John Wayne airport to do away with the history of anti trust. This is inside conflict of interest. The records are there to be shown in court from other courts. It cost nothing to go to the CPUC and file a formal complaint and collect damages. Then go to civil court and get the court order. Please come to your senses and not try and make the airport all private contracts through this monopoly trail of past violations. We will be forced to file a complaint for our rights to defend our self from these FAA violations.

**This is all unfair, RICO acts of illegal transfers of ownership;**  
**OUT OF COUNTRY COMPANIES HAVE NO LEGAL LIABILITY FOR RISK!**  
**GO TO FRANCE AND TRY TO GET SOME MONEY FROM A SWISS BANK**  
Find all the court papers that prove this from past court papers already to go. By the rights of the constitution of the U.S.A. = i represent all the small companies. We shall sue you all and win this if you force us out of the airport. We hope you come to your senses and allow a free market and fairness again. Please do not force us to have to spend all our money to get our rights. If we have to sell all our vehicles to afford it we will!

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away to down town and ucla. They are trying to price us out of the market as they did with the phones. This is part of the monopoly plan to get to the to big to fail bail out do or die area of service for the city and make them pay for the south route to O.C. for nothing. Landside has pointed all the dogs towards us and said sick'em! with the new rules and regulations to throw us off balance and out of business. Congestion for his empty buses. The monopoly gets training rules behind the dogs. This is Mr. Biagi's frame of reference to let his project have all the breaks and the non off shore locals can go to hell. No phones, strict rules, and big fines that can put us out of business for a few tail lights out. Regulatory staff does not live in reality and changes it as it fails. This is the direct opposite of Judy Christian and Joe Clair whom allowed the businesses to participate in the design and allowed them to be fair and not fail to consider the equal treatment to the monopoly forces that he has both feet in at all times. The zero sum game that they have produced sees only the success-less-ness of the failing fly away and trying to save it by pushing the competition back and out of the airport resulting in acute discrimination against FAA rules.

**no one knows who owns the monopoly.**  
**Note: no even playing field, Biagi says.**  
**"not to give out info unless contracted**  
**with advertisement or concession**  
**concerning Travelers Aide."**

**FAA violation big time.**

Regulatory department is not street smart and lacks ability to distribute street justice in LAX. Political power for monopoly take over is unjust. There is nothing more dangerous than a half educated bureaucrat.

apparatchik - one that has no training in a job of the communist party.

Member of the apparat were frequently transferred between different areas of responsibility, usually with little or no actual training for their new areas of responsibility. This term apparatchik or agent of the apparatus was usually the best possible description of the persons profession and occupation. It is used to describe individuals appointed to positions in any government on the basis of ideological or political loyalty rather than competence causing bureaucratic bottlenecks in otherwise efficient organizations. The nomenklatura or the ruling class in communist doctrine. State Capitalism caste with a Trotskyism bent against the capitalist west idea of fair and even playing fields of competition. The mindset of a political bent to answers to design such as how do we get the fly away to fly rook or crook while pretending to be fair.

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The city of Los Angeles has always in the past helped the small companies and allowed competition so that the public was protected by strikes by the drivers of the larger monopoly oriented off shore owned companies that do not allow for unions the mention of a union resulted in the drivers being terminated on the spot.

The state of California Public Utilities Commission has given us all a certificate of need and necessity to transport the public so that monopolies would not dominate the market and raise prices that have occurred in the 1960's and 70's. Super Shuttle itself got its certificate with the argument to the CPUC against the monopoly scheduled bus companies in the past that it would compete and keep the prices lower and in reach of the public. They won this argument and received it's on-call license allowing the rest of us to follow in 1976. Now they say it is best to have monopoly movement back. They have made it into the monopoly group of companies and are now part of the on going monopoly roll up that has been going on in the last 17 years with the Gray Line, Disneyland Express, Coach America, Pacific Coast Sightseeing Tours, Bakers field Airport bus, Fly Away, and Super Shuttle all becoming one company off shore. Now the monopoly wants to go back to the old way of no competition. Prime Time changed hands in the last few years and it is most likely now part of the monopoly and if not, it's shares are most likely as many times with other companies before with the monopoly promised to be signed over in some way to the monopoly. Many times in the past the monopoly has done this with secret contracts without telling the drivers, managers and the airports as with Airport Coach, Airport Cruiser, Bus link, Airport bus, and the Fly Away to the valley.

There is no proof that these two companies Prime Time and Super Shuttle are not owned out of the USA by the monopoly that runs the rest of the privately owned and public contracted by the city owned companies. The mixing of these public funded and non-public funded contracts with the same off shore monopoly by the city is unfair competition to the local American owned public certified smaller companies and is taking away the living of the owners and drivers of these companies by over powering the political advantages with large investments of political donations from out of the country and is un-American to persuade the BOAC to kick us out of the market.

The idea that congestion is a problem for commercial vehicles of our van size is another idea that comes up at times. Our size vans are the size of most loads in and out of the airport as well as the big buses are burning up all over the Country. To put flyaway buses where there is just not enough persons going to and from the airport with city contracts is not a reason to put us out of business. We are safer and have less carbon foot print than big buses that are catching fire at a high rate, such as in the Katrina fire that killed 20 persons. Replacing our small vans for large fly away buses is absolutely the wrong design for the public. It causes more pollution, more congestion with empty seats, and loses the tax money of the public that the city pays out to the monopoly off shore to do it. They failed in the past when Super Shuttle got it's license and it will fail again if tried and shall spend a lot of the tax payers money for nothing.

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If a strike would occur which will happen at some time by the monopoly all the airports with all the contracts with all these off shore companies will give the public no way to be transported at all any where. You must keep other companies here to allow for this to cover the need and necessity that the CPUC gave us a certificate for this very reason. Why must the airports run by this new landside give all the transportation over to one monopoly off shore that puts the public in risk in this way as well as the insurance for the public to be covered from any of the damages must be obtained from over seas. This is not acceptable.

All the monopoly money goes out of the country. In this day of extremely bad economy and the possible bankruptcy of the monopoly with gas prices and the down turn in the amount of passengers due to the raise of the prices for flying. The amount of passengers are going to decrease. The allowing of what has been going on that was decided by the State as being the best design is being challenged by the city. Why must you take our lively hood away from us for the monopoly off shore advantage that puts the public in more risk of no insurance due to going to court over seas, no companies due to strikes, money being taken out of the country, prices will rise from lack of options for transportation by the public. Why does this new Regulations department persist on attacking the foundation of what the California Public Utilities Commission has built up in the last two decades? The CPUC knows best and is in the business of doing this for the public. The new Regulatory landside is bringing the city in a direct opposite direction of what the CPUC wants.

To take the ideas of the new landside over the Decisions of the many Judges of the CPUC is a big mistake. The public will suffer and to replace these companies once they are dismantled will take years to put them back together. With the rise of gas prices keeping as many options for public transportation in force should be a priority. This idea of taking away competition will only give the monopoly that is taking over all the LAWA ground transportation contracts the excuse to raise prices because of the gas prices are very high. Allowing the smaller companies to keep this in check for the public is a very important step in keeping the monopoly companies under control.

We are Americans and the pursuit of happiness and equal treatment is mandated to us to make a living. Taking this away from us is discrimination. We cannot find out any information about any thing from Landside. The public information act is being ignored and all the LAWA airports are being taken over from France and Texas from this same monopoly from off shore. We cannot trust this company to help the public like American companies. We cannot trust Landside for they are only interested in promoting this off shore power structure that has invaded our ground transportation market. Please help us win this fight for our freedom.

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guilty and wants to stop the process of the public finding out more. Why wave the rights of the public for complex, problems and central issues, gravely call to question, do we have these ideals of freedom or do we just act like truth is happening?

ucla should come here to the boac and sue them for lack of interest for the public good.

The secrecy surrounds the bus companies and van companies the way they are owned. The way the airport has changed to allow the monopoly to have great advantages and a sort of police state for the airport to allow the money, rules, and halting of information to competitors to the monopoly with the voting power of the boac. What is happening here?

There is only one way to fight that is to go to court.

The last time I was in court, we lost because we had false respect for the monopoly but we did not know it was a monopoly, now we have the documents to prove that time was false, and all lies were told in every court for over 12 years and now we are aware of how valuable our rights are and how deeply we struggled and was lied to and we now know that we can win the freedom that was taken away from us in the last 14 years or so and that the boac and the city has been tricked into helping this growth of the Trojan horse monopoly, has listed and taken the city in its grip to take over the public's money and to raise the prices for all to ride any where out of the airport or into it. The rules are soon to be changed just as the public speaking rules and this is what happens, next the slide into the rules of the vehicles and change the goal post and then we are kicked out again and secret changes like the phone board, the monopoly exists and that the rules are for harm to allow it to grow stronger with the millions of dollars from the taxes of the public given to a losing design for the fly away that is a lie and loss to the public and restriction of anyone to complain to a deaf ear, that only hears money to some where for who, off shore and why has it all changed, why is it happening and why isn't it stopped? Just because the crooks have taken over the John Wayne Airport does not mean it should happen here as well. After the Second World War, the lessons are to allow freedom and due process; this is what we fought for. The boac seems to glance away from this focus for off shore greed for some reason, and it puts the great dreams of America under threat, to little attention is given to the loss of the greatest reasons for life that we here aspire for. We need to look at the curative effect of this sliding of the rights of little companies with the rights of the off shore big money political powerful fascist padding the rules for this giant question. What are you doing to allow this to happen? It is flabbergasting to make us have to fight for this right to go to court.

To state that there is only 2 ways for contracts in LAX is false there is 3, closed (which means all eggs in one monopoly over seas to big to fail scam) or open which means that contracts allowed to have competition allowed and liked by the PUC. There is also a third which is partly open allowing the contracted companies to stay that are already here. Of course the monopoly power is spread into the inside of the airport designers with some kind of control over them and they are bought off by some design so to speak by some discriminating agreement. This will all come out in court if it is successful. Fini.

The boac is to busy now and tied up with complexity to allow the public to speak as it has for the last 40 years or so here with the meetings.

To speak on more than one item is over burden to the brain power of the boac.

To point out that the monopoly is losing 30 million dollars and taking 21 million from the other local companies out of the country with the fly away is out of order to the boac.

that fascist usual suspects of the president and head of regulations is working hard to farther the monopoly of transportation in LAWA is tried to be ignored ruled out of sight from the public to speak about as the president had hired this monopoly in 1994 with the World cup and it seems to be open minded in allowing the public money to be given freely to lose over 10 million dollars helping the off shore over taking of the airport market on rides for the public with the prices for such rides sky rocketed and the communication to the public is taken away, the phones taken out and immunity to the monopoly is silence and secret to the public without public speaking by me and now that has been taken and diminishing the patriotic act of protecting the public with the public information act ignored by landside saying we do not give out information and higher prices and no one else knows about the information and as the burning of the monopoly bus on the way to the airport with a total loss would be hidden from the public without my information being available to the public with the television here in the meetings.

10 years ago I would not have to say anything, the boac would not let any of this happen, I say that the boac is not to busy and it is not to complicated today, that the boac is allowing the worst of all to take over the airport rides of the public it is allowing the monopoly of the rides and ideas as well, and the rise of prices and the taking away of all the rights for the public to information. To give or take information about the off shore public take over by an unknown owner, that is run by a lawyer from Saudi Arabian construction.

Justice - truth, honesty, has been lost here with this. Secrets to the public are unjust.

We are disarming ourselves from our talking about threats, it is taking the information away, that defeats us, this is when America lost its way, at what point is danger expected, it will spring from amongst us, we will only defeat us to give up our civil liberties and that is victory for our enemies. To stop public speaking because of bums for 3 minutes mixed with true speculation of truthful documents from court proving That the owner ceo of all the monopoly of transportation in LAX is Ben Laden's lawyer, this is cause to take away the public's right to talk to the public by television, and state write a letter, so they cannot see what is happening out in the city from the public's homes. This does not build trust in the boac? This is the enemy of the public to pass this new rule to stop the public to speak freely. Some bums speak with more truth than the ones that make the laws. We need to force the process to be fair not fast and less time to bother the boac. Protection of the public is diminished. When the search for the truth is taken away by the public speakers. Why so urgent to take it away is someone

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TO: The BOAC of LAWA. The fly away to the valley is ok. The other fly away services should be estopped. Creeping normalcy of off shore domination of LAWA is anti-American with monopoly no bid contracts.

Note: They have changed the name on the contract:

From CUSA, PCST LLC, to CUSA, CC, LLC.

This is a section 10 violation of the LAX contract. It is not the same contract that it was before and it appears to be amended.

All the trends say not to go on with this expansion of the Fly Away. Why is the names different? If it is true to force the public off the public utility courtesy phone board to be self sustaining, then it is true with the fly away to be shut down. Put this off till December. The train station has had a big set back that feeds the Fly Away as well. Mickey's sends our prayers to the families of the deceased and injured. God bless them all. Transportation is a very serious business. Always safety first. Thank you, Mickey's Space Ship Shuttle. psc 5244



THE OVERSEAS CUCKOO BIRD IS being raised in the american nest and when it hatches it EATS THE AMERICAN EGGS IN THE NEST.

Giving more money to the fly away down town and ucla is like making more Moai statues to Easter Island. How societies choose to fail or succeed book by Jared M. Diamond - LAX is killing it's self with over specialized contracts and off shore invasion of the local economy. LAWA fate is with the commissioners. Flannery, T. "Learning from the past to change our future". BOAC vote no, on the fly away Down Town and UCLA. I It is losing 10 million dollars. Put it off and see the income until December 08.



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TO: The BOAC of LAWA. The fly away to the valley is ok. The other fly away services should be napped. Creeping normalcy of off shore domination of LAWA is anti-American with monopoly no bid contracts.

**Provisions of the U.S. Code That Prohibit Diversion of Airport Revenues to Non-Airport Purposes,  
49 U.S.C. 47101-47133**

**Section 47101(a)(13).**

**Airports should be as self-sustaining as possible** under the circumstances existing at each particular airport and in establishing new fees, rates, and charges, and generating revenues from all sources, airport owners and operators **should not seek to create revenue surpluses that exceed the amounts to be used for airport system purposes** for which airport revenues may be spent under section 47107(b)(1).

The Fly Away to UCLA and Union Station and the advertising for it is a diversion of airport revenue to a non-airport purpose. They do not do what they are designed to do. The passengers are not there.

The fly away is losing at least 5 million dollars per year not including the 5 million in new buses with no bid contracts. The fly away is not self-sustaining. Not even close. It is losing more than 50% in half of the routes. The fly away loses 1 million dollars from the valley. Per year, it loses 2 million dollars from downtown. Per year, it loses 2.5 million dollars from UCLA. Per year, there has been a 2 year of loss. By Dec. 2008, you will lose 10 million dollars. Plus 5 million in new buses. They may get 2 million back from the government that is pie in the sky. The Fly Away to Union Station and UCLA is a diversion of funds that was not in the past considered part of the Airport to pay for by past commissioners for they agreed with the California Public Utility Commission to let the public choose the services that is best not the airport. They also did this by giving companies an even playing field with the public information unlike today with the setting to the highest bidder causing price fixing.

A comprehensive view of the situation shows a drastic slowing of all airports, the cutting of flights, less cars on the road, less income to LAWA due to the loss of 11% of the international flights being cancelled just this month alone. See attached Exhibit (A). John Wayne Airport is down 45.6% in total aircraft operations for August this year from last year. See Exhibit A, (b). L.A. Times reports. It states that the canceling of the international flights at LAX is a 9 billion dollar loss to the local economy. The banks are going under, people are not flying with the increase in the gas prices. Traffic is much less. The Manager is quoted to the L.A. Times, "this under scores the need to hold down the cost of Bradley Terminal, and the need to save money by limiting hiring and cutting administration costs".

This means firing persons before cutting the budget of the Fly Away it seems.

The reason for the fly away is to stop pollution and traffic and be self-sustaining. It has failed to do, what it was planned to do. The idea that these big diesel buses has less carbon foot print than cars is bad judgement. The big buses pollute in carbon particles more than the cars they replace. I have given you pictures of clouds of black smoke, for they are not always in tune. Note: The airport bus of Bakersfield has cut its schedules.

Note: The fly away wants to increase the schedules. Note: They are run by the same company. When they use the public's money they want to expand and they shut it down when they use their own money. What does this tell you?

Giving more money to the fly away downtown and UCLA is like making more Moai statues to Easter Island. How societies choose to fail or succeed book by Jared M. Diamond - LAX is killing it's self with over specialized contracts and off shore invasion of the local economy. LAWA fate is with the commissioners. Flannery, T. "Learning from the past to change our future". BOAC vote no, on the fly away Downtown and UCLA. It is losing 10 million dollars. Put it off and see the income until December 08.

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It is unethical for Travelers Aide to be given instructions by Landside to give out public information with discrimination of Public Utilities of the State of California for ground transportation. This contract should not be recommended in the future to be approved.



Fliers should be given out as SNA at the expense of companies.

*Give the public back their phone, with Fair Marketing.*

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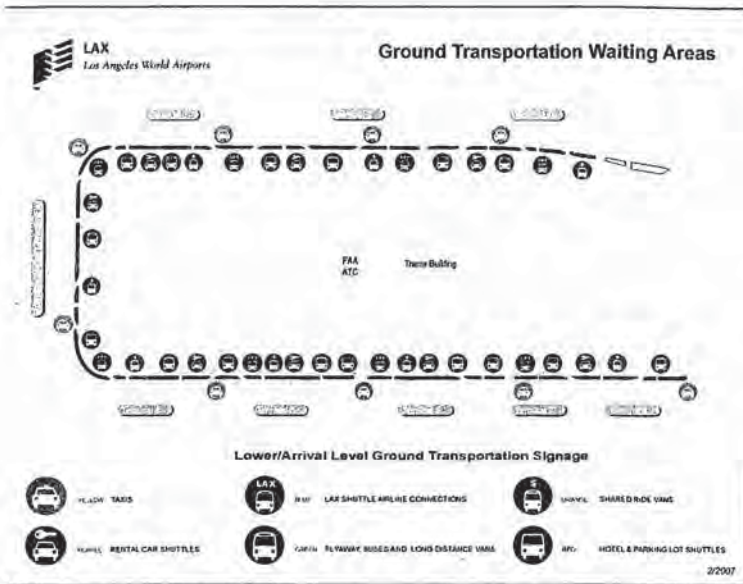
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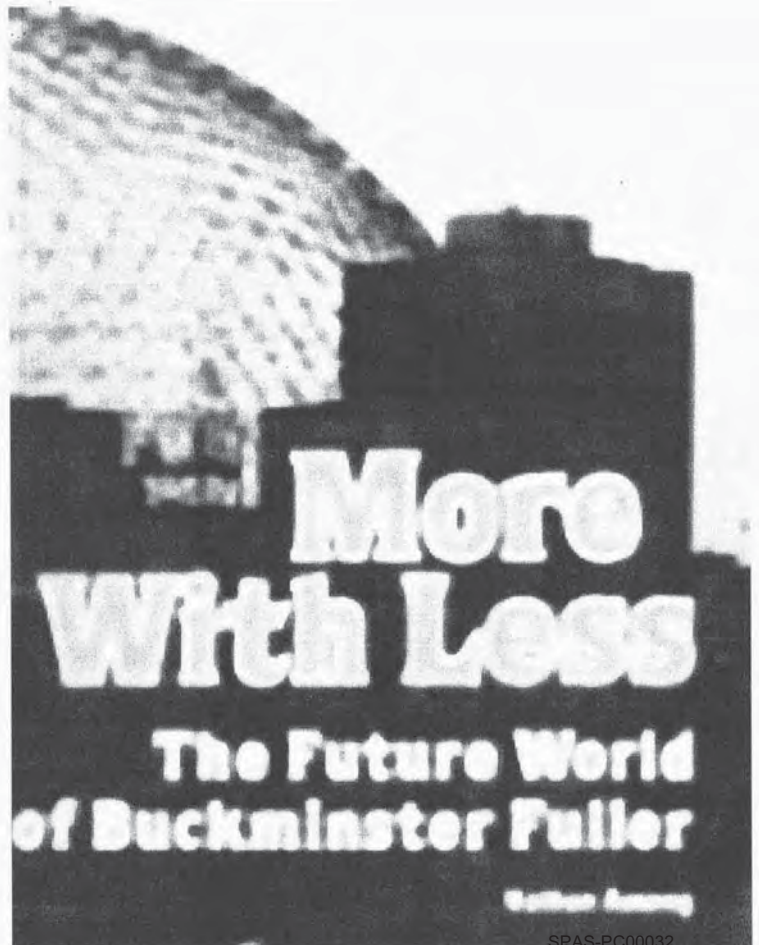


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*Put this back!*



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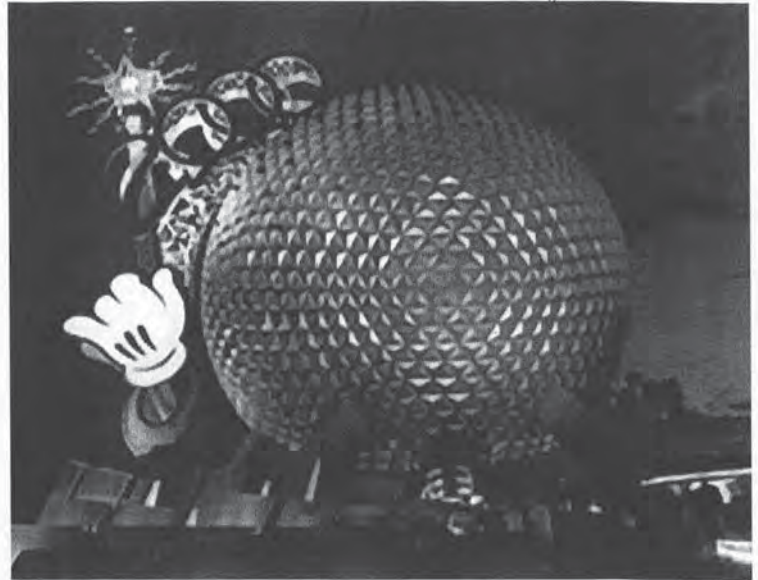
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To the Honorable LAWA airport commissioners:

5/19/08 Item 13, Public Comment:

I would like to thank you for your patience and consideration afforded me to communicate on these numerous occasions. I know at times I have been emotional in communicating with you but, I assure you it has always been to inform you on issues that I felt were important to my company, my fellow workers, to LAWA, and the public with whom we all serve here.

At your discretion please forgive me for any offense I have done in the past. My only interest is in helping the public. I have been here at these meetings for over 20 years. I have never seen other commissioners reluctant to allow the public to speak at any time. It is true some times it seems boring and a waste of time, but all in all it is never over about %12.5 to %15 percent of the time of any one meeting for all participants that I have experienced. Surely the public whom we all serve deserves at least 12.5 to 15 % of your meeting time. Historically, I rarely see more than 2-3 people speak from the public and all have had a satisfactory opportunity within those 15 minutes normally. Limiting comment time to 3 minutes per issue seems to be working perfectly well for the public. Consequently, if the system is not broken and the public is satisfied, why alter it?

As Thomas Jefferson said, "when speaking of the public servants, "without public scrutiny we would all be like wolves with our power". While it may be uncomfortable at times, I submit that it is not only the responsible but honorable behavior for the Commission to continue to allow public speaking time.

If this measure is in response to my frequent comments before you trying to fight for my companies true and honorable rights, it hardly seems fair to punish the whole public in an effort to affect me. If this is the case I would be happy to meet with a member or designee of the Commission and try to resolve this without harming the general public. Likewise, I would feel terribly guilty if the whole public were restricted because of your discomfort with me.

Lastly, if you are going to hold public meetings but not allow the public to participate, you may be violating your own rules or by-laws. I have not been allowed to obtain a copy of these documents but suggest you review them and freely make them available to the public on the internet.

Thank you

Michael S. Mitchell

SPAS-PC00032

Statement by Richard J. Riordan, Former Mayor, City of Los Angeles  
August 28, 2012

### We've planned long enough. The time for action at LAX is now.

I was honored to serve as Mayor of Los Angeles from 1993 to 2001. I love L.A. and I am proud of what our teamwork accomplished during my two terms in office. One item I was not able to complete was the modernization of Los Angeles International Airport (LAX).

Today, I am pleased to see the positive progress being made on the new Tom Bradley International Terminal, adding new gates for the latest large aircraft as well as other improvements that will enhance the positive experience for visitors to Los Angeles. But this is not enough.

The Los Angeles City Council approved the LAX Master Plan back in 2004. Now, eight years later, the approval process is just getting underway for long delayed and critically needed additional improvements to LAX.

During my administration, I proposed a Master Plan that would take the airport to 2015 and the clock continues to tick on much needed LAX modernization. We still have yet to address moving the north airfield to accommodate today's modern aircraft, properly connecting LAX to our City's mass transit and further enhancing overall airport safety and security. We've planned long enough. The time for action at LAX is now.

As the LAX Specific Plan Amendment Study (SPAS) process winds its way through public hearings and action by our Airport Commission and City Council, I call on our City leaders to make the tough decisions necessary to ensure that LAX becomes a world class airport for the 21<sup>st</sup> Century.

###

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I'm Alan Rothenberg, President of BOAC from 2005 to 2010 and Incoming Chair of the LA Chamber.

Modernizing LAX and separating the north airfield runways is essential for safety, operational efficiency and competitive reasons:

The NASA-Aames study concluded that safety could be enhanced 40-55% by separating the runways. Those academics gratuitously stated that since LAX was already safe, based on the statistical probability of a crash it would not be cost effective to separate the runways.

Absolutely incredible! Today is the 7<sup>th</sup> anniversary of Katrina. Years before that disaster the Army Corp of Engineers recommended improving the levees. It was rejected because it would take a 100 year flood to overrun the levees so it would not be cost effective. Tragically, the 100 year flood came.

I sure would not want to be a member of BOAC or the Council who rejected a chance to enhance safety at LAX by 40-55% and later have blood on my hands when a subsequent crash takes the lives of 100s, maybe 1000s of people.

By the way, upon receiving the NASA-Aames report, the FAA was incensed and sent a letter to Mayor Villaraigosa admonishing LAWA to "reconfigure the north airfield...to address...safety risks" and "to improve efficiency".

Regarding cost effectiveness, please understand that LAX is financially self-sufficient. It doesn't take a penny from the taxpayers. It operates entirely on fees paid by airlines, passengers, concessionaires and other non-airline revenues.

While the draft EIR studied many options, there is only one that maximizes safety, efficiency and competitiveness: **Alternative 5; separating the runways 350 feet.**

Doing nothing dooms LAX to be less safe, antiquated, inefficient and uncompetitive for yet another generation. And make no mistake: Alternative 2 being advocated by a handful of people means **do nothing**. In the face of the unanimous comments that LAX must be modernized, doing nothing is simply unacceptable.

[One last item to clarify: Alternative 5 does not move the boundaries of LAX an inch. No homes or businesses will be taken. Initial assessments by the FAA indicate that the RPZ will not require taking any homes or businesses, with the possible exception of ~~one parking structure~~.

Adopt Alternative 5. FIX LAX NOW

THE HVAC UNIT ON TOP OF ONE OFFICE BLD

My name is Alan Rothenberg. From 2005 through 2010 I was President of the Los Angeles World Airways Board of Airport Commissioners. Currently I am First Vice-Chair of and in 2013 will be Chair of the Los Angeles Area Chamber of Commerce.

From 1984, with the opening of the Tom Bradley International Terminal and the construction of the Upper Roadway in the Central Terminal Area in time for the 1984 Los Angeles Olympics there had been no material improvement to LAX. Plans proposed by Mayors from Bradley, to Riordan, to Hahn had been stalled. Finally in December 2004 the City Council adopted a Master Plan ("Alt D"), consisting of several important projects designated as "Green Lit" projects which could be constructed immediately, and designated others as "Yellow Lit" requiring studying alternatives.

Following settlement of a lawsuit that challenged the Master Plan, some \$4 Billion of capital improvements have finally been made to LAX, the highlights of which are new reconfigured South Airfield runways, a new Central Utilities Plant (replacing one built in the 1960s) and, of course the magnificent Bradley West Terminal, the first phase of which is nearing completion.

However, the vital "yellow Lit" projects have been delayed until now. Those projects include:

- Phase two of the Bradley West Terminal;
- A midfield concourse to be connected to Bradley West;
- Remodeling and/or replacing the antiquated terminals 1,2 and 3;
- Re-engineering and reinforcing the upper roadway to enhance security ;
- Construction of a CONRAC;
- Creation of an automatic people mover to bring passengers from the CONRAC and from the terminal to be built by the MTA for the extension of the Crenshaw and Green Lines to LAX.

The required review (the Specific Plan Amendments or SPAs) was delayed for several years as a number of studies were made regarding the necessity to separate the runways and build a center taxiway on the North Airfield to enhance safety, all of which concluded that safety would be enhanced by separating the runways, the last of which, the so-called NASA-Aames study, concluded that safety would be improved by 40 to 55%. Following that study and certain inaccurate responses to it, the FAA strongly and unequivocally reiterated in writing what it had been telling LAWA for years, that the North Airfield runways had to be separated and reminding LAWA that the North Airfield did not meet the minimum FAA standards for Group V aircraft (e.g. 747s, 777s, the new Boeing Dreamliner) and Group VI aircraft (A380 and 747-800). A copy of that letter is being submitted along with this testimony.

While safety and security are primary objectives for LAWA, and separating the North Airfield runways should be done for those reasons alone, it is of crucial importance to do so in order to enable LAX to operate at maximum efficiency and to assure that LAX will remain competitive.

Currently, because the runways are too close together, whenever a Group VI aircraft is taking off or landing, one of the parallel runways must be shut down. Based on existing and prospective orders for the new large aircraft from Airbus, maker of the A380 and Boeing, maker of the 747-800, unless the North Airfield runways are separated operating efficiencies will be adversely affected. I am submitting

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herewith an Airbus memo showing their forecasts for A380s at LAX. I have been advised by both Airbus and Boeing that they will be filing written comments supporting the necessity to separate the runways.

Competitively, it is also urgent for LAX to separate the runways to accommodate the new large aircraft. Their range is such that flights from Asia and Australia, for example, can readily overfly Los Angeles. Other cities in the Western United States such as San Francisco, Seattle, Denver, Phoenix, Las Vegas and Dallas, all of whom have invested billions of dollars in modernizing their airports, can now be reached. Qantas, currently the airline bringing the most international passengers to LAX and a leading purchaser of the A380, is submitting written support for separating the runways. And, in fact, earlier in the process, when it appeared that Los Angeles might not go forward with the necessary runway separation, Qantas moved one daily flight to San Francisco. A study in 2006 by LAEDC concluded that the loss of just one daily international flight cost the region \$632 million and 3,120 jobs annually. We simply cannot allow that to happen!

The draft EIR studied many separation options, but to me there is only one: **separate the runways by 350 feet north**. The existing Alt. D is clearly an unworkable and disastrous alternative. Doing nothing means that LAX will be doomed for another generation to be an antiquated, inefficient, uncompetitive airport, that has not enhanced safety and security to the extent it should. Even at 340 feet, LAX will not even meet current FAA standards, although the FAA has indicated its willingness to continue to grant the necessary waiver to accommodate such a separation.

As stated previously, the decision to separate the runways is the key to unlocking the modernization of LAX:

- Phase two of Bradley West
- The midfield concourse
- Remodeling terminals 1, 2 and 3
- Reconstructing the Upper Roadway
- Building a CONRAC
- Creating an APM from the CONRAC and the Crenshaw/Green Line extensions.

As the recently prepared LAEDC Report concluded, LAX is an economic engine for the entire region, responsible for close to \$40 billion to the economy and close to 300,000 jobs. The projects outlined above are estimated to involve an additional \$8.5 billion in hard costs of construction alone and close to another 100,000 jobs over the next 10-15 years.

The numbers from the LAEDC Report establish that LAX is responsible for more jobs than the aerospace industry, the entertainment industry, the burgeoning technology industry and the region's fashion design, apparel manufacturing and wholesaling business.

Travel and Tourism, the largest sector of our economy urgently depends on a modern airport.

Just as our Port has to be modernized in anticipation of new competition from the almost completed expanded Panama Canal, so, too, does LAX have to be modernized to compete for travelers and cargo

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from other airports in the western United States. (Sometimes overlooked, LAX is the 2<sup>nd</sup> leading cargo airport in the U.S., trailing only Memphis, home of FedEx)

All of this can be accomplished with no taking of homes and minimal, if any, disruption to the businesses along Sepulveda Blvd.. The CONRAC, MTA line extensions and the people mover will mean fewer cars on the surface streets. The new large aircraft are quieter, less polluting and more fuel efficient than the older generation of planes they will replace, so there will be no degradation of the environment. Over the past decade LAWA has spent in excess of \$1 billion in soundproofing or acquiring homes disaffected by LAX operations. To the very limited extent, if any, that it is necessary LAWA will continue to do so, although I emphasize that it is not foreseen to be necessary.

Once the modernization has been completed, Los Angeles will be proud of its gateway to the world.

As the Coalition of the business community and labor has stated: "Enough is Enough" we must Fix LAX Now.

Thank you.





Office of the Administrator

500 Independence Ave., S.W.  
Washington, D.C. 20591

APR 2 2010

The Honorable Antonio R. Villaraigosa  
Mayor of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012

Subject: Los Angeles International Airport North Airfield Safety Study

Dear Mayor Villaraigosa:

In the span of ten days this month, two separate runway incursions reminded us of the vulnerabilities and inefficiencies that exist on the Los Angeles International Airport (LAX) north airfield. On March 6, an arriving jetliner got too close to another commercial jet that was taking off. On March 16, a large Boeing 747 was unable to exit the runway completely before another aircraft landed behind it.

The circumstances behind these incidents were all too familiar. The March 6 incursion, like many before it, occurred because there is no physical buffer separating arriving aircraft from aircraft that are taking off on the inner runway. Moreover, the March 16 incursion underscored the difficulty of operating large aircraft on the cramped north airfield.

The Federal Aviation Administration and Los Angeles World Airports are deploying new technologies at LAX, including runway status lights and the new Airport Surface Detection Equipment, Model X ground radar. These are valuable tools that will help increase the safety margin against runway incursions. However, the only complete solution for LAX's safety and efficiency needs must include airfield geometry designed to accommodate modern aircraft.

I am concerned the most recent North Airfield Safety Study (NASS) will be used as a reason not to pursue this solution. That would be a serious mistake. The FAA conducted a detailed review of the study and identified several critical flaws in the study's assumptions, methodology, and conclusions. The enclosed document outlines these technical concerns.

I flew into LAX hundreds of times during my career as an airline pilot. I can tell you from personal experience that the north airfield safety and efficiency would be greatly improved by further separating the two runways and building a center taxiway between them. Multiple expert studies over the past several years have reached the same conclusion. A similar reconfiguration of the LAX north airfield has eliminated the most serious runway incursions there and reduced all types of incursions by nearly 80 percent.

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The latest NASS recognizes that increasing runway separation and building a center taxiway would reduce the chances of a runway collision. But surprisingly, the study's summary conclusions downplay that finding, suggesting the airfield is safe enough now. The data and the two incursions earlier this month suggest otherwise. The status quo is not good enough for the FAA, and the city of Los Angeles should not view it as good enough for the traveling public. Everything possible must be done to make the north airfield as safe as it can be.

The north airfield reconfiguration would address equally important issues of standards and efficiency. The present north airfield configuration does not meet design standards for many of the large aircraft that use the airport. This has forced the FAA to implement a series of workarounds to manage these aircraft. These workarounds add an unnecessary level of complexity to an already demanding operating environment.

In addition, a north airfield reconfiguration would relieve congestion caused by the outdated design, thus improving efficiency at one of the world's busiest airports. Air traffic controller and pilot interviews that were conducted as part of the latest NASS simulations clearly demonstrate that increasing runway separation and a center taxiway provides substantial efficiency and flexibility benefits.

I urge you, along with the city of Los Angeles and the Los Angeles Board of Airport Commissioners, to reconfigure the north airfield. The FAA stands ready to assist the city and Los Angeles World Airports to address the known safety risks, improve efficiency, and meet design standards on the LAX north airfield.

Sincerely,

J. Randolph Babbitt  
Administrator

Enclosure

cc: Gina Marie Lindsey, Executive Director  
Los Angeles World Airports

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The Federal Aviation Administration and industry safety professionals have each identified a safety risk in the current Los Angeles International Airport (LAX) north airfield configuration. This risk, demonstrated by a persistent rate of runway incursions, is the potential for a collision on the north airfield. The FAA has maintained for several years that a reconfiguration of the north airfield to include a new centerline taxiway between the parallel runways is the most effective mitigation measure for this safety risk. The reconfiguration of the north airfield in this manner has been supported by four previous independent studies listed below.

North Airfield Studies	
Los Angeles North Airfield Special Peer Review	March 2007
Los Angeles North Airfield Proposed Runway Configuration Safety Risk Assessment	May 2007
Analysis of Los Angeles International Airport North Airfield Alternatives	May 2007
Los Angeles International Airport North Airfield Assessment	May 2007

Since 1998, there have been 46 runway incursions on the north airfield. The most recent incursions occurred on March 6, 2010 and March 16, 2010. The March 6 incursion involved a Boeing 737 passing the Runway 24L Holdline at Taxiway AA after landing on Runway 24R. This required an Airbus A319 to abort departure on Runway 24L. Each of these aircraft can hold approximately 125 passengers. Therefore, in the instance of this runway incursion alone, as many as 250 passengers and 10 crewmembers were exposed to the risk of a collision. The March 16 event involved a Boeing 747-400. The pilot of this aircraft was not able to clear the aircraft entirely from the runway before an aircraft landed behind it. The pilot also mistakenly taxied the aircraft into a closed area of pavement and had to be towed. Therefore, in the span of 10 days in March 2010 alone, there were two runway incursions.

The Office of Airports, Office of Accident Investigation and Prevention, Runway Safety Office, Western Pacific Regional Flight Standards Division, and Air Traffic Organization (ATO) have each completed a review of the February 19, 2010 Los Angeles International Airport North Airfield Safety Study (NASS) preliminary report. Each of these offices disagrees with the main study conclusion that reducing the risk for a fatal runway collision is of limited practical importance and that reconfiguring the north airfield on the grounds of safety alone is not a compelling argument. The FAA cannot support a conclusion not to implement a demonstrated risk mitigation to a specific condition that has been repeatedly shown to be a known safety risk to the traveling public.

In addition, the FAA notes a major inconsistency between that main study conclusion and the specific findings of the NASS demonstrating the reduction in risk through a reconfiguration of the north airfield. Specifically, the NASS acknowledges that the alternatives could reduce passenger mortality risk by 40-to-55 percent compared to the existing north airfield configuration. The FAA firmly believes this 40-to-50 percent reduction in risk would be more than sufficient justification for the reconfiguration of the north airfield on safety grounds alone.

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The FAA offers the following specific concerns with regard to the study analysis, methodology, and conclusions:

1. **The Academic Panel (Panel) inappropriately uses an aggregate probability calculation to reach an airport-specific conclusion at LAX.** The NASS used the 2000 study, *Fatal U.S. Runway Collisions over the Next Two Decades* (authored by the Panel Chairman, Mr. Arnold Barnett) as the basis in determining the probability for a fatal runway collision to occur at LAX. The specific intent of the 2000 study was to determine the probability for a fatal runway collision to occur at any towered airport in the United States. This applied the risk determination to the system of airports as a whole rather than examining specific risk at individual airports. By determining risk calculations using a national aggregate methodology, it appears that the Panel compared the north airfield with other airports instead of assessing local risk at LAX due to local configuration. The use of generalized systemwide probabilities assumes that risk at LAX is comparable to other airports in the national system even though there are dramatic differences between U.S. airports. This is especially true at LAX where the rate of runway incursions is higher than comparable airports.

The Panel's reliance on this systemwide risk probability stands in contrast with the NASS findings that there are clear differences in risk potential between airports. In the NASS, the Panel found that comparable airports with a centerline taxiway and airfield geometry comparable to the proposed north airfield alternatives had a fatal runway collision risk of as much as 48 percent less than the existing LAX airfield (page 89). In other words, the NASS found that the current LAX configuration has a greater risk for incursions due to its airfield geometry alone. Also, the NASS estimated that airports with improved geometry suffer nearly 50 percent fewer runway incursions.

The differences between airports can be further demonstrated by examining runway incursions at busy large hub airports versus runway incursions at LAX. As shown in the table below, the number and rate of runway incursions at LAX were significantly higher than at Dallas/Fort Worth International Airport (DFW), Hartsfield - Jackson Atlanta International Airport (ATL), and Chicago O'Hare International Airport (ORD) over a 10-year period. As shown by this comparison of runway incursion rates, there are different factors at each airport that lead to different rates of runway incursions and, therefore, differences in risk potential. The higher number of runway incursions at LAX leads to a greater risk for a runway collision.

Runway Incursion Comparison (2000-2009)				
	Number of Runway Incursions			
Total Incursions	134	78	93	120
Rate Per 100,000 Operations	2.03	1.05	0.98	1.30
Number of Runways	4	7	5	7

\* Prior to the south airfield reconfiguration, this rate was 2.44 incursions per 100,000 operations.

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Calculating the likelihood of an accident occurring throughout the national system of airports, as the Panel has done, is appropriate for determining the collective progress in improving airport system safety overall. It is not an appropriate methodology for determining the benefit or value of any individual project responding to a known risk at a specific airport.

2. The methodology used by the Panel in determining the risk for a runway collision did not adequately capture the specific risk factors of the LAX north airfield. These risk factors include:
  - a. The current LAX waiver to FAA Order JO 7210.3V, Facility Operation and Administration. This waiver was developed in response to the increasing size of aircraft that use LAX. Waiver 98-T-69D authorizes LAX to hold certain aircraft types at specific taxiway locations even though these aircraft are within the obstacle free zone and the runway safety area. The NASS does not address the impact of 2020 aircraft levels and traffic mix on the risk of the hazard introduced by this waiver. The 100-north and 340-north alternatives would eliminate this hazard.
  - b. The unique air traffic control operating rules at LAX for handling of very large aircraft such as the A380 Operational Plan V.12. This introduces an additional level of complexity into the operating system at the airport. The FAA notes that with a new centerline taxiway, LAX would have air traffic control (ATC) procedures and pilot expectations consistent with other large airports in the United States. This can reduce the potential for human error.
  - c. LAX accommodates a large number of foreign flag air carriers and a large number of international pilots for whom English is not their native language. The study does not address how language barriers coupled with the special ATC procedures affects the rate of runway incursions or the risk of a fatal runway collision.
  - d. The north airfield not meeting FAA standards. Design standards not met include:
    - i. Insufficient lateral separation between parallel runways for Airplane Design Group (ADG) V and VI aircraft.
    - ii. Insufficient area to hold ADG V and VI heavy aircraft between Runway 24R and Runway 24L.
    - iii. Current modifications to standards to allow A380 and other ADG VI aircraft operations at LAX.
    - iv. Insufficient runway width for ADG VI aircraft such as the A380 and future Boeing 747-800.
3. The NASS did not include simulation of several hazards that are major risk contributors at LAX. The simulation exercises focused on air traffic performance, which is only one segment of the hazards that exist on the north airfield. The study did not consider aircraft performance and the ability of aircraft to taxi and hold positions, hold between runways, and take a high-speed exit on landing. Additionally, the study introduced pilot errors to air traffic controllers such as incorrect read backs. This was done to measure the rate at which air traffic controllers were able to mitigate errors made by pilots. However, the simulations did not include air traffic control communication errors to pilots. While air traffic controllers have an important role in reducing and eliminating runway incursions,

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pilots command the aircraft. They also have a significant role in reducing and eliminating runway incursions. Lastly, the simulation failed to study night instrument meteorological conditions, which are arguably the most hazardous conditions in the airport environment.

4. The Panel did not fully account for all the risks associated with the operations of very large aircraft at LAX.
  - a. The Panel argued that the risk of incursions does not increase with size of the aircraft. However, this argument does not take into account that the pilot sitting height of Group V and VI aircraft makes taxi more difficult, especially during low visibility conditions. This is confirmed by Airbus' decision to add a nose gear camera to the A380 as a taxi aid. The study did examine some of the sight limitations from the cockpit that make it more difficult to see down the runway from certain large aircraft cockpits.
  - b. Many of the very large aircraft are capable of flying 17 hours or more. This leads to pilot fatigue being a factor for aircraft use of the north airfield.
  - c. The Panel had limited historical data on which to make its determination that the risk of incursions does not increase with the operation of very large aircraft such as the Airbus A380. The Airbus A380 has only provided regular service to a few U.S. airports since 2008. A380 service to LAX commenced in October 2008. While the Panel examined ADG V aircraft runway incursions as a possible indicator of future very large aircraft runway incursion potential, ADG V aircraft do not have many of the same special procedures for operating at LAX.
5. The NASS overlooks other fatal runway collisions since 1991, giving the impression that this type of event has become rare. In fact, there have been three fatal aircraft-to-aircraft accidents since 1991. These include:
  - a. 1994 collision at Lambert-St. Louis International Airport between an MD82 and a Cessna 414 that resulted in two deaths.
  - b. 1996 collision in Quincy, Illinois, between a Beechcraft 1900-C and a Beech King Air A90 that resulted in 14 deaths.
  - c. 2000 collision between two general aviation aircraft at the Sarasota/Bradenton International Airport that resulted in four deaths.
6. The NASS assumes that systemwide reductions in incursions due to the use of technology such as the Airport Surface Detection Equipment, Model X (ASDE-X), runway status lights (RWSL), and the Airport Movement Area Safety System (AMASS) apply equally to the north airfield at LAX. However, a review of past incursion rates on the north airfield reveals that incursion rates remained steady or even higher after new runway incursion warning systems were installed at LAX. Between 1998 and 2002, the five-year period prior to the installation of AMASS at LAX, the north airfield incurred runway incursions at a rate of 3.2 per year. Between 2003 and 2007, after the installation of AMASS, the north airfield incurred runway incursions at a rate of 4.4 per year. In 2008, there were three incursions on the north airfield. In 2009, ASDE-X and RWSL became operational at LAX. Even with all three technologies in place, the north airfield still suffered three incursions in 2009. Therefore, in 2009, the rate of incursions was similar to that between 1998 and 2002 when none of the warning systems were in place.

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North Airfield Rate of Incursions		
	1998-2002	2003-2007
Total	16	22
Rate Per Year	3.2	4.4

7. In overlooking the fact that technology has not significantly changed the rate of incursions on the north airfield, the Panel fails to capture how the current airfield geometry at LAX can limit the effectiveness of warning technologies and contribute to runway incursions. The outdated geometry of the north airfield includes the limited distance between Runways 6L-24R and 6R-24L and the direct taxiway connections between the runways. This limited distance provides little time for pilots to slow an aircraft to an acceptable speed prior to reaching holdlines or another runway. The taxiway connections extending directly between the north airfield parallel runways lead aircraft straight to potential collision points on the runway surface. These two factors are the primary causes of many runway incursions. A new centerline taxiway would be a buffer between the runways, enabling pilots to slow aircraft more after exiting the runway. With a centerline parallel taxiway in place, incursions caused by pilots landing on Runway 24R can be reduced. Disoriented pilots or pilots exiting the runway at too high a speed will be required to maneuver onto a taxiway surface instead of easily blundering across the holdline directly into the path of departing aircraft on Runway 24L.

The limited distance between runways also compresses the time available for warning systems such as ASDE-X, AMASS, and RWSL to recognize an impending hazard and for pilots to take corrective action. This creates an overreliance on human interface to prevent hazardous situations. ASDE-X and AMASS require air traffic controllers to relay hazard messages to pilots. A May 2009 Charlotte, North Carolina, runway incursion highlights the difficulty an air traffic controller can have in relaying critical hazard information to pilots. In this instance, the controller was not able to fully provide the necessary hazard notification to the specific aircraft after an AMASS alert. While the pilots were able to avoid the hazards themselves, the aircraft were within ten feet of each other. The FAA maintains that the proper design of the airfield is required to provide controllers and pilots sufficient time to recognize, notify, and take corrective action to prevent a hazardous situation. This is similar to the altitude and in-trail separation distances maintained for en route aircraft. These separation distances allow time for pilots to employ the corrective actions necessary to avert a mid-air collision after an in-flight collision warning is issued.

The NASS correctly found that there is a relationship between proper airfield geometry and the effectiveness of technology such as RWSL. In fact, the NASS found that RWSL technology works best with proper airfield geometry. Through airfield simulation exercises conducted at the NASA Ames Research Center, the Panel found that "RWSL might be especially effective when accompanied by a centerline taxiway" (page xv) and that "the combination of RWSL and a centerline taxiway is a pairing of two measures that are most

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effective in complementary areas leading to a more pronounced effect" (page 76). Finally, the NASS determined that the incremental improvement of the RWSL applied to the centerline taxiway alternatives is actually greater than the incremental improvement provided by the RWSL to the baseline [existing airfield] (page 73).

8. It appears that the Panel did not give adequate weighting to the risk reduction on the north airfield. The NASS acknowledges the safety gains from the reconfiguration of the south airfield; however, it deems similar changes to the north airfield as unnecessary. The dramatic improvement in safety of the south airfield cannot be disputed. Between 1998 and 2007, prior to the new centerline taxiway, the south airfield experienced runway incursions at a rate of 12.5 per year. Following the completion of the taxiway, the south airfield incursion rate dropped to 5.0 per year. Notably, the NASS found that the new centerline taxiway on the south airfield reduced the most serious A and B incursions by 100 percent; A, B, and C incursions by 33 percent; and A, B, C, and D incursions by 79 percent (page 73). As a result, north airfield incursions are growing as a percentage of total airport incursions. In 2008-2009, the north airfield represented nearly 40 percent of total incursions at LAX, whereas in the previous ten years, it had represented only 25 percent of all incursions at LAX. The improvements in the rate of south airfield incursions are clear and compelling proof of the potential improvement that can be gained on the north airfield with a similar change in configuration.
9. The NASS is overly reliant on historical numbers of fatal runway collisions as the basis of risk. This underestimates the runway collision risk. Since 2001, there have been three aircraft-to-aircraft nonfatal collisions on U.S. runways. The FAA measures safety in terms of frequency and severity of events. High frequency, low severity events (such as runway incursions that do not result in fatalities) are a source of concern for the FAA because they provide an indication of the potential for a more serious event. In accordance with FAA ATO Safety Management System Manual, Category A and B incursions have a hazard severity classification of hazardous and major, respectively. Additionally, a catastrophic hazard is defined as a collision between aircraft regardless of fatalities. The severity of these hazards can easily result in an unacceptable risk as a function of their likelihood. The FAA and industry also consider reducing the risk for serious injury and damage to aircraft as measures of safety. The lack of a fatality, if a runway collision were to occur, does not change the fact that safety was compromised. The Panel should also have examined the rate of runway incursions as a measure of collision risk.
10. The differences in a cost-benefit approach versus a Safety Management Systems (SMS) approach to safety management. The NASS essentially takes a cost-benefit approach in assessing the reconfiguration of the north airfield by measuring benefits in terms of the expected reduction in fatalities. However, the cost-benefit result is not the same as finding that safety risks are unacceptable. This follows because there are other factors that influence the acceptability of safety risks beyond the economics of fatality, injury, and property loss valuation. SMS formalizes this idea by explicitly considering other outcomes that affect risk. Considering this, cost-benefit analysis is of limited applicability in airport specific safety-related decisions. Like probability assessment, it can be a useful tool for quantifying costs

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and benefits on a global scale, but it can become problematic when it is used to challenge an identified risk mitigation measure to a known safety risk in a particular airport location.

11. The NASS seemingly downgrades the risk potential of runway incursions. A review of runway incursions during the same period as studied in the NASS reveals that all Category A runway incursions at LAX involved a 14 CFR Part 121 air carrier. This is approximately 14 percent of all Category A air carrier involved runway incursions nationwide during the same period. In contrast, the NASS provides an estimate that LAX only comprises 1 to 2 percent of total Category A runway incursions nationwide. The total nationwide rate includes both general aviation and military aircraft incursions in addition to air carrier incursions. FAA research shows a statistically significant relationship between the frequency of Category D events and the likelihood of a serious runway incursion. "No conflict" events such as Category D incursions were not considered in the NASS.

Five separate published industry studies agree that the LAX north airfield safety would be greatly improved by the addition of a centerline taxiway. The NASS is the only study to conclude that the current level of risk is acceptable and improvements are unnecessary. Again, even the NASS acknowledges that there would be significant risk reduction, but then discounts that finding in the summary conclusions.

This conclusion is made even though the NASS goes as far to state that "all the proposals to create new configurations on the north airfield would reduce by a substantial percentage the risk of a runway collision" (page six). A further finding in the NASS resulting from the NASA simulations exercises is that the center taxiway is a significant safety improvement that "would virtually eliminate runway incursions onto 24L of aircraft exiting 24R, either because of excessive aircraft speed or pilot inattentiveness" (pages 83 and 84). Additionally, the NASS found that a centerline taxiway results in operational advantages and has the potential to improve safety by reducing controller workload during certain runway crossing operations (page 63).

The technical findings in the NASS appear to be based on appropriate research and simulation methodology, including extensive input from air traffic controllers and pilots who are intimately familiar with the actual operating environment at LAX. However, these findings appear to have been almost totally set aside in reaching the final study conclusions. Instead, the study focuses on a vastly different set of conclusions based primarily on a probability assessment. Although probability assessment can be a useful methodology in certain types of system-level analysis, it was misapplied in the NASS when assessing the safety benefits of a specific solution to a known safety risk at LAX.

The FAA has been pleased to support the installation of RWSLs, ASDE-X, and other safety-related improvements at LAX. However, these improvements cannot be seen as substitutes for what would constitute the single most significant safety improvement for the north airfield—geometry changes. The FAA supported similar geometry improvements on the south airfield, which significantly reduced runway incursions. The NASS acknowledges these improvements and recognizes that comparable modifications to the north airfield would have comparable results. Reconfiguring the north airfield will also correct runway and taxiway

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configurations that presently cause pilot distraction and increase the risk of runway incursions. Reconfiguration can also address other identified surface safety risks including lateral safety areas and the elimination of terrain irregularities currently existing on the north airfield.

Pursuing no further improvements to the north airfield (as advocated in the NASS) ignores the role of SMSs in reducing hazards at airports. Runway incursions are precursors to runway collisions. By advocating no further changes to the airfield to reduce the rate of incursions, the Panel implicitly accepts that a fatal accident will occur. Effective safety management requires the FAA and the airport sponsor to identify hazards and reduce/eliminate known risks. The FAA and industry's approach to safety uses many strategies to prevent accidents. Many of these strategies are in place at LAX such as training, technology, and procedures. However, the most basic element for preventing a runway incursion and/or a fatal runway collision on the LAX north airfield remains the reconfiguration of the outdated airfield geometry.

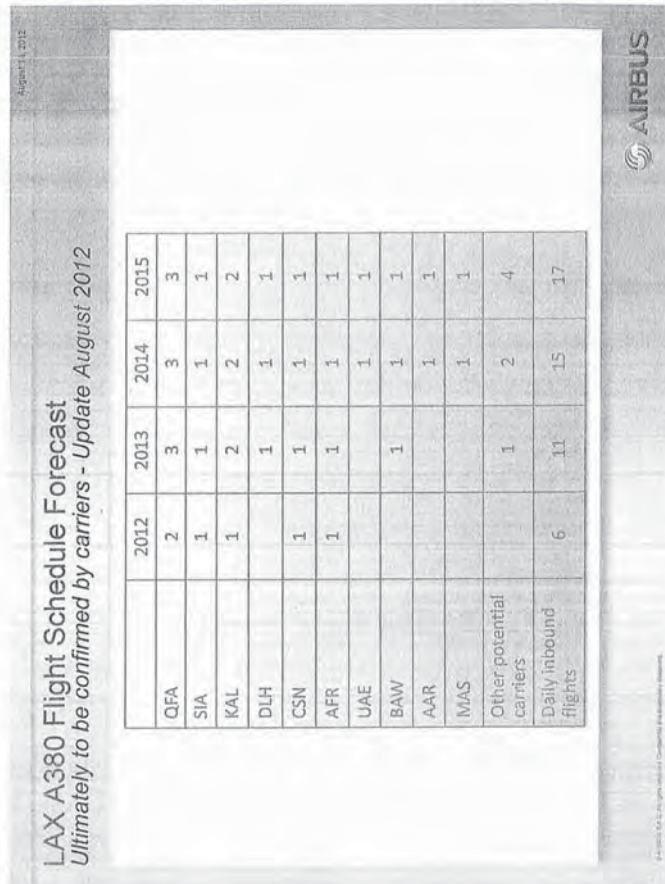
Reconfiguration of the north airfield would also provide capacity and efficiency benefits for LAX. The Purpose and Need in the FAA's 2005 Record of Decision for the LAX Final Environmental Impact Statement included specific consideration of the need to accommodate projected aviation demand in the Los Angeles Basin. LAWA has indicated that while nearby existing commercial service airports in the region can meet some of the forecast increases in demand, some growth will nonetheless need to be accommodated at LAX if the region is to sustain economic expansion in the future. Moreover, LAWA has identified a goal of maintaining LAX's role as an international gateway.

The NASS concluded that a "serious case could be made for building 340-N[orth Alternative] based on its capacity benefits" (page 162). Annual cost savings of \$15.3 million were estimated due to reductions in taxi time and runway blocking with the 340-North Alternative. Departure capacity would improve and arrival delays would be reduced. In fact, the \$15.3 million in annual cost savings is a low estimate because the cost-benefits of reduced arrival delays were not specifically assessed by the NASS. In addition, both controller and pilot interviews conducted as part of the NASS simulations indicate that a centerline taxiway provides substantive efficiency and flexibility benefits. The controller interviews indicate a "...near universal opinion that a centerline taxiway provides a significant positive impact on airport operations" (page 65). The analysis conducted in the NASS solidifies the capacity and efficiency improvements that can be gained with the reconfiguration of the north airfield at LAX. This coincides with the conclusion of the FAA and other LAX configuration analysis reports that significant benefits in both efficiency and safety are gained through airfield reconfiguration.

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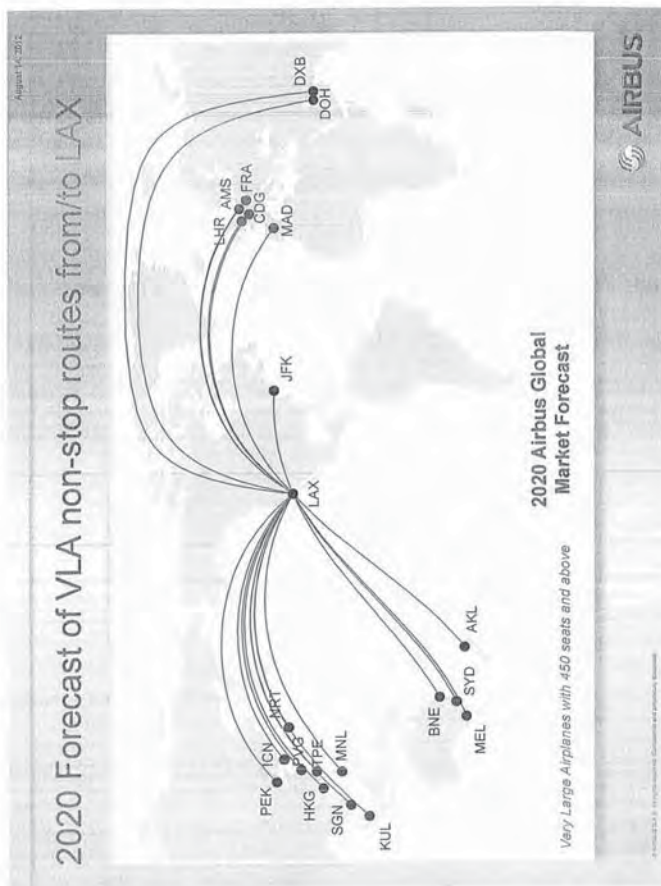


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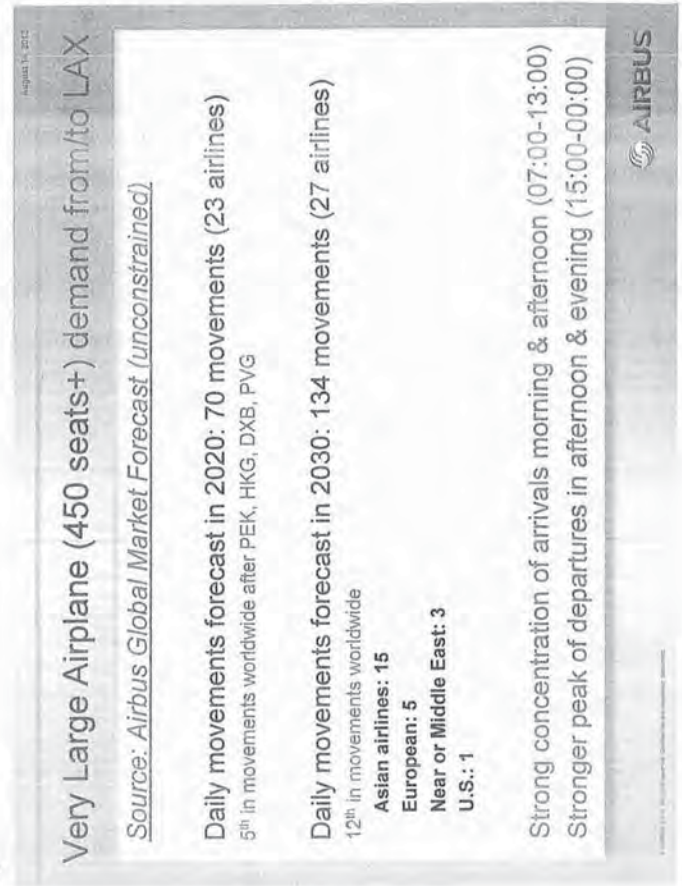


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August 27, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Dear Mr. Alvarez:

I enthusiastically support the efforts to continue the overall modernization of Los Angeles International Airport (LAX). For the millions of visitors who come to Los Angeles each year, our airport offers the first, and often lasting, impression of our city. As a world-class city, we should offer our visitors a world-class unforgettable experience.

This was our goal in 1984 when Mayor Tom Bradley led a successful modernization effort at LAX. The Summer Olympic Games of 1984 showcased Los Angeles to the rest of the world, and we worked hard to leave a positive and lasting impression for the thousands of athletes, journalists and fans who attended. At LAX, this meant the construction of a new, state-of-the-art international terminal, renovation of the existing terminals, and a new mode of transportation within the airport through the construction of an upper roadway. Simply put, the Olympic Games provided us a tremendous and rare opportunity to restore LAX as a showpiece within the aviation industry.

Nearly thirty years later, Los Angeles is once again embarked on a massive renovation of our landmark airport and I salute Mayor Villaraigosa, the Airport Commission and its staff for embarking on a multi-billion dollar program. While the projects underway, especially the rebuilding of the Tom Bradley International Terminal, are greatly important to restoring the passenger experience, I know it is only the beginning in your efforts to fully modernize LAX. The projects you are currently considering will play an even more important role in securing LAX's role as the nation's leader in aviation. We need a renovated airfield that adequately accommodates the aircraft fleet currently being built. We need direct and easy public transportation to connect LAX to the rest of the community. We need passenger-friendly, first-class terminals to greet passengers and provide them with a positive first glimpse of Los Angeles.

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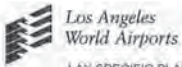
It is our sincere hope to return the Olympic Games to Los Angeles for a third time. Preliminary plans are already underway for such an endeavor. In the consideration of a Host City's bid, decision-makers will look at a city's airport and infrastructure as one of the determining factors for consideration. I encourage and urge you to continue your efforts to fully modernize LAX now - keeping the Olympics hope alive.

Once again, we are provided with a tremendous opportunity, as what happened a generation ago when LAX accommodated those who came to experience the 1984 Summer Olympics. Like then, it will take the courage and perseverance of our elected officials and the Airport Commission to make this dream a reality. Time after time, we've seen this is a city of courageous people. Now is that time once again.

Best regards,

Peter V. Ueberroth





## WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8.29.12  
 Name: LYNNE PAXTON  
 Organization: NONE - LOCAL RESIDENT  
 Address: P.O. BOX 10958, BEVERLY HILLS CA. 90213

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I AM AGAINST MOVING ANY  
RUNWAY TO THE NORTH AT ALL.  
MOVING ANY RUNWAY TO THE NORTH  
WILL RESULT IN EXCESSIVE NOISE SPIKES  
AFFECTING RESIDENTS LIVING TO THE  
NORTH, AS I DO.

THE DECIBEL LEVEL STUDIES PRESENTED  
ARE HOMOGENIZED BY AVERAGING OUT DATA  
OVER 24 HR. DAYS AND A 365 DAY YEAR.

ACTUAL NOISE SPIKES WOULD GREATLY  
INCREASE THE DECIBEL LEVEL TO WHICH  
RESIDENTS WOULD BE SUBJECTED BY  
AN UNCOMPUTED, UNPRESENTED AMOUNT,  
RECENT TAKE-OFFS ON THE NORTHERN-

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

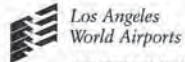
Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

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95  
 MOST RUNWAY (350 FT NORTH OF  
 THE "NORMAL" TAKE-OFF RUNWAY)  
 GAVE US RESIDENTS A TASTE  
 OF WHAT IT WOULD BE LIKE  
 MOVING A RUNWAY 350, 200  
 OR 100 FT NORTH.  
 I AM adamantly opposed to  
 ANY SOLUTION INVOLVING MOVING  
 ANY RUNWAY TO THE NORTH.

SPAS-PC00035



## WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/29/12  
 Name: MARTIN KAPP  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_

Comment:  
 (Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

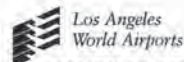
I MUCH PREFER CENTER TAXIWAY IDEA. I AM  
A LICENSED PILOT!

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

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## COMENTARIO EN FORMA ESCRITA

BORRADOR DEL REPORTE DEL IMPACTO AMBIENTAL DEL ESTUDIO DE ENMIENDA AL PLAN ESPECIFICO DE LAX

Por favor escriba de una forma legible:

Fecha: 8/29/12  
 Nombre: Richard Purdy  
 Organización: N/A  
 Domicilio: 509 W. 64th Pl.

Comentario:  
 (Por favor formule su comentario o pregunta acerca del Borrador del EIR de SPAS de LAX para que pueda recibir una respuesta en el EIR Final)

NOT LIVING IN AN AREA DIRECTLY IMPACTED BY ANY  
OF THE ALTERNATIVES MY INCLINATION TENDS TOWARD  
THE ALTERNATIVES THAT WOULD MOST IMPROVE AIRPORT  
OPERATION AND EFFICIENCY

I WOULD VERY MUCH LIKE TO SEE A PEOPLE MOVER THAT WOULD  
CONNECT WITH THE METRO LINES WITH THE AIRPORT THAT WOULD  
ALLOW AIRPORT TRIPS TO ORIGINATE LONG DISTANCES FROM THE  
AIRPORT.

I DO NOT HAVE A WHOLE LOT OF SUPPORT FOR PEOPLE  
THAT CHOOSE TO LIVE IN THE PROXIMITY OF AIRPORTS  
AND ARE CONSEQUENTLY UPSET BY AIRPORT OPERATIONS

Por favor deje la forma completada en el buzón que dice "COMENTARIOS" o mande un correo a:

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045

Comentarios se deben recibir antes de miércoles, 10 de octubre de 2012 a las 5:00 pm.

SPAS-PC00037





Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: Aug. 29, 2012

Name: Vicki Vaughn

Organization: \_\_\_\_\_

Address: 8733 Holly Cross Rd, 90045

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Please, please please do NOT move any runway further north. As it is now  
(1) 757's & 737's reverse thrusts are deafening already. Adding better placed crossways makes a lot of sense as it allows planes to decelerate without waking the dead  
(2) 747 long hauls taking off CURRENTLY VIBRATE my whole house. If you move the runways further north I'll NEVER be able to enjoy my house again.  
= If you do opt to move the runway, is it possible to be bought out? The loss of property value will eat ALL of my equity. If I'm even able to sell it.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00038



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/29/2012

Name: Gregg Aniolek

Organization: Self

Address: 4515 Falmour Ave #310 Playa Del Rey

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

- Try to Copy SFO design as much as possible. VERY Good

- Moving North Runway further up will be too much hassle (Community Relocation, legal issues, noise problems, etc)

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00039



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8/16/12

Name: Odysseus Boshdu

Organization: \_\_\_\_\_

Address: 5528 W 76th St. LA, CA 90045

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

I am concerned that expanding the runways before modernizing the existing infrastructure might result in a bad investment for the airport + the community at-large: mainly b/c the funding would not ~~be~~ be there after expansion to modernize. The result would be an airport that doesn't function efficiently. Modernizing first makes sense b/c the investment would pay off in efficiency for certain.

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00040



Los Angeles  
World Airports

WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date: 8-29-2012

Name: JACK TOLAL

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

Comment:  
(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

ALTER (2)  
SPI (9)  
Fix The traffic  
do not change the Runway  
Pattern

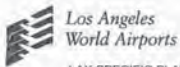
Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00041





## WRITTEN COMMENT

LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT ENVIRONMENTAL IMPACT REPORT

Please print.

Date:

8/29/12

Name:

Michael Mitchell

Organization:

Mickey's Space Ship Shuttle

Address:

PO Box 8903 Inglewood CA 90281-2

Comment:

(Please formulate your comment regarding the LAX SPAS Draft EIR so that it can be responded to in the Final EIR.)

Thank you!

Please drop the completed form into the box marked "SUBMIT COMMENTS HERE" or mail to:

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

All comments must be received no later than Wednesday, October 10, 2012 at 5:00 pm.

SPAS-PC00042

## 1.2 98th Street Intermodal Transportation Facility

The proposed 98th Street ITF would be a multi-level facility located between 96th Street and 98th Street, west of Airport Boulevard. At approximately 14 acres (single level), the ITF would provide a variety of transportation activities, including a yet-to-be determined number of public parking spaces. Airport users Los Angeles International Airport 1 LAX Specific Plan Amendment Study Report July 2012.

## Appendix E2-2 - SPAS Alternatives Ground Transportation System Elements

could use the ITF for remote passenger pick up and drop off. In addition, arriving passengers would travel to the ITF to board a door-to-door shuttle or scheduled bus such as the LAX FlyAway. Departing passengers using door-to-door shuttles or scheduled buses would continue to be dropped off directly at their terminal.

The ITF would likely include three levels of structured parking with a total of approximately 4,900 spaces. There would also be a plaza area for the busway/Automated People Mover (APM) station, waiting areas for passengers using the FlyAways and shared ride vans, and commercial support spaces to offer waiting passengers and their friends and family desired amenities such as food and beverages or other conveniences to encourage use of this facility. These functions may be on a separate level from the public parking.

The specific access/egress points have yet to be determined, but there would likely be driveways on 96th Street, 98th Street, and Airport Boulevard. Separate driveways for private vehicles and commercial vehicles would likely be provided. For safety or queuing considerations, some of the driveways might be limited to right-turn in/right-turn out.

## NOTE:

If you have to build this structure above Please allow the long distance scheduled bus services - the Ventura Airporter, Bakersfield airport bus, Disneyland Express, Antelope Valley Shuttle, Santa Maria Shuttle, Shuttle 2000, Shuttle One, and Mickey's Space Ship Shuttle that are not fly away and super shuttle, prime time to stay in the CTA. We need two circuits for our long distance 35 mile first drop off services. Separate the Street Intermodal Transportation Facility local transportation from the long distance transportation by putting the long distance transportation in the CTA. This allows for our long distance passengers not to have as much time to load with baggage and we are at a 45 second rule at the curb just as the courtesy service buses for hotels and parking buses are. We pay loop fees as we have always and we are not bank rolled by the city. We do this free and pay loop fees.

thank you

Michael S. Mitchell - Mickey's Space Ship Shuttle PSC 5244

714 642 5399

SPAS-PC00042

## — Problems —

- The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities. Put the personal passenger car down the center roads only.
- The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic.

Not true, the passenger car can be re-routed down the center of the airport that is not used and only have access to parking lots. Leave the Commercial companies on the outside road ways. The one mile circle is the best you can get for area and service. To make this area smaller off airport will congest the area terribly.

## best solution:

- Access remains the same as it is today.
- If it is not broke do not fix it.

Please consider that you are completely making a mistake to put a one mile circle of traffic that now holds it's own even on Christmas and holidays and put this out side in a one block square area. This is crazy plus the airplanes land right over it and the noise is so bad you will get law suites from ear damage. It is right in the flight path and where an airplane if it is running out of gas will crash. The cost to bus or train people out to this area should be given to the workers not the construction if you want to invest into a great airport. Please do not let the political influence of the construction companies and lobbyist of the planning people to allow this to happen. It is just as bad a design as the expansion of the fly away that is losing 40 million dollars and taking 60 million dollars from the local companies that do this for free. You do not need the fly away it was taken care of for 32 years before you tried to pay someone to compete with the local companies. Why pay someone to compete with the local area businesses and those you pay are from over seas. This is the 99% problem, giving only advantage to the big over seas businesses and not local. This is terrible. Please consider what you are intentionally doing to local business in scheduled services. Keep the cta the same it works great. If you want to lighten the traffic bus personal traffic to lot c and let passenger cars pick up. But do not stop that which works better than any other in the world now. Thank you mickey mitchell - Terrestrial Trolley, LLC

Concerning:

1.2 Intermodal Transportation Facility.

Please change E2-2 spas page 4 to do away with the Intermodal Transportation Facility. If you have to do this which is a sin. Let us local scheduled service companies stay in the CTA let super shuttle, prime time, and fly away go out there. Let us stay the way it is now with the Santa Barbara Airbus, Antelope Valley, Santa Maria Bus, Oxnard Airporter, Shuttle One, Shuttle 2000, Airport Bus of Bakersfield, Disneyland Express, and Mickey's Space Ship Shuttle.

SPAS-PC00042

From: Janice Whiffen [mailto:jwhiffen@edocsecure.com]

Sent: Monday, July 30, 2012 5:15 PM

To: SPAS EIR Comments

Cc: John Hughes

Subject: Feedback to SPAS Draft

We have owned a townhouse in lower Playa del Rey for the last 10 years.

Having worked at home for 8 of those years, I can tell you that even with double pane windows the noise is somewhat audible, but if the window was opened a crack, I could not have a phone conversation even with a noise cancellation headset.

We used to live on Conroy Street on the Marina Peninsula between Speedway and Pacific and never experienced the kind of air pollution we are now experiencing being that much closer to the airport. Now in Playa del Rey, every weekend we must first wash down our 3 balconies and patio before we can sit on the furniture, not to mention having to power wash the stucco on the outside of the building.

We moved to PDR knowing we were close to the airport, however, we may no longer be able to live here if the airport moves the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the additional pollution we will have to breathe, and the transportation impacts. We support measures that would keep the LAX a safe airport. After reading the current SPAS report and the draft EIR we ascertained that there is NOTHING of magnitude to be gained by reconfiguring the north runway. It will not make the airport safer or more efficient. We strongly oppose this measure.

We implore you to look for other alternatives such as regional airports, better transit, relocation of car rentals, etc. to accommodate future air travel needs and to not increase the burden of Westchester and Playa del Rey residents?

Janice Whiffen & John Hughes  
136 Conroy Street  
Playa del Rey, CA 90293

Janice Whiffen | COO

O 310-821-2200 x 7011 | C 310-916-8511

ALLSCRIPTS CERTIFIED PARTNER | Connect to Health™



SPAS-PC00043



**From:** Herb Child [mailto:hchild@accesshousing.org]  
**Sent:** Monday, July 30, 2012 10:54 AM  
**To:** SPASEIR Comments  
**Cc:** 'Councilmember Bill Rosendahl'  
**Subject:** No reason for North Runway expansion

As a neighbor and stakeholders in the LAX area, we are absolutely opposed to the expansion of the North runway. It has been proven by NASA and a panel of safety experts that an expansion north is not necessary for safety.

FURTHER, the real proponents of this expansion are the runway construction companies and its unions. They are expressing their usual self GREED. Most of these union workers do not live in the neighborhood and have no stake in this project except for more money for themselves.

We do not object to the rental car centralization at Manchester Square as it does not appear to add significantly to the noise level in our Playa/ Westchester area.

Herb and Dotti Child  
 7320 Rindge Avenue  
 Playa del Rey

Residents for 47 years

SPAS-PC00044

**From:** Lynn Edelman [mailto:lynn.edelman@gmail.com]  
**Sent:** Saturday, July 28, 2012 4:33 PM  
**To:** SPASEIR Comments  
**Subject:** LAX north runway alteration

A 2010 North Runway Safety Study conducted by NASA and a panel of Academic Experts found that the North Runway Complex is extremely safe, even at future fleet mix and traffic levels, and that the existing configuration would not unduly impact operational efficiency at LAX.

The inclusion of any work on the north runway brings into question the validity of ALL of the proposed work on LAX.

The runway work is so CLEARLY a bonedoggle, that it brings into question the competence and integrity of the whole plan.

SPAS-PC00045

**From:** Jayson Pida [jaysonpida@gmail.com]  
**Sent:** Saturday, August 11, 2012 4:01 PM  
**To:** SPASEIR Comments  
**Subject:** North Runway movement

You know the previous mayor/committees approved a plan that everyone liked : moving all the terminal/rental parking and the TSA security checks to an off-site area then destroying the old north side terminals and increasing the space between the runways that way. The city and LAWA even bought up an ENTIRE neighborhood for the off-site location -- it now sits boarded up or weed-choked like some 3rd world battle scene.

And now it's back to this nightmare...has everyone up to this mayor lost their minds ?? Has anyone REALLY considered or calculated the astronomical economic loss or the destruction to people's lives ??? Of the massive traffic problems that will extend into Santa Monica from cutting off Lincoln Blvd or all the residences/businesses that will be destroyed along the Westchester Pkwy ?? Such as Otis College of Fine Art or the apartments and houses in Playa Del Rey and what about all the MAJOR businesses and office buildings that WILL be destroyed along Sepulveda Blvd from the airport to Manchester Blvd -- this would tear out the economic heart of Westchester, not to mention all the new noise and pollution problems. Someone has lost their mind ( or they're just plain evil ). Count me in to fight this all the way to the end.

Not-going-to-Take-it-anymore

SPAS-PC00046

**From:** Dwight B Sturtevant [twman@mapinternet.com]  
**Sent:** Sunday, August 26, 2012 9:07 PM  
**To:** SPASEIR Comments  
**Subject:** YOU NEED TO LET METRO GO TO LAX AND STOP DRAGGING YOUR FEET

SPAS-PC00047



**From:** Mickey Space Ship Shuttle [mailto:mickysss@msc.com]  
**Sent:** Wednesday, August 29, 2012 11:27 AM  
**To:** SPASEIR Comments  
**Cc:** Mickey Space Ship Shuttle  
**Subject:** sps comment

— Problems —

- The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities.
  - The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic.

## best solution:

- Access remains the same as it is today

The best design is right now, just make the fly away not go in at the same time for all it's services, if you time them 5 minutes a part this is the answer to stop your fly away congestion. Any normal company design knows this. The ITF should not be used, leaving it the way it is does not discriminate the other companies that have been there for over 20 years. If a bomb was to be used it is more dangerous in one place at the ITF, much more dangerous than at 8 terminals. It is safe now and the the city is going broke and cannot carry more money going to bonds. the bond market is a bubble now. Note all the cities going bankrupt next door to lax. The ITF is not fair to the local scheduled service companies, about 8 of them. This is a way of allowing the off shore monopolies company contracts to push the local companies out of the way and stop competition that keeps the public prices in check. The puc is against monopolies and so is the FAA. %10 of businesses must be small local business is an FAA rule. The local companies like Mickey's Space Ship Shuttle have taken hundreds of thousands of public passengers and they love us. Please do not put us out of business for this terrible design to stop the Clifton Moore design that works so well now. If you want to take only prime time and super

SPAS-PC00048

shuttle out to the ITF do that but leave the scheduled service at the inter curb. Do not throw the baby out with the bath water on this. You have made a great mistake just designing the fly away bus company the local companies did this for free for 32 years and the way you are doing it is losing 40 million dollars and taking 60 million from local companies that would have made that money if it were not for this terrible design the fly away. Leave the valley schedule and maybe the down town but you have taken all this money over seas for the fly away company is over seas owned and bankrupt.

Please have meetings with the local companies for we are left out of the whole planning and this is discrimination. thank you Michael S. Mitchell  
 714 642 5399

SPAS-PC00048

**From:** Eric Briggs [ebriggs5@hotmail.com]  
**Sent:** Monday, August 27, 2012 11:37 AM  
**To:** SPASEIR Comments  
**Subject:** SPAS EIR comment

There are many good options here, and I'm especially enthusiastic about the proposals for a people mover to a (hopefully built) Metro station, as well as changes to the northern terminals to allow access from one to the other without going through security again. Changes to the runways to reduce delays are also needed. I would like to voice my support for the project to counter the NIMBYism that will likely comprise the bulk of the comments. It's unfortunate the some people and business will be impacted, but this is a regional issue, and if we want to consider ourselves a world-class city, we need a functional, modern, world-class airport.

Eric Briggs

**From:** Barry Schneider [mailto:writer44@msn.com]  
**Sent:** Sunday, July 29, 2012 3:20 PM  
**To:** SPASEIR Comments  
**Subject:** north runway and beyond

Dear LAWA --

I would like to invite you to night of television watching at my house.

It consists mainly of stopping the program on our television while aircraft pass over our homes, at times, every three minutes, now so close and low that not ever the triple paned sound windows installed by airport sound stops the outrageous decibels from filling our home.

While this might sound like a minor inconvenience in light of international travel and growth for LAWA, it has, due to the ever encroaching runways, become an almost intolerable living situation.

I have no fight with expansion, just stop coming closer to homes in the Playa area. Or better yet, if you want to make all of Playa del Rey like the fallow "deadlands" as we locals call the weed covered concrete and old and broken street light lined areas near our homes, simply buy up the rest of Playa del Rey and fly to your hearts content and we will all move on...

All we are saying, is, enough is enough. Expand no more -- you have had all you need for safety and profit. Let us live some semblance of a normal life without further encroachment.

As an aside, I would offer an odd scientific theory, one I learned of while writing the screenplay on the life of Nikola Tesla -- he discovered that sound could be altered or eliminated if met with the same frequency of sound. While I am no scientist, merely a writer, there does exist a method of eliminating or at least disappating the mind shattering, house rattling jet blast that hits our neighborhood on a daily and nightly basis, at times in to the early AM hours well after midnight that seems far closer than ever in the twelve years I've lived here.

It might interest your acoustic engineers (if such people exist in your purview, which I think they do not) to perhaps look into Mr. Tesla's theory on frequency, since he was the bonifide genius who gave us AC power, the electric motor and more or less made our modern age, such as it is, available to the human race.

Please LAWA, no closer, no bigger, no further.

Thank you,

Barry and Arleen Schneider

SPAS-PC00049

SPAS-PC00050



**From:** Tom Turney (<mailto:tom.turney@newcap.com>)  
**Sent:** Monday, July 30, 2012 1:03 PM  
**To:** SPASEIR Comments  
**Subject:** Your Website

Documents are not downloadable from your website. You contact us page does not work at all.

Please let me know when these problems are resolved so we can review documents.

Tom

—  
 Thomas W. Turney  
 Managing Principal  
 NewCap Partners, Inc.  
 5777 W. Century Blvd., Suite 1135  
 Los Angeles, CA 90045  
 Tel: +1-310-645-7900 x22  
 Fax: +1-310-215-1025  
 Email: [turney@newcap.com](mailto:turney@newcap.com)  
[www.newcap.com](http://www.newcap.com)

IMPORTANT WARNING:  
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SPAS-PC00051

**From:** Patricia Edler (<mailto:pedler@ca.rr.com>)  
**Sent:** Sunday, July 29, 2012 9:12 AM  
**To:** SPASEIR Comments  
**Subject:** Feedback to SPAS Draft

We are homeowners that reside near the corner of Manitoba and Earldom Ave in Playa del Rey. We have lived in this house for over 27 years.

We have learned to live with the airport as our neighbor. Our house has been sound-proofed and we are only bothered by noise when we are outside, with family or friends, and have learned to stop talking and remain still for the 30 - 45 seconds for a plane to take off before being able to resume our conversation.

We have learned to wash down the outdoor furniture, our BBQ covers and our deck often to try to mitigate the damage caused by air particulates from the airport operation and aircraft.

We have learned to have the paint ready to do the frequent touch up of paint corrosion caused by airport pollution.

We have learned to adjust our travel route when traveling south to avoid areas of traffic congestion caused by airport traffic on Sepulveda and road closures on Pershing when some traveling dignitary requires stepped up security.

And on some lovely days and evening even enjoy watching the planes land and take off from our front porch.

So we have learned to pay the price of having an International airport in our backyard and still maintain a quality of life afforded us by our location in the community of Playa del Rey.

That said...

We are very upset to learn that there is still a distinct possibility that the airport will move the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the pollution we endure, and the transportation impacts to our surrounding neighborhood streets. We are all for measures that would keep the LAX a safe airport. After pouring over the current SPAS report and the draft EIR we conclude that there is NOTHING of magnitude to be gained by reconfiguring the north runway. It will NOT make the airport safer NOR more efficient. We OPPOSE this measure.

Our community has borne the brunt of the quality of life impacts of our International Airport. It is time for the rest of the region to do its share. Why is it not possible to put the intelligence and experience of the "powers-that-be" to work to TRULY developing a regional plan that would spread the pain for whatever gain they are hoping to achieve with measures that ensure the City of Los Angeles can accommodate future air travel needs?

Jay and Patricia Edler  
 7517 Earldom Ave.

SPAS-PC00052

**From:** [mmillerphd@aol.com](mailto:mmillerphd@aol.com)  
**Sent:** Friday, August 03, 2012 3:37 PM  
**To:** SPASEIR Comments  
**Subject:** Feedback to SPAS Draft re Airport Expansion

I have been a homeowner in Playa del Rey for over 30 yrs., living on Earldom Ave. between Redlands and Manitoba. Although there was some airport noise when I moved it, I was attracted to the small town feel and closeness to the ocean. I was able to have friends over and enjoy barbecues in my backyard with little airport noise disruption.

Over the years, as LAX has expanded, I have enjoyed my backyard much less, airport pollution in the neighborhood has greatly increased, congestion has increased, and property values have severely suffered.

I have adapted and learned to continue enjoying our small town in spite of these changes. I have questioned with Los Angeles desiring the benefits of a renewed International Airport why a more forward looking and innovative plan has not been conceived, rather than piecemeal expansions that shortly become inadequate and need further expansion. In its current location, the airport will continue to be insufficient as travel, size of planes, etc. increase.

I am very upset to learn that there is still a distinct possibility that the airport will move the north runway EVEN CLOSER to our home, increasing the airport noise we experience, the pollution we endure, and the transportation impacts to our surrounding neighborhood streets. We are all for measures that would keep the LAX a safe airport and Los Angeles a major international hub. After reviewing the current SPAS report and the draft EIR I conclude that there is not the vision to achieve these goals by reconfiguring the north runway. It will NOT make the airport safer NOR more efficient nor plan for the future. I OPPOSE this measure both as a local resident and a person who has been proud to live in Los Angeles and its vision in so many areas.

Malcolm Miller, Ph.D.  
 7513 Earldom Ave.  
 Playa del Rey, CA 90293

SPAS-PC00053

**From:** Judy Gutierrez (<mailto:judy25032@yahoo.com>)  
**Sent:** Wednesday, September 05, 2012 10:11 AM  
**To:** SPASEIR Comments  
**Subject:** SPAS - Airport expansion

Unlike most of our neighbors, we became residents of this area of Playa Del Rey after our homes in San Fernando Valley burned down in 2008. Our decision to move to an area where wildfires could never be part of our lives again, we chose this area based on proximity to the beach and frankly we fell in love with living here.

We've learned to tolerate all the things our other neighbors have talked about - the noise, constant dirt, dust, film on anything left outside and anything near an open window. We are grateful that the previous owner participated in the insulated windows and soundproofing provided by the airport. I know that these improvements must not have been willingly offered to satisfy airport neighbors, but as a result of a consolidated objection to the airport request for more expansion. Thank you previous homeowners for fighting the fight that helps me have a home that can be tolerable when all the windows are closed.

Imagine moving from the hot San Fernando Valley to a new location by the sea. We never left our windows open in the valley, spring and summer were too hot and winter was too cold. Here even with the noise we leave the windows open to enjoy the ocean breeze. The noise is the trade off and we have gotten used to it.

We are FIRMLY OPPOSED to moving the north runway closer to our home!!! The situation now is somewhat tolerable, and if the planes are closer I fear that the decibel levels approved with the previous upgrades no longer be relevant. Even with the windows closed it will become difficult to have any peace.

When airport workers are in runway areas they wear headgear to protect their hearing from the noise. I have a neighbor who currently wears a version of this protection when she works in her yard. As someone who as complete hearing loss in one ear I find myself wondering what kind of protection I should be taking to protect what hearing I have left and that leads me to the following question and statement.

I have 2 points to make about the runway movement:

1. Have studies been made about new decibel level safety for people nearby? If not, why not?
2. I feel that this airport runway movement is a precursor for having the new super jumbo jets take off from the northern runways. Moving the runway is like the old saying about letting the camel put his head in the tent, once in pretty soon the camel has moved into the tent completely. Move the runways first then super jumbo jets are next. At that point sadly, the neighborhood will not have a say in the matter.

Judy Gutierrez  
 Daniel Gutierrez  
 Hilary Daniels  
 7525 Earldom Avenue  
 Playa Del Rey, CA  
 818-367-9036

SPAS-PC00054



**CONTRARIAN**  
GROUP, INC.

August 27, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Dear Mr. Alvarez:

I enthusiastically support the efforts to continue the overall modernization of Los Angeles International Airport (LAX). For the millions of visitors who come to Los Angeles each year, our airport offers the first, and often lasting, impression of our city. As a world-class city, we should offer our visitors a world-class unforgettable experience.

This was our goal in 1984 when Mayor Tom Bradley led a successful modernization effort at LAX. The Summer Olympic Games of 1984 showcased Los Angeles to the rest of the world, and we worked hard to leave a positive and lasting impression for the thousands of athletes, journalists and fans who attended. At LAX, this meant the construction of a new, state-of-the-art international terminal, renovation of the existing terminals, and a new mode of transportation within the airport through the construction of an upper roadway. Simply put, the Olympic Games provided us a tremendous and rare opportunity to restore LAX as a showpiece within the aviation industry.

Nearly thirty years later, Los Angeles is once again embarked on a massive renovation of our landmark airport and I salute Mayor Villaraigosa, the Airport Commission and its staff for embarking on a multi-billion dollar program. While the projects underway, especially the rebuilding of the Tom Bradley International Terminal, are greatly important to restoring the passenger experience, I know it is only the beginning in your efforts to fully modernize LAX. The projects you are currently considering will play an even more important role in securing LAX's role as the nation's leader in aviation. We need a renovated airfield that adequately accommodates the aircraft fleet currently being built. We need direct and easy public transportation to connect LAX to the rest of the community. We need passenger-friendly, first-class terminals to greet passengers and provide them with a positive first glimpse of Los Angeles.


5 San Joaquin Plaza - Suite 330 - Newport Beach, California 92660 949/720-9646 ph. · 949/720-9123 fax  
SPAS-PC00055

Page 2

It is our sincere hope to return the Olympic Games to Los Angeles for a third time. Preliminary plans are already underway for such an endeavor. In the consideration of a Host City's bid, decision-makers will look at a city's airport and infrastructure as one of the determining factors for consideration. I encourage and urge you to continue your efforts to fully modernize LAX now - keeping the Olympics hope alive.

Once again, we are provided with a tremendous opportunity, as what happened a generation ago when LAX accommodated those who came to experience the 1984 Summer Olympics. Like then, it will take the courage and perseverance of our elected officials and the Airport Commission to make this dream a reality. Time after time, we've seen this is a city of courageous people. Now is that time once again.

Best regards,

  
Peter V. Ueberroth

SPAS-PC00055



**Specific Plan Amendment Study**

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



**Tell us what you think.**

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Rudolph Whitcomb  
Organization:  
Address: 2264 Estribo Drive  
City: Rolling Hills Estates  
State: CA  
Zip: 90274  
Phone:  
E-mail: rudy@whitcombins.com  
Comment:

How on earth could anyone pretend that the operation of a major airport is GOOD for the environment

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00056



**Specific Plan Amendment Study**

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



**Tell us what you think.**

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Rendric Williams  
Organization:  
Address: 1699 east washington street apt #1281  
City: Colton  
State: CA  
Zip: 92324  
Phone:  
E-mail: anyahnyaneth@yahoo.com  
Comment:

Alternative 1 is the best choice both for the people and city of Los Angeles. The northern runways need a taxiway for safe operations of new age jetliners. As well as LAX is the first piece of land most visitors see when they arrive and leave. It is important we keep it updated so we don't lose business to other cities with brand new facilities. International Airlines want to spend their big dollars at a state of the art facility. We can turn LAX into an even better aviation center with alternative 1.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00057





#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Robert L. Rodine  
 Organization:  
 Address: 14649 Tustin Street  
 City: Sherman Oaks  
 State: CA  
 Zip: 91403  
 Phone:  
 E-mail: polarisrtr@sbcglobal.net  
 Comment: I was part of the Stakeholder Group - Business Interests at the outset. I am dismayed that at some point in time communications ceased coming. I look forward to being included. Thank you.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00058



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Debra Lynch  
 Organization:  
 Address: 7536 W. 80th. St.  
 City: Los Angeles  
 State: cA  
 Zip: 90045  
 Phone:  
 E-mail: dkl4re@aol.com  
 Comment: Please send me all LAX updates

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00059



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Richard Teplitz  
 Organization:  
 Address: 7525 Midfield Ave.  
 City: Los Angeles  
 State: ca  
 Zip: 90045  
 Phone:  
 E-mail: rteplitz@earthlink.net  
 Comment: NASA has shown that there is virtually no benefit to moving the north runway. Why destroy a community for virtually no benefit? Because the unions and Chamber of Commerce all located elsewhere want to? We can hire lawyers too.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00060



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Andre Parvenu  
 Organization:  
 Address: 200 North Spring Street Room 667  
 City: City Hall  
 State:  
 Zip:  
 Phone:  
 E-mail:  
 Comment: Excellent set of maps. Good use of information technology to display the various alternatives.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00061





#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Jeffrey Rothman

Organization:

Address: 5844 Abernathy Drive

City: Los Angeles

State: CA

Zip: 90045

Phone:

E-mail: cabra\_bom\_da\_pesto@yahoo.com

Comment:

E-mail is cabra\_bom\_da\_pesto@yahoo.com I have been a Westchester resident for 29 years. During this time I am concerned re additional development in the airport owned and airport adjacent area along Westchester Parkway. Currently run or ride a bicycle. Building of additional parking areas and transport facilities will increase traffic. Building of additional airport related business facilities in the area will also increase traffic. My concern is that a significant increase in traffic along Westchester Parkway will make this corridor no longer the pleasant and safe place it is to walk run and bike. Jeffrey Rothman

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00062



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Richard Whittman

Organization:

Address: 849 S. Broadway

City: Los Angeles

State: CA

Zip: 90014

Phone:

E-mail: rkwhittman@gmail.com

Comment:

It is essential that there be some kind of Metro/light rail connection that brings passengers from around the city either a) directly to the terminals OR b) directly to a fast and efficient APM service that brings passengers directly to the terminals. This should dramatically reduce the automobile circus in the Central Terminal Area

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00063



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Howard Siegel

Organization:

Address: 27539 Pamplico drive

City: Valencia

State: CA

Zip: 91354

Phone:

E-mail:

Comment:

As usual there is no direct connection of any public MetroRail or any other type of rail connection into the airport. Having to get off one public transportation system and then having to get on another is simply stupid. I think Heathrow Express and there is a great system

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00064



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Kurt Haukohl

Organization:

Address: 2612 S Denison Ave

City: San Pedro

State: CA

Zip: 90731

Phone:

E-mail: khaukohl@gmail.com

Comment:

Several of the Alternative taxiway layout schemes are problematic specifically recommended against in the FAA Engineering Brief #75 and in newer versions of the FAA AC 150-5300-13 change 17. Direct high speed crossing of a second parallel runway are high incursion points nationally.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00065





### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: James Fujita

Organization:

Address: 4734 W. Caldwell Ave. Apt. D

City: Visalia

State: CA

Zip: 93277

Phone:

E-mail:

Comment:

LAX needs a peoplemover which would link the central terminal area with the Green Line and the Crenshaw Line. LAX needs to work with Metro to make sure that the transfer is simple and painless. A cross-platform transfer would work best. People don't care about bureaucratic jurisdictions but they do want rail to the airport.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00066



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Donna Parks

Organization:

Address: 302 w g st unit 30

City: Ontario

State: CA

Zip: 91762

Phone:

E-mail: reddnup@msn.com

Comment:

I have friends and relatives who fly into John Wayne or Burbank to avoid the high costs of Ontario airport. Why ??? the airport was built to serve it serves no one- politics at its worst . Someone or LAWA should be accountable for the fact they have there residents and taxpayers going miles out of their way in order to get a "deal ". You can fly from Burbank to Vegas for \$49.00 - out of Ontario a joke . Blatant disregard for public - need to revamp the whole LAWA system - starting at the top with the officials who seem to have their heads in the "clouds"

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00067



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Tim

Organization:

Address: 4067 hardwick st #408

City: Lakewood

State: CA

Zip: 90712

Phone:

E-mail: tim.m.rusch@aexp.com

Comment:

update me please

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00068



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Michael S. Mitchell

Organization:

Address: p.o. box 8903

City: anaheim

State: CA

Zip: 92812

Phone: 714 642 5399

E-mail: mickeysss@me.com

Comment:

Problems. The central terminal area design does not meet current airport security needs associated with vehicular access to airport facilities. The curb-front and access road system used for drop-off and pick-up of passengers in the terminal area was not built for today's level of traffic. best solution: Access remains the same as it is today The best design is right now for all it's services fly away congestion. Any normal company design knows this. The ITF should not be used much more dangerous than at 8 terminals. It is safe now and the the city is going broke and cannot carry more money going to bonds. the bond market is a bubble now. Note all the cities going bankrupt next door to lax. The ITF is not fair to the local scheduled service companies about 8 of them. This is a way of allowing the off shore monopolies company contracts to push the local companies out of the way and stop competition that keeps the public prices in check. The puc is against monopolies and so is the FAA. %10 of businesses must be small local business is an FAA rule. The local companies like Mickey's Space Ship Shuttle have taken hundreds of thousands of public passengers and they love us. Please do not put us out of business for this terrible design to stop the Clifton Moore design that works so well now. If you want to take only prime time and super shuttle out to the ITF do that but leave the scheduled service at the inter curb. Do not throw the baby out with the bath water on this. You have made a great mistake just designing the fly away bus company the local companies did this for free for 32 years and the way you are doing it is losing 40 million dollars and taking 60 million from local companies that would have made that money if it were not for this terrible design the fly away. Leave the valley schedule and maybe the down town but you have taken all this money over seas for the fly away company is over seas owned and bankrupt. Please have meetings with the local companies for we are left out of the whole planning and this is discrimination. thank you Michael S. Mitchell

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00069





### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: James Earl McKinley Jr.  
 Organization:  
 Address: 23317 JENNINGS RD.  
 City: CLEVELAND  
 State: OH  
 Zip: 44128  
 Phone: (216)(581-0191)  
 E-mail: HARD OF HEARING THAT CALL ME  
 Comment: ONE TIME TRIP FOR VOCATION ON WHEN!

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00070



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Rick Tepnitz  
 Organization:  
 Address: 7525 Midfield Ave  
 City: Los Angeles  
 State: CA  
 Zip: 90045  
 Phone:  
 E-mail: rteplitz@earthlink.net  
 Comment: The NASA study showed that there is virtually no safety impact by moving the runway north. LAWA has a long-standing agreement with the residents and stakeholders in the area not to expand north. Don't even think about it.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00071



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Gregory Dina  
 Organization:  
 Address: 6550 W 84th Place  
 City: Los Angeles  
 State: CA  
 Zip: 90045  
 Phone:  
 E-mail: gregdina@gmail.com  
 Comment: I have lived in the communities north of LAX since I arrived in Los Angeles in 2000 to attend LMU. I recently chose to become a homeowner in this area and firmly support the alternatives that DO NOT move runways further north towards Westchester and Playa del Rey and increase the airport's footprint. I am a firm supporter of modernizing LAX and connecting the airport to the region's growing Metro rail network and understand the vital and important role that it plays in the local and regional economy. The recent efforts to upgrade the terminals and improve safety on the runways are long overdue and should be applauded by all resident and visitors of Los Angeles.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00072



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Stan Rosen  
 Organization:  
 Address: 8004 Kentwood Ave  
 City: Los Angeles  
 State: CA  
 Zip: 90045  
 Phone:  
 E-mail: srosen6@aol.com  
 Comment: The effects of the impacts of these changes should be assessed over time. That is the developmental path to achieve each alternative will be different depending on the sequence of the implementation. For example buses could be used first on existing streets then on new roadways. This consideration will significantly affect the environmental impacts of each alternative.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00073





## Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Mark R. Johnston  
 Organization:  
 Address: 4185 VAN BUREN STREET  
 City: CHINO  
 State: CA  
 Zip: 91710  
 Phone:  
 E-mail: CANAMMJ@YAHOO.COM  
 Comment:

MY MIX OF IMPROVEMENTS ARE AS FOLLOWS: #1 SAFETY- MOVE THE NORTH RUNWAY TO AVOID OPERATION ISSUES. #2 REPLACE SOME OF CTA PARKING WITH CHECK IN TERMINALS- A TRULY GRAND ENTRANCE TO LAX. #3 THIS CTA CENTRAL FACILITY NEED TO HAVE THE NORTH/SOUTH LIGHT RAIL STATION SERVING BOTH THE CRENSHAW GREEN LIGHT AND COAST LINES TO SANTA MONICA AND SOUTH TO TORRANCE. #4 A CONSOLIDATED RENTAL CAR FACILITY PLEASE ! (LIKE THE REST OF THE WORLD) #5 PEOPLE MOVER TO CONNECT TERMINALS PARKING AND RENTAL CAR CENR. GET RID OF ALL THOSE SHUTTLE BUSES. #6 BUILD BRADLEY 3 TO THE WEST OF THE CURRENT TERMINAL - ALSO CONNECTED BY PEOPLE MOVER.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00074

From: Loreal [mailto:[loreal@professionalseoservice.info](mailto:loreal@professionalseoservice.info)]  
 Sent: Friday, August 24, 2012 5:26 AM  
 To: SPASEIR Comments  
 Subject: 1st Page on Google Ranking

Hi  
 Hope you are well. I am a Business Development Manager in a leading SEO Agency.  
 I have visited your website and analyzed that it is not ranking on the first page of Google for most of the keywords pertaining to your domain so I was wondering if you would be interested in getting Search engine optimization done for your website

Let me know if you are interested, I would be happy to send you complete website detail and cost...

I look forward to your mail.

Yours sincerely,  
 Loreal  
 Business Development Manager  
 Email: [loreal@professionalseoservice.info](mailto:loreal@professionalseoservice.info)

Disclaimer: The CAN-SPAM Act of 2003 (Controlling the Assault of Non-Solicited Pornography and Marketing Act) establishes requirements for those who send commercial email. It sets out penalties for spammers and companies whose products are advertised in spam if they violate the law and gives consumers the right to ask e-mailing to stop spamming them. This above mail is in accordance to the Can Spam Act of 2003. There are no deceptive subject lines and is a manual process through our efforts on World Wide Web. You can opt out by sending mail to: [removal@moz.com](mailto:removal@moz.com) and we ensure you will not receive any such mails.

SPAS-PC00075

From: Christina Davis [Christina@laxcoastal.com]  
 Sent: Thursday, September 06, 2012 2:10 PM  
 To: SPASEIR Comments  
 Subject: Request to Extend Comment Period

On behalf of the LAX Coastal Area Chamber of Commerce, we request that an extension of the comment period be given regarding the LAX EIR.

We understand that you are anxious to complete the process, however, the future plans for LAX is not a decision to be taken lightly. In order to properly review these documents, we request that a 90 day extension be granted for public comment. Our intention is to carefully and methodically review the EIR and weigh in with educated comments that thoughtfully address the concerns of the LAX coastal area business community.

For the reasons above, we request an extension of the comment period.

Christina V. Davis  
 President & CEO  
 LAX Coastal Area Chamber of Commerce  
 9100 S. Sepulveda Blvd., Ste. 210  
 Los Angeles, CA 90045  
 (310) 645-5151 Cell (310) 529-7331  
[www.laxcoastal.com](http://www.laxcoastal.com)

From: Lynne Shapiro [mailto:[lyn2323@gmail.com](mailto:lyn2323@gmail.com)]  
 Sent: Thursday, September 06, 2012 4:10 PM  
 To: SPASEIR Comments  
 Subject: Air plane noise - Marina del Rey

Dear Mr. Alvarez:

I have lived in Marina del Rey in Silver Strand two blocks from the beach since 1967. At no time have I been disturbed by airplane noise until this summer. When I have taken a plane, it has always headed west, out over the ocean and then on to its northern or eastern direction. For the last three or four weeks, I have heard planes as if I lived next to the airport. At first, I was awakened three and four times a night by planes taking off on the half-hour. The week and possibly part of last week, the planes are heading north over the Main Channel and the Marina Peninsula and beach. Seven thousand of us residents are on the west side of the Marina (L.A. City statistics). The current routes are very disturbing. I don't know if the airport is experimenting or changing its fly zones, but I must protest this routing. As a homeowner and property tax payer, I do not want to hear airplanes zooming by every hour on the hour. This is supposed to be a tranquil, recreational community for its residents and for visitors from L.A. County and abroad. I hope that the airport will not make changes in the west-bound, over the Pacific, planes at LAX.

Yours truly,

Ms. Lynne Shapiro  
 5100 Via Dolce #312  
 Marina del Rey CA 90292

SPAS-PC00076

SPAS-PC00077



Attachments: Venice Stakeholders Association Letter to LAWA re Alternative 10 - EIR Comments.pdf

-----Original Message-----

From: Venice Stakeholders [mailto:VeniceStakeholders@ca.rr.com]  
Sent: Tuesday, September 11, 2012 10:21 AM  
To: West LA Director for the Mayor; Bill.Rosendahl@lacity.org; carmen.trutanich@lacity.org;  
Cyndi Hench; Denny Schneider; LINDSEY, GINA MARIE; SPASEIR Comments  
Cc: Jane Usher; John A. Henning, Jr.  
Subject: Comments on the LAX SPAS Draft Environmental Impact Report

Please find attached the comments of the Venice Stakeholders Association on the LAX SPAS Draft Environmental Impact Report.

Thank you,

Mark Ryavec  
President  
Venice Stakeholders Association  
310 392 4843

## Venice Stakeholders Association

September 11, 2012

Los Angeles World Airports, Facilities Planning Division  
Attn: Diego Alvarez  
One World Way  
Los Angeles, CA 90045

Re: Comments on the LAX SPAS Draft Environmental Impact Report

Ladies and Gentlemen,

I am writing to provide comments on the LAX Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR).

The EIR is deficient in meeting the objective of minimizing the environmental impacts on surrounding communities and in adequately exploring all alternatives to meet the objectives of the LAX SPAS process.

These deficiencies are evident in both the lack of a thorough analysis of the potential to significantly expand air service at LAWA's Ontario airport and the degree to which such expansion could ameliorate the need for increased capacity at the Westchester facility. Further, the EIR does not explore to a significant degree alternative(s) that would significantly reduce existing negative impacts on nearby residents.

In regards to Ontario, there does not appear to be any analysis in the material presented to the public (as viewed on August 29, 2012 at the Proud Bird Restaurant) or in the written material provided to the public at that time of the potential for expansion at Ontario which could obviate and/or attenuate the pace and/or degree of increase in annual passengers at LAX that drives the need for physical expansion, with all of its attendant negative effects on residents, traffic and local air quality.

Since expansion of the Ontario facility has the potential to greatly diminish the need for new capacity at LAX, it must be analyzed and presented to the public and decision-makers in the EIR process.

The EIR also does not adequately explore the opportunity presented in Alternative 3 to significantly reduce the current noise impact of airport operations on residents to the north (Westchester) and northwest (Playa del Rey) by moving Runway 24 Left 340 feet to the south, along with the corresponding ability to modernize facilities by the re-construction of Terminals 1, 2 and 3.

I would suggest an Alternative 10 which combines moving Runway 24 Left 340 feet to the south with re-development and expansion of Terminals 1, 2 and 3, as envisioned in Alternative 3, utilizing some of their existing terminal footprint along with a portion of the land now occupied by the Central Terminal Area (CTA) internal access road and by parking structures in CTA just opposite from Terminals 1, 2 and 3. With the anticipated relocation of CTA long term parking capacity to Manchester Square, much of the CTA parking capacity will be redundant and a significant portion of the cleared land could be dedicated to terminal development. This would allow for the replacement - over time - of all gate capacity now provided at Terminals 1, 2 and 3 while providing completely modernized facilities to advance the goal of creating a world class airport at LAX.

*The Venice Stakeholders Association is dedicated to civic improvement. The VSA supports slow growth, protection of the limits of the Venice Specific Plan, neighborhood safety, better traffic circulation, increased parking for residents, neighborhood beautification projects, habitat restoration and protection of coastal waters. VeniceStakeholdersAssociation.org*

SPAS-PC00078

SPAS-PC00078

Page 2 -- Comments on LAX SPAS Draft Environmental Impact Report

One of the arguments advanced against Alternative 3's linear terminal design is that it would not provide for replacement of all gates currently provided at Terminals 1, 2 and 3. The use of a modest portion of land now used for the parking structures, along with relocation of the LAX access road southward within the CTA, would permit development of an equal number of gates at the new terminals.

Such a configuration would still allow for an internal access roadway, though narrower than the current one, dedicated to shuttles, buses, taxis, police and fire safety vehicles and possibly private vehicles for departures and arrivals and access to short term (hourly) parking, and also one (or two) linear trains or bus lines (instead of the proposed u-shaped design), similar to trains in many other airports - they do not turn-around but rather simply go back and forth on a relatively straight track.

With LAWA poised to spend billions of dollars on long overdue modernization, there should be more focus to assure that a significant priority is given in these expenditures to mitigating the current effects of operations on the long suffering residents living around LAX. The noise reductions from the relocation southward of Runway 24 Left would provide that palpable relief, especially to the Westchester and Playa del Rey communities. Expansion of the Ontario facility would slow the growth in ground and air traffic at LAX, again to the benefit of residents in the entire surrounding area.

My thanks to the Alliance for a Regional Solution to Airport Congestion for its June 17, 2008 Runway 24 Left Realignment Proposal, which is combined here with re-deployment of Central Terminal Area parking lands made available by expected development of the new long term parking facility at Manchester Square.

Thank you for consideration of my views on this matter.

Sincerely yours,

Mark Ryavec

Mark Ryavec, President

cc: Mayor Antonio Villaraigosa  
Councilman Bill Rosendahl  
City Attorney Carmen Trutanich  
Gina Marie Lindsey, Executive Director, Los Angeles World Airports  
Denny Schneider, Alliance for a Regional Solution to Airport Congestion  
Cyndi Hench, President, Westchester/Playa del Rey Neighborhood Council

From: Bryan A. Garner and LawProse [lawprose@bridgemailsystem.com]  
Sent: Wednesday, September 12, 2012 9:28 AM  
To: SPASEIR Comments  
Subject: LawProse Lesson #86

[http://mail.bridgemailsystem.com/pms/graphics/lawprose/LP\_logo\_462x300.jpg]

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Fall 2012 Cities & Dates

Seattle -- Oct. 19  
Portland, OR -- Oct. 11  
Las Vegas -- Oct. 16  
Atlanta -- Oct. 19  
Salt Lake City -- Oct. 22  
Newark, NJ -- Oct. 29  
Columbus -- Oct. 31  
Los Angeles -- Nov. 7  
San Francisco -- Nov. 9  
New York -- Nov. 12  
Phoenix -- Nov. 27  
San Diego -- Nov. 30  
Washington, D.C. -- Dec. 7

SPAS-PC00078

SPAS-PC00079



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Lesson # 86

What's wrong with underlining in briefs, contracts, and other legal documents?

ANSWER: Underlining is a holdover from the era of typewriters. It's crude and unsightly. Why else would you recoil from a published book that contained underlining? Admit it: you would. Any publisher that typeset a book with underlining would seem like a fly-by-night operation.

Underlining obscures part of some characters: the descenders on the lowercase letters g, j, p, q, and y. It also bumps into commas and semicolons. On the word-processors we use today, the underline is ridiculously close to the baseline of the type. And it's too thick -- thicker than the strokes of most fonts we use for office documents.

All this is more than just bad aesthetics. Underlining hurts legibility: underlined text is noticeably harder to read, especially in big doses. The obscured letters and punctuation require more effort to see.

But if it's unsightly, doesn't that draw the eye and create emphasis? Well, it does that all right. But emphasis should not create negative attention.

While wonderful in their day, typewriters were limited to a single type, invariably roman. Instead of the elegant italics that typographers used as complementary fonts, typists had a key for underlining. That was the only way (besides using all-caps) to show emphasis.

But those days are gone forever. So should be underlining.

Sources: Garner's Modern American Usage 271 (3d ed. 2009).  
The Redbook: A Manual on Legal Style 69-70 (2d ed. 2006).

Making Your Case: The Art of Persuading Judges 121 (2008).  
Matthew Butterick, *Typography for Lawyers* 78-79 (2010).

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From: Yoshie Kurkowski [Yoshie@thesheppard.com]  
Sent: Thursday, September 13, 2012 6:25 PM  
To: SPASEIR Comments  
Cc: ALVAREZ, DIEGO  
Subject: Name of a person who shared a public comment at SPAS meeting on Aug 28 2012

Dear Diego,

My name is Yoshie Kurkowski and I attended SPAS meeting back in Aug 28. I would like to know what is the name of a gentleman who talked about Olympics. If you can let me know who he was would be great. I went to spasvirtualmeeting website as well as laxspas.org but I could not figure out where the information I was looking for.

Thanks!

[cid:844DF8AB-25AA-4F2E-8C3A-5576E6BAD82B]  
Yoshie Kurkowski  
Event Logistics/Coordinator

The Sheppard  
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Suite 101  
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From: easwaran@gmail.com [easwaran@gmail.com] On Behalf Of Kenny Easwaran [easwaran@usc.edu]  
Sent: Saturday, September 15, 2012 9:06 PM  
To: SPASEIR Comments  
Subject: LAX SPAS EIR comments

To the EIR committee:

In studying the 9 proposed alternatives, it appears to me that only Alternative 3 fully addresses the ground transportation issues facing the airport. Given the increasing importance of public transportation in Los Angeles, and the increasing need for reduced reliance on personal automobiles for the world, as gasoline prices continue to increase and global warming advances, it seems more likely that travel by public transportation is more likely to exceed expectations in decades to come rather than fall short. This makes it essential to allow better connections to light rail stations and intermodal transportation centers than may be planned for.

Although Alternatives 1, 2, 8, 9 all make some attempt to connect the new Metro station at Aviation/Century to the terminal area, only Alternative 3 improves the connection to the existing Green Line station at Aviation/LAX. Additionally, Alternative 3 places the intermodal transportation center close to the intersection of two major interstates, rather than at a great distance from them - this will allow for increased bus service, as demand grows. Alternative 9 additionally falls short in improvements for Green Line passengers, because it includes no busway, and thus passengers coming on the shuttle from the Green Line will have a substantially worse experience, and may be forced to drive personal cars instead.

I understand that Alternative 3 involves major changes to the runways, which necessitates a total restructuring of the terminal facilities, which is why private automobile access to the terminal area is eliminated. However, it seems to me that even without such a radical restructuring of the runways and terminal facilities, it may become important to reduce or eliminate private automobile access to the terminal area. Even on alternatives 1, 2, 8, or 9, it may be useful to consider imposing a congestion charge on all private vehicles that enter the terminal area, to help encourage people to use public transit or parking facilities, and pick up travelers at the transportation centers. At the moment, the worst aspect of the airport experience is in waiting for half an hour in the smoggy roadway, either waiting for a bus, or waiting in a car to exit the area. This experience can be greatly improved, with or without the radical restructuring of the airport involved in Alternative 3.

Thus, I strongly support Alternative 3 on the basis of the ground transportation features it includes. If this alternative is ruled out on the basis of other features, then I support a version of Alternatives 1, 2, or 8, with the addition of some sort of surcharge or other incentive for private automobiles to avoid the center terminal area. This is the best way to serve passengers coming from the Green Line as well as the future Crenshaw Line, and to improve access to the terminals for all passengers, and not just those who can afford to use a personal automobile in a future of ever-increasing gasoline prices.

Kenny Easwaran  
4117 Cumberland Ave.,  
Los Angeles, CA 90027

Assistant Professor  
Department of Philosophy  
University of Southern California



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Lesson # 87

What are the rules on indenting?

ANSWER: The first rule of indenting is to change your word-processor's default tab setting.

Half-inch tabs are a sure sign of a dysfunctional layout. They jump out at you as soon as you pick up a document and see "A." half an inch from the left margin, followed by another half inch before the text begins. The problem builds when writers use cumulative indents, especially for headings. After a few levels of hierarchy we get a pile-up: lines of boldface heading crammed in toward the right margin followed by flush-left text. So start by setting your tab stops for a quarter of an inch.

The second rule is to learn how to create proper hanging indents for numbered and bulleted lists. The number or bullet is to the left of the copy (though not necessarily on the left margin--the whole list can itself be indented). Just to the right of the number or bullet is the text in the list, with all lines indented to the same point.

The third rule of indenting is to avoid cumulative indents by limiting the levels of hierarchy in your headings: two or three should do it. Even then, you can create a better-looking page by keeping all headings flush left and using other typographical elements to show the hierarchy--as demonstrated on pages 308-11 of *The Winning Brief*.

Sources: Garner's *Modern American Usage* 271 (3d ed. 2009).  
The *Redbook: A Manual on Legal Style* 81-82, 84-85 (2d ed. 2006).  
Matthew Butterick, *Typography for Lawyers* 94-96 (2010).  
The *Winning Brief* 308-11 (2d ed. 2004).

2

SPAS-PC00082

SPAS-PC00082

From: Bryan A. Garner and LawProse [lawprose@bridgemailsystem.com]  
Sent: Monday, September 17, 2012 11:52 PM  
To: SPASEIR Comments  
Subject: LawProse Lesson #87  
  
<[http://mail.bridgemailsystem.com/pms/graphics/lawprose/LP\\_logo\\_462x108.jpg](http://mail.bridgemailsystem.com/pms/graphics/lawprose/LP_logo_462x108.jpg)>

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3

SPAS-PC00082

From: Ellen Klein [ellen@calnative.com]  
Sent: Monday, September 17, 2012 10:09 AM  
To: SPASEIR Comments  
Subject: Comments on SPAS Alternatives

To Mr. Diego Alvarez:

I want to give my opinion on the SPAS EIR:  
I would like to adopt Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North. The impact to the community is completely unnecessary both from a neighborhood view and an airport safety view.

Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway. The North Airfield Safety Study concluded that the

The North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.

If 24R was moved as far north as LAX actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAX's estimates? LAX has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.

If 24R were to be moved as far north as LAX actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions. Also, property values of good neighbors would go down. Many Westchester residents have been there for over 60 years and don't deserve this from our neighbor.

Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs than moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North:

1

SPAS-PC00083



\* Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts, where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 241. The last time it was inspected (after a very dry season) there was water in the tunnel. LAMA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runways for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.

\* Moving affected sewers. Other city departments have stated that the sewers cannot be moved.  
 \* Property acquisition. As noted above.  
 \* Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAMA does not have any approval as of the DEIR date to make changes to the channel.

PLEASE DO NOT CONSIDER any Alternative that involves movin the runway. MODERNIZE, CONSOLIDATE, but don't EXPAND!!

Ellen Klein  
 6701 W 87th Place  
 Los Angeles, Ca 90045  
 310-210-4457

Ellen Klein  
 ellen@calnative.commailto:ellen@calnative.com  
 310-210-4457 (cell, Notary)  
 310-642-1140 (home, California Native)

P Please consider the environment before printing this email.

From: Brian Ward [briankward85@hotmail.com]  
 Sent: Tuesday, September 18, 2012 1:42 PM  
 To: SPASEIR Comments  
 Subject: Comment on LAX development

There is an incredible amount of material available for study, and I will not pretend that I have reviewed it all. I have lived in Westchester in the past at the Park West apartments which border Northside Development land. I am also a stakeholder in this debate, as I work for one of the airlines at LAX. I am old enough and lived here long enough to remember when the city bought up land bordering the north field in the seventies, force majeure, to create space for further expansion and/or a buffer zone. It is time that the city of LA cashes in on that investment, and use the land for the maximum benefit of LAX. This is not the time in history that groups like ARSEC and environmentalists should have the green, leftist luxury of stopping expansion when we have so much unemployment and stagnant economic conditions. The city needs the revenue and people need the jobs that LAX provides. Current Master Plan D reduction in size (gates) and senseless destruction of terminals 1, 2, and 3 should absolutely not be implemented; what were people like Villaragosa, Rosendahl and the City Council thinking when they caved to the special interests of a small, vocal group of rebels in Westchester? Absolute spineless weakness! Let me bring up an interesting historical perspective: westside middle-class communities like El Segundo and Westchester were practically built by the prosperity created by the aviation industry. Many of the whiners in these communities who fight against LAX expansion are ironically the sons and daughters of that aeronautical generation's workers and have had the lifestyle they have and ability to live here only because of Social's aviation past! Let's get real with our current economic reality and provide jobs for construction now and aviation employees in the near future. Move 24R far enough north to build the center taxiway (for safety, capacity, traffic balance, large size category aircraft like the A380). Do NOT destroy current terminals 1, 2, and 3. Follow through with the second phase of Bradley expansion for additional gates. Develop remaining northside properties with warehouse industry (preferably aviation related) for a noise buffer. And do whatever is necessary in the road access situation to hook into the metro train and external parking lots. Green considerations should be the last consideration. This airport is a huge, beneficial economic engine and should serve our citizens for decades to come. Ontario will come back on its own when the lingering effects of the real estate bubble/foreclosures wane. Palmdale is out of the question. LA residents (even SF Valley) have made it clear for years that nobody wants to go all the way out there to take a flight. Makes no sense for LAX's hub-and-spoke airlines to fragment traffic away from their hub business model and they are the 800 pound gorilla stakeholder customers who pay the bills. Top foreign airlines (eg transpacific) have no interest at all in serving satellite airports with widebodies either. MAN UP over there at LAMA and push the development through, force majeure like in the past if necessary; we need it! We've spent enough precious taxpayer money already on studies. It's time to get it done. Have we become so paralyzed now that we can no longer complete major infrastructure projects without melting down internally? I watch chinese cities build entire airports in the time it takes us to perform a ridiculous environmental impact study!

- Brian Ward

SPAS-PC00083

SPAS-PC00084

From: Lynn Edelman [lynn.edelman@gmail.com]  
 Sent: Wednesday, September 19, 2012 7:04 PM  
 To: SPASEIR Comments  
 Subject: moving the north runway at LAX. (what a boondoggle!)

Dear Mr. Alvarez:

Please STOP this project instead:

Adopt Alternative 2, plus Alternative 9 and a realistic train service plan that includes all the terminals

The reasons I am opposed to moving the north runway include:

\* Any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate. All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.

\* Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway.

\* The North Airfield Safety Study concluded that the North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.

\* If 24R was moved as far north as LAMA actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAMA's estimates? (People who have plowed through the Acquisitions section say that it seems low.) LAMA has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.

\* If 24R were to be moved as far north as LAMA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions.

\* Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc., would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

\* Adding a Centerfield taxiway (between the runways) does NOT create a Group 6 airfield. It does, however, decrease the space between the wings of aircraft on a runway and the Centerfield taxiway. (Group 6 refers to the class of New Larger Aircraft, such as the A380.)

\* According to LAMA's figures, Group 6 aircraft in 2025 will be just 1.6% of total air traffic. It seems ridiculous to go through so much upheaval, not to mention cost, for such a small number. The Airbus A380 has been landing and taking off with no trouble.

There are some extremely expensive issues in moving the runway North:

\* Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts, where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 241. The last time it was inspected (after a very dry season) there was water in the tunnel. LAMA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runways for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.

\* Moving affected sewers. Other city departments have stated that the sewers cannot be moved.  
 \* Property acquisition. As noted above.  
 \* Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAMA does not have any approval as of the DEIR date to make changes to the channel.

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). (Analyses are from ARSAC.) Alt. 1: Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway.

- Displaces businesses and homes  
 - Risky construction factors; could be very costly in time and delays  
 - Fixes little traffic or Central Terminal Access (CTA)  
 - Impacts major underground utilities, sewer, and tunnel

Alt. 2: Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North

- Most affordable. Most efficient. Most environmentally sound. Less impact to communities.  
 - Does little for CTA traffic and access Alt. 3: City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City (Aviation/Imperial).

- Not affordable. Cost has risen from \$12 billion in 2004 to over \$100 billion in 8 years  
 Alt. 4: Alt. D Green Light projects +. 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxiway changes.

- Does little for CTA traffic and access Alt. 5: Moves 24R 350 ft North and 604 ft West, and widens it to 280 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 5857 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9.

- Greatest impacts to businesses and residents  
 - Major move of flight path North (heavily impacting Westchester and Inglewood)  
 - Risky construction factors, could be very costly in time and delays  
 - Does little for traffic and CTA access.

Alt. 6: Moves 24R 100 ft North. Moves 24L 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxiways. Lincoln Blvd moved sub terrain & new Sepulveda connect. - Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9.

- Impacts businesses & residents: Adds new terminal and extends Bradley and Mid-Course terminals North

- Moves flight path North

- Risky construction factors, could be very costly in time and delays Alt. 7: 24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures

SPAS-PC00085

SPAS-PC00085



taxiways & taxilanes. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9.

- Avoids construction risks of tunnel, roadways, sewers Alt. 8: Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square
- Only partially addresses CTA traffic
- Alt. 9: Moves CONRAC to Manchester Square with a people mover that goes into CTA
- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA problematic.
- Once people mover in place, CTA traffic would be reduced.

Thank you for your attention to my objections.

Lynn edelman, ( an LA CITY resident)

From: p sandov [sandov\_p@yahoo.com]  
Sent: Wednesday, September 19, 2012 10:42 AM  
To: SPASEIR Comments  
Subject: Playa Del Rey resident supportive to Adopt Alternative 2, plus Alternative 9

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

email: spaseircomments@lawa.orgmailto:spaseircomments@lawa.org

Dear Mr. Alvarez,

As a 20+ year resident of Playa Del Rey and Westchester, I continue to have concerns on the effects LAWA proposed plans will have on our community. After a detailed review, we strongly support that you

Adopt Alternative 2, plus Alternative 9 and a realistic train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

Some grounds on why I am taking this position are noted below.

\* Any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate. All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.

\* Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway.

\* If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently recovered from losing 10,000 customers from previous LAX expansions.

\* Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs that moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North that completely affect our community:

1

SPAS-PC00085

SPAS-PC00086

\* Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts, where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runways for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.

\* Moving affected sewers. Other city departments have stated that the sewers cannot be moved.

\* Property acquisition. As noted above.

\* Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). (Analyses are from ARSAC.)

Alt. 1: Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway.

- Displaces businesses and homes
- Risky construction factors; could be very costly in time and delays
- Fixes little traffic or Central Terminal Access (CTA)
- Impacts major underground utilities, sewer, and tunnel

Alt. 2: Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North

- Most affordable. Most efficient. Most environmentally sound. Less impact to communities.
- Does little for CTA traffic and access

Alt. 3: City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City (Aviation/Imperial).

- Not affordable. Cost has risen from \$12 billion in 2004 to over \$100 billion in 8 years

Alt. 4: Alt. B Green Light projects +. 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxilane changes.

- Does little for CTA traffic and access

Alt. 5: Moves 24R 350 ft North and 604 ft West, and widens it to 200 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 9857 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9.

- Greatest impacts to businesses and residents
- Major move of flight path North (heavily impacting Westchester and Inglewood)
- Risky construction factors, could be very costly in time and delays
- Does little for traffic and CTA access.

2

SPAS-PC00086

SPAS-PC00086

Alt. 6: Moves 24R 100 ft North. Moves 24L 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. Lincoln Blvd moved sub terrain & new Sepulveda connect. - Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9.

- Impacts businesses & residents. Adds new terminal and extends Bradley and Mid-Course terminals North
- Moves flight path North
- Risky construction factors, could be very costly in time and delays

Alt. 7: 24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxilanes. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9.

- Avoids construction risks of tunnel, roadways, sewers

Alt. 8: Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square - Only partially addresses CTA traffic

Alt. 9: Moves CONRAC to Manchester Square with a people mover that goes into CTA

- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA problematic.
- Once people mover in place, CTA traffic would be reduced.

I truly appreciate your reading through this and consideration of Alternatives 2 complimented with 9. Our community greatly appreciates your support.

Sincerely,  
Paula Sandoval  
Resident Playa Del Rey

1



From: Richard Dosch [richard@thelaloop.com]  
 Sent: Wednesday, September 19, 2012 7:27 PM  
 To: SPASEIR Comments  
 Subject: planning for the future program

Suggestions:

- \* Consistency for airline terminology on flight update screens from one airline/terminal to another
- \* More seats in baggage claim areas for terminals
- \* Food outlet in each terminal before security screening
- \* Prevent airport personnel vehicles from occupying passenger pick-up spaces along curb outside of baggage claim
- \* GET MORE CASHIERS IN THE LIMO AND BUS HOLDING LOT!!!!!! Whoever is responsible for the lack of cashiers is a real jackass! Cars wind around within the lot and then overflow into a long line on the street. This is bullshit and shows a gross lack of concern on the part of the airport for the efficient service of those vehicles and their passengers - remember - you are charging them money and providing deplorable service!
- \* More obvious directions for passengers between T5, T6, T7 and T8 when flights land in one of those terminals and then the pax has to go to another terminal for luggage. Whatever is there is not adequate.
- \* Have cashiers at terminal parking garages say thank you when customers pay their fee. As of now less than 50% say thank you.

Richard Dosch, Loopmeister  
[www.thelaloop.com](http://www.thelaloop.com)  
<http://www.thelaloop.com/images/logo.jpg>

Unlimited Disk, Data Transfer, PHP/MySQL Domain Hosting <http://www.doteasy.com>

From: bobdunagan [bobdunagan@verizon.net]  
 Sent: Thursday, September 20, 2012 1:43 PM  
 To: SPASEIR Comments  
 Subject: THE UNNECESSARY AND OVERLY EXPENSIVE EXPANSION OF LAX

I simply cannot support this gross misuse of precious public resources.

I would like to issue a challenge to you folks on the other side. Allow our group to PAINT - on the ground and across the buildings that would be torn down or evacuated - a three foot wide RED stripe and allow the citizens to get the taste of what Lawa wants to take. Then I would like to see an accurate, weighted by experience, budget of what this mess will cost, how all of the actions are going to be paid for and by whom, and why. I sincerely doubt that anyone on your side really knows.

You folks should be ashamed of yourselves, but somehow, I don't think you are.

Bob Dunagan

SPAS-PC00087

SPAS-PC00088



## Neighborhood Council of Westchester Playa

10725 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045  
 213.473.7023 ph • 310.361.8564 fx  
 Email: [info@ncwp.org](mailto:info@ncwp.org) • [www.ncwp.org](http://www.ncwp.org)



September 4, 2012

Ms. Gina Marie Lindsey  
 Executive Director  
 Los Angeles World Airports  
 Post Office Box 92216  
 Los Angeles, California 90009-2216

The Neighborhood Council of Westchester/Playa supports a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring \$10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history. Knowing that funding sources are limited, we encourage LAWA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX.

As the first line of welcome to travelers to Los Angeles, the Neighborhood Council of Westchester/Playa is excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in the

country. We believe that these alternatives will invest in Los Angeles' economy and build an airport that we can be proud of - that maintains and increases safety, efficiency, and community.

Sincerely,

Cyndi Hench  
 NCWP President

cc:  
 Los Angeles Mayor Antonio Villaraigosa  
 Los Angeles City Councilman Bill Rosendahl  
 Los Angeles County Supervisor Mark Ridley-Thomas  
 Los Angeles County Supervisor Don Knabe  
 United States Congress Representative Maxine Waters

SPAS-PC00089

SPAS-PC00089



J. A. Hyra  
7645 Midfield Ave.  
Los Angeles, CA 90045-3239

SANTA CLARITA, CA 91353



Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
Room 218  
One World Way  
Los Angeles, CA 90045

0045586293



September 8, 2012

Dear Mr. Alvarez:

Please do not move the runway north. It will negatively impact our community and is not needed for safety.

Thank you.

Sincerely,

*J. A. Hyra*

SPAS-PC00090



San Diego  
Local Public Affairs

August 31, 2012

Mr. Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045-5803

Re: Los Angeles World Airports Yellow Light Project DEIR

Dear Mr. Alvarez:

Southern California Edison (SCE) appreciates the opportunity to provide comment on the above referenced project.

Southern California Edison Company's rights-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE's Operating Department. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. In the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of project plans, and a PDF copy of the same, depicting SCE's facilities and its associated land rights to the following location for review as noted above:

Real Properties Department  
Southern California Edison Company  
2131 Walnut Grove Avenue  
G.O.3 - Second Floor  
Rosemead, CA 91770

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for two years or longer.

Once again, we appreciate the opportunity to comment on the project. If you have any questions regarding this letter, do not hesitate to contact me at (323) 720-5292.

Sincerely,

*Ben Wong*

Ben Wong  
Local Public Affairs Region Manager  
Southern California Edison Company

1000 Potrero Grande  
Montebello, CA 91754  
(323) 720-5292 FAX 45292  
Fax: (323) 720-5208  
ben.wong@sce.com

SPAS-PC00091

The Boeing Company  
P. O. Box 3707  
Seattle, WA 98174-2207

August 28, 2012

Mr. Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way, Los Angeles, CA 90045-5803

**Re: Boeing Aircraft's Support of a Group VI FAA Airfield Design at LAX**

Dear Mr. Alvarez:

Boeing's Commercial Airplanes division manufactures the 747-8 the largest commercial aircraft built in the United States and the longest passenger aircraft in the world.

The 747-8 has a wingspan of 224 ft 7 in and is 250 ft 2 in long. This aircraft requires a Group VI airfield. Currently, Boeing customers have begun flying 747-8 into Los Angeles International Airport (LAX), which is not a Group VI airfield—nor is it even a Group V airfield in all weather conditions. Operating the 747-8 today at LAX requires special airfield operational accommodations.

We recently reviewed a report which stated that the Los Angeles International Airport generated \$37.9 billion dollars in direct economic impact the Southern California economy. This underlies the importance of commercial aviation from international trade to passenger spending.

Given this background, we have a significant interest in the current Specific Plan Amendment Study Process (SPAS) underway at LAX and specifically the reconfiguration of the North Airfield. Boeing urges Los Angeles Airport and City Officials to select the necessary alternatives under SPAS to make LAX a Group V and Group VI airfield in all weather conditions.

We trust that the City will work to find a balance with these interests while ensuring that LAX doesn't lose its position as a major international airport able to accommodate the world's newest aircraft.

Sincerely,

*Shaunta Hyde*  
Shaunta Hyde, Director  
Global Aviation Policy  
Boeing Commercial Airplanes

SPAS-PC00092

From: Aviva Boxer [mailto:arboxer@yahoo.com]  
Sent: Monday, September 10, 2012 12:42 PM  
To: SPASEIR Comments  
Subject: Emergency Safety comments on the Draft EIR

To Mr. Diego Alvarez or to whom it may concern,  
My family lives on the top of the hill near Pershing and Manchester in Playa del Rey.  
I have lived here since 1980. I would like my concerns to be noted in the EIR.

I am concerned about the safety issue of the residents that live on the northwest side of the airport. As you expand your runway northwards we will be hemmed in during a natural disaster like an earthquake, tsunami or hurricane. We have no place to go and we are hemmed in if you take away Westchester Parkway. Presently we are hemmed in by the Pacific Ocean to the West, the liquification of Culver Blvd and Ballona Creek to the North, the Hyperion Treatment plant to the south, and the airport to the east. We have no place to escape in the event of an emergency. While we are a small community because the bulk of our community land has been purchased by the airport, we are human beings who deserve the same rights and protections as the rest of the Los Angeles residents. Please consider the other plan that uses the south runway as an option to preserve our lives in the case of some natural disaster. This emergency plan has not been considered in the documents I have read. So if you could please address this concern, I would appreciate it. Thank you.

Sincerely,  
Aviva Boxer  
214 Barbour St.  
Playa del Rey, Ca 90293

Please confirm that you have received this email

SPAS-PC00094



# The California Native

INTERNATIONAL ADVENTURES

September 17, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Dear Mr. Alvarez:

I want to give you my opinion on the SPAS EIR: I would like to adopt Alternative 2, plus Alternative 9 with a train service plan that includes all the terminals.

This position has been taken by the Neighborhood Council of Westchester/Playa and ARSAC (Alliance for a Regional Solution to Airport Congestion). I heartily support this position and strongly urge that you also encourage its adoption. Alternative 2 does NOT move 24R closer to our communities and Alternative 9 includes a Consolidated Rental Auto Facility (CONRAC).

All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North. The impact to the community is completely unnecessary both from a neighborhood view and an airport safety view.

Alt. 2 is the most economical, efficient, and environmentally sound choice. It is also the least intrusive into the neighborhoods. It does include realigning some taxiways as noted in the North Airfield Safety Study. Improvements and extensions to the east end of 24L are also included which would allow the New Larger Aircraft (such as the A380) easier take off from that runway. The North Airfield Safety Study concluded that the

The North Airfield is safe AS IT IS to handle the future estimated air traffic. The study did recommend taxiway realignment that is included in Alt. 2.

If 24R was moved as far north as LAWA actually wants to move it, the Delta building and probably the Paradise Building would have to be removed. A valid question is what market value was used in LAWA's estimates? LAWA has assumed that the In-N-Out and Parking Spot would not be in an FAA protective or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing). Many pilots like to land as soon as their assigned runway is available, not midway down it.

If 24R were to be moved as far north as LAWA actually wants it moved, at least 500 jobs would be lost. Some businesses might also be lost. The business district only recently

6701 West 87th Place, Los Angeles, California 90045 U.S.A. • (310) 642-1140

SPAS-PC00095

recovered from losing 10,000 customers from previous LAX expansions. Also, property values of good neighbors would go down. Many Westchester residents have been there for over 60 years and don't deserve this from our neighbor.

Modernizing the airport: improving the elevators, escalators, bathrooms, signage, roadways, etc. would provide more jobs than moving the runway. And it would greatly improve the passengers' experience of traveling through LAX.

There are some extremely expensive issues in moving the runway North:

Filling in the Manchester Tunnel. This is the tunnel that was originally built to connect the North communities to the South, by tunneling underneath LAX. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts, where Lincoln turns East, near the apartment complex, and runs South to within 50 ft of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes), or taking the top off the tunnel and filling it with dirt. (The tunnel is about 35 ft down and 4 to 6 lanes wide. We all remember how long Playa Vista had a huge mound of dirt to compress the ground.) This would mean closing both runways for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a worker familiar with tunnel problems is that the tunnel be filled in with a special foam that was developed to handle this problem of filling in a hole to withstand heavy weights landing over it. The cost could run into the millions, possibly billions.

Moving affected sewers. Other city departments have stated that the sewers cannot be moved.

Property acquisition. As noted above.

Enclosing the Argo Flood Control Channel. This channel is required as a drain for a flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel.

PLEASE DO NOT CONSIDER any Alternative that involves moving the runway. MODERNIZE, CONSOLIDATE, but don't EXPAND!!



Los Klein  
6701 W 87th Place  
Los Angeles, CA 90045  
310-642-1140

SPAS-PC00095



8917-B S. Sepulveda Boulevard  
Westchester, CA 90045  
310-741-6850

Mr. Diego Alvarez  
Facilities Planning Division  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Re: Draft EIR for the LAX SPAS study

Dear Mr. Alvarez:

The Guided Cage is a small boutique in Westchester staffed entirely by volunteers, and which is sponsored by a 501(c)(3) charity, the Westchester Mental Health Guild, which devotes all its net proceeds to the Airport Marina Counseling Service, which in turn provides low-cost mental health counseling to our community. The Guided Cage has operated in Westchester for 37 years. As an entity affected by the alternatives proposed in the recent Draft Environmental Impact Report (DEIR) or the proposed Specific Plan Amendment Study at LAX (the SPAS), the Guided Cage is providing comments on those alternatives.

Initially, we are dismayed that the expressed Project Objectives for the SPAS (pages 1-10 through 1-13) do not include the goal of regionalizing Southern California air traffic. Only an aggressive regional approach to air transportation will mitigate the safety concerns, noise, congestion and air pollution currently impacting Westchester and other communities near LAX, at the same time continuing the economic benefits of the airport for all of Southern California. Regionalization should have been one of the Project Objectives, and the DEIR should have discussed how each alternative will help to accomplish that objective.

Many of the alternatives discussed are prohibitively expensive and there is no discussion of the source of funding for them. Although LAWA needs to modernize, we do not favor any expansion. It would make more sense to devote funds to developing facilities at Ontario and Palmdale that can relieve some of the burden of regional air transportation from this portion of Southern California. Given the possibilities of a terrorist attack on

SPAS-PC00096

Diego Alvarez  
September 14, 2012  
Page 2

or a major earthquake near LAX, the economy of this region needs to have other airport facilities.

We favor a combination of Alternatives 2 and 9, which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming Westchester and other nearby communities. Alternative 2 is recognized as the "environmentally superior alternative" (page 1-103). It also appears to us, particularly when combined with Alternative 9, to be the most affordable option.

We support the airfield improvements in Alternative 2, which does not relocate the north runways, but instead lengthens Runway 6R/ 24L, and modifies and improves taxiways. Alternative 2 is preferable given that the DEIR shows that larger Group 5 and 6 aircraft can be acceptably handled by these modifications to the airfield with no additional runway spacing (pages 4-514-515). A 2010 North Runway Safety Study (NASS) conducted by an expert panel under the auspices of the North Airfield Safety Advisory Committee unanimously concluded that the North Runway Complex is extremely safe, even with future projected traffic levels (pages 4-505). The NASS also recommended the taxiway realignment that is included in Alternative 2.

In addition, we note that the DEIR does not explore all the other safety measures that could be taken to improve airfield safety. Therefore, please address the following items in the final EIR to determine whether they would be adequate to address any remaining perceived safety issues:

- \* Fully staffed tower and TRACON offices,
- \* Updated and efficient equipment installed in the tower,
- \* Improved communications between tower and cockpit,
- \* GPS ground-tracking system installed,
- \* More space between aircraft, and
- \* Compliance with the LAX preferential runway noise abatement plan.

Among other things, Alternative 2 would have the least impact on road traffic noise (page 4-942). Alternative 2 would not require modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under other options, so it should not take as long or be as expensive as the alternatives that would move the runways north.

We support the combination of Alternatives 2 and 9 because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the Automated People Mover (APM) from Alternative 9, would take rental car shuttles off the road, improve traffic, and provide a great convenience to the traveling public. We expect that the APM in Alternative 9 would prove to be less cumbersome for travelers than would the elevated bus way proposed in Alternative 8, for the simple reason that stepping onto an APM with one's luggage is simpler than getting onto a bus with luggage.

SPAS-PC00096



Diego Alvarez  
September 14, 2012  
Page 3

However, we are concerned with the drawings of the APM which suggests that it dead-ends at Terminal 7. We believe it should be a loop design that does not end, rather than having an endpoint.

We oppose the three alternatives that propose to move Runway 6L/24R north (Alternative 1: 250 feet north, Alternative 5: 350 feet north, Alternative 6: 100 feet north). It already has been demonstrated that further runway separation is unnecessary for safety (page 4-505). In negating the safety rationale for revisiting the separation distance of Runways 24-L and 24-R, the expert panel also negated any legitimate argument that Westchester and the other communities near LAX must simply tolerate all the adverse impacts of runway movement because of safety concerns.

Given that the DEIR predicts an increase in the size of the noise contour over Westchester from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)), we oppose them because it appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Particularly when the NASS concluded that the existing configuration would not unduly impact operational efficiency at LAX, it is unnecessary to adopt any of these plans to move the north runways. We relied upon the promise of Mayor Villarreal to work to increase regionalization of air travel in Southern California, and all of these proposals are inconsistent with that promise and would be extremely disruptive to our Westchester community.

The DEIR says that impacts associated with the change of uses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77) when it is clear that Westchester businesses not currently located within an RPZ would be located within it and may need to be destroyed (see, for example, page 4-516). In at least some of these maps, our store falls within the RPZ. LAWA appears to assume that very little of the existing Westchester business district would not have to be purchased by the airport even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on Runway 24R. However, there is no guarantee that pilots will land mid-runway or that the FAA will agree that telling them to do so is an adequate protection for the businesses that will be within the RPZ. It is our understanding that the FAA will no longer "grandfather" existing structures, but instead will insist that they be cleared not only from the Runway Safety Area (RSA) but also from the RPZ. The DEIR recognizes these as incompatible uses under FAA design recommendations (page 4-522), and recognizes that FAA may require that these structures be removed. Where would you have us relocate and who would bear the expense of such relocation?

In addition, these three alternatives also would be prohibitively expensive. The DEIR seems to assume that the FAA would not require that these businesses would be destroyed or relocated, but we did not see any guarantee that the FAA would allow them to remain where they are. Do you have such a guarantee? In addition, it is not at

SPAS-PC00096

Diego Alvarez  
September 14, 2012  
Page 4

all clear that these businesses should remain in the RPZ. Please explain how our shop and the nearby businesses would be safe if we remain in the RPZ.

We did not find cost estimates in the DEIR for the purchase of the properties within the Westchester Central Business District along Sepulveda Boulevard south of La Tijera Boulevard. Precisely which businesses in the Westchester Business District would need to be relocated, and what buildings demolished?

Do the cost estimates included in the DEIR for this alternative include the cost of purchasing the very profitable properties that likely would need to be purchased at great expense to LAWA and Los Angeles? How was the market value determined for this analysis?

In addition, moving the runway north would require astronomically expensive modifications to the Argo Drainage Channel, the Manchester Tunnel and Lincoln Boulevard. In addition, sewer lines may have to be moved. Where does the DEIR analyze these impacts of each of these alternatives?

We do not see an adequate discussion in the DEIR of the following questions:

- Realistic costs for all proposals should take into account negotiations over the purchase of businesses, as well as potential litigation.
- What would be the amounts lost to the City from the loss of this tax base and purchasing capability of dislocated businesses and residences?
- How many employees would lose jobs under each proposal due to destruction of the business district?
- What would it cost to soundproof the homes, schools, and businesses impacted by the new noise contours?
- Under each alternative, what would be the cost of filling in the tunnels under the North Airfield and addressing the seepage problems from the natural aquifer which causes sink holes, and what would be a reasonable schedule to accomplish these tasks?
- Under each alternative, what would be the costs for relocating/realigning/reinforcing Lincoln and Sepulveda Boulevards, including the Sepulveda Tunnel? Because these endeavors would involve other agencies such as Caltrans, what do you expect will be a realistic schedule?
- Who would pay for the costs associated with the various proposals for reconfiguration?

We also oppose Alternative 3 because it unnecessarily proposes to move Run 6R/24L 340 feet south, at what would necessarily be an astronomical expense, including demolition of three terminals and extensive central terminal construction, because, as discussed above, the separation of the North runways by this amount of distance is

SPAS-PC00096

Diego Alvarez  
September 14, 2012  
Page 5

simply unnecessary for either airfield safety or efficiency. In any event, there does not seem to be a cost analysis for the displacement of the newly included businesses that would be located within the Alternative 3 RPZ.

We do not think Alternative 7, which proposes a 100 foot southward movement for Runway 6R/24L, is as problematic as some of the other alternatives. In that it seems to accomplish the same airfield changes as Alternative 3, but in a much less costly manner. The DEIR states that Alternative 7 will increase runway separation from 700 to 800 feet, while Alternative 3 will increase it to 1040 feet. In both cases, the changes would not affect the existing abilities relative to simultaneous arrivals and departures (page 4-533 and page 4-563). However, given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives, we see no reason for the additional costs that Alternative 7 would be likely to entail.

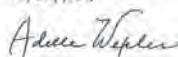
We have no objection to Alternative 4, which represents what would happen if all non-yellow light improvements identified in the Alt. D Master Plan were implemented, but we do not consider it preferable to Alternative 2. Alternative 4 proposes the same extension of Runway 6R/24L and Taxiway E as Alternative 2, coupled with a Consolidated Rental Car facility and new parking lot. However, because Alternative 4 would not meet design standards for Group 5 and 6 aircraft or reduce the need for FAA waivers, it does not appear to us to accomplish as many of LAWA's goals as would Alternative 2.

We appreciate the need to modernize LAX. Modernizing the airport, including such things as improving the upper roadway, the signage, the elevators, and restrooms will accomplish more to improve the travelling public's experience with LAX than will moving the north runway.

In the end, however, we believe that these Alternatives are in fact all piecemeal solutions that never will result in our city having the world-class airport that we all desire. If LAWA truly desires the airport we all deserve, the city must realize that LAX is not the location for it, because of the geographic constraints here. The best alternative is for Los Angeles to develop an airport where there is space for such an airport, and at the same time, build mass transit from downtown that goes directly into that airport.

Please let us know if you have any questions regarding our position on these matters.

Very truly yours,

  
Adelle Wexler, Chair  
Gilded Cage Advisory Board

SPAS-PC00096

From: Kim Cunningham [kccunningham@gmail.com]  
Sent: Monday, September 24, 2012 2:53 PM  
To: SPAS/ER Comments  
Subject: SPAS - Comments

To: Los Angeles World Airports

As residents of Playa del Rey for more than 20 years, this will confirm our support of Alternatives #2 and #9 contained in the SPAS Draft EIR.

We are already acutely aware of the noise, pollution and congestion issues that occur on a day-to-day basis.

We are in favor of the above Alternatives as the only viable solution to these issues from an environmental, economic, and efficiency standpoint.

Sincerely,

~  
K. G. Cunningham  
Donald Michael Quinn

230 Rees St.  
Playa del Rey, CA 90293

310-439-1991

SPAS-PC00097



From: Bryan A. Garner and LawProse (lawprose@bridgemailsystem.com)  
 Sent: Tuesday, September 25, 2012 9:00 AM  
 To: SPASER Comments  
 Subject: LawProse Lesson #88



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## Lesson # 88

### What are the rules on initial capitals?

ANSWER: Most of the first letters of words in the titles of books, articles, songs, etc., are capitalized. The exceptions are articles or prepositions of four or fewer letters (unless they begin the title). So *The Great Escape* and *Much Ado About Nothing*, but *Hope Is the Thing with Feathers*.

Proper names are always capitalized. People's titles and ranks are usually treated as ordinary nouns and capitalized as proper nouns only when they accompany a person's name (*Justice Ruth Bader Ginsburg*) or are used as a direct form of address ("If I may say so, *Judge*, my opponent's statement is misleading"). Other proper nouns and adjectives are used in those of businesses (*Purity Bakery, Inc.*), trademarked business products (*Kleenex*; *Mountain Dew*); educational institutions (*Matlock High School*; *the University of Arizona*); government bodies and agencies (*Department of Motor Vehicles*; *Homeland Security*); public or private organizations (*Peoria Chamber of Commerce*; *Lowell Street Coffee Klatch*). Adjectives derived from proper nouns, such as nationalities, languages, or religions, are also capitalized (*Australian-rules football*; *Hindi songbook*; *Jewish holiday*).

7

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Legal writers follow some additional rules. *Constitution* is capitalized when referring to the United States Constitution or even to a particular state constitution (but the adjective *constitutional* is lowercase). So revered is our Constitution that its parts, when written out in full, are capitalized: *Article*, *Section*, and *Amendment* (as well as *Due Process Clause*). But when abbreviated, such terms usually aren't capitalized (e.g., *art. III*); consult the *Bluebook* or your local style guide.

A prosecuting entity's name such as *State* or *People* is capitalized when used as part of or as a shortened form of a full name: *State of New Mexico*, *People of New York*. When referring to a prosecuting entity, *State* or *People* may be used as the short form of reference, e.g.: "The State claimed that Martin was driving the car"; "Livingston objected that the People's evidence was insufficient."

Source: *The Redbook: A Manual on Legal Style* (2d ed. 2006).

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Timothy J. Leiweke  
 President & CEO

Office of the  
 Executive Director

August 27, 2012

Los Angeles World Airport Commission  
 1 World Way  
 Los Angeles, CA 90045

Dear Commissioners:

AEG would like to applaud your efforts to "Fix LAX Now" and modernize the most important gateway to our city.

AEG proudly hosts over 15 million attendees at sporting events and concerts in Los Angeles each year and many of those attendees are visitors who fly into LAX. We appreciate the improvements being made at the airport today, but so much more needs to be done and we know that the major modernization plans will not be started until the Specific Plan Amendment process is completed and a decision is made on the configuration of the north airfield.

We urge you to act expeditiously and plan for the next 50 years. It has been 28 years since LAX was a showplace for the 84 Olympics and it needs to be that again.

Thank you for your dedication to building a better airport for our citizens and visitors.

Sincerely,

Timothy J. Leiweke  
 President & CEO

[www.aegworldwide.com](http://www.aegworldwide.com)

800 W. Olympic Blvd., Suite 305 • Los Angeles, CA 90015 • p: (213) 742-7101 • f: (213) 742-7291

SPAS-PC00098

SPAS-PC00099



**From:** Bryan A. Garner and LawProse [lawprose@bridgenet.com]  
**Sent:** Tuesday, October 02, 2012 11:57 AM  
**To:** SPASEIR Comments  
**Subject:** LawProse Lesson #89



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### Lesson # 89

#### When should all-caps text be used?

ANSWER: When you need to emphasize particularly important information in text, all-caps will do the job, but you should never use all-caps for more than just a few words, as in a title: THE OLD MAN AND THE SEA, for example, on a billboard.

Less defensible is the quasi-shouting notice that says, "This product is sold AS IS, and comes with NO WARRANTY."

In dialogue or a quotation, a word or sentence in all-caps shows that the speaker's tone was vehement or angry, or that the speaker is ranting: "I demand JUSTICE for the deceased! JUSTICE for the family! JUSTICE for the community!" But using all-caps for less-important speech dilutes its effectiveness.

In a document with section headings, all-caps may help the headings stand out above the text, but only if the headings are short. For instance: CONDITIONS FOR PAROLE is easy to read. But THE STATE REQUIRES THE PETITIONER TO MEET FOUR CONDITIONS BEFORE PAROLE MAY BE GRANTED is not. And because good point headings in a brief often contain 15 to 35 words, all-caps text is highly inadvisable for them.

SPAS-PC00100

7

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Finally, all-caps is acceptable for acronyms and initialisms, such as NASA and SUV. But if the acronym or initialism is one that has become an ordinary word, then don't use all-caps (as with *radar* and *scuba*).

Source: *The Redbook: A Manual on Legal Style* 64-65 (2d ed. 2006).

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SPAS-PC00100

**From:** Lynne Shapiro [lro2323@gmail.com]  
**Sent:** Friday, September 28, 2012 3:18 PM  
**To:** SPASEIR Comments  
**Subject:** Airplane Noise

I attended the Westchester Neighborhood Council community meeting last night. I hope that your DEIR and subsequent EIR's include the environmental impact of airplanes in the sky over the Marina Peninsula. I have lived here for twenty-five years. This summer LAX flights are not going out to sea but rather going north over Ballona, the Main Channel and the Marina Peninsula. Thousands of us live here in apartments, condos and single family homes. The noise degradation is measurable and increasing. This has an impact on birds and humans. I have twenty minutes or so of peace, and then the flights start in and are constant for some thirty to forty minutes. The planes fly low and are close to our homes, and their noise is insufferable. Although I have always appreciated LAX, I oppose your three mile expansion plan and feel it will be extremely detrimental to Westchester, Playa del Rey and, with respect to flight noise, Marina del Rey.

Yours truly,

Lynne Shapiro  
 5100 Via Dolce #312  
 Marina del Rey CA 90292

**From:** steady3 [steady3@sbcglobal.net]  
**Sent:** Friday, September 28, 2012 2:16 PM  
**To:** Madeline Wright  
**Cc:** SPASEIR Comments  
**Subject:** Re: Airport Expansion Town Hall

Hi Madeline,

The general consensus is to adopt alternative 2 &/or 9. Modernize – No Expansion

There is another meeting on Monday October 1 – 7-9pm @ LA TIJERA United Methodist Church 7400 Osage Ave, in Westchester.

You can see the different alternatives online at [http://www.laxspas.org/LAX\\_Solutions.aspx](http://www.laxspas.org/LAX_Solutions.aspx)

You can submit comments until October 10th at [spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

There were two cameras recording; but, I didn't get which websites they would posted at.

I just looked thru youtube and didn't find anything; but, it does take a long while to record a long 2 hour video like that. Probably a couple of days.

Ciao,  
 Marco

**From:** Madeline Wright  
**Sent:** Friday, September 28, 2012 11:57 AM  
**To:** steady3  
**Subject:** Re: Airport Expansion Town Hall

Thanks for invite. I was not able to attend. Is anyone available to put out an e-mail summary of the meeting? Madeline Wright

**From:** steady3 [steady3@sbcglobal.net]  
**To:** Bob Flores [info@BobFloresforCongress.com]  
**Sent:** Tue, September 25, 2012 10:21:15 PM  
**Subject:** Airport Expansion Town Hall

Don't forget!

Airport Expansion Town Hall

Thursday, September 27th between 7 & 9 PM, at Westchester High School.

Councilman Bill Rosendahl & Congress Woman Maxine Waters are going to be there.

Plus, I have invited Congressional Candidate Bob Flores to be there!

Some of you know that I majored in Airport Planning & Management; and, I'd like to share with you some of my thoughts and suggestions for the Airport "Modernization":

First Problem

SPAS-PC00101

SPAS-PC00102



Inside Terminal Congestion – The terminals are too small and aren't big enough. They are no match against the ever larger aircraft being used. They were built and designed during the 707 & DC-8 Days. They've been too small ever since 747's came out.

Real Estate is at a premium. We won't be getting any more of it.

Solution: Create multi-level terminals.

Separate arrival passengers from departure passengers, possibly even add a business class & first class levels?

#### Second Problem

Outside Terminal & Traffic Congestion – In some of my airport planning classes, the general consensus was to adopt the Orlando Airport model, for vehicle traffic; which consists of 4 levels; but, their passenger levels are much lower than LAX; and highly dependent on rental car traffic.

LAX currently has 2 levels for vehicles – arrival & departures; and that's it. How can anyone say it's adequate with a straight face? I actually heard the head of the taxi-cabs say so.

The Orlando MCO Airport divides vehicle traffic into 4 levels, and to add to that, I was thinking of possibly even exploring 5 levels, by combining the Orlando Model WITH the LAX Model.

a) Level for taxis & limousines – possibly directly serving a first class & business class level?

b) Level for busses & vans

c) Level for rental cars

d) Level for arrival passengers being picked up by private cars

e) Level for departure passengers being picked up by private cars

#### Third Problem

Connecting Flights & Terminal Transfers – Right now, if you land at LAX on a Southwest Airlines Flight and then need to transfer to the Tom Bradley Terminal for an international flight, all anyone can say is "Good Luck".

If we adopt an "Arrival Level", in the terminals, I was thinking that this level should be equipped with moving walk-ways; and, then moving walk-ways should connect all of the terminals. This way, it would much easier for passengers to go from Terminal 1 to Terminal 6 or vice-versa.

Hope to see you there and submit your comments.

Marco

From: wickslaw4@gmail.com [wickslaw4@gmail.com]  
Sent: Thursday, October 04, 2012 10:05 AM  
To: SPASEIR Comments  
Subject: LAX SPAS Draft EIR

To whom it may concern:

It is a no-brainer that LAX needs to be modernized. Every time I visit another city with a contemporary and efficient airport, I always rue my eventual return to ours. Alternatives 2 (taxiway reconfiguration/terminal and ground transport improvements) and 9 (ground transport improvements) provide jobs and benefit the local economy. As a Westchester resident, I am not against improving a vital engine to our local economy. But, I am opposed to the unnamed advocates (airline industry? LAWA Exec. Director Gina Marie Lindsey?) of moving the north runway. The suggestion that it would decrease noise pollution is laughable. And, we know from the NASA-Ames study, that runway safety would not improve. Expanding the runways to accommodate high air busses serves the interests of the airlines, it does not serve the interests of OUR COMMUNITY.

Douglas and Tammie Wicks  
7423 W. 90th St.  
Westchester  
310.578.6528  
Sent via BlackBerry by AT&T

From: LR Kesting [lrkesting@aol.net]  
Sent: Monday, October 01, 2012 3:06 PM  
To: SPASEIR Comments  
Subject: comment-LAX expansion-particulate matter

Attn: Diego Alvarez, LAWA, Facilities Planning Division,

COMMENT- RESIDENT-Westchester

I am concerned for the particulate matter and emissions in all alternatives, as stated in the report.

My concern:

Qualified health organizations, such as the American Lung Association, AAAALorg-Assoc. of Allergy, Asthma and Immunology, have NOT reviewed the LAX SPAS Alternative report.

If this is false, can you direct me to the organizations, regarding lung disease or COPD, that have reviewed the LAX expansion alternatives?

The document EIR states that

"during project operations all of the alternatives would result in significant emissions of sulfur dioxide and particulate matter (i.e. PM10 and PM2.5)."

"during operations all of the SPAS alternatives would result in significant air pollutant concentrations for nitrogen dioxide and particulate matter (i.e. PM10 and PM2.5)."

Thank you.

Rachel Kesting  
resident, Westchester

From: Julie Camino [caminojulie@me.com]  
Sent: Tuesday, October 02, 2012 2:50 PM  
To: SPASEIR Comments  
Subject: Specific Plan Amendment Study

To Whom it May Concern:

I am a concerned resident of Westchester and I am very interested in your plans for renovating LAX.

I understand that there are many options presented in the Specific Plan Amendment Study and I wonder which Alternative LAWA favors? What is LAWA gaining from their favored Alternative? Why is this plan better than the other Alternatives? How will residents of Westchester/El Segundo/Playa del Rey be impacted by this favored Alternative? Specifically what are the environmental impacts, including noise pollution and air pollution, for these areas?

Should any Alternative move forward and there are expected detriments to the surrounding community, how will the community be compensated for these detriments? Noise pollution? Air pollution? Property values decreasing? Quality of life decreasing?

I recently learned that in the earlier stages of LAX's renovation, there was a lawsuit brought against LAWA by the community and eventually there was a settlement. In that settlement LAWA was required to do certain things in the community that are still outstanding. When will these things be completed? How can this community in good faith work with LAWA if there is no follow thru on previously agreed terms?

In closing, I'd like to join the community in a compromise with LAWA and support Alternative #2 in conjunction with Alternative #9. I understand that LAWA has objectives with LAX and I can only hope that "Minimizing Environmental Impacts on Surrounding Communities" is the top priority while achieving all other objectives.

I look forward to hearing back from you and reviewing your responses to my questions.

Best regards,

Julie Camino  
caminojulie@me.com





Robert Walker  
Managing Director - Corporate Real Estate

Office of the  
Executive Director

July 27<sup>th</sup>, 2012

Gina Marie Lindsey  
Los Angeles World Airports  
1 World Way  
Los Angeles CA 90045

Re: LAX - North Airfield Developments

Dear Gina Marie,

As you are aware, United has worked closely with LAWA and other carriers operating at Los Angeles International Airport (LAX) regarding the airport's efforts to improve performance and operational efficiency at LAX in the most cost-effective manner. We support LAWA's efforts to date and we will continue to work closely together towards achieving this mutually-beneficial goal.

Though we can specifically state that we are opposed to the Master Plan Alternative D for the North Airfield in that it is not a cost-effective approach to developing the North Airfield, we are aligned on the concept of replacement or rehabilitation of the North Airfield runways and taxiways to meet current FAA design standards.

We look forward to reviewing the Specific Plan Amendment Study and working with your team and the other LAX carriers to better understand the North Airfield options. We anticipate that this collaborative effort will ultimately yield a consensus agreement on the best approach to the North Airfield development.

Yours sincerely,

Robert W. Walker  
Managing Director  
Corporate Real Estate

The United Building, 77 West Wacker Drive, Chicago, IL 60601

A STAR ALLIANCE MEMBER

SPAS-PC00107

From: John Owens [jowens31@yahoo.com]  
Sent: Thursday, October 04, 2012 3:48 PM  
To: SPASER Comments  
Cc: councilman.rosendahl@sdcity.org  
Subject: Lax Expansion

We have resided in Westchester 46 years and observed LAX outgrow its limited location years ago to the detriment of the surrounding area and the citizenry. It should have been relocated to Ontario at a time it could have been practical. It is now beyond that for all practical purposes, but now LAX is attempting to further expand its footprint by moving runway 8L/24R North of its present location to cause more noise and dirt pollution as well as general inconvenience to the residents and business establishments in Westchester. Enough already!

We attended the informational meeting at Proud Bird and collected the handouts including the SPAS study. We do not agree with any of the alternatives to move 8L/24R any distance North of its present location. Just because the North boundary fence is not moved per some speaking representative of an airport service company does not mean that the footprint is not enlarged to the further detriment of the community. A combination of alternatives 2 and 9 would seem to take care of the LAX needs at a decent price.

As an aside, you should figure out a way to keep all the livery, hotel, car rental vans, buses, etc off the central terminal area and provide common shuttle service to the intermodal facility. Leave the central terminal area and garages as is for private vehicles and taxis.

John and Barbara Owens  
7844 McConnell Avenue  
Los Angeles 90045

SPAS-PC00106

Joseph D. Haythorn  
7530 West 88<sup>th</sup> Street  
Los Angeles, California 90045  
310-641-2991  
[jhaythorn@law.whittier.edu](mailto:jhaythorn@law.whittier.edu)

September 20, 2012

Los Angeles World Airports  
Facilities Planning Division, Attention: Diego Alvarez  
One World Way  
Los Angeles, CA 90045-5803

Dear Mr. Alvarez:

I would like to submit the following statement to the SPAS Draft EIR:

From the outset of the process to explore development of the facility at LAX, it appears that LAWA has been acting in a duplicitous manner toward the citizens of Westchester and Playa del Rey. Inglewood has been treated in similar way. The idea that the northernmost runway could be moved further north without much significant community resistance is so preposterous that it can only be taken as a negotiating position. Obviously, if LAWA were to pursue moving the runway, an additional group of houses, condominiums, apartments, schools, and businesses would need to be condemned. Any remaining outside the condemned area would surely bring actions for diminished value. The violation of the consent decree from the last condemnation would serve as the basis of the action, but even without that the property owners would be successful in stopping the development resulting in no activity or, at worst, delaying any construction for years and ultimately receiving compensation forcing the costs of the project far beyond LAWA's predictions.

The recent charade of the Northside development project meetings and "negotiations" are a further indication that LAWA is either not serious about the alternatives which involve moving runways north, or intending to lull the neighbors into a false sense of security. Neither reflects well as to whether LAWA is a trustworthy party in this project. As LAWA proves again inept and untrustworthy, it is difficult to understand whether the entire process of proposing alternatives is a sham.

SPAS-PC00108

Community partners have demonstrated that the safety claims are so exaggerated they may be dismissed. The statement that noise would not be worse if the runways are moved may be technically true but the noise would be closer to the residences, schools, and businesses so louder there. To actually claim otherwise again demonstrates that LAWA is not dealing seriously.

So I am left to speculate as to whether LAWA is lying or inept. In either case, my only alternative at this point is to seek counsel unless LAWA begins to address this business honestly with a clear understanding of the consequences of their actions.

I still believe that the best alternative has not been considered, to close the interior parking and access roads, construct two or three north-south terminals with access by passengers from a subterranean mall, as at the airports in Atlanta or Denver. Passengers would enter the facility east of the airport at Manchester Square or the area now with derelict warehouses between the two points. Otherwise I agree with the Neighborhood Council of Westchester Playa that alternatives 2 and 9 appear to be the only reasonable ones. The other would receive such opposition as to block all construction. If LAWA is actually intent on ignoring their prior consent agreements, there is really no reason to bother negotiating.

I further agree with the Neighborhood Council of Westchester Playa that we do support intelligent development of LAX, it is a shame any development is relegated to the abilities of the existing management of LAWA.

Sincerely,  
  
Joseph D Haythorn

Also submitted as a comment on [www.laxsops.org](http://www.laxsops.org)

SPAS-PC00108



From: Sharon Inamoto [sinamoto@me.com]  
 Sent: Friday, October 05, 2012 7:25 PM  
 To: SPASEIR Comments  
 Subject: LAX North Runway Expansion

I have been a resident of Playa del Rey and Westchester for over 20 years and LOVE our community. Please don't ruin our neighborhood by making the noise any worse than it is and not to mention the detriment to our health. You would also lower the value of our property. Please don't make me move from my community!

Sent from my iPad

SPAS-PC00109

From: Mary Ellen Cassman [maryellencassman@gmail.com] On Behalf Of Mary Ellen Cassman [maryellen@cassman.org]  
 Sent: Sunday, October 07, 2012 6:58 PM  
 To: SPASEIR Comments  
 Subject: LAX Expansion

Dear Mr. Alvarez:

I heartily support the position of the Westchester Neighborhood Council, and countless other community groups, that LAX adopt Alternatives 2 and 9, with a realistic train service plan that includes all the Terminals.

Thank you for your consideration.

Mary Ellen Cassman  
 7701 Hosford Ave., L.A. 90045

SPAS-PC00110

Attachments: WNA DEIR LETTER 9-25-12.docx

From: Tom Chesney [productionwiz@usa.net]  
 Sent: Monday, October 08, 2012 5:34 AM  
 To: SPASEIR Comments  
 Cc: 'Denny Schneider'; 'Robert Shurtz'  
 Subject: Westchester Neighbors Association Response to DEIR

Attached is our response to the DEIR.

Tom Chesney  
 Chairperson, Westchester Neighbors Association

SPAS-PC00111

#### WESTCHESTER NEIGHBORS ASSOCIATION

5945 West 76<sup>th</sup> Street  
 Los Angeles, CA 90045

September 25, 2012

Ms. Gina Marie Lindsey  
 Executive Director  
 Los Angeles World Airports  
 P.O. Box 92217  
 Los Angeles, CA 90009-2216

Re: Comments to LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT EIR

Dear Ms. Lindsey:

Our neighborhood organization represents the Westchester Community in the 90045 area. Our focus is on maintaining and improving the quality of life for those who live and work in the community. As an organization we support modernizing the airport and turning it into a world class destination for the global community. Our position is let's upgrade the terminals, do the taxiway fixes, and complete the installation of the runway status lights. This direction will provide the improvements we need and provide long term jobs for many. Also, it has been conclusively shown that LAX's current geometry provides more than adequate safety and moving runways will be extremely expensive and not accomplish what really needs to be done.

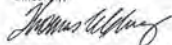
After thoroughly reviewing the report we find it is inadequate in fully addressing the key issues and uses old and flawed data to draw conclusions. These include:

- Inadequate resolution of traffic congestion within the Central Terminal Area and adjacent communities.
- Failure to fix traveler ability to navigate LAX with the terminals or between terminals when transferring flights.
- Concentrates air commerce into LAX, thereby increasing LA Area traffic instead of diffusing traffic.
- Failure to designate a single, preferred alternative with general details for review and direct response.
- No resolution to the substantial customer base changes to our business district plus the considerable construction impacts that would occur during a protracted rerouting of Lincoln and Sepulveda Boulevards. This one DEIR inadequacy, alone, dictates that our businesses operate to survive rather than for growth and prosperity.

We encourage LAWA to adopt as the preferred alternative the environmentally superior plan, Alternative 2 with a Consolidated Rental Car Facility in Manchester Square (Alternative 9) supported by some form of rail mass transit which allows for connection into our business district. This plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns without a centerline taxiway, fixes the taxiways, provides the least calculated time to get to the terminal after landing, presents the least intrusive impacts on local communities, and, at the same time provides the lowest construction cost and construction risks.

We look forward to working with LAWA to improve LAX which is the Los Angeles gateway to the world.

Sincerely,



Thomas C. Chesney, Chairperson  
 Westchester Neighbors Association

cc:  
 Los Angeles Mayor Antonio Villaraigosa, Mayor of Los Angeles; Los Angeles City Councilman Bill Rosendahl, 11<sup>th</sup> District;  
 Los Angeles County Supervisor Mark Ridley-Thomas, 2<sup>nd</sup> District; Los Angeles County Supervisor Don Knabe, 4<sup>th</sup> District;  
 Congresswoman Janice Hahn; Congresswoman Maxine Waters; Congressman Henry Waxman;  
 US Senator Barbara Boxer; US Senator Diane Feinstein

SPAS-PC00111



L.A. World Airports  
Facilities Planning Division  
% Mr. Diego Alvarez  
1 World Way  
Los Angeles 90045-5803

Dr. Mr. Alvarez:

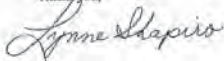
I have lived in the same location in Marina del Rey for twenty-five years. For twenty-five years I have enjoyed the proximity of LAX. No more! This summer the peace and quiet of the Marina Peninsula (which I overlook) has been replaced by the roaring din of planes taking off and heading north over the Main Channel and the Peninsula and flying at low levels. Sometimes I see as many as 4-6 planes in the air.

The planes used to fly out to sea, make their turns and continue at a higher altitude. Why has this route been changed? It is very disturbing for thirty to forty minutes of every hour. I would appreciate your responding to my question. I have written many office holders without a response.

For me and my neighbors this environmental degradation is very disturbing. Since the ocean is at your disposal, why fly low close to our homes (thousands of apartments, condos and single residences within earshot of these flights)?

If this correspondence is part of any EIR studies, please include it. Again, I would like to know why so many planes are allowed to fly north and if this is to be a permanent change.

Thank you,



Lynne Shapiro  
5100 Via Dolce #312  
Marina del Rey CA 90292

SPAS-PC00112

Attachments: Airbus Americas letter to LAWA SPAS Draft EIR October 8, 2012.pdf

From: COHENNIR, Dan [Dan.Cohen@airbus.com]  
Sent: Monday, October 08, 2012 12:51 PM  
To: SPASEIR Comments  
Subject: Airbus letter to LAWA SPAS Draft EIR October 8, 2012

Attention to Mr. Diego Alvarez,

Airbus is pleased to provide the attached letter from Allan McArthur, Chairman, Airbus Americas, Inc. in regards to the SPAS Draft EIR.

Sincerely,  
Dan Cohen-Nir

Dan Cohen-Nir  
Program Director  
Safety and Technical Affairs - ANG  
Airbus Americas, Inc.

Phone: +1 202-331-2235  
Mobile: +1 571-276-6536  
Fax: +1 202-467-5492  
Mailto: dan.cohen@airbus.com

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United States of America

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SPAS-PC00113



Allan McArthur  
Chairman

October 8, 2012

Mr. Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way, Los Angeles, California 90045-5803

Dear Mr. Alvarez:

Airbus, a leading aircraft manufacturer, is pleased to provide comments and background on the Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR).

Airbus has designed the A380, the world's largest commercial airplane, primarily for airports like Los Angeles International (LAX) that need to optimize the usage of constrained resources and to find solutions to reduce noise and carbon footprints.

The A380 has a wingspan of 261 ft 8 in and falls into the Airplane Design Group (ADG)-VI as defined by the FAA. LAX airfield – in particular the north airfield complex – does not comply with ADG-VI standards, while deviations from ADG-V standards even remain. Under the current operational plan at LAX, applicable to all ADG-VI airplanes, A380 flights are primarily handled on the north side of the airfield. The operational plan requires special and time-consuming procedures and accommodations that result from the existing geometrical limitations on the airfield and on the terminal aprons.

Four Airbus customers have started A380 service into LAX, and a fifth one will commence soon. Airbus customers have plans to deploy more A380s into LAX in the immediate and near-term future. As an example, the number of daily A380 flights to and from LAX may grow from the current ten to twenty six by the end of 2015, according to Airbus forecasts. The latter figure only accounts for existing A380 customer airlines.

Further, Airbus' Global Market Forecast calls for a significant and steady increase in the number of very large airplanes that will serve LAX in the next twenty years. It ranks LAX as the top A380 airport in North America in terms of operations.

These plans and forecast will materialize only if LAX modernization incorporates a greater compatibility for ADG-VI airplanes on the north airfield and provides more ADG-VI gates than what is currently or will be provided at the Bradley West terminal.

Airbus is expressing strong concerns that the planning assumptions considered in the Draft EIR underestimate the level and intensity of ADG-VI operations at LAX, with the planning horizon (2025) considering merely an equivalence to Airbus A380 daily operations forecast for 2015.

Airbus Americas, Inc.  
www.airbusamericas.com

2590 Wason Terrace, Suite 6100  
Herndon, VA 20171, USA  
Phone: (703) 934-3469  
Fax: (703) 934-3469

SPAS-PC00113

October 8, 2012  
Mr. Alvarez  
Page 2

More broadly, Airbus recommends that the Los Angeles World Airports devise and implement a plan that will remedy operational deficiencies on the north airfield and increase compliance with ADG-VI standards in all weather conditions. Airbus emphasizes the need for such level of compliance on the area located between the Central Terminal Area and runway 06R/24L that includes taxiway/taxiway D, taxiway E and the vehicle service road.

All of the above will result in safer and smoother operations for all operators involved.

We trust the City of Los Angeles will seize this unique opportunity, not only to make necessary improvements to LAX but also to prepare it for the future.

Sincerely,



T. Allan McArthur  
Chairman, Airbus Americas, Inc.

Airbus Americas, Inc.

Page 2

SPAS-PC00113



From: Lucia Lebon [laxar2108@cam.com]  
 Sent: Monday, October 08, 2012 2:04 PM  
 To: SPAS-IR Comments  
 Subject: Los Angeles International Airport Expansion

October 8, 2012

Mr. Diego Alvarez

We want to voice our objection to the proposed expansion at Los Angeles International Airport, expanding the Northernmost runway approximately 340 feet closer to Playa Del Rey and our property. This expansion presents health, safety, and environmental risks such as incremental noise, pollution, and traffic; as well as financial implications which will adversely affect the value of property to the residents of Playa Del Rey.

LAWA needs to be concerned with the above-mentioned safety, financial, environmental, and quality of life issues that face the residents of Playa Del Rey and neighboring communities if this expansion goes ahead, rather than with special interest groups that stand to gain from this expansion. Our health and environment is already affected by the pollution from jet fuel that is present on our roofs and patios, which will be increased if the Runway is moved closer. Safety and efficiency at LAX can be achieved without imparting greater impact on local communities such as Playa Del Rey.

Sincerely,

Juan Carlos and Lucia Lebon  
 Villas Del Rey Residents  
 Playa Del Rey, CA 90293

SPAS-PC00114



Karen Dell  
 H.B. Dickinger Co.  
 President

John Rutten  
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Heather Lemmon  
 The Real Estate Consultants  
 L.B. Property Management

Donald R. Duckworth  
 Executive Director

September 29, 2012

Mr. Diego Alvarez  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles,  
 CA 90045

Re: Comments to LAX SPAS DEIR

Dear Mr. Alvarez:

Our Westchester Town Center Business Improvement District (WTC BID) represents all of the commercial property and businesses owners north of LAX to Manchester Avenue along Sepulveda Boulevard from Sepulveda Westway to Sepulveda Eastway. Our customer base includes the Westchester-Playa Del Rey communities, LAX employees, and the millions of Los Angeles travelers that arrive or depart from the airport. We recognize the symbiotic relationship between the WTC BID and LAX. We enthusiastically support LAX modernization and improvements to the Central Terminal Area and access routes which are long overdue.

We encourage LAWA to adopt the project that ensures the most rapid completion of LAX modernization. Alternative 2 with a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into our business district should be our preferred alternative. Such a plan, according to DEIR evaluations, would address needed airfield operational efficiency and safety concerns, present the least intrusive impact on the local communities, and, at the same time, provide the lowest construction cost and associated risk.

We do not believe that the proposed north runway expansion impacts are adequately addressed in the SPAS DEIR, however. This inadequacy alone deprives WTC BID property and businesses owners of the ability to effectively plan for their future. Therefore, any project alternative that moves the north runway to the north is unacceptable.

Any planned movement of LAX runways north will clearly encroach upon the WTC BID and, at the least, continue this uncertainty for our properties and

8029 S. Sepulveda Blvd., #150  
 Westchester, CA 90045  
 310.417-9030 job - 310.417-6031 fax  
 www.WestchesterBID.org

SPAS-PC00115

Comments to LAX SPAS DEIR  
 September 29, 2012  
 Page 2

businesses for years to come. Moreover, adverse construction impacts attendant to any runway movement north could substantially degrade our customer base and traffic circulation upon which we critically depend. Such construction impacts would occur during a protracted rerouting of Lincoln and Sepulveda Boulevards and are a major concern. We have experienced such negative impacts from LAX in the past. In the late 1960s, when the north runway (24 Right) was built, thousands of homes and many businesses were removed by LAX, which had a devastating effect. Many major stores and local businesses were forced out of the business district or subsequently left. It took more than 25 years to recover the business base.

Finally, we have not seen a total project phasing and funding plan. We encourage LAWA to release this information as soon as possible, and suggest that project phasing should express preferences for improving the LAX passenger experience, reducing local traffic gridlock, addressing urgent maintenance projects, and completing taxiway improvements before any runway changes are contemplated.

We look forward to working with LAWA to improve LAX, Los Angeles' "window to the world."

Sincerely,

Donald R. Duckworth

C: Mayor Antonio Villaraigosa, City of Los Angeles  
 City Councilman Bill Rosendahl, 11<sup>th</sup> District, City of Los Angeles  
 Supervisor Mark Ridley-Thomas, 2nd District, County of Los Angeles  
 Supervisor Don Knabe, 4th District, County of Los Angeles  
 Congresswoman Janice Hahn  
 Congresswoman Maxine Waters  
 Congressman Henry Waxman  
 Senator Barbara Boxer  
 Senator Diane Feinstein

SPAS-PC00115

Attachments: Scan0013.pdf

From: Laurie Hughes [mailto:lhughes@gatewaytola.org]  
 Sent: Wednesday, October 03, 2012 2:20 PM  
 To: LINDSEY, GINA MARIE  
 Cc: ALVAREZ, DIEGO; Bill Rosendahl; diazroderick@metro.net; TRIFILETTI, LISA  
 Subject: EIR Comment Letter

Dear Gina Marie,

Attached is the EIR Comment Letter from Gateway to L.A.

Thank you for considering our comments and concerns.

We look forward to working with you and your staff to make the LAX area a first-class experience to travelers and workers alike.

Respectfully,

Laurie Hughes, Executive Director

**GATEWAY TO LA**  
 6153 West Century Blvd., #121 Los Angeles, CA 90045  
 T: (310) 216-7328 F: (310) 216-7346 C: (310) 418-2661  
 lhughes@gatewaytola.org



SPAS-PC00116



September 28, 2012

Ms. Gina Marie Lindsay  
Executive Director  
Los Angeles World Airports  
One World Way  
Los Angeles, CA 90045

RE: Specific Plan Amendment Study – EIR COMMENT LETTER

Dear Ms. Lindsay,

I am writing to you today on behalf of the Gateway to LA Business Improvement District (Gateway to LA BID) to provide comment on issues raised in the Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (EIR) currently in circulation.

Gateway to LA BID represents the hotels and businesses that are the literal gateway to Los Angeles – for many the first experience they have of our city. For that reason we have worked hard to create a sense of identity and place and to ensure that the millions of visitors who stay, work and play in and around LAX have the ability to enjoy our city and experience a clean, safe, and easy to navigate environment.

We appreciate the ongoing engagement and inclusion of a wide variety of stakeholders in the SPAS effort and our members continue to eagerly await the outcome of this very important process.

Specific to the SPAS Draft EIR, we support the following proposals under consideration:

**Coordination of transportation** – While there are many alternatives for “Stand Alone Ground Transportation Improvements”, we believe the most successful and impactful alternative is one that fully integrates ground, light rail, parking, consolidation of shuttle services, and an automated people-mover.

- Alternative 9, which includes the build-out of the Consolidated Rental Car facility (CONRAC) and Employee Parking at Manchester Square will have the most positive impact on the airport, businesses and hotels in and around the area. Connectivity with the Metro Crenshaw/LAX and Green Line stations through the use of APM technology is essential and support location of the Metro Crenshaw/LAX Crenshaw/LAX and Green Line stations at the northeast corner of Century and Aviation Blvds.

3121 W CENTURY BOULEVARD, SUITE 111, LOS ANGELES, CA 90045  
405-840-1111

SPAS-PC00116

We do not support the concept currently under consideration for a bus-way, which would incorporate rubber tire articulated buses versus an elevated fixed rail system. While we understand the cost differential involved in choosing an APM over buses, we believe an asset as valuable as LAX must support long-term thinking and investment in visionary infrastructure upgrades.

- Focus on Traffic Impacts – The Draft EIR identifies 39 intersections which will be negatively impacted by growth in and around the LAX community. Mitigation measures, which we presume will include multi-modal public transportation options as identified above and consolidation of off and on-airport transportation, must continue to be a priority. Transit-Oriented Development, even in the build-out of projects like the CONRAC and in Metro-sponsored bus facilities, must be a high priority and ongoing interagency coordination and cooperation is crucial. Resources must be prioritized to address these issues as project development moves forward.

Projects like the proposed Century Corridor Streetscape Plan must also be considered and incorporated into LAWA's development efforts.

- Enhanced Central Terminal Area Circulation – We are supportive of the efforts outlined in the Draft EIR to improve and better manage circulation into and around the Central Terminal Area and to link satellite terminals to the central airport facilities. Any efforts to better manage CTA impacts should be advanced through the SPAS process. Better circulation within the airport will have a positive impact on the ingress and access points, which will have a meaningful trickle-down impact on the Century corridor and surrounding communities.

- Parking Issues are Key – We believe strongly that a highly functioning airport must include a mix of alternatives for short-term, long-term and employee parking. Many stakeholders have invested significantly in efforts to provide the traveling public with affordable options for off-airport parking, with a strong emphasis on customer service, ease of access, and reliability. As such, we believe the SPAS process must clearly delineate parking responsibilities of LAWA – such as employee parking being provided at Manchester Square, from other parking changes, such as NOT moving parking lots B and C. Ensuring an appropriate mix of parking alternatives is key to maximizing options for all LAX stakeholders.

Nothing is more important to the health and vitality of our region than continued investment in LAX. The importance of the jobs, tourism, positive trade and economic development impacts and the impetus for continued growth of Los Angeles in the world's marketplace depends on a highly functional airport and a thoughtfully developed community to support that engine. The SPAS process is the next step forward in helping to develop a “world-class” airport facility and to create an asset for the 21<sup>st</sup> century.

SPAS-PC00116

Gateway to LA is proud to be a partner in this effort and we look forward to the next steps in the modernization and improvement of LAX. Thank you for your consideration of our views.

Sincerely,



Laurie Hughes  
Executive Director  
Gateway to LA Business Improvement District

CC: Councilman Bill Rosendahl  
Rodrick Diaz, METRO

From: Van Valkenburg, Peter [mailto:Peter.VanValkenburg@ehi.com]

Sent: Monday, October 08, 2012 11:01 AM

To: ALVAREZ, DIEGO

Cc: Langella, David; Bettison, William L

Subject: LAX Master Plan - Written Comments from Enterprise/Alamo/National on SPAS CRM:00050445

Mr. Diego Alvarez  
SPAS Program Director

Diego-

Thank you for taking the time to review with us the LAX Specific Plan Amendment Study (“SPAS”) during our meeting at LAX on September 21, 2012.

Please accept this e-mail as formal “Written Comments” on SPAS from the Enterprise, Alamo and National car rental concessions at LAX.

We appreciate being given the opportunity to submit our comments on these potential amendments to the LAX Specific Plan.

The rental car companies (“RACS”) have been meeting with LAWA Staff for several years discussing a possible consolidated rental car facility (“ConRac”) at LAX. The two threshold questions we always face with any proposed ConRac project are 1) Is there a viable/feasible location for the proposed ConRac; and 2) Is there a viable/feasible plan of finance for designing, constructing, and operating the proposed ConRac project.

Regarding a viable/feasible location for a proposed ConRac at LAX, we have identified several fatal flaws with the proposed “Lot C” location. In a nutshell, these fatal flaws with the “Lot C” location include: 1) onerous building height restrictions, 2) a bifurcated site (Arbor Vitae runs right through site), and 3) increased construction and operating costs. In turn, we do NOT support locating any proposed future ConRac at the “Lot C” site, and we do NOT support the two SPAS Alternatives (Alternatives 3 and 4) that include the proposed “Lot C” ConRac site.

At some point in the future, a ConRac will likely be necessary. For example, once LAX reaches the maximum 75.9 MAP level, a proposed CFC (fully-funded) ConRac project at a viable/feasible location would likely 1) help reduce congestion at the terminal, and 2) provide a better customer service experience for the traveling public at LAX. Assuming LAX reaches maximum capacity and a viable ConRac plan of finance can be identified, we believe that the preferred location for any necessary future ConRac is the Manchester Square site. The Manchester Square site is a preferred location because it does not have any of “Lot C’s” fatal flaws, and it has better access to the freeway system. Accordingly, under the aforementioned circumstances, we would expressly support the two SPAS Alternatives (Alternatives 8 and 9) that include the proposed Manchester Square ConRac site.

In summary, our position on the proposed ConRac locations in the proposed SPAS Alternatives is as follows:

-We do not support (under any circumstances) the proposed “Lot C” location (SPAS Alternatives 3 and 4) for any future ConRac project; and

-We support the proposed Manchester Square location (SPAS Alternatives 8 and 9) for any necessary, CFC fully-funded, future ConRac project.

Please let me know if you have any questions.

(Please also confirm receipt of these Written Comments.)

Thank you,  
Peter

SPAS-PC00116

SPAS-PC00118



**From:** Al Lay [al\_lay@hotmail.com]  
**Sent:** Monday, October 08, 2012 9:19 PM  
**To:** SPASEIR Comments  
**Subject:** COMMENTS regarding The LAX Specific Plan Amendment Study Draft Environmental Impact Report

Mr. Alvarez,

Regarding SPAS 2012 and the 9 Alternatives:

I strongly urge you to adopt:

1. Alternative 2
2. Alternative 9 (with a realistic train service plan that includes all the terminals)

I believe that these options represent the most reasonable course of action.

Thank You,

Al Lay

President, LAX-Area Democratic Club

SPAS-PC00119

**From:** Stephanie Siroich [ks07@ca.m.com]  
**Sent:** Monday, October 08, 2012 3:36 PM  
**To:** SPASEIR Comments  
**Subject:** Airport Expansion

October 8, 2012

Dear Mr. Alvarez,

I want to voice my objection to the proposed expansion at Los Angeles International Airport, expanding the Northernmost runway approximately 340 feet closer to Playa Del Rey and my property. This expansion presents health, safety, and environmental risks such as incremental noise, pollution, and traffic; as well as financial implications which will adversely affect the value of property to the residents of Playa Del Rey.

LAWA needs to be concerned with the above-mentioned safety, financial, environmental, and quality of life issues that face the residents of Playa Del Rey and neighboring communities if this expansion goes ahead. Rather than with special interest groups that stand to gain from this expansion, My health along with other residents and the environment is already affected by the pollution from jet fuel that is present on our roofs and patios, which will be increased if the Runway is moved closer. Safety and efficiency at LAX can be achieved without imparting greater impact on local communities such as Playa Del Rey.

Sincerely,

Stephanie D. Siroich  
 Beachport Village  
 Playa del Rey, CA 90293

SPAS-PC00120

**From:** Donna Murray [dmurray47@gmail.com]  
**Sent:** Monday, October 08, 2012 3:43 PM  
**To:** SPASEIR Comments  
**Subject:** Runway alternatives

Mr. Diego Alvarez,

I have reviewed the proposed changes to LAX and feel that Alternative 2 with Alternative 9 supporting it should be the preferred plan. These plans improve airside safety by moving and improving taxiways, are the least expensive and quickest to implement, and do the least damage to our community.

Please listen to the public involved, our elected officials and our Neighborhood council. I currently have airport approved windows and insulation and cannot hear my television when planes go over. The quality of life in Westchester will be adversely affected during the implementations of the other Alternatives for both the short-term and long-term.

Alternatives 2 and 9 will meet the capacity needs for LAX providing airfield and transportation improvements.

Thank you.

Sincerely,

Donna Murray  
 8734 Wiley Post Avenue  
 Los Angeles, CA 90045

SPAS-PC00121

**From:** Val Schnabl [vjschnabl@verizon.net]  
**Sent:** Monday, October 08, 2012 5:53 PM  
**To:** SPASEIR Comments  
**Subject:** LAWA SPAS Comments

We live in a house on Rindge Ave. in Playa del Rey about one block north of the LAX property. We strongly oppose moving the north runways further north. Instead, we support the 2012 SPAS Alternatives 2 & 9 which would have a tolerable impact on nearby LAX neighbors. I (Val) have lived in Playa del Rey since 1967 (45 years) and my wife has lived in PDR for 31 years. We like it here and want to continue to have an amiable relationship with LAX.

Val & Sheri Schnabl

SPAS-PC00122



From: Bryan A. Garner and LawProse [lawprose@bridgemailsystem.com]  
 Sent: Tuesday, October 09, 2012 9:28 AM  
 To: SPASEIR Comments  
 Subject: LawProse Lesson #90



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 San Diego – Nov. 30

Lesson # 90

**Is it correct to refer to an attorney general or solicitor general as "General So-and-So"?**

ANSWER: Not really. The trend has been to address attorneys general and solicitors general as if they were military officers, as in "General Starr, when will the report be available to the public?" Despite its prevalence, this is strictly speaking incorrect. In titles such as *attorney general*, the word *general* is not a noun, but a postpositive adjective – an adjective that follows rather than precedes the noun it modifies. *Attorney general* and *solicitor general* are two examples. Other examples include *court-martial* and *notary public*. But no one calls a notary public simply "public." The word *general* in *attorney general* is every bit as much adjectival as it is in *general counsel*.

The practice of using *general* as a title appears to have been popularized by then-Justice William Rehnquist, who was otherwise known as a stickler for grammar. He used the term in this way as early as 1980. Meanwhile, the Chief Justice in that era, Warren Burger, fastidiously addressed the Solicitor General as "Mr. Solicitor General." But from the outset of his chiefship, Chief Justice Rehnquist used *general* as a title, undoubtedly helping to spread the linguistic innovation. I amentally the practice has continued.

Washington, D.C. – Dec. 7

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with Chief Justice Rehnquist's successor and has been adopted by other members of the Court as well. Even transcript references to the Solicitor General now simply state "General Clement," "General Kneeder," and "General Vermili." Although the practice of militarizing high legal offices will likely persist, the sticklers will abstain (correctly) from using "General" in this way.

Incidentally, the Surgeon General is a uniformed officer of the Public Health Service Commissioned Corps – not a general, though, but a vice admiral.

On the other hand, if Supreme Court justices are saying it, perhaps it's correct *de jure*, though not *de facto*. As Justice Robert H. Jackson once declared: "We are not final because we are infallible, but we are infallible only because we are final."

Postscript: The rhetorical term for Jackson's figure of speech there – reversing parallel words in adjoining clauses – is chiasmus.

Source: Garner's *Dictionary of Legal Usage* 387 (3d ed. 2011).

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From: spaseir@agil.com [mailto:spaseir@agil.com]

Sent: Tuesday, October 09, 2012 7:53 AM

To: spaseir@agil.com; ALVAREZ, DIEGO

Subject: My personal input for LAX Reconfiguration: Support of Alternatives 2 and 9

To Diego Alvarez and any relevant and affiliated LAX SPAS Planners:

The following comments do not represent either the opinion or stated support of either the CD11 Transportation Advisory Committee, The Transit Coalition, The Sierra Club, The Mar Vista Community Council or Friends of the Green Line, of which I affiliate with. Although my experience and affiliation with those entities have certainly affected my held views, these views are entirely my own.

Simply put, Alternatives 2 and 9 are the best alternatives for LA and LAX to move into the 21st Century and they merit our collective support.

Simply put, demolishing, relocating and rebuilding the northern airline terminal structures is inevitably more expensive, disruptive and environmentally-impacting than is a refurbishing and modernization of the existing structures, and that latter alternative (part of Alternative 2), merits our collective support.

Simply put, relocation of the northern airfield to the north, and accompanying destruction and razing of the adjacent portion of the commercial district of adjacent Westchester, results in a permanent loss of City revenue and is more expensive, disruptive and environmentally-impacting than is a relocation and modernization of our existing northern runway, and that latter alternative (part of Alternative 2), merits our collective support.

Simply put, a Consolidated Rental Car Facility with an adjacent Green/Crenshaw Line rail station at/near Century/Aviation is more efficient, cost-effective and more amenable to high-capacity, heavily utilized car/train/rail/bus/pedestrian intermodal transportation connections than is our current arrangement with car rental and transit connections that aren't pedestrian-friendly and easily accessible, and that former alternative (Alternative 9) merits our collective support.

Simply put, a connecting LAX People Mover that is a rail alternative to link the Green/Crenshaw MetroRail Lines, the latter of which just received a \$545.9 million loan from the federal government to expedite its construction and lower construction costs, with the Central Terminal Area is the modern, compatible, and commuter-preferred alternative (Alternative 9), and merits our collective support.

Simply put, a bus route to connect MetroRail to the Central Terminal Area might have lower capital costs for LAWA, but much higher operating costs as an Automated People Mover rail service need have no drivers and fewer vehicles to pay for and maintain after the initial capital costs (which may come from Metro, should Measure J or other funding measures occur) are accommodated.

Simply put, the \$200 million that County Transportation Measure R (the half-cent sales tax approved by county voters in 2008) assigns to a Green Line connection to LAX was meant only as seed money to properly study and prepare for the next steps of the MetroRail to LAX project that the entire county needs as part of a 21st Century transportation network. Planning and funding efforts to build a comprehensive rail network linkage to LAX merits our collective support.

Simply put, County Transportation Measure J absolutely DOES allow funding and fast-tracking of the Green Line and Crenshaw Line connections to LAX from the Westside, Mid-City and South Bay regions, in addition to fast-tracking and lessening construction costs of other Measure R projects, and it merits our support.

Simply put, comments by LAWA Executive Director Gina Marie Lindsey that openly support a bus service over a rail Automated People Mover are entirely inappropriate, in that all Alternatives are to be considered and evaluated as to a Locally Preferred Alternative, and based on community input rather than a top-down bias from the LAWA Board and leadership. Ms. Lindsey has the right to state her personal opinion, but should recognize that the voters who chose to tax themselves with Measure R (and who might vote in favor of Measure J as well), and those who weigh in on the LAX SPAS EIR, are the ones who determine any Locally Preferred Alternative.

It is my strongly-held belief that Alternatives 2 and 9 represent the Locally Preferred Alternatives that are most cost-effective for the long-term benefit of LA World Airports and the City and County of Los Angeles.

SPAS-PC00123

SPAS-PC00124



Most Sincerely,

Kenneth S. Alpern, M.D.  
3222 Military Avenue  
Los Angeles, CA 90034-3026

**From:** Hetz Matthew [hermes333@dslextrreme.com]  
**Sent:** Tuesday, October 09, 2012 1:53 PM  
**To:** SPASEIR Comments  
**Cc:** Hetz, Matthew  
**Subject:** LAX SPAS DIER

Oct 9, 2012

re:LAX expansion, DEIR.

attn: Diego Alvarez

I live in Westchester, and I support Alternatives 2 and 9. In Westchester we have suffered enough with the past removal of homes and business and a school to accommodate LAX expansion. This is seen by the various vacant lots around the airport along Westchester Parkway, Pershing Ave and Vista del Mar. There is no need to take more homes and businesses in Westchester. Ontario Airport needs to be let go by LAWA and let the Inland Empire increase capacity to take some strain from LAX.

We suffer from the noise and pollution from the airport itself twenty-four hours a day, seven days a week. This includes the annoying and sleep disrupting noise in the middle of the night from jets engines warming up at LAX. I hear this, and I live a little more than one mile north of the airport. Moving the north runway further north would be a disaster to any kind of remaining decent way of life in Westchester.

We also must contend with airport traffic, which clogs the streets and leaves behind traffic noise and vehicle exhaust fumes. COPD is attributed to vehicle exhaust, and Westchester with the airport traffic and the 405 Freeway does not need more traffic.

Moreover, the studies clearly show Alt. 2 is much less costly and disruptive than the other alternatives, some of which would require massive road and utility relocation construction, have much higher costs. With government sinking in debt, careful and wise spending of tax payer money is required.

The expansion of LAX should not have the subtext of a jobs bill, this should not be placed on the backs of the people of Westchester, we have paid enough through past airport deeds and current operations.

The north runway has been operating safely for the past years, with the double-deck A380 Airbus jets in daily use. Incorporating the most up-to-date technology for runway safety and reconfiguring runway taxi lanes will further increase safety at LAX.

For Alt. 9, a rail line into LAX is long, long overdue. A number of smaller airport throughout the U.S. have rails to the airport, and for LAX to not have it is disgraceful. I am a transit rider since 1992, and light rail is far superior to buses in rider comfort, speed, ease of boarding and disembarking and carrying capacity.

Matthew Heiz  
Member, Los Angeles Council District 11 Transportation Advisory Committee  
6211 W 78th St  
Los Angeles, CA 90045

SPAS-PC00124

SPAS-PC00125

**Attachments:** DCommentsLAXDEIROct2012.doc

**From:** Danna Cope [dannacope@gmail.com]  
**Sent:** Tuesday, October 09, 2012 3:35 PM  
**To:** SPASEIR Comments  
**Cc:** Bill Rosendahl; Antonio Villaraigosa  
**Subject:** Comments on LAX SPAS DEIR

Mr. Diego Alvarez

Please find attached my comments on the LAX SPAS DEIR.

I look forward to reviewing the Final EIR when it becomes available. However, I note that there is no public review period listed in the LAWA brochure; after the responses to comments/preparation of the Final EIR, the next phase goes directly to BOAC and local approvals. Please clarify this issue: there should be a public review period included.

Thank you.

---  
Danna Cope  
dannacope@gmail.com

SPAS-PC00128

**DANNA COPE**  
8219 Reading Avenue  
Westchester, CA 90045  
310 641-2503  
dannacope@gmail.com

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Re: Comments on the LAX SPAS Draft EIR

email: [spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

Dear Mr. Alvarez:

After studying the DEIR, my conclusion is that no convincing argument was made in the document to move the northernmost runway (24R) on the North Airfield. Therefore, I earnestly advise that the following action be taken:

**Adopt Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals.**

This position has been taken by many people and organizations, including the Neighborhood Council of Westchester/Playa.

Questions that are raised by the DEIR and must be fully investigated in the Final EIR include:

- **Why go to the expense of moving 24R north, when any of the runway alternatives (1-7) would result in the same number of passengers that LAX can accommodate?** All the alternatives would enable LAX to handle the projected traffic in 2025: 78.9 Million Annual Passengers (MAP). Therefore, there would be no gain in passenger capacity from moving 24R North.
- **Why is Alt. 2 not the preferred alternative when (by statements in the DEIR) it is the most economical, efficient, and environmentally sound choice?** It does include realigning some taxiways as noted in the North Airfield Safety Study (NASS). Improvements and extensions to the east end of 24L and 24R are also incorporated which would allow the New Larger Aircraft (such as the A380) easier operations on the North Airfield. A new terminal at the east end (roughly where the Park One lot currently is located) is included, which will help ease aircraft movement on the North Airfield.
- **Why, when the accredited and fully accepted safety report, the North Airfield Safety Study (NASS), concluded that the North Airfield is safe AS IT IS to handle the future estimated air traffic, are expansion alternatives being proposed?** The study did recommend taxiway realignment that is included in Alt. 2.

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- Why propose so many alternatives, when Alt. 2 is also the least intrusive into the neighborhoods? Alt. 2 would not move flight paths, or increase noise and air pollution into Westchester/Playa del Rey.
- What market value was used in LAWA's estimates for purchasing properties that would be affected by moving 24R as far north as LAWA actually wants to move it (at least 350 feet)? The Delta and Paradise Buildings, as well as all the businesses up to Ralph's in the Westchester Business District would have to be removed. Figures that were listed in the Acquisitions Section are very low.
- Why did LAWA make the erroneous assumption that the In-N-Out and Parking Spot would not be in an FAA protective, safety, or buffer zone because pilots would land midway down 24R (which would be extended West to Pershing)? Most pilots like to land (and do land) as soon as their assigned runway is available, not wait until they are midway down the runway.
- Why wasn't the loss of at least 500 permanent jobs taken into account in discussions of moving 24R north? The business district only recently recovered from losing 10,000 customers and many employees from previous LAX expansions.
- Why didn't the DEIR discuss spending funds on modernizing the airport: improving the terminals, roadways, elevators, escalators, bathrooms, signage, etc., all of which would provide more jobs than moving the runway? Modernizing LAX would greatly improve the passengers' experience of traveling through the airport.
- Why add a Centerline taxiway (between the runways) when it does NOT create a Group 6 airfield and does create safety hazards? A Centerline Taxiway (CLT) decreases the space between the wings of an aircraft on a runway and an aircraft on the CLT. More aircraft would be exposed to the contrail "blast effect" off the wings of a New Larger Aircraft (NLA) if a CLT were to be jammed into the North Airfield. In addition, the reduction of incursions on the South Airfield after the addition of a CLT could be credited to the installation of the Runway Status Lights.
- Why go to exorbitant expense of moving 24R, citing the wish to create a Group 6 Airfield, when, according to LAWA's figures, Group 6 aircraft in 2025 will be just 1.6% of total LAX air traffic? This 1.6% figure is based on the original "buy" orders - but very few of the airlines are actually buying their full, original orders. It seems ridiculous to go through so much upheaval, not to mention cost, for such a small number.
- Why blame the NLAs for extensive, expensive changes when the Airbus A380 has been landing and taking off with no trouble on the North Airfield? As noted above, Alt. 2 would extend Runways 24L and 24R to the east, which would ease aircraft traffic on the North Airfield.
- Where were the cost estimates and evaluation of the impact on the South Airfield while the North Airfield is closed for projects that would move the runways?

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There are some extremely expensive matters caused by moving the runway North which were not adequately addressed in the DEIR. These items must be completely examined in the Final EIR:

- **Filling in the Manchester Tunnel.** This is the tunnel that was originally built to connect the North communities to the South. It was to be part of the never-authorized Laurel Canyon Freeway that was being considered back in the late 1950s and early 1960s. It starts where Lincoln turns East, near the Park West apartment complex, and tunnels South under LAX to within 50 feet of 24L. The last time it was inspected (after a very dry season) there was water in the tunnel. LAWA has recommended filling the tunnel with sand (a glorious recipe for sink holes!), or taking the top off the tunnel and filling it with dirt. The tunnel is about 35 ft down and 4 to 6 lanes wide, and 750 feet long. Using 20 feet for the height, 55 feet for the width (5 lanes x 11 ft/lane), and 750 feet for the length, the area to be filled comes to 825,000 cubic feet ( $20 \times 55 \times 750 = 825,000$ ) if just the tunnel is filled with foam. If the ground over the tunnel is also removed, the number jumps to 1,443,750 cubic feet ( $35 \times 55 \times 750 = 1,443,750$ ). Filling the space with dirt would require a lengthy compression period. This would mean closing both runways 24L and 24R for some time, putting an undue amount of traffic on the South Airfield. A recommendation from a person who is familiar with tunnel problems is that the tunnel be filled with a special foam that was developed to handle filling in a space so it can withstand heavy weights. The cost could run into the millions, possibly billions. The actual cost of filling the tunnel with dirt or with foam, plus the downtime for the North Airfield must be included in the Final EIR. Impact on the South Airfield from the closure must also be included.
- **Moving affected sewers.** Other city departments have stated that the sewers cannot be moved. How would LAWA propose to a) protect the sewers and b) protect aircraft from cave-ins?
- **Property acquisition.** As noted above.
- **Enclosing the Argo Flood Control Channel.** This channel is required as a drain for the flood control plain and, as such, should not be enclosed. It is under the jurisdiction of the Army Corps of Engineers and LAWA does not have any approval as of the DEIR date to make changes to the channel. Covering the channel with a permeable substance is not practical; no known permeable substance would withstand the weight and impact of aircraft landing or taking off.

What coordination with other agencies will be completed so that time lines and true cost estimates are accurate in the Final EIR for all Alternatives?

- Other agencies include: The Army Corps of Engineers (Argo Flood Control Channel), Caltrans (the CTA upper roadway, Lincoln Blvd, Sepulveda Blvd, and Sepulveda Tunnel), LA Public Works Dept. (sewers and storm drains), LA Water and Power (utility lines, water mains), FAA (tower and TRACON staffing, flight

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paths and Runway Protection, Safety, and Buffer Zones – and FAA enforcement of these zones).

Why were the following items (which were listed in comments on the NOP) not addressed in the DEIR? These issues would do more for safety on the airfield than moving 24R would. Some of these items would require interfacing with the FAA. Was this done? Or at least attempted? If so, what was the outcome?

- Improve communications between tower and cockpit
- Fully staff tower and TRACON offices
- Install modern and efficient equipment in the tower
- Install and implement the GPS ground-tracking system
- Complete the installation and implementation of Runway Status Lights in the whole North Airfield

The DEIR includes 7 alternatives that involve the runways and 2 alternatives that involve other issues such as the Consolidated Rental Auto Facility (CONRAC). Below is an analysis of these alternatives and the issues they raise (or solve).

**Alt. 1** (Moves 24R 260 ft North and 600 ft West. Moves 24L 1250 ft East. Adds a Centerfield Taxiway).

- Displaces businesses and homes
- Risky construction factors; could be very costly in time and delays
- Fixes little traffic or Central Terminal Access (CTA)
- Impacts major underground utilities, sewer, and tunnel
- Very costly, not affordable

**Alt. 2** (Leaves Runways in current location. Reconfigures taxiways. Adds new terminal and extends Bradley and Mid-Course terminals North)

- Most affordable
- Most efficient
- Most environmentally sound
- Less impact to communities

**Alt. 3** (City approved Alt. D. Extends 24R 1495 ft West. Moves 24L 340 ft South and adds Centerfield taxiway. Ground Transportation Center in Manchester Square with a baggage tunnel to the CTA. CTA closed to car traffic. Integrated Transportation Center in Continental City at Aviation/Imperial)

- Not affordable. Cost has risen from \$12 billion in 2004 to over \$100 billion in 8 years
- Baggage tunnel safety, viability, and efficiency is questionable

**Alt. 4** (Alt. D Green Light projects +. 24R left as is. 24L moves 835 ft East. No Centerfield taxiway. Argo Flood Channel partially enclosed. CONRAC in Manchester Square. No terminal, taxiway, or taxiway changes)

- Does little for CTA traffic and access
- Questionable viability and stability in covering the Flood Channel

**Alt. 5** (Moves 24R 350 ft North and 604 ft West, and widens it to 200 ft. Adds Centerfield taxiway. Lincoln Blvd moved sub terrain & new Sepulveda connect. Fully encloses all 9557 ft of the Argo Channel. Compatible with ground access in Alts. 1, 2, 8 & 9)

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- Greatest impacts to businesses and residents
- Major move of flight path North (heavily impacting Westchester and Inglewood)
- Risky construction factors, could be very costly in time and delays
- Does little for traffic and CTA access
- Not affordable (have the airlines indicated agreement to paying the astronomical landing fees that would be imposed?)

**Alt. 6** (Moves 24R 100 ft North. Moves 24L 1250 East. Adds Centerfield taxiway. Reconfigures taxiways & taxiways. Lincoln Blvd moved sub terrain & new Sepulveda connect. - Does little for traffic and CTA access. Eliminates all remote gates. Compatible with ground access in Alts 1, 2, 8 & 9)

- Impacts businesses & residents
- Adds new terminal and extends Bradley and Mid-Course terminals North
- Moves flight path North

- Risky construction factors, could be very costly in time and delays

**Alt. 7** (24R no extension or widening. 24L moves 1250 ft East. Adds Centerfield taxiway. Reconfigures taxiways & taxiways. All remote gates eliminated. No business district impact. Adds new terminal and extends Bradley and Mid-Course terminals North. Compatible with ground access in Alts 1, 2, 8 & 9)

- Avoids construction risks of tunnel, roadways, sewers
- May involve extensive or complete remodeling of Terminals 1, 2, and 3

- Costly, airlines could be charged much higher landing fees

**Alt. 8** (Has CONRAC in Lot C with bus service into CTA. Parking moved to Manchester Square)

- Only partially addresses CTA traffic
- Does not include train service into CTA

**Alt. 9** (Moves CONRAC to Manchester Square with a people mover that goes into CTA)

- Creation of people mover that could service amount of people traffic and length required to transport from Manchester Square into CTA is problematic
- Once people mover in place, CTA traffic would be reduced

The only acceptable alternative is Alt. 2. It has the least cost, yet is safe, efficient, and has the least impact on the communities surrounding LAX.

Other alternatives would involve massive cost. In addition to the disruption on the North, the South Airfield would be significantly impacted by the extended North Airfield down time to accomplish the Alt. 1, 3, 4, 5, 6, and 7 projects.

Sincerely,

Danna Cope  
8219 Reading Ave, Westchester, CA 90045; [dannacope@gmail.com](mailto:dannacope@gmail.com)  
phone: 310 841-2503

SPAS-PC00128



Attachments: LAX SPAS Public Comment.doc

From: Tallarico, Lorraine [Lorraine.Tallarico@avisbudget.com]  
 Sent: Tuesday, October 09, 2012 3:32 PM  
 To: SPASEIR Comments  
 Subject: SPAS PUBLIC COMMENTS

Mr. Alvarez, please see our attached letter. Please confirm your receipt of these comments within the stated time period.

Regards,

Lorraine M. Tallarico

Avis Budget Car Rental, LLC

513 Eccles Avenue

South San Francisco, CA 94080

650-616-0136

[lorraine.tallarico@avisbudget.com](mailto:lorraine.tallarico@avisbudget.com)

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## avis budget group

October 9, 2012

Mr. Diego Alvarez  
 Los Angeles World Airports, Facilities Planning Division  
 One World Way  
 Los Angeles, CA 90045-5808

RE: SPAS EIR COMMENTS

Dear Mr. Alvarez,

The following comments represent the position of Avis Budget Car Rental, LLC, ("Avis") which has operated its rental car companies at Los Angeles International Airport ("LAX") for over 35 years. As such, we have a unique vantage point with respect to the planning at LAX, particularly with respect to ground transportation. We take no position on the various alternatives in SPAS with respect to runway changes. Many, if not all, aviation alternatives set forth in SPAS can be matched with one of the alternatives pertaining to the ground transportation. Therefore, any of the alternatives which expands the passenger capacity of the airport, improves overall efficiency, or increases the safety at LAX, receives our support.

Most importantly, Avis supports Alternatives 1 and 2, which do not include the construction of any Consolidated Rental Car Facility ("CRCF"). In addition, Avis supports Alternatives 8 and 9. Avis only supports Alternatives 8 and 9 in the event LAWA decides, notwithstanding all evidence in SPAS to the contrary, that a Consolidated Rental Car Facility is even necessary. The cost/benefit of a Consolidated Rental Car Facility in Los Angeles simply does not add up.

We are pleased that LAWA took the time to carefully review the Master Plan that has been in place for almost a decade. Many things have changed in the area of technology, and the general public's habits with respect to travel. These changes must be considered before LAWA moves forward with major construction such as a Consolidated Rental Car Facility, or Ground Transportation Centers, or even new public parking lots. We applaud the thorough job reviewing all of these changes, as well as challenging old perceptions that were driving early decisions. These perceptions and assumptions may no longer be accurate, if they ever were, regarding rental car activities.

The SPAS report findings, particularly in the traffic study data, that the conclusion that the construction of an estimated \$750 million-\$1 billion dollar Consolidated Rental Car Facility will not significantly improve either traffic congestion or air quality, the two key drivers for the inclusion of a CRCF in the Master Plan for LAX. SPAS data indicates the minimal positive impact resulting from a CRCF is insufficient to justify the cost. We agree.

Centurion Car Rental Group, Inc.  
 513 Eccles Avenue, Suite A  
 South San Francisco, CA 94080  
 Main: (650) 616-0130 / Fax: (650) 624-0179

AVIS

Budget

SPAS-PC00129

All the rental car companies operating on-airport at LAX now utilize the newest in clean burning CNG fuel efficient buses. The CO2 and other NOX emissions are virtually zero now. As such, even a 40% reduction in the total buses that might result if a CRCF were constructed will have an insignificant impact of overall air quality in the area. In other words, technology alone has solved one of the first targeted problems the CRCF plan was intended to solve.

Secondly, SPAS also concluded that the overall traffic impacts in the LAX surrounding area resulting from rental car buses, or rental vehicle fleet movement, will not significantly change. In fact, the concentration of the rental car industry traffic at certain affected intersections will deteriorate if all vehicles are moving in and out of a single location as compared to the existing locations that disperse the traffic among various routes.

Utilizing the millions of dollars paid by rental car customers for facility improvements for roadway changes, such as an elevated and dedicated roadway in and out of LAX will be far more effective in improving traffic than one, enormous building sitting at the corners of several key intersections.

Improvement to the vertical circulation at each terminal, and modifications to the Central Terminal Roadway system will have a much more significant impact improving traffic than a single destination CRCF. In fact, changes to the CTR that enable the companies to all utilize a single level for pick up and drop off will cut the rental car shuttle bus traffic by 50% immediately. The industry has advocated for this change for many years. It will be much more effective and far less costly than a CRCF that few, if anyone, in the rental car industry wants to see build. Rental car customers have already contributed \$150 million dollars that can be properly used to fund these roadway projects.

Notwithstanding the above factors, we do understand it's possible that some may still advocate for a CRCF to be approved for construction. In that case, it would be an utter disaster for a CRCF to be built on, or about, Lot C. **Alternatives 3 and 4 are 100% unacceptable.** The only possible location for a CRCF of sufficient size and design is Manchester Square, or a portion thereof. Lot C has been studied by the industry and a team of planners and architects. **All agree Lot C is not a suitable site.** The Lot C location is too small oddly configured, divided by a Westchester and other city streets, encumbered by aviation/runway easements that restrict design and utility.

We will not support any use of Lot C for a CRCF. It would be a tremendous error in judgment for LAWA to think a CRCF at Lot C is in the best interest of the traveling public, the community, the industry, or the City. The rental car industry looks forward to a clear direction from LAWA on these matters soon. Uncertainty has, in the past, prevented the industry from modernizing its existing facilities in a manner that reflects LAX as a world-class airport.

Accordingly, we urge LAWA to recognize the strong position of the rental car industry and either abandon all plans for a CRCF and modernize LAX in a manner that is in the best interests of the public, or, adopt Alternative 8 or 9 only, with respect to ground transportation.

Respectfully submitted,

Lorie M. Tallarico  
 Director of Properties, West Area

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## Organization of ARSAC LAX SPAS DEIR Comments Package:

1. Chatten-Brown & Carstens letter
2. ARSAC position and issues letter
3. Summary of Alternatives Matrix
4. Specific Comments and Questions (3 groupings)
5. Topical Area Comments
  - a. Operational Analysis and Design Day Flight Mix
  - b. Ground Access Appendix E
  - c. Center-line taxiways (including list of sources and articles)
  - d. Impacts of Moving Runways North - Construction risks and Cost
  - e. Economic Impacts and Jobs Created
6. 2010 NOP Comments (not addressed by LAWA)
7. 2008 NOP Comments (not addressed by LAWA)
8. 2007 Town hall Presentation of issues (not addressed by LAWA)
9. ARSAC Press Release recognizing DEIR issuance

The enclosed disc contains all contents above including the cover letters

SPAS-PC00130



## CHATTEN-BROWN &amp; CARSTENS LLP

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October 8, 2012

Los Angeles World Airports  
Facilities Planning Division  
Attn: Diego Alvarez  
One World Way  
Los Angeles, CA 90045-5803

Re: Comments on Draft Environmental Impact Report for Specific Plan  
Amendment Study, SCH 1997061047

Dear Mr. Alvarez:

On behalf of the Alliance for a Regional Solution for Airport Congestion (ARSAC), we provide these comments on the Draft Subsequent Environmental Impact Report (DEIR) prepared for the Specific Plan Amendment Study ("SPAS" or "Project") at Los Angeles International Airport (LAX).

The SPAS Project DEIR assesses numerous potential alterations to LAX, including runway relocations and realignments, the relocation of Lincoln Boulevard, reconfiguration of central terminal area roadways, and relocation and construction of various terminals, security implements, and transportation facilities. The DEIR discusses 9 separate alternatives, the components of which can be configured into 25 separate possible projects. This "mix and match" approach renders the Project a moving target. As the SPAS DEIR fails to specify LAWA's preferred project it is unclear what LAWA's plans for the airport actually are, and which environmental impacts would be expected to result. ARSAC and the public are thus unable to focus their comments on LAWA's preferred project, and important concerns about potential impacts are likely to be lost in the mass of comments that will be generated by the many SPAS Alternative permutation projects. More importantly, the EIR's failure to designate a preferred project precludes satisfaction of two of the goals sought by the California Environmental Quality Act (CEQA) – public involvement and informed decision making.

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Los Angeles World Airports  
October 8, 2012  
Page 2 of 12

## I. Preliminary Statement About the Background of the SPAS Process.

ARSAC is a public interest community organization composed of area residents and business owners with many years of experience collaborating with LAWA on issues related to LAX expansion. In accordance with the February 2006 Stipulated Settlement with the City of Los Angeles calling for significant revisions to the 2005 LAX Master Plan, ARSAC has been a member of the SPAS Advisory Committee and has been extensively involved with the development of the SPAS Study. Even so, it appears that LAWA has disregarded ARSAC's carefully considered alternatives for runway alignment, terminal configurations, and ground transportation facilities. ARSAC is adamantly opposed to expanding LAX into the surrounding communities, and especially to any alternative that would relocate Runway 24 Right further north. As with all of its submissions during this process, ARSAC provides these comments with the hope that LAWA will revise the SPAS Project DEIR to remove northward runway movements to reach consistency with both the Settlement Agreement and community needs.

The Settlement Agreement contemplated that LAWA would "focus the LAX Specific Plan Amendment Study on . . . Potential alternative designs, technologies, and configurations for the LAX master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers. . . [and] Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternatives Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR." (Settlement Agreement, p. 9, Section V.D.)

Instead of fulfilling this intent of the Settlement Agreement, the DEIR emphasizes north runway movement, while failing to adequately address traffic and other consequences, calling them generally unmitigable. We are therefore surprised that, despite its many flaws, the DEIR correctly acknowledges, "Compliance with FAA Airport Design Standards - the larger aircraft are more acceptably handled by Alternative 2, no additional runway spacing." (Table 4.7-2-8.) In view of the fact that Alternative 2 is also designated the "Environmentally Superior Alternative," the decision to choose this alternative as the preferred project should be clear. Once a preferred alternative is chosen, the DEIR must be recirculated to allow informed and meaningful public review and comment.

The DEIR improperly characterizes the bulk of the Project's impacts as resulting from the projected increase in aircraft operations and passenger growth instead of from the project components. Several of the SPAS Alternatives propose relocating airport

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Los Angeles World Airports  
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runways north, nearer to homes and businesses in Westchester and Playa del Rey, which would have significant and unmitigable environmental impacts attributable to noise, vibration, air and water pollution, and aircraft safety hazards. Northward runway extension would also require northward expansion of the FAA-mandated runway protection zone to include additional homes and businesses, which would ultimately be vacated and demolished. As Westchester and Playa del Rey have already lost many homes and businesses to past airport expansion, the cumulative community impacts of additional losses would be great, and must be avoided. Significant impacts would also be expected to affect communities located east of LAX, if proposed changes to the approach pattern are adopted.

Runway movement would also require relocation and potential tunneling of busy Lincoln Boulevard (California State Highway 1), which would undoubtedly have significant traffic impacts on all of western Los Angeles County. Such tunneling would also require re-routing of wastewater treatment lines, and identification and mitigation of possible water seepage issues. Sensitive biological resources, including the endangered El Segundo blue butterfly, could be impacted by relocation of navigational aids, needed to support relocated runways. Even unrelated to runway relocation, the SPAS Alternatives may have significant impacts on air pollution, traffic congestion, hazardous materials, and safety. As discussed further in the comments below and attached, the SPAS DEIR fails to adequately disclose and mitigate the Project's potential environmental impacts. Accordingly, the document must be revised and recirculated before approval by LAWA.

## II. LAWA's SPAS Review Process Has Been Procedurally Defective.

ARSAC believes the public's ability to fully participate in the environmental review process and the decision makers' ability to fully understand the project and its impacts has been hindered by the DEIR's failure to provide an adequate project description and its use of tiering without sufficiently summarizing or providing access to necessary documents.

### A. The DEIR's Project Description Fails to Identify the Proposed Project.

"The term 'project' refers to the activity which is being approved." CEQA Guidelines §15378(c). The DEIR fails to accurately identify this activity. The Project Description states the project is merely to conduct a study of alternative designs for the LAX Master Plan; "The project is to complete a Specific Plan Amendment Study (SPAS)." (DEIR I:17-18.) However, the study is not the activity that would be approved. Rather, the proposed activity is the selection of a Specific Plan amendment that would implement changes to the LAX Master Plan.

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The DEIR describes nine different alternatives, seven of which have interchangeable runway, terminal and ground access components, resulting in at least 25 different configurations. (DEIR I:17-18.) While identifying alternatives is required under CEQA, the DEIR does not indicate a preferred alternative among these various options. Failing to identify a defined project by not selecting a preferred alternative violates CEQA's requirement for an adequate project description and fails to inform decision makers and the public of the activity under consideration.

CEQA mandates that the EIR identify a *single* proposed project. The EIR must include "[a]lternatives to the proposed project." (Pub. Res. Code §21100(b)(4).) Since statutes should be interpreted according to their plain and unambiguous wording (*Sutton v. Industrial Acc. Com.* (1956) 46 Cal.2d 791, 797), this statute demonstrates that there must be "the proposed project," which is singular, and alternatives to the proposed project, which are plural. In contrast, the SPAS DEIR fails to provide one, defined proposed project, and provides instead numerous potential projects LAWA has labeled "alternatives."

The requirement to identify a single project is present throughout CEQA and the CEQA Guidelines. For example, pursuant to CEQA, an EIR must contain a detailed statement of "all significant effects on the environment of the proposed project." (Pub. Res. Code §21100(b)(1), emphasis added.) The CEQA Guidelines also provide that a project description shall include "[t]he precise location and boundaries of the proposed project . . ." (CEQA Guidelines §15124(a), emphasis added.) Provisions of statutes should be interpreted consistently with the apparent purpose and intention of the legislature. (*DeYoung v. City of San Diego* (1983) 147 Cal.App.3d 11, 18; see also *United Business Com. v. City of San Diego* (1979) 91 Cal.App.3d 156, 170.) The legislature refers to "the proposed project" in the singular. The Legislature's intention that a single project be identified and evaluated in an EIR, compared to feasible alternatives, and modified in response to environmental information received was thwarted as this EIR obscures the true proposal under review.

The importance of a single, defined project description has been discussed repeatedly by the courts.

[A]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. The defined project and not some different project must be the EIR's bona fide subject. [Citation.]

(*Mira Monte Homeowners Assn. v. County of Ventura* (1985) 165 Cal.App.3d 357, 365, emphasis added.)

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Courts have explained the consequences of failing to provide an adequate project description:

A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance.

(*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-93.) *The Inyo* court added that an "enigmatic, or unstable project description draws a red herring across the path of public input." *Id.* at 197-198.

Contrary to CEQA's requirement to identify a single project, the EIR purports to analyze *nine different potential projects* with a myriad of different combinations. By failing to describe a specific proposed project, the DEIR violates CEQA. Even if LAWA's description of numerous potential projects, in place of a project description, was not clearly prohibited, which ARSAC disputes, such a technique violates CEQA because the description of numerous alternatives frustrates the CEQA's twin goals of public participation and informing the public and decision makers of a project's environmental impacts. For example, the matrix prepared to show potential traffic impacts of the Project describes in detail the changes that would be made to each subarea for each alternative, as well as the pros and cons of each element. However, because the DEIR never reveals the preferred Project alternative, it fails to disclose the potential traffic impacts of the Project.

#### B. The DEIR Improperly Uses Incorporation by Reference Without Adequate Descriptions of the Incorporated Material.

The DEIR incorporates by reference the LAX Specific Plan. (See DEIR I-105.) CEQA Guidelines require that certain requirements be met in order to use incorporation by reference:

Where an EIR or Negative Declaration uses incorporation by reference, the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described.

(CEQA Guidelines § 15150(c).)

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However, several sections of the DEIR fail to specifically identify the "incorporated part of the referenced document," in this case the specific sections of the LAX Specific Plan EIR it is incorporating. For example, the DEIR states:

...the analysis of indirect effects from light emissions, air pollutant emissions, and noise is based upon the evaluation contained within the LAX Master Plan EIR [citation to entire Master Plan EIR], which is incorporated by reference into this EIR. Baseline conditions relative to light emissions, air pollutant emissions, and noise are not markedly different from those that existed at the time of the LAX Master Plan EIR. Therefore, conclusions regarding potential impacts associated with baseline conditions at that time are considered to apply to current baseline conditions.

(DEIR 4-99.) By not providing citations to the portions of the document being incorporated, the general public and decision makers are unable to determine what portions of the LAX Specific Plan EIR are being incorporated or how to locate them.

Even when the DEIR references a particular document within the LAX Master Plan EIR, it fails to provide the page numbers where the portion of the document being incorporated is located. When discussing hydrology, the DEIR states:

The rationale for the selection of pollutants of concern is presented in Technical Report 6, *Hydrology and Water Quality Technical Report*, and Technical Report S-5, *Supplemental Hydrology and Water Quality Technical Report*, of the LAX Master Plan Final EIR, which is incorporated by reference...

(DEIR 4-603.) These two technical reports consist of 137 pages in total. To expect members of the public and decision makers to read these entire reports to locate the relevant portions of these documents places an extreme and undue burden on them.

Courts have explained that the presentation of the information in the EIR is extremely important:

The data in an EIR ... must be presented in a manner calculated to adequately inform the public and decision makers, who may not be previously familiar with the details of the project. "[I]nformation 'scattered here and there in EIR appendices' or a report 'buried in an appendix,' is not a substitute for 'a good faith reasoned analysis.'" [Citation.]

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(*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442.) The information that was incorporated by reference in the DEIR fails to adequately inform the public and decision makers.

Also, the DEIR should not use incorporation by reference for its substantive analysis of environmental impacts. The CEQA Guidelines state, "Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." (Guidelines § 15150(f), emphasis added.) Nonetheless, the "analysis of the problem at hand" from the LAX Master Plan EIR is incorporated into the DEIR. An example of this is the DEIR's analysis of effects from light, air pollution, and noise. "[T]he analysis of indirect effects from light emissions, air pollutant emissions, and noise is based upon the evaluation contained within the LAX Master Plan EIR..." (DEIR 4-99.) The DEIR did not use incorporation by reference to properly provide general background information, but rather to improperly support its analysis of these substantive issues.

#### C. Components of the Airport Revitalization Project are Improperly Segmented into Separate Review Processes.

LAWA has undertaken study of maintenance facility separate from the SPAS EIR. This facility should have been included in the DEIR and its impacts, both project specific and cumulative, analyzed. A scoping meeting about this project is scheduled for October 4, with comments due on October 15.

As reported in the Daily Breeze newspaper "Los Angeles World Airports, which operates LAX, says the maintenance complex is needed so that existing facilities in the center of the airport can make way for new terminals and airport access projects." ([http://www.dailybreeze.com/news/ci\\_21621901/lax-begin-environmental-studies-proposed-aircraft-maintenance-compound?source=ss](http://www.dailybreeze.com/news/ci_21621901/lax-begin-environmental-studies-proposed-aircraft-maintenance-compound?source=ss))

One of the features of this project at the west end of LAX (southeast corner of Pershing and World Way West) is a Ground Run-up Enclosure (GRE). The GRE is where aircraft are parked and the engines are turned on for testing. The proposed run-up enclosure will have three sides and no roof. This GRE could cause noise problems for El Segundo and Playa del Rey residents. There are GREs that are fully enclosed like an aircraft hangar. This GRE should be fully enclosed GRE and have restrictions on operating times. There will also be Group VI size aircraft hangars at this location. Who will be the tenant? Will it be Qantas Airways?

Another feature that could adversely affect Playa del Rey, Westchester and Inglewood

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with fugitive dust is the contractor staging yard. Quote from the [ourlax.org](http://ourlax.org) website: "In addition, as part of the proposed Project, existing contractor staging yards and associated infrastructure equipment on the Project site would be relocated to existing LAX staging areas located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of uncharacterized soil and construction rubble) currently existing within and immediately adjacent to the Project site, would be re-used on-site as backfill material and/or exported off-site to permitted landfills." Therefore, the cumulative dust pollution impact of this project and others contemplated must be identified and analyzed in the EIR.

Another project not included in the SPAS EIR is the "LAX Runway 7L/25R Runway Safety Area (RSA) Project & Associated Improvements." LAWA has issued a Notice of Availability on September 28, 2012 for the Draft Environmental Assessment with comments due by November 13, 2012. The 7L/25R runway project is listed under NEPA. Why is this project also not considered under CEQA? If Runway 7L/25R is closed for construction, then this will alter the normal air traffic pattern of aircraft landing on the outboard runways 24 Right and 25 Left and takeoffs occurring on Runways 24 Left and 25 Right. Where are the impacts of a Runway 7L/25R closure, even if for limited time periods, covered in the SPAS DEIR?

#### D. LAWA Should Have Consulted with Public Agencies Potentially Affected By Anticipated Changes.

As lead agency, LAWA is required to consult with responsible and trustee agency with jurisdiction over resources that might be affected by LAWA's proposal. (Public Resources Code 21153(a) [lead shall consult with responsible agency]; Public Resources Code 21080.4(a) [shall send NOP to responsible agency].)

We have learned that LAWA failed to consult with, or even to notify, the Bureau of Sanitation that its sewer lines might be affected by the movement of a runway north and tunneling of Lincoln Boulevard. Denise Chow, an Environmental Engineering Associate in the Wastewater Engineering Services Division of the Bureau of Sanitation of the City of Los Angeles confirmed on September 5, 2012 that her division had not yet received a request to review the SPAS project. Subsequent to an ARSAC request for clarification, LA Sanitation contacted LAWA Planning and confirmed that LAWA understands that the outfall sewers cannot be moved. How that knowledge impacts the rerouting of Lincoln and Sepulveda Boulevards is an unanswered question. In the Specific Plan Amendment Report Appendix G, program level cost estimates are provided, but appear to be severely underestimated given the magnitude of the work that would be involved in relocating wastewater lines.

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Additionally, there is an FAA radar site on Lincoln and McConnell. McConnell is a short street that connects Lincoln to Westchester Parkway. In Alternatives 1, 5 and 6 (DEIR pages 4-693, 4-739 and 4-749, respectively), this radar site would need to be moved to allow for Lincoln to be pushed closer to Westchester Parkway. Therefore, FAA should have to be consulted about this possible relocation.

Was the California Department of Transportation (Caltrans) given the opportunity to review and comment on the potential need to realign by more than a mile and tunnelize California State Route 1? This would not be a minor modification or improvement to the state highway system but rather a major change.

**E. LAWA Has Not Fully Complied with the Terms of the 2006 Settlement**

In a series of communications with LAWA including Public Records Act requests, the most recent being dated July 16, 2012, we expressed concern about, and detailed how, LAWA was not complying with the terms of the 2006 Settlement agreement. (Enclosure.) LAWA failed to consult with Petitioners even during SPAS update meetings prior to the release of the DEIR. Instead, LAWA chose to unilaterally present some, but not all, information about its plans without responding to feedback from ARSAC and others about such issues as the choice and assignments of security consultants, possible tunnelization of Lincoln Boulevard, and air quality impacts to the surrounding communities. We had hoped some of the questions and issues raised in prior correspondence would be addressed in the SPAS DEIR but find that they have not. Therefore, we renew our requests for the information below.

**1. We Requested All Correspondence and Documents Related to Tunnel Projects Contemplated by LAWA.**

It is our understanding that LAWA has been studying at least two tunnel locations: the Manchester Tunnel, a north-south tunnel behind the Bradley Terminal and discontinuous to under Runway 24 Right to the Argo Ditch, and a proposed tunnel on a re-aligned Lincoln Boulevard. We requested all writings regarding these tunnels within the past five years. Specifically, but not exclusively, we requested any inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos. As noted by ARSAC, if tunnelization of Lincoln Boulevard is proposed, those plans must be fully disclosed as part of the EIR so that they are reviewable by the public and public agencies. What inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos have been prepared for potential tunnelization of Lincoln Boulevard?

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responses.")

Though these comments may appear detailed and comprehensive, in view of the length of the EIR, the limited time that has been allowed to review it, and the difficulties accessing the documents, they represent ARSAC's best effort to provide timely comments before the October 10 deadline. Public Resources Code section 21092(b)(1) requires the City to provide "the address where copies of . . . all documents referenced in the draft environmental impact report . . . are available for review." CEQA Guidelines section 15087(c)(5) contains a similar requirement. LAWA did not make copies of the DEIR available at libraries immediately upon its release, and the electronic disc copy of the DEIR was not searchable. Additionally, documents referenced in the DEIR were not available. There are many references in general to the Alternative D EIR which is not readily available. Many of the footnoted documents were not made available. Documents that were available were not only unsearchable, but not susceptible to bookmarking, annotation or extracting pages which are all important in doing an effective review.

ARSAC may submit further comments as more information is made available or clarified. We request that these comments and questions be reviewed by LAWA and addressed. Once the information is supplied or corrected in the EIR, and a preferred alternative is chosen as the proposed project, the DEIR must be recirculated for at least 90 days to provide sufficient time for public review.

**CONCLUSION**

For all of the reasons set forth above and delineated in the attached comments, the current SPAS DEIR is inadequate. The document must be revised and recirculated. Additionally, the Project cannot be approved as proposed because feasible mitigation measures and alternatives exist. As mentioned above, the Settlement Agreement is based on a good faith effort, and ARSAC is disappointed with the results of that agreement thus far. Even so, ARSAC remains committed to working with LAWA to improve and modernize LAX. Thank you for your time and consideration in this matter.

Sincerely,

  
Douglas P. Carstens

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**2. We Requested All Correspondence Between LAWA and FAA in the Past Year.**

We requested all writings that LAWA received from, or sent to, FAA in the past year. We anticipated that the response to this request should include but not be limited to correspondence related to draft Advisory Circular No. 150/5300-13A. A copy of this document is posted at [http://www.faa.gov/documentLibrary/media/Advisory\\_Circular/draft\\_150\\_5300\\_13a.pdf](http://www.faa.gov/documentLibrary/media/Advisory_Circular/draft_150_5300_13a.pdf). It is our understanding the FAA is redesigning the airspace over LAX. That airspace redesign should have been fully explained in the EIR. How has FAA been proposing to redesign the airspace over LAX, and how does that affect LAWA's various proposals?

**III. Attached Comments Prepared by ARSAC Members Identify Numerous Areas in Which Vital Information is Incorrect, Omitted, or Requires Further Clarification.**

We are submitting herewith comments on the DEIR prepared by ARSAC and we request a response to each point raised in them. The comments and questions identify significant areas where vital information is missing. These areas include but are not limited to questions and comments about the following areas: project description; intended uses of the EIR; aesthetics, public health, air quality, traffic circulation and parking, hydrology and water quality, biological resources, hazardous materials, land use planning, wastewater, solid waste, public safety, and cultural resources impacts; and the alternatives analysis. Significant impacts such as air quality impacts and significant traffic impacts to nine or more intersections are not unavoidable. They could be reduced or eliminated by an emphasis on regionalization including greater service at Ontario Airport to meet anticipated future demand instead of building up LAX with expanded facilities to try to provide all services.

"There must be good faith, reasoned analysis in response [to comments received]. Conclusory statements unsupported by factual information will not suffice." (CEQA Guidelines § 15088(c).) This requirement for good faith, reasoned analysis "ensures that stubborn problems or serious criticism are not swept under the rug." (*Santa Clara Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal. App. 4th 715, 732.) Inadequate responses to comments alone can be grounds for voiding a project approval. (*Env. Protection Information Center v. Johnson* (1985) 170 Cal. App. 3d 604, 627.) The level of detail of responses to comments must be commensurate with the detail of the comments. (*Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 878 ["the determination of the sufficiency of the agency's responses to comments on the draft EIR turns upon the detail required in the

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cc: Hon. Antonio Villaraigosa, Mayor of Los Angeles  
Hon. Bill Rosendahl, Los Angeles City Council Member, 11<sup>th</sup> District  
Board of Airport Commissioners  
Gina Marie Lindsey, Executive Director, Los Angeles World Airports  
Hon. Mark Ridley-Thomas, Los Angeles County Supervisor, 2<sup>nd</sup> District  
Hon. Don Knabe, Los Angeles County Supervisor, 4<sup>th</sup> District  
Hon. Janice Hahn, Member of Congress, 36<sup>th</sup> District  
Hon. Maxine Waters, Member of Congress, 35<sup>th</sup> District  
Hon. Barbara Boxer, United States Senator  
Hon. Dianne Feinstein, United States Senator

Attachments: Letter re Second Request for Documents and Compliance with Settlement Agreement, July 16, 2012

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**CHATTEN-BROWN & CARSTENS**

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July 16, 2012

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Brian Haig  
By email: [BHaig@lawa.org](mailto:BHaig@lawa.org)

Re: Second Request for Documents and Information to Be Provided in Compliance with February 16, 2006 Settlement Agreement in County of Riverside Case No. RIC-426822, *City of El Segundo v. City of Los Angeles*, and Pursuant to the Public Records Act

Dear Ms. Tracy and Mr. Haig:

Thank you for sending your letter of June 7, 2012 and providing certain documents. For clarity's sake we list out the documents we received from LAWA in response to our letter:

1. Letter dated June 7, 2012 from Los Angeles City Attorney to Chatten-Brown & Carstens
2. Req for St Lighting May 20 2009 (rec'd on 6-7-12, email from Brian Haig)
3. SPAS Advisory Committee Meeting Presentation 03-12-2012 (rec'd on 6-7-12 in email from Brian Haig)
4. Airport Regional Strategic Plan 2009 (rec'd on 6-7-12 in email from Brian Haig)
5. Airport Regional Strategic Plan 2007 (rec'd on 6-7-12 in email from Brian Haig)
6. 1st Mtg Agenda 10-12 SCRAA (rec'd on 6-7-12) in email from Brian Haig)
7. SCRAA Mailing List (rec'd on 6-7-12 in email from Brian Haig)
8. SCRAA Minutes 10 12 06 (rec'd on 6-7-12 in email from Brian Haig)
9. SCRAA PUBLIC MEETING NOTICE 101206 (rec'd on 6-7-12 in email from Brian Haig)

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**A. We Requested the Air Quality Apportionment Study Supporting Data, an Update on Its Status, and All Annual Contractor Progress Reports.**

We note that the links to the Air Quality Apportionment Study that you provided were not provided to ARSAC until Brian Haig's email in response to our letter in June 2012. This obviously was not conducted in consultation with all Petitioners.

The links that were provided with the study do not have any data or set of conclusions from the first two and a half phases of the three phase study. We request all writings that are related to the Air Source Apportionment Study, including but not limited to the Phase I and II data and "preliminary emissions inventory" as noted on the website.

**B. We Requested Documents Regarding Traffic Analysis.**

Regarding traffic analysis, thank you for the lists of intersections that were added. We were not aware of other intersections that had been identified until you sent the lists provided in emails from other Petitioners. We note that lists of intersections were contained to LAWA in 2008, but these lists were not provided to all ARSAC until Brian Haig's email in response to our letter. We look forward to reviewing the SPAS DEIR's analysis of traffic issues including time phased estimated traffic counts entering the CTA from each of the three directions which were promised in several SPAS meetings from 2008 on.

**C. Security Consultation Requirements Were Not Adequately Met.**

We continue to disagree that security consultation with Petitioners has been adequately undertaken. LAWA has not answered the questions posed about the content, selection process, and other issues raised in ARSAC's prior letters. Slides 15-17 at the March 12 SPAS meeting do not address the scope of the security study. Slide 16 states "TransSecure may provide programmatic recommendations" but there is no more detailed information (and none provided verbally in the meeting).

**D. We Requested Documents or Information Identified in Various Other Provisions of the Settlement Agreement.**

You noted the provision of the "Airport Layout Plan" is pending. We look forward to reviewing that when it is made available.

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10. REGIONALIZATION UPDATE 12-15-11 BOAC (rec'd on 6-7-12 in email from Brian Haig)
11. 2008 REGIONALIZATION UPDATE NON-BOAC (rec'd on 6-7-12 in email from Brian Haig)
12. 2007 BOAC regionalization update (rec'd on 6-7-12 in email from Brian Haig)
13. FAA Response Letter Dated 10 2 09 Street Lights (rec'd on 6-7-12)
14. Board Report for amendment1 (rec'd on 5-29-12)
15. Board report (rec'd on 5-29-12)
16. CONTRACT CAMP DRESSER AND MCKEE INC (rec'd on 5-29-12)
17. First amendment camp dresser and mckee inc (rec'd on 5-29-12)
18. 2008 LAX Metro Green Line Task Force Record Proceedings Part5 (rec'd on 5-29-12)
19. 2008 LAX Metro Green Line Task Force Record Proceedings Part4
20. 2008 LAX Metro Green Line Task Force Record Proceedings Part3
21. 2008 LAX Metro Green Line Task Force Record Proceedings Part2
22. 2008 LAX Metro Green Line Task Force Record Proceedings Part1 (rec'd on 5-29-12)
23. Response to Chatten-Brown & Carstens-May 24, 2012 (rec'd on 5-24-12)

Please advise us if you believe LAWA sent other documents that we have not listed.

We do not believe these documents show that LAWA has complied with the Settlement Agreement. Therefore, we are both requesting further writings, and look forward to discussing with you what can be done to meet the terms of the agreement. While we appreciate LAWA's attempts to achieve compliance with the agreement, we do not intend for our comments and further requests about certain items to imply that we are satisfied that LAWA has complied with the Settlement Agreement with regard to all of its provisions. Instead, at this time we are still conducting our review of documents and considering how to obtain more complete compliance with the Agreement. Part of our hope is that the Draft Environmental Impact Report and Specific Plan Amendment Study Report whose existence was first referenced in the June 28 SPAS meeting and promised to be released simultaneously and include costing information, when they are released later in July as has been anticipated, will supply necessary information though much of it should have been made available earlier.

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With regard to our request for documents about the Regional Airport Working Group (Section VII of the Settlement Agreement), LAWA noted that SCRAA disbanded. However, SCRAA is not the only activity LAWA could or should undertake to promote regionalization. As noted, and requested, below, LAWA must also develop a regional strategic planning initiative each year to analyze potential opportunities to utilize under-utilized airports. LAWA appears to have extended one invitation and then nothing more when that did not work out.

With regard to Regional Strategic Planning (Settlement Agreement Section VIII), LAWA responded with a link and statement that the most recent report was Dec. 15, 2011 sent by Brian Haig.

It is our understanding that the initial regional strategic plan was "withdrawn" by LAWA and cancelled. LAWA has not held a regionalization meeting with petitioners for several years despite requests to do so. The BOAC presentations (2007 and 2008 BOAC regionalization updates) were status reports of LAWA efforts; they did not provide documentary back up and they did not provide specifics. We request all writings related to Regional Strategic Planning.

We requested documentation showing compliance with the requirement to operate at least eight FlyAway sites before 2015 and implement a public outreach program. LAWA responded that compliance is not required until 2015. While full compliance is not due until 2015, has there been any progress on this settlement term to date? We request all writings related to FlyAway sites.

We requested information about the conversion of LAWA and tenant GSE to low emission technology by 2015. LAWA responded that compliance is not required until 2015. While full compliance is not due until 2015, has there been any progress on this settlement term to date? We request all writings related to conversion of LAWA and tenant GSE to low emission technology.

Regarding electrification of passenger gates, LAWA responded with a list of gates in the attachment to the letter. The total number of gates listed was 133, not 158. It was our impression that there is a cap of 158 gates and that there are 158 gates at LAX. Please confirm that there are only 133 gates, or provide writings related to electrification of the other 25.

Regarding LAWA's attempt to establish a fund of \$1 million to participate in street lighting projects affecting residential neighborhoods adjacent to the northern boundary of LAX, LAWA sent a copy of FAA's letter rejecting LAWA's request. After

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we asked, LAWA sent a copy of the letter requesting the funding. The letter did not make it clear which streets were the subject of the lighting request.

**E. We Requested Information Regarding Projects LAWA Considers Not Covered By the Settlement Agreement.**

LAWA did not provide any list of projects it considers to be outside the scope of the settlement agreement in response to our request. Please provide us a copy of all notices pursuant to Public Resources section 21092.2 and the Public Records Act for all projects conducted or planned by LAWA since 2006. We request such documents whether they are related to the Settlement Agreement or not.

**F. We Request All Correspondence and Documents Related to Tunnel Projects Contemplated by LAWA.**

It is our understanding that LAWA has been studying at least three tunnel locations: on Manchester Boulevard, a north-south tunnel behind the Bradley Terminal, and on Lincoln. We request all writings regarding these tunnels within the past five years. Specifically, but not exclusively, we request any inspection reports, test reports, memos, correspondence, drawings, plans, maps, photos and videos.

**G. We Request All Correspondence Between LAWA and FAA in the Past Year.**

We request all writings that LAWA received from or sent to FAA in the past year. We anticipate that the response to this request should include but not be limited to correspondence related to draft Advisory Circular No. 150/5300-13A. A copy of this document is posted at [http://www.faa.gov/documentLibrary/media/Advisory\\_Circular/draft\\_150\\_5300\\_13a.pdf](http://www.faa.gov/documentLibrary/media/Advisory_Circular/draft_150_5300_13a.pdf).

**CONCLUSION**

Please let us know if you would like to discuss our requests, and the schedule for supplying the requested information if it will not be possible to provide all documents within 10 days as required by the Public Records Act.


If documents are provided after July 30, we ask that you transmit them by email, or provide them to us at our new office location at 2200 Pacific Coast Highway, Suite 218, Hermosa Beach, CA 90254.

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Thank you for your consideration.

Sincerely,

  
Douglas P. Carstens

cc: Gina Marie Lindsey, LAWA Executive Director  
Hon. Antonio Villaraigosa, Mayor Los Angeles  
Hon. Bill Rosendahl, Councilman, 11<sup>th</sup> District  
Hon. Carmen Trutanich, City Attorney, Los Angeles  
Attorneys for the County of Los Angeles  
Attorneys for City of Culver City  
Attorneys for City of Inglewood  
Attorneys for City of El Segundo  
ARSAC

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**ARSAC Alliance for a Regional Solution to Airport Congestion**

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(LETTER ABOUT SPAS FOR INCLUSION IN OUR DEIR SUBMITTAL)

October 8, 2012

Ms. Gina Marie Lindsey, Executive Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

LAX Specific Plan Amendment Process and Draft EIR Comments due before October 10, 2012

Ref: Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (DEIR) CA Clearinghouse No. 1997061047) dated July 2012 and Preliminary LAX Specific Plan Amendment Study Report (unnumbered) also dated July 2012

Dear Ms. Lindsey:

We continue to want to work with you in creating the world class LAX airport that the City of Los Angeles and the region deserves.

The close of the DEIR comment period should have been a momentum building milestone in the SPAS process. Instead we are left with almost as many questions after the documents are released as before.

Many of the issues raised over the past six years remain unaddressed including those in our 2008 and 2010 Notice of Preparation comments. The response period for this DEIR has been so short that we have concentrated our efforts on the DEIR to preserve all of our legal options. The 6,000 page SPAS Report included with the DEIR release and, the Stipulated Settlement activities conduct in general, will be addressed much more comprehensively after the DEIR comment period has expired.

ARSAC has difficulties with the much delayed SPAS implementation process and presented assessment but we want to facilitate the modernization of LAX as quickly as possible. To this end, we support implementation of SPAS DEIR Alternative 2 with the incorporation of Alternative 9 to reaffirm the consolidated rental car facility in Manchester Square along with a rail type connection into LAX.

We encourage LAWA to designate this combination the preferred alternative. In our opinion, this action is a "no brainer" because it meets the stated goals introduced in the DEIR and is a benefit to all stakeholders. Alternative 2 is referred to as "the Environmentally Superior Alternative," is assessed to have the most efficient times from runway to gate, lowest cost, least construction cost and schedule risks, least impact on surrounding communities, and includes the taxiway changes that provide safe operations.

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Although LAXA has not yet committed to phasing or scheduling of project elements, we encourage you to start with the landslide and taxiway projects which impact visitor and tourist experience while creating the greater number of much needed, permanent jobs. We ask that these projects be done first to ensure that LAXA will not run out of money or credit before the critical landslide projects are completed.

Less than seventy-five days ago LAXA released the DEIR and a SPAS Report consisting of over 12,000 pages causing struggle to complete a comprehensive review. LAXA chose not to facilitate our review by withholding detailed information prior to the formal release. LAXA also hindered the process by releasing restricted use PDF document files that precluded cutting, pasting, bookmarking and extracting pages.

There are several major issues which we want to highlight to you and by including this letter in our DEIR Comments request responses for the final EIR.

#### The Master Plan Vision is Incomplete.

Many of our community leaders predate the current round of program planning and the establishment of LAX Specific Plan whereas the present LAXA management team is "relatively new." We fear that LAXA corporate knowledge continuity of promises made to the community has been lost. Perhaps LAXA is unaware that the overriding purpose of the 2006 Stipulated Settlement is to develop a total Master Plan for LAX which revises Alternative D with elements that are of no greater impact on the surrounding communities. That intent is thwarted within the current DEIR and preliminary report that is neither comprehensive nor fully accurate.

- Nowhere in any of the SPAS DEIR is a Master Plan that provides the total vision for the future of LAX. In fact, several new elements are referred to in the documents as being out of the scope of the DEIR such as terminals 1.5 and terminals 2.5, and passenger support areas in the CTA such as tearing down parking structures P3 and P4 to build a Tom Bradley International passenger processing area. Further, elements such as the recently released NOP for the West Aircraft Maintenance Area are not even included in the overall program level plan discussions. Master Plan Alternative D contains two taxiways to connect the north and south runway complexes, R and S, but only S has been constructed. We understand that taxiway R will be built sometime in the future using some unrevealed trigger condition but that the evaluations assume both are in place. Your staff likely has more examples since we are not privy to LAXA future construction planning such as Belford Square which LAXA now owns but whose purpose has not been revealed.
- For us to have provided more effective solution suggestions, it would have been helpful for us to have LAXA planned major maintenance ideas of the magnitude of the Central Utilities Plant or identified, but not fully scoped upper roadway repairs.
- The Settlement presents a list of the Yellow Light projects. It was expected (and requested by ARSAC numerous times over the past six years) that LAXA identify and quantify the specific parameters that the Yellow Light Projects had resolved so that we could ensure that the updated Master Plan properly addressed them. This was not intended to be a carte blanche for LAXA to create a new set of goals for Master Planning and to ignore the requirement not to be more intrusive on local communities.

#### The SPAS Matrix of Projects fails to provide a unique project for comments and questions.

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The mix and match approach doesn't focus on only one vision. As such, we are unable to determine the interrelationship of the elements within the environmental assessments made by LAXA. In order to present specific questions we are forced to make several assumptions about what LAXA has included in its detailed analyses. The assumptions made at the sub element level are not directly specified in the detail appendices.

#### Inadequate Solutions are Evaluated and it appears SPAS generated suggestions were ignored.

Throughout the document LAXA has indicated that there are significant and unavoidable impacts which are driven by the projected increase in LAX passenger use or aircraft operation assumptions. LAXA in many cases didn't even address cargo increase impacts. LAXA appears to have used the increased use of LAX and its attendant overwhelming impacts as a reason to not change basic approaches. In the traffic section and appendices, for instance, LAXA created matrices of scenarios for various sub elements and then analyzed the pros and cons of each approach. Which elements were assumed in the evaluation calculations, however was never highlighted.

- Never is there any mention of the extensive traffic discussions held in the SPAS meetings which provided innovative impact solutions. One example is the diversion of traffic from the 96<sup>th</sup> Street bridge into the Park One area and creating paths for allowing Terminal One passenger vehicles to leave the area directly onto Sepulveda without going through the CTA loop. This is known as the "Front Door Terminal Concept." Another is the traffic flow changes recommended by the Petitioners in the drawings made by HNTB for us and given to LAXA. Yet another was the rerouting of traffic from the 405 to the underutilized LaCienega Boulevard which runs parallel to the 405 beyond Manchester Avenue to Century.

#### Northern Runway Movement Impacts not fully evaluated or disclosed.

The DEIR states in general terms that movements of Lincoln Boulevard, changes to the ARGO Flood Control Channel, and removal of a decommissioned 740' Manchester Tunnel that extended Lincoln Boulevard to approximately where Runway 24L exists would be required if a runway is moved north. The DEIR assumed that the Runway Protection Zone areas would not be fully enforced. It never addressed the upcoming changes in the FAA Advisory Circular 150/5300-13A Airports Design to be released at the end of September 2012 or the FAA airspace redesign efforts in process.

#### Air Quality studies in process for the past five years were ignored.

The overdue Air Quality and Apportionment Study that is currently three years in arrears is not even mentioned in the air quality evaluation sections of the DEIR. Since LAXA is now saying that the last phase of the comprehensive study would be complete in the first quarter of 2013 there should have been some useful data available.

#### Cost Estimates for various projects are questionable.

Although not normally a part of the DEIR, this important issue was included in the SPAS Report and therefore relevant to this discussion.

- In 2008 LAXA started to provide cost estimates. That effort was suspended and not restarted when we pointed out to LAXA that the estimates demonstrated that it was more expensive to "not move a runway at all" than to pour concrete, move utilities, and to implement all of the other necessary changes.
- The current report has a cost chart that is used extensively in all of the presentations made by LAXA. In the June 28, 2012 SPAS meeting with the Petitioners LAXA presented this chart and, after questions, admitted that several major cost factors were not included that should have been to provide a comprehensive picture. Despite knowing the inadequacies LAXA continues

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to present this same chart without noting limitations at presentations to BOAC, formal SPAS DEIR comment hearings and the recent Neighborhood Council Westchester-Playa Town hall.

- We are including lots of cost comment questions to the DEIR questions to clarify assumptions made and to get a better picture of the cost impact differences of the various runway movement amounts. This includes the impacts of underground utilities including sewers (both movable and those too expensive to move), gas lines, power lines, water channels, tunnels, etc.
- We know that the costs needed to bring LAX up to "World Class" will be substantial. Although it is not a CEQA requirement, it is important for decision makers to have this information. Will there be enough money to complete all of the tasks? We are concerned that even with FAA grants the cost to implement the needed changes are tremendous and work could be limited by available credit. We understand that time phasing is not normally a requirement of a DEIR, but again this is critical to decision makers. Even if not part of the DEIR, please present as part of SPAS a time phasing of how LAXA would complete its projects. As you heard often at the hearings and town hall we encourage LAXA to start with landslide and critical taxiway improvements before going to any risky construction projects associated with moving runways.

#### General impacts not fully disclosed.

What assumptions has LAXA made about runway protection zones implementation? How much residential and business areas will be impacted with removal? How much residential and business area will be in the RPZ but remain with aircraft landing and taking off over or just adjacent to them? If Lincoln is moved and lowered to some level in avoidance of the outfall sewers that can't be moved how will that impact the Sepulveda Business District?

#### The Regionalization Component of the LAX Master Plan has been ignored.

A tenant of the entire process to update the LAX Master Plan is to incorporate LAX into a regional network of airports to improve capacity, and drive down the impacts of air commerce. The idea is to create alternatives to having just one vulnerable airport handle the majority of the air commerce (as is the case with LAX currently) and to expedite an effective back up plan. To date the best candidates to foster regionalization, LA/Ontario and LA/Palmdale have been far less than genuine. The alternatives considered as part of this DEIR did not include a regionalization component. For that reason we have pushed for the local control of these airports.

While it is bad enough to ignore regionalization, it is a flagrant violation to work in direct opposition to a term of the Settlement Agreement. LAXA listed "SPAS Project Goal 3" as enhancing LAX capacity.

The questions in this letter are requested to be addressed as part of the DEIR process. Additional questions are also attached in the ARSAC submittal with this letter for LAXA to address before moving forward into the approval process.

Sincerely,



Dennis Schneider

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### Summary of the LAX Specific Plan Amendment Alternatives in the 8-2012 DEIR

(ARSAC Generated [www.RegionalSolution.org](http://www.RegionalSolution.org))

Alt #	Alternative Name/Comments	Characteristics
1	<b>LAXA Mgmt Preferred</b> -Fully Integrated Alternative -Displaces businesses and homes -Risky construction factors, could be very costly in time and delays -Fixes little traffic or CTA access -Major underground utilities, sewer, and tunnel impacts	Moves Runway 24R (outboard) — 280' N and 600' W (width to 200'), Moves Runway 24L (inboard) — 1250' E. Reconfigures taxiways and taxiways to accommodate bigger aircraft. Moves Terminal 3 340' W. Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N Argo Flood Channel enclosed Eliminated ConRAC Lincoln Blvd repositioned to sub terrain or tunnel and new Sepulveda interface Impacts business district and homes Redesigned 96 <sup>th</sup> St. Entrance into Park One Leaves Runways in current location Reconfigures taxiways and taxiways to accommodate bigger aircraft Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N No ConRAC Redesigned 96 <sup>th</sup> St. Entrance into Park One Lincoln Blvd/Sepulveda Blvd interface intact
2	<b>No Runway Movement</b> -Fully Integrated Alternative -Most affordable -Does little for traffic and CTA access	Extends Runway 24R (outboard) 1,495 feet west Moves Runway 24L (inboard) 340' S and adds Centerfield taxiway Reconfigures taxiways and taxiways to accommodate bigger aircraft ConRAC in Lot C Ground Transportation Center in Manchester Square with baggage tunnel to Central Terminal Area Central Terminal Area Closed to traffic Integrated Transportation Center in Continental City Lincoln Blvd/Sepulveda Blvd interface intact
3	<b>City Approved Alt D</b> -Fully Integrated Alternative -NOT AFFORDABLE Cost has risen from \$12B 2004 approval time estimate at to over \$100 B in eight years	Extends Runway 24R (outboard) 1,495 feet west Moves Runway 24L (inboard) 340' S and adds Centerfield taxiway Reconfigures taxiways and taxiways to accommodate bigger aircraft ConRAC in Lot C Ground Transportation Center in Manchester Square with baggage tunnel to Central Terminal Area Central Terminal Area Closed to traffic Integrated Transportation Center in Continental City Lincoln Blvd/Sepulveda Blvd interface intact
4	<b>Alt D Green light projects w misc projects. No yellow projects. No yellow projects.</b> -Fully Integrated Alternative -Limited runway movement -No runway movement North -Least impacts or cost -Does little for traffic and CTA access	Moves Runway 24R (outboard) 1,495 feet west Moves Runway 24L (inboard) 340' S and adds Centerfield taxiway Reconfigures taxiways and taxiways to accommodate bigger aircraft ConRAC in Lot C Ground Transportation Center in Manchester Square with baggage tunnel to Central Terminal Area Central Terminal Area Closed to traffic Integrated Transportation Center in Continental City Lincoln Blvd/Sepulveda Blvd interface intact

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5	<p><b>Airfield Mod 350' N</b></p> <p>"Airfield Change Alternative"</p> <p>-Greatest impacts north businesses and residents/major move of flight path north</p> <p>-Risky construction factors: could be very costly in time and delays</p> <p>-Does little for traffic and CTA access</p>	<p>Move Runway 24R (outboard)—350' N and 604' W (increase to 200' wide)</p> <p>Move Runway 24L (inboard)—1250' E</p> <p>Adds Centerfield Taxiway</p> <p>Moves Terminal 3 40' W. Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N</p> <p>Argo Flood Channel enclosed (1957)</p> <p>Lincoln Blvd sub terrain and moved/new Sepulveda connect</p> <p>Impacts business district and homes</p> <p>All west remote gates eliminated</p> <p>Compatible with ground access in Alts 1,2,8, &amp; 9</p>
6	<p><b>Airfield Mod 100' N</b></p> <p>"Airfield Change Alternative"</p> <p>-Impacts north businesses and residents/major move of flight path north</p> <p>-Risky construction factors: could be very costly in time and delays</p> <p>-Does little for traffic and CTA access</p>	<p>Move Runway 24R (outboard)—100' N (no extension or widening)</p> <p>Move Runway 24L (inboard)—1250' E</p> <p>Adds Centerfield Taxiway</p> <p>Reconfigures taxiways and taxiways to accommodate bigger aircraft</p> <p>Argo Flood Channel partially enclosed (1400')</p> <p>Lincoln Blvd sub terrain and moved/new Sepulveda connect</p> <p>Impacts business district and homes</p> <p>Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N</p> <p>All west remote gates eliminated</p> <p>Compatible with ground access in Alts 1,2,8, &amp; 9</p>
7	<p><b>Airfield Mod 100' S</b></p> <p>"Airfield Change Alternative"</p> <p>-Avoids construction risks of tunnel, roadway moves, sewers</p>	<p>Runway 24R (outboard)—no extension or widening</p> <p>Move Runway 24L (inboard)—100' S and extend 1250' E (wide to 200')</p> <p>Adds Centerfield Taxiway</p> <p>Reconfigures taxiways and taxiways to accommodate bigger aircraft</p> <p>All west remote gates eliminated</p> <p>No business district or home impact</p> <p>Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N</p> <p>Compatible with ground access in Alts 1,2,8, &amp; 9</p>
8	<p><b>Consolidated Rental Car - bus</b></p> <p>"Ground Alternative"</p> <p>-Spills to reduce CTA traffic</p> <p>-collector's reimbursement req'd</p>	<p>Removes ConBAC</p> <p>Paces Parking in Manchester Square</p> <p>(Must be combined with others to establish Full Master Plan)</p>
9	<p><b>Consolidated Rental Car - peo mov</b></p> <p>"Ground Alternative"</p> <p>-reduces CTA traffic</p>	<p>Moves ConBAC to Manchester Square from Lot C (as approved in Alt b)</p> <p>(Must be combined with others to establish Full Master Plan)</p>

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Attachment of Detail Comments and Questions for LAWA to address as part of the final release of the SPAS DEIR due 10/10/2012

Los Angeles International Airport -- LAX Specific Plan Amendment Study Draft EIR July 2012

General comment: These comments are by no means comprehensive as we have been given inadequate time to fully evaluate the statements and studies presented in the 12,000 pages (6000 DEIR, supporting 6000 SPAS Report).

These comments were prepared by many readers. Many, but not all, have specified a specific section in the DEIR. Comments are in regular text and questions are in italics. These are supplemental to the general issues and questions raised in the basic letter, ARSAC position letter with questions, and other attachments where questions are asked.

The newly referenced check in for a midfield terminal, for instance, is noted as non-spas and is not in the existing Master Plan. Question: What is the basis for LAWA interpretation of SPAS project relevancy for inclusions in this DEIR? Doesn't inclusion of this have a ripple impact on CTA parking?

The way that the alternatives are presented makes it nearly impossible to ensure we understand what was evaluated in any particular circumstance. Question: How can we determine what is assumed in each evaluation? How does LAWA justify the tearing and reference to Alt D EIR without specificity?

The 2006 Stipulated Settlement calls for reworking the Master Plan to include potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the "Alternative Projects"). Question: How has LAWA determined which projects are part of SPAS and how is it finishing the task to incorporate the entire package of projects into a coherent, comprehensive group of projects into a Master Plan?

Hydrology can impact long term viability of the north airfield from impacts of an unknown water source that can flood areas, distribute pollution, and has caused sink holes. We note that LAWA is making changes to the Argo Ditch Flood Channel as noted in Hydrology tech reports 6 and 5-5. Question: On what basis has LAWA confirmed that projects won't change underground water pathways causing problems? How has LAWA analyzed past sink hole occurrences? By what authority have they redesigned the Argo ditch without coordinating with the design authority?

Question: IF NOP was released in 2010 shouldn't data used in analyses be from then forward? Is there a table of data, periods used for the various analyses and the period covered by the data? Why must LAWA choose, in some cases year old data instead of from NOP inception for twelve months since monthly values are frequently available?

Reference to the Alt D EIR is generally used as justification for not studying something yet specifics are not included in this DEIR document (ie archeology, hydrology issues). Question: Please create a list of each element that is not being freshly studied.

Alternative 7 includes moving runway 24R 100' south. It seems to be a hybrid of ARSAC submittal and the LAWA fatal flaw versions. Question: How was the included version of 100' S determined? Where is this document? Could this version be tweaked to improve taxiway changes or improve the gate availability of a new Terminal 0?

Safety is the political reason given for runway expansion. The Academic Panel/NASA study (NASS) is referenced in the DEIR as equivalent to several less rigorous studies. LAWA also included an FAA response letter to the NASS and called it "a study." Question: When establishing safety needs and status why didn't LAWA include the Academic response to the FAA letter? Why were none of the NTSB concerns with FAA design criteria not included in the discussions of runway expansion? Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 1

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safety? What other studies of runway safety have been conducted that are relevant to the design issues at LAX? How has LAWA reviewed actual data? Has LAWA kept incursion and excursion data for LAX since it stopped posting it on it's website? When the FAA fails to post incident data for extended periods of time after an event does LAWA keep track status or ask why it has not been presented?

The comments below are for the Main Document of the DEIR.

Page 1-1 1.1.2 INTRODUCTION AND EXECUTIVE SUMMARY

General Question: Overview includes reference to Palmdale airport. Has LAWA officially given up LA/Palmdale operational certificate and therefore all responsibility?

Page 1-1 to 1-2 1.1.1 LAX Master Plan and EIR

In December 2004, the Los Angeles City Council approved the LAX Master Plan<sup>2</sup> and related entitlements for the future development of LAX. The LAX Master Plan provides the first major new facilities for, and improvements to, the airport since 1984, and plans to accommodate projected growth in passengers and cargo at LAX through the year 2015. The LAX Master Plan serves as a broad policy statement regarding the conceptual strategic planning framework for future improvements at LAX and working guidelines to be consulted by LAWA as it formulates and processes site-specific projects under the LAX Master Plan program.

Environmental Review and Approval (Phase III): Phase III of the LAX Master Plan Study included a thorough evaluation of the potential environmental effects associated with the four build alternatives....

Questions:

1. Since they reference the phases, does LAWA have to review the assumptions to see if their assumptions still justify disregarding ideas?

2. Must this also only go to 2015 or could it be required to go to 2020 or beyond?

Figure 1-2 shows the existing airport and the Argo drainage channel just north and east of 24R to west of 24R. Will there be a chart that shows the utilities underground such as the major sewer lines and tunnels in the area so that construction projects are assessable? If included, where is it? If not included, why not?

Page 1-9 1.1.2 The Stipulated Settlement

In January 2005, the City of El Segundo, the City of Inglewood, the City of Culver City, the County of Los Angeles, and the Alliance for a Regional Solution to Airport Congestion (Petitioners) filed petitions challenging the approval of the LAX Master Plan Program. In early 2006, the City of Los Angeles and Petitioners agreed to, and the court approved, a Stipulated Settlement of the subject lawsuits (Stipulated Settlement). "... is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region...."

Question: How does LAWA interpret this statement of minimizing environmental impacts? Is the best performing environmentally preferred since it minimizes impacts? What specific conditions are used by LAWA to create conditions that encourage airlines to go to other airports?

Page 1-10 1.2 Summary of Proposed Project

The proposed project is the LAX SPAS. As noted above, the SPAS process involves the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address.

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Question: Where is the table of problems that the Yellow Light Projects were designed to address and what quantifiable numbers are assigned to these problems so that we can assess if the solutions are adequate or in the case of multiple solutions which more closely matches the solution of the Yellow Light Project?

#### Page 1-10 1.2.1 Project Objectives

1. Provide North Airfield Improvements that Support the Safe and Efficient Movement of Aircraft at LAX...

Existing problems associated with the outdated airfield design include, but are not limited to, the following:

- LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group (ADG) V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).

- The north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay.

#### Question: 1.2.1 bullet 1

LAWA states that neither of the airfield complexes meet Grp V or Grp VI but the basis for the SAIP was that it would. Are the designs contemplated supposed to meet the requirements in place at the time Alt D was passed, requirements current at NOP release, or current/future requirements in the draft AC 150/5300-13A approved last month?

Is it the LAWA position that all standards MUST be met without waiver or is there some standards of practicality and cost involved? What are those factors?

#### Question: 1.2.1 bullet 2

If the north airfield configuration is not "...optimal for safety and increase aircraft delay," what condition is acceptable for safety and aircraft times and how was it determined? What assumptions in airfield conditions are made? What would be the time phasing of implementation of the design changes? Is the answer that LAWA is to provide safety based on total project implementation? What technical improvements and signage marking improvements are assumed? What about staffing and work load? What other factors has LAWA included in its assumptions?

#### Page 1-11

- The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

Question: Although ARSAC has acknowledged support for extending 24L east, how many flights per year are not acceptable for assignment to the current north runway? Is this based on a decision made by a carrier or is it related to the aircraft and weather conditions? How is this decision made? Please quantify the number of aircraft involved and where they originated for the past years and show how this can be extrapolated to the future. What is the time taxiing penalty for aircraft moving from one complex to the other?

- The outdated airfield design creates a situation where aircraft are at increased risk of hazards. Those hazards include potential collisions with other aircraft, such as when a landing aircraft might move in the path of a departing aircraft (incursion). 7 Other potential hazards include, but are not limited to, insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. Such hazards contribute to the potential for conflicts between taxiing aircraft and ground vehicles on runways, taxiways, and nearby service roads.

Question: The reference to incursions says that it is based on inadequate spacing between runways and taxiways. Every one of the designs submitted by LAWA to move north which includes a center line taxiway leaves a condition where an aircraft on the taxiway is closer to an adjoining runway than is currently the condition between the two runways. What is the basis for which LAWA has determined that this is acceptable?

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number of concerns relative to traffic flows including, but not limited to, the following:

- CTA roadway system design currently creates queuing, weaving, and conflict points at various locations that impede traffic flow;
- During peak travel times, inbound airport traffic currently extends out of the CTA roadways onto public streets and may worsen as airport activity returns and grows;

#### Question: 1.2.1 Topic 2 - Improve Ground Access

What were the Alt D ground access improvements? Numerically, how many more people could get to their gates?

Again, all of the bullets describe more of the "problems" with the current rather than what improvements were accomplished that need to be addressed. Since virtually no significant changes are imposed on CTA traffic by the LAWA alternatives what does LAWA believe should be done to improve traffic? Is this objective considered lower priority? How can these improvements be combined with the various capital improvement and refurbishment projects that LAWA must entertain just to keep LAX open?

#### Page 1-12 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region

LAX serves a key role in the region's economy, particularly as related to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic flight traveling round-trip from LAX everyday added \$623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with \$155 million in wages. 8 Given the continued growth in, and reliance on, new large aircraft such as the Airbus A380 by major airlines operating on those long distance international routes, it is important that LAX be able to effectively accommodate those aircraft.

LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger-scale, LAX related regional employment provided over 400,000 jobs and \$60 billion in economic output.

Question: Although air commerce is tied strongly to our regional economy, where does LAWA prove that the amount of economic benefits couldn't be provided by having the same amount of economic activity disbursed around the region. How is this objective consistent with fixing the problems which Alt D fixed? Are the numbers quoted based on LAWA's dominant position with 75% of all activity? A prior 1968 LAX Master Plan EIR recognized the importance of regionalization. Is this objective lost by the current LAWA administration? It also talks about job growth. Since there's not unlimited funds, has LAWA done an evaluation of job/economic impacts of the various types of jobs? We understand that landside projects provide twice the job creation of airside ones and 8X more economic benefits. What has LAWA's studies shown?

#### Page 1-12 10. Los Angeles Economic Development Corporation, Economic Impact Analysis - LAX Airfield and Terminal Construction Projects, 2011.

Question: LAWA appears to be relying on this LAEDC analysis. Where in the document pile is this analysis? If not included, please make it available.

Page 1-13 4. Plan Improvements That Do Not Result in More Than 153 Passenger Gates at 78.9 MAP In identifying and evaluating alternatives to the demolition of Terminals 1, 2, and 3, LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 passenger gates, which was based on a future passenger activity level of 78.9 MAP at LAX in 2015.

Question: No more than 153 gates? What schedule for phase out of gates has LAWA created or assumed when evaluating their alternatives? Is there a plan to remove the remote gates? Separate projects like the AA gates in the southeast portion of LAX are apparently not part of this study since a separate NOP and negdec was used. What other gate related projects are contemplated?

#### Page 1-13 5. Enhance Safety and Security at LAX

In identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the

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- With one exception, the north airfield configuration does not comply with FAA Runway Safety Area (RSA) requirements.

Question: If the RSA requirements are not met, how does LAWA justify or explain that these RSA would not have changed in previous approved Master Plans or the FAA Record of Decision? Will LAWA explain and list all of the requirements which will NOW be required to be met, but were acceptable to be grandfathered as is before?

- The north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75.

Question: "The north airfield high-speed taxiways are not in compliance..." LAWA is not required to meet every Engineering Brief as these are advisory. Has LAWA performed studies or reviewed any FAA studies to show that these must be required? Past history on the south complex was that high speed turnoffs (hst) were ADDED for safety and then it was recently changed for the SAIP which removed hst's. How do we know that the requirement will not change back to hst's before the north is reconfigured?

- The north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing departing aircraft.

Question: What requirement is not met to specify that the "north airfield does not provide sufficient areas... for holding flights..." Since this study is to address items fixed by yellow light projects, what specifically changed in Alt D to justify this?

- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

Question: If "existing Runway Protection Zone (RPZ) ...includes residential uses" what changes are in the yellow light project that fixed this or caused it to be worse? The RPZ was approved by the FAA in its Record of Decision.

#### Page 1-11

In identifying and evaluating alternatives to the north airfield improvements called for in the LAX Master Plan, LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX; specifically, such improvements:

- Are consistent with FAA design standards for the largest aircraft types currently in service and anticipated for the future (ADG V and VI aircraft) for all weather conditions;
- Minimize modifications of standards, waivers, or operational restrictions, all of which reduce airfield efficiency and level of service;
- Reduce the potential for airfield hazards, including incursions, and enhance the overall safety of airfield operations through runway and taxiway design;
- Accommodate a greater percentage of departing aircraft, thereby increasing airfield efficiency;
- Provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft; and
- Minimize or eliminate the extent to which Runway Protection Zones overlay residential areas.

Question: the six bullets state LAWA north airfield improvement technical goals, but LAWA will never have unlimited funds. Please identify associated costs to relate these goals. Going back to the purpose of this study, however,--to identify the issues Alt D addressed which of these were directly accomplished in Alt D? What numerical improvements did (do) they achieve?

#### 2. Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area

Page 1-11 Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the CTA, have various ground access options including private vehicles, transportation service providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground access within the CTA, where departing and arriving passengers are dropped off and picked up at curbside or can park their vehicles, is provided by an upper-level roadway and a lower-level roadway that loop around the center of the CTA and connect with surface streets on the east side of the CTA. The subject roadway system poses a

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outcome of the SPAS process, to enhance safety and security at LAX.

Question: There were dozens of recommendations in the 2004 RAND Study of LAX Security. Which of these have been introduced in the new alternatives? If not in the alternatives, how many have been addressed by separate projects?

#### Page 1-13 6. Minimize Environmental Impacts on Surrounding Communities

LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities.

#### Question: 1.2.2 Airfield Improvements

Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars?

Where are the assumptions listed used in the estimates? ie location of gates, taxiways, types of aircraft, frequency of aircraft, tower staffing, etc.

#### Page 1-13 7. Produce an Improvement Program that is Efficient, Sustainable, Feasible, and Fiscally Responsible

The nature and scope of improvements associated with the Yellow Light Projects are substantial. Each of those projects represents a major undertaking, requiring substantial funding, considerable planning, engineering, and design, and major construction activities. The costs for each of these major improvement projects would be financed primarily by Airport Improvement Program grants, Passenger Facility Charges (PFCs), and bond sales, all of which are subject to federal requirements regarding expenditure of airport funds, and which will also be utilized to finance other airport improvements outside of the scope of SPAS. The ability to successfully fund such improvements is, to a large extent, dependent on whether certain airport activity levels are reached. Additionally, the types of improvements associated with the Yellow Light Projects and the alternatives thereto represent major long-term investments in the airport's infrastructure that must be efficient and sustainable for many years. The construction of these major improvements poses the potential for major disruptions to existing airport operations. In identifying and evaluating alternatives to those Yellow Light Projects, LAWA is seeking to produce an improvement program that is efficient, sustainable, feasible, and fiscally responsible. (underline is emphasis)

Question: Since LAWA is concerned about cost, what has LAWA identified as a prioritization for projects? Are any time phasing issues addressed? Has LAWA identified the potential disruptions? What are they? What assumptions have been made in the establishment of the costs? Who prepared the cost estimates and how reliable are they? ie Alt D was estimated at \$68 prior to the approval cycle and increased to \$12 at approval. Current estimates for Alt D we've heard exceed \$100B. What is the actual current estimate? Cost estimates were done for LAWA in 2008 for SPAS. How have they changed in scope and confidence?

#### Page 1-13 1.2.2 Overview of SPAS Alternatives

Nine alternatives offering various options to the Yellow Light Projects, including one alternative that provides for implementation of the Yellow Light Projects (i.e., implement the Yellow Light Projects as generally reflected in the LAX Master Plan instead of options to those improvements), are addressed within this Draft EIR for SPAS. Figure 1-4 identifies the location of the Yellow Light Project areas. The types of improvements used to define the key characteristics of each SPAS alternative can be grouped into the following three categories:

1. Airfield Improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences in airfield improvements associated with the various SPAS alternatives pertain to:
  - a. Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility.

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conditions, and, in certain visibility conditions, would either require Federal Aviation Administration (FAA) approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited;

**Question: Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars? Where are the assumptions listed used in the estimates? i.e. location of gates, taxiways, types of aircraft, frequency of aircraft, tower staffing, etc.**

Page 1-14

- Whether an increase in the separation distance between Runway 6L/24R and Runway 6R/24L would allow for the construction of a centerfield parallel taxiway between the runways, to enable aircraft arriving on the outboard (6L/24R) runway to exit onto the center taxiway and hold while aircraft are departing on the inboard (6R/24L) runway, thereby allowing the departing aircraft to safely pass before the arriving aircraft proceeds to the terminal gates;
- The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;
- Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on longhaul flights and improve the balance between the north airfield and the south airfield relative to such departures;
- Whether Runway 6L/24R would be reconfigured or extended to relocate its associated RPZ with respect to residential uses, and/or to improve the north airfield and the south airfield relative to the operation of aircraft;
- How RSA requirements would be met, in terms of runway extensions, declared distances, displaced thresholds, or a combination thereof; and
- Separation distances between Runway 6R/24L, Taxiway E, Taxiway D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain limitations, particularly as related to the interface between aircraft going to or from the gates at Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

**Question: Which flight mix was assumed as several were developed during the past four years? How was it determined? How does this flight mix assumption compare with the Part 161 study that LAWA is about to complete?**

- Terminal Improvements** - Terminal Improvements consist primarily of additions/demolitions to existing terminals/concourses, and, for most SPAS alternatives, the construction of a new terminal - Terminal D ("zero"). The primary differences in terminal improvements for the various SPAS alternatives are directly related to the movement of runways and taxiways under each alternative. Specifically, the alternatives differ in the location of their building limit lines (i.e., the "object free" safety area along runways and taxiways where no part of a structure can be present) and their aircraft parking limit lines (APLL) (i.e., the safety clearance setback area along runways and taxiways into which no part of an aircraft parked at a gate can extend). The northernmost limit of concourse building area and/or aircraft gate parking positions is defined by the southernmost safety clearance distance for the runways and taxiways in the north airfield. Depending on the location and design of the runways and taxiways associated with each alternative, the locations of the building limit line and APLL may differ between alternatives.

**Question: How has LAWA reconciled and quantified Alt D improvements for comparison to current program proposed? i.e. More or less terminal area? curb space? seating area near gates? concessions? TSA and baggage handling areas?**

**What assumptions has LAWA made about the need and schedule for fixing current infrastructure? i.e. upper roadway, bridges, terminals, etc.**

Page 1-17 1.2.2 Terminals...

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1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxiway D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxiway/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 9, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 1-9.

**Question: 1.2.2 Alternative 5 description notes that alts 1, 2, and 6 taxiway/taxiways would not fully accommodate ADG VI aircraft. What chart lists the taxiway/taxiway aircraft accommodations? Since the SPAS is supposed to address the same "problems" fixed by Alt D what specific changes in alt D changed taxiway/taxiway limits and how is this different from each of the alternatives?**

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 6, similar to Alternative 5, also focuses on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the improvements associated with Alternatives 8 and 9. The distinguishing feature of this alternative is the movement of Runway 6L/24R 100 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed. All other physical aspects of the airfield and terminal improvements associated with this alternative would be essentially the same as those of Alternative 1, described above, with a lesser portion of the Argo Drainage Channel requiring covering (i.e., conversion to a concrete box culvert) and a lesser portion of Lincoln Boulevard requiring tunneling. This alternative is illustrated in Figure 1-10.

**Question: 1.2.2 Alternative 6 notes conversion of the argo ditch to a concrete box culvert. Since this is created to accommodate runoff from an unknown water source what calculations has LAWA performed to ensure adequacy of flow capacity? Does it (or any other changes to the argo ditch) accommodate a 100 year storm (worst case flow condition)?**

Page 1-26 1.2.3 Preliminary Evaluation of Relationship Between Project Objectives and SPAS Alternatives

Based on the project objectives presented above in Section 1.2.1 and the characteristics of the nine SPAS alternatives summarized in Section 1.2.2, Table 1-2 presents a preliminary evaluation of the relationship between each project objective and each SPAS alternative. A more detailed evaluation of that relationship will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearings process. Table 1-3 provides additional information summarizing key characteristics associated with the SPAS alternatives that pertain to each objective. (underline for emphasis)

**Question: The underlined sentence above states that further evaluations will be conducted. Is LAWA planning to recirculate their documents when this is done? How will LAWA ensure that each of the detailed assessments are changed to match the Alternative changes?**

Page 1-45

Chapter 1 -- Introduction and Executive Summary

This chapter introduces the project background and project description, an overview of the report organization, a discussion of areas of known controversy and issues to be resolved, and a delineation of documents that are incorporated by reference into this EIR. Also included is a summary of the environmental analysis and identification of the environmentally superior alternative. (underline for emphasis)

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In general, the building lines and APLLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to) the north concourses for Bradley West and the MSC. While the amount of concourse area and the layout of aircraft gates vary between alternatives, none of the SPAS alternatives includes more than 153 passenger gates.

**Question: The locations and purposes of the terminal D appear to have been located to create new gate types which are different than existing ones. Where is the chart which shows the number and types of gates that must be present? Include this information since although there is to be no more than 153 gates it appears that "remote gates" are not taken out of service.**

Page 1-17 1.2.2 Terminals...

Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing. For those alternatives that include development of the new Terminal D, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 96th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA.

**Question: 1.2.2 Terminals**

**The shift of the 96th street bridge appears to be the only major change to CTA traffic flow despite numerous suggestions during SPAS meetings. Is there a listing of all of the traffic flow improvements in one location or table? Please list them as it appears that most have not been considered.**

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 4 represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan (i.e., "Alternative D") were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. Analysis of Alternative 4 will allow decision-makers and the public to evaluate the impacts of simply eliminating the Yellow Light Projects from the LAX Master Plan Program. Alternative 4 is a fully integrated alternative, consisting of airfield, terminal, and ground access components. Ongoing and reasonably-foreseeable non-Yellow Light projects that would be developed include the Bradley West Project, an extension to Runway 6R/24L for RSA improvements, the MSC and related new passenger processor and connector within the CTA, and various terminal improvements. In addition, a CONRAC at Parking Lot G would be constructed and a new parking structure would be developed at the ITC site to accommodate the public parking displaced by the CONRAC. A portion of the Argo Drainage Channel would be covered to comply with existing RSA requirements by converting a portion of the existing open unlined channel to an enclosed concrete box culvert. There would be no modifications to Lincoln Boulevard under this alternative. This alternative is illustrated in Figure 1-8.

**Question: How do Alternatives 3 and 4, the two LAWA identifies as unique and not "interchangeable" consider major capital improvements which will need to be made just to keep airport ground access functional? i.e. CTA upper roadway bridge repairs to take care of creeping rust issues, parking lots and passenger bridges to terminals, etc.**

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 5 provides, as noted above, a focus on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives

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**Question: Since the analysis is summarized and environmentally superior alternative identified, why hasn't LAWA selected this as a preferred to go forward?**

Page 1-46 1.3 Organization of this EIR

Chapter 6 -- Evaluation of Amendments to the LAX Specific Plan

This chapter evaluates the environmental impacts associated with amendments to the LAX Specific Plan, including a revision to Section 7.H that would require completion of passenger and airline surveys and studies, the results of which would help inform LAWA as to potential actions that could be taken to encourage airlines to provide increased domestic passenger service at other airports in the region, particularly those owned or operated by LAWA, as well as administrative amendments to the LAX Specific Plan that might be needed depending on the SPAS alternative. (underline for emphasis)

**Question: If the underlined action to require passenger and airline surveys is performed, how will LAWA make these public and how will they conduct this information to result in actions? What other Amendments to the LAX Specific Plan are contemplated? When will final versions of the changes become available and how will they be distributed?**

Page 1-46 1.4 Executive Summary of Environmental Impacts Related to SPAS

Table 1-4 summarizes the environmental impacts after mitigation of the SPAS alternatives as identified in Chapter 4, Environmental Impacts Analyses, of this EIR. Impacts associated with implementation of the alternatives include those directly associated with proposed physical improvements (e.g., impacts to biological resources that would occur from new structures or modification of existing structures), impacts associated with implementation of the alternatives also include those associated with proposed or anticipated changes in airport operations (e.g., noise impacts, air pollutant emissions from aircraft operations, traffic impacts from vehicles traveling to and from the airport). The majority of the operations related impacts summarized in this section, and more fully addressed in Chapters 4 and 5, are primarily attributable to future growth in aircraft and passenger activity levels at LAX that are projected to occur independent of the SPAS alternatives. The Draft EIR analyzes and identifies mitigation for such impacts even though they are attributable to future growth not related to the proposed project.

**Question: None of the past EIRs have mentioned sink holes, but we are aware that they are occurring all over the airport. What is the frequency and magnitude of the occurrences over the past 10 years? i.e. before and after the drought period? Since LAWA is now aware of the Manchester Tunnel and it had water before the drought, have they measured the water since the drought ended? Where are the results of the water tests from the Manchester Tunnel? What did they reveal?**

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS

Specifically, the impacts analysis completed for the SPAS project include an evaluation of conditions projected to occur upon completion (buildout) of each alternative compared to conditions that existed at the time the Notice of Preparation (NOP) for the Draft EIR was published (i.e., existing baseline conditions). The analyses of operations-related impacts, such as those pertaining to air quality, noise, and traffic, account for the growth in activity projected to occur between 2009 (56.5 MAP and 1,493 average daily aircraft operations [landings and takeoffs combined]) and 2025 (75.9 MAP and 1,937 average daily aircraft operations). This 30 to 40 percent increase in aircraft and passenger activity at LAX is projected to occur regardless of SPAS (i.e., would occur even if none of the SPAS alternatives were implemented). The SPAS Draft EIR analysis evaluates how the improvements specific to each alternative would interact with that projected growth and delineates the differences, or the similarities, in impacts between alternatives.

**Question: How does the estimate of activity on page 1-46 2009 (56.5 MAP) to 2025 (75.9 MAP) correlate to what was used in the North Airfield Safety Study? Were the same flight mixes used? How do they differ?**

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS

As indicated in Table 1-4, impacts are anticipated to be less than significant after mitigation for all nine alternatives relative to most environmental topics. Unavoidable significant impacts are expected to occur for all alternatives relative to air quality, greenhouse gas emissions, human health risk, aircraft noise, construction equipment noise, on-airport surface transportation, and off-airport surface transportation. With the exception of construction equipment noise impacts, the vast majority of the unavoidable significant impacts that occur under all alternatives are primarily attributable to the projected growth in Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 10

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airport activity... (underlined for emphasis)

*Question: Even though many impacts are significant and unavoidable, why hasn't LAX presented the quantified each significant impacts in a way that each alternative performance can be compared and rank ordered? Will this be normalized to separate unavoidable impacts resulting from the assumed airport growth?*

Pages 1-49 to 1-60 Table 1-5 Summary Comparison of Unavoidable Significant Impacts

*Question: Table 1-5 What assumptions are made to show the differences in human health risk for each of the alternatives? Why is no runway separation best? and no airfield improvements worst by a significant amount. In Alt 4 are there no taxiway changes as well?*

*Question: In table 1-5 what would the number of on-airport intersections who feasible fix be for the ARSAC suggested fix which we cited in the DEIR where the 96th st bridge is moved east with a new drop off structure and moving sidewalk to support Terminal 1 allowing cars to enter the drop off and then exit directly to Sepulveda without having to clog up the CTA?*

*Question: Page 1-54 to 1-56 Table 1-6 LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives*

*Question: Page 1-54 Table 1-6 What is the characteristic of the alt 1 (260' N), alt 5 (350' N), and Alt 6 (100' N) related to MM-SAF (SPAS)-1 Runway Protection Zone Reviews that impacts safety? What does note 4 to the table mean?*

*Question: Table 1-6 On-airport Shows no mitigations for Alts 5,6,7 in any intersection or on-airport condition. How is this possible when Alt 1 has mitigations?*

*Question: Table 1-6 Wastewater Generation How is it possible that there are no wastewater generation mitigations for any SPAS or LAX Master Plan elements? If the runways are moved north and Lincoln/Sepulveda interface is necessarily below current levels it could impact the major sewer lines going to Hyperion. If the argo ditch is covered and/or enclosed and LAX's capacity guess is too low can't there may be quite a wastewater issue causing spillage on to the runways and towards the terminals and or business district? What special precautions does LAX plan to design?*

Page 1-61 Aesthetics

Alternative 3 would include the greatest extent of development throughout the airport environment, including improvements within the Los Angeles/EI Segundo Dunes, north airfield, CTA, Lot C, Manchester Square, and Continental City. These improvements would affect aesthetics and views from sensitive receptors within the CTA, Century Corridor/eastern boundary, and southern, western, and northern boundary areas. Within the CTA, improvements related to the APM and terminal improvements under Alternative 3 would result in significant impacts to focal views of the Theme Building. Implementation of Mitigation Measure MM-HA (SPAS)-1, Preservation of Historic Resources: Theme Building and Setting (Alternative 3), described in Section 4.1, Aesthetics, would reduce impacts to views associated with Alternative 3 within the CTA to a level that is less than significant.

Compared to Alternative 3, improvements that would affect aesthetics and views under Alternatives 1 and 2 would not be as extensive, particularly within the CTA, Manchester Square, and Continental City. Impacts to views of the Theme Building under Alternatives 1 and 2 would be less than significant. Ground access facilities associated with Alternative 3, including the CONRAC, APM, and GTC, would not be developed under these alternatives. Alternative 4 has limited improvements with the potential to affect visual resources, including a CONRAC in the Lot C area and a parking structure in Continental City. (underline for emphasis)

*Question: Aesthetics - what is the second paragraph of page 1-61 saying? Is there an explanation of the assumptions used to draw conclusions of this nature with more detail than section 4.1 of the document?*

Page 1-62 Air Quality

Table 1-7 and the text below summarize the conclusions regarding significant air quality impacts, all of which are based on the comparisons to baseline (2009) conditions or, in the case of construction impacts, the SCAQMD construction emission thresholds.

*Questions: Page 1-62 Air Quality references comparisons to a 2009 baseline condition. Why was this year chosen when the NOP was created in 2011 as a baseline and what year is assumed as the final year for comparisons? In order to assess intermediate air quality conditions there has to be some sort of construction order and schedule assumed. Where is this documented and the assumptions listed?*

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*Why is the air quality apportionment study data which is currently 3 years beyond completion schedule not included in any of the discussion? As LAX has not released any data from the first phase, second phase, or second (plus) phases which LAX indicates are complete, how is this data reconciled with whatever IS used?*

*Question: Table 1-7 Air Quality Impacts after Mitigation: Many of the elements and especially particulate matter of each size (ultra fines not addressed) show significant, unavoidable impact. Are some of the alternatives "better" than others? How are they ranked and what is the basis for the ranking? Is there a ranking that combines levels with concentrations?*

Page 1-70 Table 1-9

Summary of Impacts to Listed/Eligible Historical Resources After Mitigation

*Question: Where is the Union Savings and other historic buildings located on a map in this document? Are these the only historical resources?*

Page 1-70 Cultural Resources

No direct impacts to any historical resources would result from Alternatives 1, 2, 4, 5, 6, 7, or 8. Indirect impacts to historical resources associated with proposed concourse and terminal improvements under Alternatives 1, 2, 5, 6, and 7 would be less than significant due to their height limitations, design, and distance from the Theme Building and Setting and the intervening development. Similarly, indirect impacts to the Union Savings and Loan Building under Alternatives 1, 2, 8, and 9 would be less than significant due to the distance of the improvements to this resource. Impacts to historical resources under Alternatives 1, 2, and 5 through 9 would be further reduced with implementation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources.

*Question: Page 1-70 discusses historical resource impacts. What potential impacts were considered if the hydrology efforts are found to be inadequate? Can't some of the movements of land and underground structures cause redirection of unknown water sources? What about leaching of airfield contaminants and those contaminants from the old Garret Research site (Park One) by new water flow patterns and deposit into new locations? Can't this also make some historic resources require significant clean up since they would no longer be buried under the Park One lot? What about "normally expected" fuel contaminants that occurred from pipeline leaks as well as normal aircraft operations?*

Page 1-72 Table 1-10 Summary of Impacts to Recorded Archaeological Resources

*Note from table: Alternatives 1 through 4 consist of airfield, terminal, and ground access improvements. Alternatives 5 through 7 focus on airfield and terminal improvements only. Alternatives 8 and 9 focus on ground access improvements only. The archaeological improvements associated with Alternatives 1, 2, 5, 6, and 7 could be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Similarly, the ground access improvements associated with Alternatives 1, 2, 6, and 9 could be paired with the airfield improvements associated with Alternatives 1, 2, 5, 6, or 7. The full impacts of any alternative must consider airfield, terminal, and ground access contributions. The airfield, terminal, and ground access improvements associated with Alternatives 3 and 4 are specific to each of these alternatives and cannot be paired with other alternatives.*

*Question: The note at the bottom of Table 1-10 (above) talks about the mix and match concept but doesn't properly spell out a concept for evaluation. Has LAX identified the native american indian sites which used to be located in the areas in and around LAX? How are they watching for artifacts and other indications of encampments and burial grounds?*

Page 1-74 Table 1-11 Summary of Human Health Risk Impacts After Mitigation

*Question: What is the basis for these categorizations of significance of health risks?*

*Question: Table 1-11 Summary of Human Health Risk Impacts states that all alternatives have acute non-cancer health hazards as significant and unavoidable. Where have these been assessed in enough detail to rank order the impacts? What assumptions have been made to get to these conclusions?*

*Again, as in several other commented areas, why has LAX used a 2009 baseline? Although this table on page 1-74 talks about "buildout in 2025" are there other impacts which are compared at other times?*

*LAX has talked about time-phased and condition-phased implementation of various projects. What if significant elements have not been constructed by 2025?*

*Question: Table 1-11 health risks*

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*Under what category are TAC (toxic air contaminants) which are generated during construction from toxic fugitive dust piles inadequately controlled during construction? One example are the piles in the staging area behind the Sepulveda Ralphs Market off Westchester Parkway which has been uncovered and unaddressed for in excess of 6 months despite several community requests.*

Page 1-75 Health Risks section

*...The increased acrolein emissions are attributable mostly to the increase in passenger activity levels and associated aircraft operations anticipated to occur between 2009 and 2025 for all alternatives...*

*Question: Page 1-75 highlight phrase notes that acrolein emissions are attributed to passenger activity levels. Is taxi time to gate a significant item in allowing for comparing the bad impacts from each alternative? What assumptions in flight mix, gate location, times of day (relative amounts of air traffic to peak hours or not), and other factors were made? What were all of the factors?*

Page 1-75 Health Risks section

LAX Master Plan mitigation measures would reduce TAC emissions associated with all of the SPAS alternatives. However, even with implementation of these measures, acute non-cancer health hazards at some fence-line receptors would exceed the threshold of significance under all of the alternatives, compared to 2009 baseline conditions. As such, acute non-cancer health hazard impacts under all of the SPAS alternatives are considered to be significant and unavoidable.

*Question: Why is 2009 used as the baseline condition when the NOP was released in 2010?*

Page 1-76 Safety

Currently, no active solid waste landfills are located within a five-mile radius of LAX. Therefore, none of the alternatives would relocate a runway to within 10,000 feet of a solid waste landfill. Under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, impacts under all of the alternatives with respect to birdstrikes would be less than significant.

*Question: Were is an analysis of the impacts of tunnels, utilities such as major sewer lines, hot oil lines and high voltage power on safety? Where is unknown water source causing sink holes evaluated in this document? What is the frequency and magnitude of sink holes? When a tunnel is removed, what controls for sink holes are in place if unknown water sources are in the area?*

*Question: page 1-76 discusses safety and states that there are no impacts because there are no solid waste landfills within a five-mile radius. However there are known contaminants within the airport airside and landside plus areas in the Northside Development area that contain toxic items used or leaked into the ground as well as having had many oil wells and gas wells naturally occurring and operated in the past at these locations. When can disturbing the ground that may have covered contamination become a safety hazard? What about during construction and movement of the contaminated soil?*

Page 1-76 and 1-77 Table 1-12 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

*Question: Table 1-12 summarizes safety and efficiency enhancements but there are some questionable items which give credit for improvements to certain alternatives over others. Where are the details and assumptions listed which justify classifications for each of the line items? Footnote 1 of this table indicates "greater amount of FAA Airport Design Standards for ADG V and VI are met as noted, but since there is a new version of AC150/5300-13A in draft review at this time is this still true? Under current design standards if a center line taxiway has an aircraft between two runways the actual separation distance from the taxiway to the adjacent runway is smaller than the current separation without the center line taxiway. How is this justified by LAX and how is it considered in the current FAA design standard? The new draft mentions this condition and notes this issue on separation distances. Where did LAX address this? Also, when a centerline taxiway exists how are the new failure modes such as landing or taking off from a taxiway addressed?*

*Question: Related to table item on "Realign/straighten Taxilane D... Table 1-12 Safety and Efficiency Enhancements: Why is the first item only referring to Taxilane D as full ADG VI when the version of Alt 6 given to Diego Alvarez twice and the one sent in a letter to GML in Jan 2011 each had full ADG VI? This again raises the question of what version of Alt 6*

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*is used by LAX in its evaluation, either of the two with poison pills in them drawn by LAX or the corrected one provided by ARSAC?*

Page 1-77 Safety enhancement evaluations...

Regarding cumulative impacts, none of the ongoing and reasonably foreseeable on-airport improvements identified in Chapter 5, Cumulative Impacts, would increase the potential for aviation incidents or accidents. Future development within LAX Northside would place new structures north of the north airfield complex. The relocation of Runway 6L/24R to the north under Alternatives 1, 5, and 6 and the westerly shift of the displaced landing threshold for Runway 24L would shift the associated FAR Part 77 Airspace Surfaces accordingly, drawing them closer to LAX Northside. Depending on the location, design, height, and timing of future development in LAX Northside, there would be a potential cumulative impact on aviation safety due to structures penetrating the Part 77 Airspace Surfaces (i.e., the potential for future development to penetrate existing Part 77 surfaces and, in combination with the shifting of the surfaces, increase the amount of penetration). FAR Part 77 imaginary surfaces are primarily intended to serve as a means of identifying objects that require more detailed analysis specific to the types of airspace operations and related safety requirements that occur within those surfaces. A determination of whether such penetrations of a Part 77 surface pose an aviation safety hazard, and the identification of the appropriate measure(s) to address any such hazard, occur through the more detailed analysis, which is completed by, or in coordination with, the FAA. Options to address potential aviation safety hazards can range from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on structures to make them highly visible to pilots and indicating such objects on aviation maps, to...

*Question: Re: Cumulative impact on safety of on-airport improvements, Didn't Congress mandate that all RPZ be resolved by 2015 and that new runways be constructed with full RPZ implementation?*

Page 1-78 Hazardous Materials

Proposed improvements associated with all of the SPAS alternatives would require excavation in areas of known contamination. Alternative 3 would have the potential to affect ongoing remediation at the greatest number of sites, whereas Alternative 4 would affect the fewest. However, implementation of LAX Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts, impacts associated with interference with remediation efforts under all of the SPAS alternatives would be less than significant.

*Question: LAX has made low to no impact, but have they actually tested soil at each of the areas where digging is to be done? When was this testing done and were are the reports?*

*When the Manchester Tunnel was finally acknowledged and LAX examined its contents were reports created? Where are those reports? When were those reports written? What levels of water and contamination were found? Were samples taken one time or have they been taken since the drought ended two years ago?*

Page 1-78 Hazardous Materials

*... A lack of adequate access could impair the effective implementation of emergency response activities by impeding the movement of emergency vehicles...*

*Question: Page 1-78 has a notation (above) noting potential for lack of adequate access... emergency response...<sup>4</sup> This was a defect noted by ARSAC and others when reviewing Alternative D and was one of many other safety and security issues noted in a RAND study provided to LAX. Has LAX reviewed the alternatives studied against the recommendations? If not, why not. If so, which of the recommendations were implemented in the alternatives?*

*Question: p 1-78 Safety The statement says that Alternatives 5-7 do not propose ground access improvements, but if the tunnel under the north runways is opened and thereby destabilized, there may need for special access to the runway areas. Is this not considered? If it was, where will the access come from and what impact will it have on air operations? How long could this condition linger?*

Page 1-79 Table 1-13 Summary of Hydrology and Water Quality Impacts After Mitigation

*Question: What studies have been made on the north complex for sink holes? Does the CDM report contain this information to be included as part of the DEIR? Has the covering of the argo ditch been assessed to ensure that mitigation is adequate under all conditions? What about movement of Lincoln Blvd to a new site and lowering it. Has all underground water flow been measured and monitored to ensure that it is not going to be driven onto the LAX property*

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and runways or terminal areas? Just because the baseline condition may or may not have been adequately determined doesn't relieve LAWA of responsibility to ensure that new construction doesn't cause more problems. This relates also to the Argo Flood Channel as well as underground utilities and tunnels.

#### Page 1-79 Hydrology

Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, changes associated with the alternatives would represent a marginal increase in regional impervious area. However, the increases in impervious area and the associated increase in storm water peak flow rates could potentially exceed the capacity of the storm water facilities in area sub-basins, which would result in flooding in any location where capacity was exceeded...

#### Question: P 1-79 Hydrology

The storm water capacity and runoff is identified as an issue and the DEIR notes "under Alternatives 1, 2, and 4 through 9, improvements may not fully mitigate flooding impacts." Therefore, what other measures have been evaluated to make sure that LAX operations are not impacted nor operations on lands outside of LAX? Several paragraphs of this section are highlighted to identify questions of how a new mitigation was established to be adequate when construction and movement of Lincoln or other areas could drive more underground water into the area. If the arge ditch is enclosed what impacts could an earthquake have including loss of proper water flow? What quake level must occur to present unacceptable impacts? Please list all potential impacts.

#### Page 1-79 Hydrology

...flooding would be less than significant. However, under Alternatives 1, 2, and 4 through 9, the LAX Conceptual Drainage Plan improvements may not fully mitigate flooding impacts, as these improvements were not specifically designed for these alternatives. This would be a significant impact...

Question: If this is a significant impact what mitigations are necessary?

#### Page 1-80 Hydrology

Also, under Alternatives 1 and 5, the entire channel would be structurally covered to support aircraft and, therefore, not subject to erosion or siltation. Under Alternatives 2, 4, and 7, only the easterly end of the channel (750 linear feet) would be lined; however, there would be no increase in the peak flow rates through the Argo Drainage Channel under these alternatives and, therefore, no increase in the potential for erosion or sedimentation. Under Alternatives 3 and 6 portions of the Argo Drainage Channel would remain unfilled and there would be an increase in peak flows to the channel, resulting in the potential for erosion and sedimentation. As described in Section 4.8, Hydrology/Water Quality, a new mitigation measure, MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is proposed to tailor the LAX Conceptual Drainage Plan recommendations to the specific characteristics of the selected SPAS alternative. The measure would reduce erosion and sedimentation impacts associated with Alternatives 3 and 6 to a level that is less than significant. Therefore, the impact of erosion or siltation due to runoff from the airport would be less than significant for all drainage facilities under all alternatives.

Question: If siltation and erosion are considered not to be a problem, why are sink holes occurring all over the airfield necessitating repairs? If silt clogs a flow what issues could occur to impact operations or even safety?

#### Page 1-82 Land Use Planning – Plan Consistency

No significant impacts due to a plan inconsistency or plan conflict with the applicable plans analyzed were identified for any of the SPAS alternatives. However, each of the alternatives would include plan amendments to either an off-airport or on-airport plan to ensure precise consistency with the applicable plan. Alternatives 1 and 4 would include amendments to the greatest number of plans, and Alternative 3 would include amendments to the fewest. All of the alternatives, with the exception of Alternative 3, would include amendments to the LAX Plan and LAX Specific Plan. All of the alternatives with ground access components (i.e., Alternatives 1 through 4, 8, and 9) would include amendments to the City of Los Angeles Transportation Element. Alternatives 1, 3, 4, 5, and 6 would also include amendments to the City of Los Angeles 2010 Bicycle Plan. Finally, all of the alternatives with airfield components, with the exception of Alternative 3, (i.e., Alternatives 1, 2, 4, 5, 6, and 7) would include amendments to the Los Angeles County Airport Land Use Plan (ALUP). With an amendment to the LAX Plan, LAX Specific Plan, City of Los Angeles Transportation Element, and City of Los Angeles 2010 Bicycle Plan to ensure precise consistency, impacts related to conflicts with plans and regulations would be less than significant.

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Question: What is the status of the Part 161 request LAWA has been preparing for the past four to five years? How is it accounted for in the conclusions made in this document? Is it assumed that it is granted? If not, what impacts are exacerbated and by how much?

#### Page 1-89 Airport Facilities

The construction and alteration of airport facilities can either directly or indirectly affect noise levels off the airport. Noise barriers, for example, can reduce the noise from aircraft ground operations that are heard off airport property. LAWA has already constructed noise barriers along the northern edge of the airport to reduce runway noise impacts to noise-sensitive users to the north. Additionally, the LAX Master Plan and the LAX Noise Variance from the state include provisions for the future installation of two ground runway enclosures at LAX. Changes in runway length can alter noise patterns, as can the construction of new runways. The construction of taxiways can alter runway use by making the use of a given runway more convenient and safer for aircraft operators. Alternatives 1, 2, 3, 5, 6, and 7 include high-speed exists for arriving aircraft to exit from the runway and transition onto a taxiway that directs aircraft away from noise-sensitive users located to the north. Other airport facility improvements that serve to reduce aircraft noise impacts include the electrification of all passenger gates at LAX, along with the installation of preconditioned (i.e., cooled) air systems, to reduce the need for parked aircraft to operate the on-board auxiliary power unit (i.e., turbine engine that provides power and cooling to the aircraft).

Question: page 1-89 Aircraft Noise abatement. There is a requirement for several hush hangers to be placed west of TBIT which is included in the CA DOT noise variance. Where are they to be located? If they are not present how has this been considered in the noise exposure predictions?

#### Page 1-91 Table 1-22 Additional Schools Exposed to Significant Noise Impacts for Each Alternative 2025 Noise Exposure

Question: Table 1-22 Schools exposed to additional noise. The note indicates Alts 1,5,6,7 are comparable. Is the capacity of the runways assumed to be the same for each of those alternatives? If so, were the same aircraft mixes and numbers of aircraft (ending the noise assumed to be the same? Since most of the schools are affected but not impacted per the legal definition, was there a predicted higher number of interruptions (single event) for one alternative over another?

#### Page 1-92 Road Traffic Noise

The ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would result in changes in road traffic noise levels at off-site noise-sensitive receptors. The predicted changes in road traffic noise levels under each of these alternatives would be less than a 3 A-weighted decibel (dBA) increase in CNEL; therefore, the road traffic noise impacts associated with Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive users.

Question: Even though the underlined section above alternatives do not include ground access improvements will there be unacceptable levels of noise from construction equipment moving facilities north? How much impact?

#### Page 1-92 Road Traffic Noise

Regarding cumulative impacts, as discussed in Section 5.5.10.2 in Chapter 5, Cumulative Impacts, the increases in road traffic noise anticipated to occur between baseline (2010) conditions and future (2025) conditions, including the projected growth in regional traffic combined with the effects of each SPAS alternative, would not result in a 3+ dBA CNEL increase at any of the noise-sensitive receptor locations evaluated. As such, cumulative road traffic noise impacts would be less than significant.

Question: Is the reliance for no cumulative impact from noise along this corridor due to an assumption that the previous 1982 Land Use Plan called for more traffic than that scaled back in Alternative D and neither has been enacted?

#### Page 1-95 Fire Protection

Airfield improvements under Alternatives 1, 2, 3, 4, 5, 6, and 7 would enhance the safety and efficiency of the airfield compared to baseline conditions, thereby decreasing the potential need for emergency fire response associated with airfield accidents.

Question: Where is the analysis that supports the above statement? What safety and efficiency factors are improved?

#### Page 1-97 Law Enforcement

It is anticipated that those facilities would be relocated to the future LAX Public Safety Building and Supporting Facilities that is being planned independent of SPAS.

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Question: Page 1-82 talks about Chapter 5 Cumulative Impacts and Plan Consistency. Has any table been prepared to highlight (those necessary changes)? This section states that "Because acquisition and removal of businesses would not require changes." However LAWA has told businesses in informal meetings that they would help relocate them into local areas which COGID require changes.

#### Page 1-83 Aircraft Noise Exposure

...in Table 1-16, Alternative 4 would result in the greatest number of residential units, population, and non-residential noise-sensitive facilities that would be newly exposed to 65 CNEL or higher noise levels. This alternative would also result in the greatest number of residential units and acres that would be newly exposed to the 75 CNEL...

Question: Table 1-16 and the highlighted note on page 1-83 states that Alternative 4 (All D) would result in the greatest number of residential units... newly exposed... This is counter intuitive as it leaves the outboard runways 24R in place and moves the inboard south 340'. Assuming that these newly impacted residences and other facilities are to the east, one would expect an equal number or greater number would be found moving north. What is the basis of these statements? What noise model and assumptions were used? What Integrated Noise Model was chosen and how was this validated? Was CNEL the only criteria used? Was any combination of factors such as single event also addressed? Which factors were they? If newer, more dense residential units were built in areas already impacted would they not be considered impacted because structures after a certain date require sound mitigation to preclude being included?

#### Page 1-86 Table 1-20 Awakening Probability Impacts of All Alternatives

Question: Table 1-20 indicates that all of the runway movement alternatives reduce the exposed population for likelihood of being awakened. This is far from intuitive since more people are impacted as shown by previous tables. How is this justified?

Under Mitigation Evaluation on same page, 1-86, numerous noise abatement program items are listed. One noise abatement used at LAX is take off on inboard and landing on outboard. This is not always followed, however, due to the fact that certain times of the day more aircraft are landing than taking off and vice versa. This leads to both runways used for take offs at some periods which results in increased noise over the "modeled" amounts. What assumptions are identified which impact the conclusion as the one noted above, and where in the DEIR are they listed?

#### Page 1-86 Mitigation Evaluation

The airport has a long history of addressing concerns related to aircraft noise. The operational elements of the current LAX noise abatement program are:

- Use preferred inboard runways for departures and arrivals and interior parallel Taxiways C and E during the hours between 10:00 p.m. and 7:00 a.m. This measure is intended to move nighttime noise to the interior of the airfield and away from noise-sensitive areas adjacent to the airport to the north and south.

Question: Even though this is an objective to keep takeoffs on the inboard runway, what percentage of aircraft take off from the outboard? Doesn't this occur especially when a majority of aircraft are waiting for takeoff rather than a mix of landings and takeoffs?

#### Page 1-86 Mitigation Evaluation (third bullet)

- Conduct departures to the west along the runway heading until reaching the coastline. This measure has been the subject of continuing concern to assure better compliance to achieve the desired effect.

Question: Since a significant number of early turns have occurred and still occur how is this modeled into the sleep awakenings modeling? Will a substantial number (even though reduced in recent times) of outboard over-ocean takeoffs on the south side how is this included in the model to establish sleep awakening impacts?

#### Page 1-88 Airport Operating Regulations

Local regulations would be needed to implement mandatory restrictions in airport operations, shifts in flight schedules, or changes in aircraft permitted to operate at the airport. With the adoption of the Airport Noise and Capacity Act of 1990, Congress required that airport operators could adopt such regulations only upon completion of a detailed study of the potential impacts of and alternatives to the proposed regulations. In most cases, the regulations can be adopted only after explicit FAA approval of the proposed restrictions. Before the FAA will consider a proposal to adopt a noise or access restriction, the airport sponsor must complete an analysis in compliance with 14 CFR Part 161. The analysis must demonstrate that the proposed restriction would meet the following six statutory conditions:

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Question: Page 1-97 A new public safety building is planned to be "independent of SPAS." Where is the list of all projects independent of SPAS listed and their contributions to traffic?

#### Page 1-99 On-Airport Transportation Curbside Operations

No significant impacts to curbside operations would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, all of the alternatives would have a significant cumulative impact at the inner curbside at TBIT on the arrivals level.

Question: Does this mean that no matter what LAWA has in any of its alternatives traffic around TBIT will be terrible? Aren't there other improvements that could address this that should have been considered? Why not?

#### Page 1-99 On-Airport Transportation Roadway Links

No significant impacts to on-airport roadway links would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to the Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, Alternatives 1 and 2 would have significant cumulative impacts at three roadway links, all on the arrivals level; Alternative 4 would have significant cumulative impacts at five roadway links, all on the arrivals level; Alternative 8 would...

Question: 1-98 Roadway Links indicates No significant impacts, but LAWA has been pushing a BRT (articulated bus that shares CTA levels). How is it possible to add giant buses into a congested curbside area and not cause even more congestion?

#### Page 1-99 On-Airport Transportation Public Parking Impacts

The airport's public parking supply in each of the Future (2025) alternative scenarios is sufficient to accommodate the airport's estimated future (2025) public parking demand for all the alternatives; supplies which are assumed to be 15 percent greater than the space demand to account for fluctuations in vehicles arrivals in the facilities. Therefore, impacts associated with parking are considered less than significant...

Question: Page 1-99 Public Parking Impacts. Has LAWA assumed that the parking structures will continue operation as is through 2025? Will there be major repairs or renovation to these facilities? What percentage of people are expected to park on-airport vs. off-airport? Was an assumption of off-site check in made? If not, why not?

#### Page 1-100 Note from Table 1-24 Summary of Off-Airport Transportation Impacts After Mitigation

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. It would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. As such, the total number of intersections that may be temporarily significantly impacted during construction cannot be determined at this time.

Question: The note in table 1-24 states that "no construction plans, programs, or schedules ... It would be speculative to estimate..." Was any consideration of construction traffic made? If not, why not?

#### Page 1-100

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. Nevertheless, based on a qualitative evaluation...

Question: Even at a program level some basic amounts of construction related traffic should be quantifiable if the general types of construction are identified. On the runway related movements it can be more difficult, but the amount of construction and a survey of potential complications should enable LAWA to make an estimate. Why hasn't these elements been properly considered. The cost estimates use boiler plate \$xxx\$ yard of runway, why can't construction related efforts be estimated at least as well as that?

#### Page 1-101 Transportation-Related Fuel

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... As discussed above, the SPAS alternatives with ground access components (i.e., Alternatives 1, 2, 3, 4, 8, and 9) include a variety of design features to shift individuals away from personal vehicle use to other more efficient modes of transportation, which would reduce transportation related fuel consumption. With these design features, Alternatives 1, 2, 3, 4, 8, and 9 would not result in a wasteful, inefficient, or unnecessary consumption of Jet A fuel, gasoline, or diesel...

**Question:** p 1-101 Transportation-Related Fuel

This section states that there will be no "wasteful, inefficient, or unnecessary consumption..." Since we would continue to expect the CTA to be gridlocked during peak hours, what does that statement mean? How many cars are assumed to be able to use the CTA during peak hours? What number of people changing access modes is necessary to reduce vehicle access enough to remove this limiting constraint on passenger growth?

**Page 1-101 Solid Waste**

Improvements associated with the proposed alternatives would not, in themselves, alter passenger-related municipal solid waste generation. Passenger activity at LAX would increase by 2025 due to projected growth with or without implementation of the SPAS alternatives, and those future passenger activity levels would be the same under each of the alternatives. As a result of increased passenger activity levels, passenger-related solid waste generation at LAX would increase by 22 percent compared to baseline (2010) conditions. The increase in solid waste generation would be the same under all alternatives. The Sunshine Canyon Landfill has sufficient physical and permitted capacity to accommodate this increase in solid waste generation. LAX would continue to implement and enhance existing programs aimed at reducing waste generation, which are designed to fulfill LAX Master Plan Commitment SW-1, implement an Enhanced Recycling Program, and increase the diversion rate to meet the state's 70 percent requirement by 2020. Therefore, under all alternatives, impacts to solid waste disposal capacity and to diversion-related policies and objectives associated with the solid waste generated from the increased number of passengers would be less than significant. With respect to cumulative impacts, passenger activity levels at LAX are forecasted to be 78.9 MAP by 2025 as a result of natural growth. The increase in passenger activity is expected to occur with or without implementation of any of the SPAS alternatives. Projected increased passenger demand at LAX, in...

**Question:** Since solid waste is expected to be significant regardless of alternative can LAX utilize conversion techniques for its waste similar to that identified in RENEW LA which could reduce waste by 90% and thereby reduce the need for Sunshine Canyon or any other dump?

**Page 1-103 1.5 Environmentally Superior Alternative:**

Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. Based on the analyses in Chapter 4, Environmental Impact Analysis, and Chapter 5, Cumulative Impacts, of this EIR, Alternative 2 is considered to be the Environmentally Superior Alternative of the nine alternatives evaluated in detail throughout this document.

**Question:** Section 1.5 Environmentally Superior Alternative. Since Alternative 2 is the environmentally superior noted alternative and the Settlement Agreement calls for the least impact, how are any of the other alternatives justified?

**Page 1-105 Incorporation by Reference**

**Questions:** Was the 2004 LAX Master Plan Final EIR and addendums recently delivered and available at the libraries? Which ones?

**Page 2-2 Project Objectives (third bullet)**

The primary north airfield departure runway (6R/24L) is too short for 2025 large aircraft (e.g., fully loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

**Question:** p 2-2 Project objectives states that runway 24L length can't handle "fully loaded 747-400" but isn't it true that many of these aircraft do take off from the north complex? What number and percent of the 747-400 must taxi to the north to the south? What percentage is this number of the total aircraft operations? If the runway is "too short" what should it be and how did Alternative D account for this problem?

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**Page 2-2 Project Objectives (eighth bullet)**

- The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

**Question:** p 2-2 Project objectives states "The existing Runway Protection Zone...includes residential uses." The All D yellow light project moved the inbound runway south with no change in the location of 24R therefore the RPZ remained the same. Since the key component of the Stipulated Settlement objective is to address the issues resolved by the yellow light project how is this an issue that is appropriate for consideration? If anything, since the RPZ was fixed by All D then no action which changes that for the worse should be unacceptable.

**Page 2-2 2. Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area**

Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the Central Terminal Area (CTA), have various ground access options including private vehicles, transportation services providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground...

**Question:** P2-2 Improve Ground Access System...Especially... Central Terminal Area? What quantifiable values are used to conveniently access the CTA curbside at each terminal? What specific queuing, weaving, and conflict points are being addressed to reduce the impedance of traffic? What causes each of these limits? Since no quantifiable numbers are provided it's hard to judge actual effectiveness.

**Page 2-3 Improve Ground Access**

- Curbside demand is unevenly distributed, especially during peak periods, creating concentrations of passengers that are not accommodated by the existing curbside system.

**Question:** Page 2-3 Project objectives states that ground access is critical. I agree, but what is LAX doing to reduce peak time access? Since it is stated that curbside demand is unevenly distributed what amounts of changes (quantifiable measures) is needed? Would a third level for buses and emergency vehicles help the situation as has been suggested at SPAS meetings but has never made it into any LAX plan?

**Page 2-3 Improve Ground Access**

- The roadway system is not designed to efficiently accommodate security screening of vehicles entering the CTA.

**Question:** P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SoOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regeneration has not been fostered?

**Page 2-3 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region**  
LAX serves a key role in the region's economy. This is particularly true relative to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic flight traveling round-trip from LAX everyday added \$623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with \$156 million in wages. (Given the continued growth in, and reliance on, new large aircraft such as the Airbus A380 by major airlines operating on these long distance international routes, it is important that LAX be able to effectively accommodate these aircraft.) LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger scale, LAX related regional employment provided over 400,000 jobs and \$60 billion in economic output. (underlined for emphasis)

**Question:** Page 2-3 Project objectives states that the roadway system is not designed to efficiently accommodate security screening, but again LAX's plans have failed to address a recommended, effective fix of putting weight scales and cameras into the roadway at critical points. These could be monitored automatically at all times. How many check points does LAX need to avoid creating a security bottleneck? How many cars per hour can be accommodated in any one location? Has LAX considered a special access for buses and commercial vehicles?

**Question:** P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SoOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regeneration has not been fostered?

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**Page 2-4 5. Enhance Safety and Security at LAX**

During the preparation of the LAX Master Plan, which began in the 1980s, Alternative D was formulated following the events of September 11, 2001 and integrated into the CEQA review process for the LAX Master Plan as the "Enhanced Safety and Security Plan." In now identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAX is seeking to maintain the ability of the LAX Master Plan, II and as modified by the outcome of the SPAS process, to enhance safety and security at LAX.

**Question:** Page 2-4 Program Objectives Item 5 calls for enhanced safety and security per All D. During the review and approval of All D there was a report prepared by RAND Corp which identified many "fixes" that could be incorporated quickly and effectively. How many of those have been done, if any? Did LAX consider the RAND report when creating its potential designs? What portions?

**Page 2-4 6. Minimize Environmental Impacts on Surrounding Communities**

LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAX seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities. (underlined for emphasis)

**Question:** page 2-4 Program Objectives Item 6 highlighted section states that LAX is concerned about environmental impacts on surrounding communities. What are they considering "surrounding" since areas both north including Santa Monica and Culver City, LA County areas, and the entire South Bay is affected (not necessarily impacted by the legal definition). Also all those communities on the arrival flight paths as far away as Palm Springs, but also midway like Lufthansa Flights and Monterey Park are also very affected by even slight changes in flight paths or absolute numbers of aircraft operations.

**Page 2-5 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

Problems the North Airfield Reconfiguration was Designed to Address: Under existing conditions, the north airfield does not meet FAA standards for ADG V and VI aircraft under any weather conditions. Failure to meet these standards results in restricted operations when ADG V or VI aircraft utilize the north airfield, impacting operations of all aircraft on the north airfield. Restricted operating procedures increase operational delays and aircraft-related emissions and adversely affect passenger convenience. Additionally, without a continuous taxiway and other airfield improvements, there is an increased risk of incursions and collisions. Further, Runway 24L is not long enough to accommodate some fully-loaded departing aircraft, resulting in higher utilization of the south airfield by these aircraft.

**Question:** Section 2.3 Project Characteristics

Defining problems: Agreed that neither All D nor existing conditions meet full ADG V or VI design standards. Nor would any of the alternatives. The excuse for this is that there is some accommodation necessary for the larger aircraft. What is the quantified impact in seconds and number of these aircraft that impact. As the percentage of those NLA is small and most A380s will not arrive during peak hours how much practical impact is there?

Similarly, since an A380 is designed for take off and landings in shorter distances than a 747 than only the very heavily loaded with full fuel are even at issue. How many of these are anticipated by 2025? What is the percentage of total aircraft operations?

**Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

Problem the Demolition of Terminals 1, 2, and 3 was Designed to Address: Under the LAX Master Plan, substantial portions of Terminals 1, 2, and 3, notably the piers/concourses, would be demolished in order to provide room for the relocation of Runway 6R/24L, 340 feet to the south of the existing runway centerline. The existing terminals would be replaced by a linear concourse that would provide aircraft gates and passenger hold rooms but no passenger processing capacity. Under the LAX Master Plan, the passenger processing capacity provided by existing Terminals 1, 2, and 3 would be replaced by new passenger processing facilities in the interior of the CTA (where the existing parking garages are currently located). Only the demolition of Terminals 1, 2, and 3 is a Yellow Light Project.

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**Question:** section 2.1 Problems addressed...

Quantify how much terminal space is needed to handle the 78.9 MAP. Also curb space requirement specifics?

**Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

Problem the Ground Transportation Center was Designed to Address: Under the LAX Master Plan, the function of the GTC is to replace CTA curb front for drop off and pick up of passengers and to replace a portion of the private vehicle parking area and all of the commercial vehicle (e.g., taxis, shuttle vans, and limousines) staging area. The GTC was designed to allow closure of the CTA to private vehicle access and provide the curb front function at a location well removed from the main terminal area to enhance security within the CTA. The GTC, in conjunction with the Intermodal Transportation Center (ITC) and other parking facilities proposed as part of the LAX Master Plan, also provided replacement parking for the existing parking that would be eliminated under the LAX Master Plan, such as in the CTA and Parking Lots C and D. Problem APM 2 was Designed to Address: Under the LAX Master Plan, the function of APM 2 is to provide connection between the planned GTC and the CTA.

**Question:** section 2.1 Problems addressed...

How many parking spaces are required? How many are lost given that LAX has called for the ConRAC in Manchester Square? Why isn't Balford Square area used or contemplated for any airport use since it was vacated at the same time as Manchester Square? What is the anticipated number of cars given that LAX has plans for a people mover (or direct train connection or bus connection)? How many cars does LAX anticipate will be removed from consideration by the 8 flyway routes to be developed?

**Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

Airfield Improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences in airfield improvements associated with the various SPAS alternatives pertain to:

- Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility conditions, and, in certain visibility conditions, would either require FAA approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited...

**Question:** P 2-6 Airfield improvements states an obvious that "separation distances determine the maximum size aircraft that can freely operate on that system..." but fails to provide any quantitative information. This section also talks about a corridor parallel taxiway between runways without referencing any specific stats. In other airports when a CLT was built, how many new incursion opportunities occurred due to an aircraft on the CLT or mistakenly landed on it?

**Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

- Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on long haul flights and improve the balance between the north airfield and the south airfield relative to such departures.

**Question:** 2.3 Problems addressed... talks about the need for balance between the two runways and implies that there must be a balance of each type of aircraft. What number of ADG V and ADGVII aircraft originate from gates on the south and how many originate from gates on the north? If the number is not exactly 50% on each, doesn't this add to the taxiway traffic unnecessarily?

**Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR**

Separation distances between Runway 6R/24L, Taxiway E, Taxiway D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain limitations, particularly as related to the interface between aircraft going to or from the gates of Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

**Question:** Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives. When the assessment of efficiencies (travel distance times to get off a runway and get to their gate) were these variances

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in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation?

#### Page 2-7 Project Characteristics Terminal Improvements

In general, the building lines and APLLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to the north concourses for Bradley West and the MSC).

While the amount of concourse area and the layout of aircraft gates vary between alternatives, all of the SPAS alternatives include no more than 153 passenger gates.

Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing.

For those alternatives that include development of the new Terminal 0, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 99th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA. (underline for emphasis)

*Question: Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives. When the assessment of efficiencies (travel distance times to get off a runway and get to their gates) were those variances in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation?*

#### Page 2-8 Project Characteristics Ground Access Improvements

Yellow Light projects that are integral parts of the overall ground access system. Such projects include the Consolidated Rental Car Facility (CONRAC), the ITC, the APM connecting the ITC and CONRAC to the CTA, and the West Employee Parking facility. The ground access improvements proposed under the various SPAS alternatives represent different combinations of options to the Yellow Light Projects. Due to integral nature of these key non-Yellow Light projects with the overall ground access system, the SPAS alternatives include proposed modifications to, or proposed deletion of, these non-Yellow Light projects.

*Question: P2-8 Ground access improvements. The ITC in Alternative D is in Continental City near the Green Line. Since LAXA has not included it in any of their plans what numerical changes in traffic flow have occurred? How does this impact traffic flows and the assessment of intersections? Although LAXA has done their traffic assessments based on one design day we also know that the access to LAX CTA varies substantially by time of day. The assessments don't appear to assess this type of impact inside or outside of the CTA. What impacts will the time of day have on intersection service level grade?*

#### Page 2-8 2.3.1.1 Alternative 1

##### Overview

Alternative 1 is a fully-integrated alternative, consisting of airfield, terminal, and ground access components. The distinguishing airfield improvement feature of this alternative is the movement of Runway 6L/24R 260 feet north, along with the addition of a centerfield taxiway, the extension of Runway 6R/24L, improvements to Taxiway D and Taxiway E, and relocation of the service road. Terminal improvements include addition of new Terminal 0, loss or modifications to concourse areas and/or gates.

*Question: 2.3.1.1 Alternative 1 description. Where are the detail drawings that identifies the number of gates in terminal 0 and their location to be used in the efficiency calculations?*

#### Page 2-9 2.3.1.1.1 Airfield Facilities

Alternative 1 meets FAA airport (runway) design standards for ADG V with a Category I/III outboard runway (Runway 6L/24R) and Category I inboard runway (Runway 6R/24L), and provides sufficient space

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- Demolish and reconstruct the Terminal 3 concourse and associated gates, with the building centerline shifted 40 feet to the west to increase the width of the alleyway between Terminals 2 and 3 to allow for dual-directional aircraft movement and comply with FAA standards

*Question: 2.3.1.1.2 Demo and reconstruction of Terminal 3 40' west to provide better spacing from Terminal 2. This happens to be a good idea that should have been included in all of the alternatives where terminals could be moved. Why wasn't it?*

#### Page 2-10 Terminal Facilities

- Demolish and replace the northerly end of the TBIT concourse and associated gates (with new concourse and gates in line with the new Bradley West concourse) to the Alternative 1 APLL. Provide the opportunity to extend the northerly end of the future MSC to the Alternative 1 APLL...

*Question: 2.3.1.1.2 Demo and replace northerly end of TBIT. Is this demo of the TBIT currently being built? What is assumed in all of the evaluations for aircraft movement efficiency? Will more gates be added? Where? How many?*

#### Page 2-10 Terminal Facilities

- The commuter facility currently in use east of Sepulveda Boulevard would be maintained
- West remote gates would be eliminated upon completion of the airfield and terminal improvements

*Question: 2.3.1.1.2 Continue use of commuter facility. Is this the AA terminal? What aircraft mix is assumed in the evaluations? How is this considered in the equivalent gate count? Is this done for every one of the options? Why not?*

#### Page 2-10 Terminal Facilities

- The total number of gates used at LAX for scheduled passenger service would be 153

*Question: 2.3.1.1.2 West remote gates will be removed. How will they be removed? Will the concrete be changed or will the gates just stop being used so that they become available after 2020? What was assumed for the efficiency calculations? With remotes or without? If used, how does this impact conclusions? Is open space with a roll up stairs and articulated bus still be available for use?*

#### Page 2-13 2.3.1.1.3 Ground Access Facilities

- Relocate Lincoln Boulevard to the north, outside of the Runway 6L/24R RSA, with a portion below grade and/or tunneled.

*Question: Page 2-13 and nowhere in the document is Balford Square area plans mentioned. How can the impacts of LAX be assessed without some assumption of its use?*

#### Page 2-13 2.3.1.1.3 Parking

- Generally, no changes to existing CTA parking conditions would occur as a result of SPAS, although future pricing structures may change long-term/short-term composition
- Parking Lot E would no longer be used for employee parking, although this property could be used for other airport purposes in the future. Changes to the use of this parking area would occur independently from SPAS.
- No changes are proposed to Public Parking Lot C
- Parking Lot D would provide approximately 1,944 employee parking spaces. The Jenny Lot east of Parking Lot D would provide approximately 2,000 employee parking spaces. These parking areas were not in use in the 2010 baseline year; however, their use for parking is occurring independently from SPAS.
- Development of the ITF would include approximately 4,900 short-term public parking spaces to facilitate passenger drop off and pick up outside of CTA
- Construct parking within Manchester Square, including 4,200 long-term spaces and 3,500 employee parking spaces
- No public or employee parking is proposed for the area referred to as Continental City

*Question: We know that CTA parking will be changing even if LAXA doesn't define the cause as SPAS changes. How are the cumulative impacts established?*

*Question: Page 2-13 ground access states that no parking would be placed in Continental City. What is intended to be placed there? Why is it not identified as part of the Master Plan or used to determine the comprehensive impacts?*

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between Runway 6R/24L and the centerfield taxiway for ADG V aircraft to hold prior to crossing the runway with a pilot line-of-sight of the end of Runway 24L. This alternative provides the FAA standard ADG VI runway-to-taxiway separation between Runway 6L/24R and the centerfield taxiway for approach visibility at or above one-half mile (Category I approaches). Taxiway E and Taxiway D dimensions would meet ADG V standards.

*Question: 2.3.1.1.1 Airfield Facilities... States that it meets FAA requirements for ADG V and ADG VI runway to taxiway. Is this statement based on AC150 5300-13 or -13A which goes into effect next month? If the FAA changes requirements (which it is doing) how has LAXA planned to accommodate these changes?*

#### Page 2-9 Runway Modifications

##### Runway 6L/24R

- Relocate 260 feet north of current location to accommodate a new centerfield parallel taxiway (see below) and to provide for ADG V separation distances
- Extend 604 feet west so that the RPZ no longer extends over residential areas
- Establish dual displaced thresholds to remove existing residences from the RPZ (east end displaced threshold) and maintain existing westerly aircraft landing heights (west end displaced threshold)
- Widen to 200 feet to meet FAA standards

*Question: 2.3.1.1.1 Modification of Runway 24R 604' west... If the runway is extended west, what additional noise will occur on the PDR areas in terms of single event noise? How will this impact the possibility of extra go-arounds over the PDR community? It might be an appropriate time if the runway is fully rebuilt, but is it necessary to expand to 200' wide runway since even the A380 is approved for a 150' wide runway with hardened shoulders?*

#### Page 2-9 Taxiway Modifications

##### Centerfield Taxiway

- Construct an 82-foot-wide centerfield taxiway between Runways 6L/24R and 6R/24L, with a centerline separation distance of 500 feet to Runway 6L/24R and 480 feet to Runway 6R/24L, to enhance safety and reduce incursions and other airfield hazards, while providing for ADG V separation distances; also provide exit taxiways from Runway 6L/24R to the centerfield taxiway, taxiways from the centerfield taxiway to and across Runway 6R/24L, and other related airfield taxiway improvements...

*Question: If the centerfield taxiway is installed LAXA states that it enhances safety and reduces incursions. The \$2M Northside Safety Study paid for by LAXA using the top academic experts chosen by LAXA stated a % improvement but of an extremely small base number resulting in no appreciable improvement. What number of incursions and incidents has LAXA calculated will be alleviated? Does that change if the flight mix changes? What about impacts of control tower movement or staffing? What about new construction which causes increased non-visibility areas?*

#### Page 2-10 Other Airfield-Related Features

- Cover the entire length of the Argo Drainage Channel (0.857 linear feet) such that the weight of an aircraft could be supported within the RSA by converting the existing open unlined channel to a concrete box culvert.

*Question: 2.3.1.1.1 Alt 1 features. How much capacity will the Argo Flood Channel have after being converted to a concrete box culvert? Will it be the same or less than current? Will it require the bottom to be moved or lowered resulting in disturbance of the substructure where there is an unknown water source? How has the total volume capacity been calculated for the channel? Does it consider 100 year storms? Fifty year storms? Where will the extra water go and what will it's impact be?*

#### Page 2-10 Terminal Facilities

- Construct a new Terminal 0 with seven gates in the western portion of the area now occupied by Park One to replace gates lost or downsized at Terminals 1 through 3

*Question: 2.3.1.1.2 Terminal Facilities. States that Terminal 0 will replace lost or downsized gates. What has LAXA done with the existing remote gates? Will they continue to be available? If they are to be removed, how will this be accomplished?*

#### Page 2-10 Terminal Facilities

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*Question: Page 2-13 and nowhere in the document is Balford Square area plans mentioned. How can the cumulative impacts of LAX be assessed without some assumption of its use?*

#### Page 2-15 Figure 2-2 LAX Specific Plan Amendment Study Draft EIR Alternative 2

*Question: Figure 2-2 Why are the relocated taxiways in Alternatives 2 vs. 4 different? There were both supposed to be based on the safety study which LAXA prepared three years ago to do some quick fixes of taxiways for safety improvement.*

#### Page 2-26 2.3.1.5 Alternative 5 Overview

As noted above in Section 2.3.1.1, the focus of this alternative is on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxiway D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxiway/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 2-5. (underline for emphasis)

*Question: 2.3.1.5 Alternative 5 States that for "Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards..." The ARSAC submitted Alternative 7 contained a taxiway that meets ADG VI. How was this considered in the evaluations? Why does the underline statement say that the taxiway doesn't meet the ADG VI standards?*

#### Page 2-33 2.3.1.6.3 Ground Access Facilities

Alternative 6 includes airfield and terminal components only. This alternative is compatible with the ground access improvements associated with Alternatives 1, 2, 8, and 9.

*Question: 2.3.1.6.2 Alt 6 terminal facilities section states "same as Alternative 1" for facilities and gate configuration. Does this mean that LAXA is including the same Terminal 0 with the same intent of eliminating the remote gates?*

#### Page 2-33 2.3.1.7 Alternative 7

*Question: 2.3.1.6.2 Alt 7 terminal facilities section states "similar to Alternatives 5 and 6" ... Terminal improvements... Does this mean that LAXA is including the same Terminal 0 with the same intent of eliminating the remote gates?*

#### Page 2-34 2.3.1.7.1 Airfield Facilities, Taxiway Modifications, Centerfield Taxiway

- Construct an 82-foot-wide centerfield taxiway between Runways centerline separation distance of 400 feet to each runway, to enhance and other airfield hazards, while providing for ADG V separation distances; from Runway 6L/24R to the centerfield taxiway, taxiways from the Runway 6R/24L, and other related airfield taxiway improvements. (underlined for emphasis)

*Question: 2.3.1.7 Alt 7 centerfield taxiway is listed as 82-foot-wide. Is this the same for all centerfield taxiways? Highlighted item on centerfield taxiway indicates 400' separation from each runway. Has LAXA or FAA done any evaluations of safety impact of a distance less than the initial distance between runways when a centerfield taxiway is made? What were the results and where can they be found? Does LAXA and FAA consider the safety the same if an aircraft is on the taxiway or not? Why?*

*Question: Is the Terminal 0 the same in these alternatives? What are the differences? Why?*

#### Page 2-37 2.3.1.8 Alternative 8

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Question: Several presentations made by LAWA prior to the release of the draft EIR used Alternative B to represent no ConRAC and LAWA stated an unofficial desire to delay or eliminate the ConRAC. Do any options show the elimination of the ConRAC?

Page 2-45 Summary of SPAS Alternatives

Question: Table 2-2 shows most alternatives extend runway 24L east 1250' but Alt D is 1280'-why? What causes the 30' difference?

Question: Table 2-2 shows Terminal D as 330,000 sq ft in Alt 7 when it is built. Why? Are the number of gates the same in each Terminal zero? If not, why not?

Question: Table 2-2 shows many changes in the terminals with demolitions and reconfigured square feet. How many gates does this represent in each change? What kind of gates? (ie ADG VI dual, single? etc.) Please provide information in terms of gate types AND single gate equivalents so that it can be compared to the Stipulated Settlement number requirement.

Page 2-53 Figure 2-10 Existing Facilities Affected by SPAS Improvements

Question: Item notation 9, Urgent Care Facility is shown to be relocated subject to tenant decision. What alternatives force this move?

Page 2-69 Potential Construction Staging Areas

Question: Areas C and D are north of Westchester Parkway adjacent to residences. What usage limitations are specified? There are already uncovered dirt mounds in area D which have been inadequately addressed for at least five months; what actions are planned and what provisions are to be put in place to preclude repollution in future uses?

Question: Area E appears to be Belford Square set aside for potential staging. Is this assumed to be near permanent for at least beyond the Master Plan? If not, what uses are planned? What kinds of staging are planned? Similarly, what is planned for Manchester Square (F) and Continental City (G)?

Page 2-71 2.3.2.1 Alternative Location  
Implementation of any of the SPAS alternatives would not be feasible at any location other than LAX. Pursuant to the Stipulated Settlement, the SPAS will plan for the modernization and improvement of LAX. Implementing the SPAS alternatives at any other location would not accomplish this fundamental goal. The existing facilities at LAX cannot accommodate the existing demand and forecasted increase in the numbers of aircraft, cargo, and passengers without significant delays and a very poor level of service. As the existing facilities are used beyond their design capacity, the level of service provided to the user degrades. This lowering of the level of service may be demonstrated by increased congestion within the passenger terminals, the various surface roads on and around the airport, and on the airfield itself. The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) for the Los Angeles region. Air service and economic benefits would likely relocate to other regions both within the state of California and to other states. Therefore, any comprehensive solution to meeting the regional demand for transportation must include improvements at LAX. (underline for emphasis)

Question: The sentence in the paragraph makes a strong statement of LAX facility limitations. What is the limiting factor that creates the concern? What is the current capacity of aircraft on the existing runways? What is the current capacity of the existing taxiways? What is the current capacity of the existing gates? What is the current capacity of the current roadways in the CTA and also in the streets surrounding LAX?

Question: While there is already CTA curbside traffic over-congestion, what reconfiguration is needed to handle the 76.9 MAP? How much can be accomplished by the re-routing of traffic as opposed to expanding the amount of curbside space?

Question: The subject paragraph states that everything must be done at LAX to alleviate congestion. If other regional airports increase in capacity doesn't this reduce peak hour needs? What if alternative transportation were available, such as HSR to reduce demand? What was actually considered? The statement that economic benefits would be lost to CA if

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not at LAX, but what evidence is there that this is true? Isn't the entire regional impacts tied together and that if congestion around LAX were reduced the costs of doing business on the coastal area would reduce thereby INCREASING overall economic benefits? LAWA provided a 2012 LAEDC study that LAX was responsible for about \$40 billion in economic impacts; as evidence that LAX needs to be expanded whereas a 10-24-2005 LAWA presentation stated, "Contributes \$60 billion annually to the regional economy." Since LAWA, as operator, is responsible for the reduction in service at Ontario (or in the case of Palmdale no service), why isn't improvements at those facilities a larger driver for economic benefits?

Page 2-71 2.3.2.2 Alternative Designs

Several alternative concepts were formulated and considered during development of the nine SPAS alternatives addressed in this EIR. Chapter 5 of the SPAS Report describes the basis, nature, and characteristics of those early concepts. The SPAS Report is available for review at LAWA's Facilities Planning Division, One World Way (LAX), Los Angeles or online at [www.laxspas.org](http://www.laxspas.org). Three of the airfield improvement concepts initially considered for inclusion in this Draft EIR were subsequently refined or consolidated. Specifically, an airfield improvement concept proposing to relocate Runway 6L/24R 400 feet north, which would meet all FAA standards for ADG VI aircraft, was subsequently refined to meet the basic requirements with only a 350-foot northward move. That refined alternative is Alternative 5 in this Draft EIR. Two other airfield improvement concepts, one proposing to move Runway 6L/24R 200 feet north and the other to move the subject runway 300 feet to the north were consolidated into the 260-foot north move, which is Alternative 1 in this Draft EIR. (underline for emphasis)

Question: The alternatives were stated to have been molded to meet full ADG VI aircraft standards. However, the same argument was used prior to "fixing" the south runway complex. As the "fix" was being instituted the standards were changed and made those runways undesirable for use with NLA. What has been studied to meet the newer, greater separation standards of AC150 5300-13A? If the separation standard is currently resolved by not using the adjacent runway for a short period, what frequency of NLA causes excessive delay? If certainly isn't current conditions or the runways would be closed to NLA traffic.

Page 2-72 2.3.2.4 Next Generation Technology

The application of NextGen to the SPAS effort was considered by LAWA to determine if any component of NextGen could provide for a viable concept. Although NextGen systems could provide for better ground situational awareness for air traffic controllers and pilots, and it could make airfield operations more efficient, it would not increase safety-related physical separation distances on the ground to meet ADG V and VI runway and/or taxiway/taxiway separation standards and obstacle free zone requirements. Based on this evaluation, LAWA determined that no component of NextGen technology can provide a viable concept (i.e., a SPAS alternative) and, therefore, NextGen was eliminated from further consideration.

Question: NextGen is a broad category of technology. The FAA has been evaluating and developing numerous elements for safety such as runway status lights, but also other ground and air technological improvements. Where in the EIR are these enumerated and why haven't they been included in the consideration as parts of the solution?

Question: The existing airfield has several "non-visibility" areas created by recent projects. How is the design of this SPAS program addressing them?

Page 2-74 2.4 Intended Use of this EIR

This EIR will be used by LAWA, the Board of Airport Commissioners, and the Los Angeles City Council to evaluate and consider the potential environmental impacts of each of the SPAS alternatives and to take action relative to amendments to the LAX Specific Plan. Certification of the SPAS EIR would complete the program-level CEQA compliance review for the SPAS process. Depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative.

In addition to use of this EIR by the City of Los Angeles, implementation of the selected SPAS alternative may require various federal, state, and local approvals, for which the approving agencies may use this EIR in their respective environmental reviews and decision-making and approval processes. Provided below is an overview of the actions and permits anticipated to be required for the project.

Question: The above paragraph says that project level EIRs "may" be required. Why not "must" be required since there are so many impacting construction details that are not addressed. In a previous paragraph LAWA dismissed dual runway moves as impractical due to logistics. Several factors on runway movement could be even more confounding than that issue (such as the Manchester tunnel which would need to be removed due to its destabilizing effects when a runway

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is moved along with the unknown water source impacts)? What other factors does LAWA consider to be cause for impractical phasing decisions?

Page 2-74 and -75 Federal Actions

Decisions regarding project eligibility for federal grant-in aid funds or PFC funds for land acquisition, site preparation, runway and taxiway construction, environmental activities, and mitigation;....

U.S. Army Corps of Engineers (USACE). Key action by the USACE may include:

• Issuance of a Clean Water Act Section 404 permit (if needed for impacts to jurisdictional wetlands (i.e., should jurisdictional wetlands be determined to exist within the Argo Drainage Channel).

Question: What commitments or comments have been provided to LAWA regarding project funding during this EIR preparation? What assurances have they received which grants waivers in advance?

Question: Since earlier sections acknowledge that the USACE have not been consulted on items such as jurisdictional wetlands and the Argo Drainage Channel when will this be addressed to determine the adequacy of LAWA assumptions?

Page 2-77 2.4.4 Other Actions

Other permits and approvals of specified types, but as yet unknown, may be issued to implement various aspects of the selected SPAS alternative.

Question: Please describe what additional permits and types of approvals LAWA is referring to and the conditions under which they would expect this to occur?

Page 3-1 3.1 Land Use Setting

As indicated in Chapter 1, Introduction and Executive Summary, and Chapter 2, Project Description, depicted in Figures 1-1 and 1-2, the SPAS improvement areas are located at LAX, within highly developed, urbanized areas consisting of airport, commercial, transportation (i.e., interstate highways), residential uses. West of the project site are the Los Angeles/El Segundo Dunes (Dunes), Environmentally Sensitive Habitat Area (ESHA), and beyond the Dunes is the Pacific Ocean.

Surrounding land uses include the following:

- Open space, recreation, and residential to the north;
- Commercial, industrial, and residential to the east and south; and
- Dockweiler State Beach and Pacific Ocean to the west.

The land use setting for each of the SPAS improvement areas is provided below:

Question: 3.1 Land Use Setting - Surrounding land uses: There are commercial uses to the north as well. What does LAWA consider the use of the Westchester Business District?

Question: 3.1 Land Use Setting. Surrounding land uses: In addition to Dockweiler State Beach there are also protected dunes with protect species and other adjacent habitat lands. Why is this not identified when the paragraph above it lists this land use?

Question: 3.1 Land Use Setting - North Airfield: left out the construction staging and construction support which is home to many dunes of potentially contaminated dirt deposited from other areas of the airfield. How/when will this be reconciled?

Page 3-3 Land Use...

Cultural Resources - The findings of the historical resources surveys of LAWA-owned property and adjacent areas conducted as part of the LAX Master Plan EIR indicated that four buildings within the overall boundary of LAX are considered potentially significant historical/architectural resources: (1) Hangar One (listed on the National Register of Historic Places (National Register)) on the southeastern portion of LAX near the northwest corner of Aviation Boulevard and Imperial Highway; (2) the Theme Building and Setting (eligible for listing on the National Register) in the center of the LAX terminals; (3) the WWII Bombers Storage Bunker (eligible for listing on the National Register) near the western boundary of LAX; and (4) the Intermediate Terminal Complex (eligible for listing on the California Register of Historical Resources (California Register)) on the south side of Century Boulevard between Sepulveda Boulevard and Airport Boulevard. Immediately adjacent to the airport,

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the Union Savings and Loan Building at 9900 S. Sepulveda Boulevard is eligible for listing on the California Register and for local designation. Eight archaeological resources have been recorded within the SPAS improvement areas. Due to the lack of important prehistoric or historic association and/or insufficient integrity, all but one of these sites were determined by the Federal Aviation Administration (FAA) to be ineligible for federal, state, and/or local designation as part of the Section 106 process undertaken for the LAX Master Plan EIS.

Similarly, with the exception of one site, these sites are not considered to be historical or unique archaeological resources pursuant to CEQA or the Public Resources Code.

Question: 3.1 Environmental Setting - Cultural Resources: Just because the Alt D EIR did not identify the former uses by Native Americans doesn't mean their historic use was not there. What studies has LAWA conducted to identify burial grounds and other significant uses?

Page 3-3 Hazards/Hazardous Materials

With respect to aviation safety, the runways and taxiways within the north airfield at LAX were designed and constructed in the late 1900s. Issues associated with the outdated airfield design include, but are not limited to, the following:

- The north airfield is not fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group [ADG] V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).

Question: 3.1 Environmental Setting - Hazards/Hazardous Materials talks extensively about waived conditions for aircraft operation, but fails to discuss the multiple sources of toxic contamination from the former oil field, airport activities and fuel, rocket testing, and chemical contamination related to manufacturing. Why doesn't this section mention the unknown water source and water flow characteristics which could spread contamination within the airport lands and also to adjacent habilitated lands?

Page 3-4 Hydrology/Water Quality - Much of the SPAS improvement areas are developed and paved, although there are areas of disturbed, undeveloped pervious areas adjacent to the runways in the north airfield and within Manchester Square and Continental City. Surface water from LAX drains into storm drain facilities within the jurisdiction of the County of Los Angeles and the City of Los Angeles, which discharge to either San Pedro Bay, via the Dominguez Channel, or to Santa Monica Bay. The Argo Drainage Channel, a 9,857-foot-long drainage channel, lies to the north of, and approximately parallel to, Runway 6L/24R. This channel is lined and uncovered across most of the north airfield, becoming a subsurface box culvert at the west end of the airfield before emptying into Santa Monica Bay. The project site is located within the West Coast Groundwater Basin. Groundwater beneath LAX is not used for municipal or agricultural purposes. Due to its largely impervious nature, the project site provides a negligible amount of recharge to the regional groundwater basin. Existing surface water pollutants typically include total suspended solids, oil and grease, metals, and fuel hydrocarbons, as associated with airfield activities and aircraft maintenance. No 100-year floodplain areas are located within the airport boundaries. (underline for emphasis)

Question: Since LAX is within the Dominguez flood plain why is the 100 year storm not applicable?

Page 3-4 Noise - The existing noise setting at the project site, a very active international commercial airport, is dominated by aircraft activities that occur throughout the day and evening, primarily involving commercial jets. These activities generate noise from aircraft arriving and departing on the north and south runway complexes, aircraft movements on taxiways, and aircraft undergoing maintenance activities that require engine testing (i.e., engine "run-ups"). Traffic noise from vehicles on-airport and on off-site area roadways and highways, as well as ongoing construction activities at LAX, also contribute to the existing noise setting at and near the SPAS improvement areas.

Question: 3.1 Environmental Setting - Noise. When CNEL is calculated how is the ground air traffic and any maintenance included in the calculations? How is topography included in the application of the INM model? Which version was used? What flight mix was assumed and is it the same one used in determining ground efficiency times from runway to gate?

Page 3-5 Utilities - The City of Los Angeles Department of Water and Power (LADWP) is the water purveyor for most areas in the City of Los Angeles, including LAX. LAX is served by a trunk line in Sepulveda Boulevard that distributes water to transmission lines running along the airport perimeter. LAX also

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uses reclaimed water from the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility and has implemented other measures to decrease potable water use at the airport. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant (HTP), a City-owned treatment plant located adjacent to the southwest boundary of LAX, approximately two miles southwest of the CTA. Electric power at LAX is supplied by LADWP. LAX participates in LADWP's "Green Power for LAX" program to purchase electricity from renewable resources and incorporate energy efficiency and conservation into existing buildings and new construction. In addition to obtaining electricity from LADWP, LAX operates the CUP, which provides heating and air conditioning to the CTA. The CUP also houses a co-generation system that generates electrical power, which is sold to LADWP. The CUP is currently being replaced with a more modern facility with higher capacity and greater efficiency. LAX has had a comprehensive, facility-wide recycling program at LAX to reduce solid waste generation and disposal since 1992. This program includes collection of recyclable materials generated by LAX and within airport terminals and airfield areas; collection of materials from airlines and tenants at no cost to participants; independent airline and tenant recycling programs; and source reduction through purchase of recycled products and reuse of materials. Solid waste that cannot be recycled is transferred to the Sunshine Canyon Landfill in Sylmar for disposal.

**Question:** In other sections of this EIR LAX acknowledges that the amount of waste will be increasing just because more passengers will be accommodated at LAX. Where are the innovative ways to improve recycle and reuse studied by LAX?

**Question:** 3.1 Environmental Setting - Utilities

At one time there were some fuel cell experiments done at LAX to provide power. What were the results and where was any potential contamination from them deposited?

**Page 3-5 3.3.1 LAX Development Projects Not Related to the SPAS Elements**  
LAX development projects that are not related to the SPAS elements include the following:  
Airfield-Related Improvements

**Question:** 3.3.1 LAX non-SPAS projects

Where are the hush hangers shown in Alt D and agreed to install by 2015 as a condition of the CA Noise Variance? Where is the Continental City activity which appears to be starting? What about activity in Belford Square? What is planned there?

**Page 3-6 3.3.1 LAX Development Projects Not Related to the SPAS Elements**  
LAX development projects that are not related to the SPAS elements include the following:  
Terminal-Related Improvements

**Question:** 3.3.1 LAX non-SPAS projects

What cargo related projects are planned? What about relocations of LAX staff or LAXA PO?

**Page 3-7 3.3.2 Non-LAX Planned Development**

A list of other development projects in the City of Los Angeles and neighboring communities within the vicinity of the project area is provided in Chapter 5, Cumulative Impacts. A total of 140 projects in the LAX area (illustrated in Figure 5-1 and briefly described in Table 5-2) have been identified whose development could occur within the same time frame as SPAS. Information regarding the background development projects is based on site visits and/or consultation with staff from and/or websites of the County of Los Angeles and the cities of Culver City, El Segundo, Hawthorne, Inglewood, and Los Angeles.

**Question:** 3.3.2 LAX non-SPAS projects

There are numerous residential and commercial projects throughout the areas that are contained within the intersections identified for the traffic study not in Table 5-2. A sanity check item missing is Howard Hughes Center covering multiple large towers (over 1M sq ft). Playa Vista phases are not shown either. There is a 140 unit apt bldg on La Tijera 74th just west of the 405 exit being planned as well as several others off Airport Blvd also not listed. Which other ones has LAXA not included? What date is the list "as of"? Does LAXA believe that nothing will be built in this area after that time?

**Page 4-1 Environmental Impact Analysis - Public Services**

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LAX have not materially changed. Therefore, the available information in 2009 or 2011 that was used to characterize baseline conditions is considered to be generally representative of 2010 conditions. The methodology discussion for each environmental topic addressed in this section describes the nature, timeframe, and basis of the data used to characterize existing baseline conditions. (underline for emphasis)

**Question:** Even though a full year was desired, why was it necessary to go back to 2009 when most of the elements of studied have data collected and reported monthly?

**4-10 Aesthetics**

- Policy P7: Provide and maintain landscaped buffer areas along the southern boundary of Airport Airside and northern boundary of LAX Northside that include setbacks, landscaping, screening, other appropriate mechanisms with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of airport facilities from adjacent residential areas.

**Question:** Why is there no complimentary landscape policy for the east and west ends of LAX where there is substantial traffic passing along the north-south routes daily?

**Page 4-12 Aesthetics**

LAXA committed to updating design-related guidelines and plans, including the LAX Street Frontage and Landscape Development Plan, in order to avoid view degradation and incompatibility between on-site and off-site land uses. The LAX Street Frontage and Landscape Development Plan Update, adopted in 2005, fulfills this component of LAX Master Plan Component DA-2, and now serves as a basis for reviewing future public and private development projects at LAX. The objectives set forth in the LAX Street Frontage and Landscape Development Plan Update are identified below:

- Coordinate and enhance the visual and aesthetic appeal of streets, buffer areas, and open space surrounding LAX.
- Maintain and improve safety and security at and surrounding LAX through coordination of street frontage and landscape design with airport security and in compliance with the LAX Wildlife Hazards Management Plan.
- Enhance pedestrian, bicycle, and vehicular circulation on streets internal to and surrounding LAX, and comply with airport security requirements, as feasible and practical.
- Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities.
- Ensure that street frontage and landscape design is cost-effective, efficient, environmentally sensitive, and sustainable.
- Provide the basis for the design and review of public and private development projects at LAX by establishing a hierarchy of landscape treatments based on airport gateways and public facilities. The LAX Street Frontage and Landscape Development Plan Update also calls for the preparation of a Neighborhood Compatibility Program (NCP), based on commitments made in the LAX Master Plan, which outlines interface treatments along the airport perimeter for the purpose of "ensuring that the airport complements surrounding properties and neighborhoods." The NCP, which is to address all issues relating to compatibility, including landscape buffers, noise, light spillover, odor, and vibration, is to include the following measures to ensure that this policy is achieved

**Question:** If this plan has been in place since 2005 why haven't improvements been made to the perimeters? Is there a schedule to get started?

**Page 4-83 Impacts Summary 4.2.1. Introduction**

**Question:** LAXA started an air quality apportionment study in 2006 but has failed to provide any data or information to the public other than a verbal statement that it has finished two and a half phases. What data from this study has been used to evaluate impacts for this EIR? If none, why not? How does the data from this study compare with the assumptions made to result in air quality evaluations. What concentration assumptions were made based on LAXA property boundaries? Did it assume ownership of Manchester Square and Belford Square? What uses were assumed for these properties?

**Question:** There are many particulate studies of PM 0.1 including one on the LAX properties by Froines (UCLA) which concluded that these smaller, more dangerous particles are evident in plumes correlating to takeoffs and landings. The

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**Question:** Page 4-1 Environmental Intro. Shouldn't public services include health care/trauma care? What about related EMT and the ability to handle disasters?

**Page 4-2 and -3 Commitments**

- The Applicable LAX Master Plan Commitments and Mitigation Measures section lists the LAX Master Plan commitments and mitigation measures applicable to the SPAS alternatives. As background, in conjunction with approval of the LAX Master Plan and certification of the Final EIR in December 2004, the Los Angeles City Council adopted a Mitigation Monitoring and Reporting Program (MMRP) to ensure that mitigation measures and LAX Master Plan commitments identified in the Final EIR are implemented. Mitigation measures are activities, policies, or practices designed to avoid or minimize significant environmental impacts. Besides mitigation measures, the MMRP for the LAX Master Plan includes Master Plan commitments. LAX Master Plan commitments were determined to be more appropriate than mitigation measures where: (1) standards and regulations exist with which compliance is already required by the applicable regulatory 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. The timing of implementation of LAX Master Plan commitments and mitigation measures is set forth in the LAX Master Plan MMRP. Unless otherwise noted, the impact analysis for the SPAS alternatives assumes that the applicable LAX Master Plan commitments and mitigation measures would be implemented concurrently with and as part of each alternative. To the extent that the LAX Master Plan commitments and mitigation measures would not reduce significant environmental impacts to a level that is less than significant, SPAS-specific:
  - The Impacts Analysis section presents the analysis of impacts for the nine SPAS alternatives for the buildout horizon year 2025. Impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, potential impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below.
  - Level of Significant After Mitigation is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Section 7.1, Significant Environmental Effects, of this EIR. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures specific to SPAS are required. (underlines for emphasis)

**Question:** Since many projects identified in this EIR are not in the LAX Master Plan and several projects referenced as not being part of the EIR are also not in the Master Plan (such as terminals 1.5 or 2.5 or the midfield check in inside the CTA) how has LAXA identified and included mitigations in the MMRP let alone provide implementation schedules? How are the construction impacts of these projects included?

**Question:** Many of the "significant unavoidable impacts" are acknowledged by LAXA as resultant from the growth of flights, passengers, etc. for all alternatives. How has LAXA provided an assessment of those which allow for comparison of the alternatives so that the least of the unavoidable impacts can be chosen and why hasn't LAXA presented possible partial mitigations for these impacts?

**Question:** Although detail phasing is generally in a project EIR and since the EIR is willing to consider general phasing of mitigations, why doesn't it address phasing of the key project improvements?

**Page 4-4 Environmental Baseline**

The Notice of Preparation (NOP) for the SPAS EIR was first published in March 2008; however, the EIR work effort was temporarily suspended while the North Airfield Safety Study (NASS) was being completed, based on the possibility that the study results would yield new information relative to the range of airfield alternatives being considered for the SPAS Draft EIR (see Section 4.7.2, Safety, for a description of that study). Upon completion of the NASS, work on the SPAS Draft EIR resumed and a revised NOP was published in October 2010.

In accordance with the provisions of CEQA, October 2010 is the baseline date for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to October 2010 were not available or where October 2010, by itself, was not an appropriate representation of baseline conditions, this Draft EIR identifies this fact, explains what data was used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions. For example, in some cases, available reports and other documentation were only available for timeframes preceding 2010. For those topics which relied upon site surveys, such information was collected during preparation of the Draft EIR, typically in 2011. Due to the highly developed nature of LAX and the surrounding communities, and the lack of economic growth in recent years, site conditions at and around

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study also showed that the measurement of larger particles were NOT a predictor for the ultra-fine particles. On page 4-84 LAXA acknowledged that fugitive dust generated by construction activities is a major source of suspended particulate matter. What has LAXA done to evaluate the contamination in the construction piles placed around the perimeter of LAX which is adjacent to residential and commercial areas?

**Page 4-88 Meteorology**

Airport-specific meteorological data were used to analyze air quality impacts. The data set used consisted of twelve continuous months of hourly surface data collected at LAX for calendar year 2007, the most recent data year available from the SCAQMD's on-airport meteorological station. This data set, provided by the SCAQMD, included ambient temperature, wind speed, wind direction, and atmospheric stability parameters, as well as mixing height parameters from the appropriate upper air station, and was provided "AERMOD-ready," including hourly O<sub>3</sub> concentrations from the LAX Hastings monitoring station collected in 2007. The location of the on-airport SCAQMD meteorological and air quality monitoring station is identified in Figure 4.2-1.

**Question:** Why is CY 2007 considered representative since the number of aircraft (a major contributor) and port activities (another major contributor) were artificially low due to the recession? Also wasn't 2007 abnormal drought conditions that impacts assumptions of wind and atmospheric conditions?

**Page 4-91 Emission Source Types: Aircraft**

Information on the number and types of aircraft operations considered at LAX for 2009 and 2025 was developed as part of the LAX SPAS forecasts. The aircraft activity levels for baseline conditions are from calendar year 2009 (i.e., full year) with aircraft activity data in order to develop peak month average day activity characteristics to be used in modeling. The aircraft activity levels for future conditions were based on aircraft activity growth forecasts for LAX in the year 2025. These data were used to develop airport simulation models (SIMMOD) of aircraft operations for baseline (2009) conditions and future (2025) conditions. The simulation models used information about facilities and operations to predict specific timing, volume, and location (e.g., runway used) for future aircraft operations. This modeling provides specific information regarding aircraft engine operations, such as time-in-mode (i.e., the amount of time aircraft engines are idling, or being used for taxiing, or are in take-off or landing modes), that is used to estimate aircraft emissions. Detailed SIMMOD runs were completed for Alternatives 1 through 4. For Alternatives 5 through 7, the existing SIMMOD data were reviewed to assess the operational characteristics applicable to those alternatives and adjusted where necessary to reflect the airfield design configuration specific to each alternative. Such adjustments took into account the runway improvements associated with each alternative, particularly whether a runway would be relocated closer to or farther from the CTA, as this would affect aircraft taxiing distance/time, and the extent a runway relocation would result in a loss of aircraft gates on the north side of the CTA, potentially causing aircraft to use more gates on the south side of the CTA.

**Question:** What does the above paragraph mean? Was actual flight data used from 2009 or was it "approximated and summarized"? Similarly, which aircraft growth forecasts were used and the assumptions made? Several were generated during the past several years (e.g., one in 2006, one for the Part 161 Study, one in 2008, one for the Northside Safety Study. What assumptions were made for the 2009 airport layout and availability of runways and taxiways? What about location and number of gates in use? Was APU use assumed to be 100%, 95% or what? Since LAXA had conducted dispersal and particulate studies on the actual flight field why did it revert to FAA EDMS models instead of actual information?

**Question:** For an estimation of construction equipment emissions did LAXA use a formula to approximate the number and types of equipment? If LAXA hasn't decided what construction (or when) is to occur and its phasing, how did LAXA estimate maximum amounts for a worst case condition?

**Page 4-100 4.2.3.4 Existing Airport Emissions**

The baseline (2009) airport-related emissions, including those from aircraft, GSE, and APU operations, on-airport and off-airport roadways, parking lots and structures, and the CUP are shown in Table 4.2-4.

**Question:** Were the baseline values shown in Table 4.2-4 measured or estimated by modeling? Subsequent sections state that the main drivers of these values is increased ground traffic and air traffic. Since most of the alternatives assume the same numbers of vehicles and aircraft, how are the smaller differences among alternatives displayed to give decision makers a frame of reference as to the significance of the differences (even if all are designated as significant, not mitigatable)?

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Page 4-106 Table 4.2-8 Construction-Related Air Quality Mitigation Measures Not Quantified in the Construction Emissions Inventories....

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 hours. Fugitive Dust

Question: Since the measure noted above has not been followed on several occasions for several months at a time, how is the estimate of impacts valid?

Page 4-105 -106 LAX Master Plan - Mitigation Plan for Air Quality: MM-AQ-3, Transportation-Related Mitigation Measures.

This measure applies to mass transit, surface traffic, and on-site parking facilities. The principal feature of MM-AQ-3 is to replicate and expand the current LAX FlyAway service to other communities within regions of Los Angeles County. This initiative also includes a public outreach program to encourage the use of both the existing and new facilities. For the mitigated emissions inventory presented in Section 4.8.8.5 of the LAX Master Plan Final EIR, only emissions reductions associated with the new FlyAway capacity were quantified to account for the ensuing decrease in VMT regionwide combined with less traffic congestion in the vicinity of the airport and the use of clean-fueled buses used in FlyAway service. The remaining, secondary, transportation-related air quality mitigation measures contained in MM-AQ-3 may also be implemented to help ensure the emission reduction goals of the LAX Master Plan Final EIR and MMRP are achieved.

Question: Little of the FlyAway outreach has been accomplished that is required in the Settlement Agreement. What assumptions are made by LAX about what is to be accomplished since this section talks about "equally feasible and practical, but that are not specifically identified in the MMRP, may also be considered." What was assumed complete in the assessments?

Page 4-106 Table 4.2-9 Transportation-Related Air Quality Mitigation Measures

- Provide free parking and preferential parking locations for ultra low emission vehicles/super low emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV) in all (including employee) LAX lots; provide free charging stations for ZEV; include public outreach to reduce air emissions from automobiles accessing airport parking...
- Expand LAX's rideshare program to include all airport tenants Additional Rideshare

Question: How much of the above parking has been assigned and how much will be assigned in the future? What is the schedule for doing so? How much and what percentage of rideshare is currently occurring now, what is the target?

Page 4-107 Air Quality LAX Master Plan Community Benefits Agreement; X.A., Electrification of Passenger Gates This provision requires that all passenger gates newly constructed by LAX shall be equipped with and able to provide grid electricity to parked aircraft (for lighting and ventilation) from and after the date of initial operation and that LAX will ensure that all aircraft (unless exempt) use the gate provided grid electricity in lieu of electricity provided by operation of an auxiliary or ground power unit.

This provision would apply in conjunction with construction or modification of passenger gates that occur as a result of implementing any of the SPAS alternatives, specifically Alternatives 1, 2, 3, 5, 6, and 7.

Question: There is also a requirement to address existing gates as well as new ones. What percentage and how many do not provide grid electricity availability? What is the completion schedule? How many new gates are planned to replace old ones? Will those gates be kept closed until electricity is available? If a unit fails, what is the target to get it back on line?

Question: General air quality. When taxiways are closed for extended periods causing longer than programmed routes to gates is there a way this is included in the air quality modeling?

Page 4-108 to -111 4.2.6.1 Construction Emissions Impacts Analysis

Peak daily construction emissions for Alternatives 1 through 9 are presented in Table 4.2-10. To provide a more representative basis of comparison between all nine alternatives, the emissions of those alternatives that focus solely on airfield and related terminal improvements (Alternatives 5, 6, and 7) were combined with the range of emissions that could occur under various ground access improvements scenarios. Similarly, the emissions of those alternatives that focus solely on ground access improvements (i.e., Alternatives 8 and 9) were combined with the range of emissions that could occur under various airfield/terminal improvements scenarios – see Notes 2 and 3 in Table 4.2-10. In so doing, the total potential emissions associated with these focused alternatives can be better compared to the emissions associated with the "fully integrated" alternatives (i.e., Alternatives 1 through 4, which consider...

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Question: Since LAX has failed to do more than a program level review, how is it determining the amount of construction required? What did it assume was necessary for the tunnels, utilities, and water flow mitigation work? Did LAX include the amounts of construction work necessary to move and change Lincoln Blvd and Sepulveda? How was the amount of work determined? The SPAS report cost section lists some numbers, but does not provide assumptions made. Almost all emissions in Table 4.2-10 show "threshold significant." Has LAX made recommendations on how to reduce these numbers? Where?

Pages 4-120 to Table 4.2-13 and 4.2-14 Incremental Project Operational Emissions Compared to Baseline (2008) Conditions and Future (2015)

...The vast majority of the aircraft emissions increases shown in Table 4.2-13 are due to the anticipated growth in aircraft activity. Within Table 4.2-14, the incremental aircraft emissions associated with each alternative in 2025 are measured against the 2025 emissions of Alternative 4. The same aircraft activity level and fleet mix are assumed for all alternatives in 2025. As such, the incremental aircraft emissions shown in Table 4.2-14 are only influenced by the differences in the airfield configuration specific to each alternative.

Question: Since detailed gate layouts are not assumed in the "Program level" of this document, how were the gate assignments (and therefore types of aircraft for emission calculation) determined? Related, how did LAX estimate the time to gate for each class of aircraft since the locations of airlines (and their particular types used) could change substantially between now and 2025?

Pages around 4-147 There are Peak Operational Concentration Figures for each Alternative presented.

Question: What is the color coding of the areas on the figures represent? The highest concentration items for the varied parameters are shown on each figure and are different for each alternative. Is there a summary overview chart that explains why each alternate is different? What can be done to mitigate?

4.3 Biological – skipped others are submitting separately

Page 4-218 Figure 4.3-7 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 1

Page 4-227 Figure 4.3-8 Vegetation/Land Uses - Alternative 2

Page 4-228 Figure 4.3-9 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 2

Question: There are black rectangles shown near the end of runway 6L (just north) and in the dunes which are not identified by coded legend colors. Similarly there is a black bar in Figure 4.3-8 just north of 6L but 1/3 from the west end. The black bars in Figure 4.3-9 are similar to the Alt 1 version. These bars are in each alternative figure. What do they represent? What is their function or impacts?

Page 4-339 Figure 4.5-1 Surveyed Historical resources

Question: Several underground, lead lined air raid/bomb shelters were constructed at LAX. These are not shown in the diagram. Where are they located?

4.6 Greenhouse gases –skipped others are submitting separately

4.7 Health Risk –skipped others are submitting separately

4.7.2 Safety information is in Appendix G2

Page 4-485 Table 4.7.2-1 Birdstrikes at LAX by Year

Question: How many bird strikes occurred on the north complex versus the south runway complex? The number of events does not appear to be a function of number of aircraft operations since 2001 was the highest and the variance of strike numbers is quite high. What explanation is given for the variability?

Page 4-486 Safety

The ALP for LAX was updated in conjunction with the FAA's issuance of the Record of Decision in 2005 for the LAX Master Plan improvements. That ALP update includes a plan sheet for future conditions (i.e., buildout of the LAX Master Plan improvements) and a plan sheet for current airport conditions. The ALP plan sheet for current airport conditions is in

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the process of being updated by LAX, in coordination with the FAA, to incorporate improvements completed since 2005, such as the South Airfield Improvement Project (SAIP), the Crossfield Taxiway Project (i.e., Taxiway R), and the new Airport Rescue and Fire Fighting (ARFF) station, as well as other recent and pending near-term improvements at LAX. Depending on the outcome of the SPAS process, the LAX ALP may need to be amended to reflect the airport modifications identified by LAX. Such amendment of the LAX ALP would first require completion of the NEPA review process by the FAA and issuance of a Record of Decision specific to the proposed ALP modifications. It is common at airports throughout the country to have facilities depicted on ALPs that depart from FAA Airport Design Standards in order to meet local site conditions and constraints. Such differences do not compromise safety. Operational changes and restrictions are made to preserve an acceptable level of safety. (underline for emphasis)

Question: When updating to "current" will LAX/FAA include both Crossfield Taxiways planned (ie S and T) or just S as built?

Question: Since the ROD has approved the need of standards for handling ADG V and ADG VI and the FAA uses these operational changes then these operations are "safe." Does LAX or the FAA predict when the frequency and number of operations would make changes or restrictions not practical?

Page 4-488 Safety

Of particular relevance to the SPAS alternatives are the runway to taxiway separation requirements related to large aircraft, as follows:

Aircraft Design Group (ADG) V Aircraft (e.g., B747)

- 400 feet - Good visibility (approach visibility >1/2 mile)
- 500 feet - Low visibility (approach visibility <1/2 mile)
- ADG VI Aircraft (e.g., A380)
- 500 feet - Good visibility (approach visibility >1/2 mile)
- 550 feet - Low visibility (approach visibility <1/2 mile)

Relative to the existing (baseline) configuration of the north airfield at LAX, the two existing runways (Runways 6L/24R and 6R/24L) are separated by 700 feet, which allows simultaneous arrivals and departures during good visibility conditions. In low visibility conditions, Air Traffic Control (ATC) will not land or depart aircraft simultaneously on Runways 6R/24L and 6L/24R; however, ATC can clear two aircraft for landing on adjacent runways if the trailing aircraft has a visual sighting of the aircraft ahead. In addition, ATC has a procedure called "2 increasing to 3" where they can clear an aircraft to land in low visibility conditions after an aircraft on the adjacent runway has begun its takeoff roll, as long as the arriving aircraft is at least two miles out.

To the south of Runway 6R/24L is Taxiway E, which meets FAA Airport Design Standards for ADG V aircraft during periods of good visibility. The movement of the A380, an ADG VI aircraft, on Taxiway E during poor visibility conditions is only allowed with the observance of several restrictions and special conditions set forth by FAA, specific to that taxiway. During good visibility conditions, the A380 can operate on the full length of Taxiway E with no restrictions on 6R/24L due to an approved MQS from FAA. Vehicular traffic on the adjacent service road is restricted anytime an A380 is on Taxiway E. During CAT I conditions, not more than one ADG VI aircraft can be on the first 3,000 feet of the taxiway from the runway threshold.

South of Taxiway E is Taxiway D, which is separated by 300 feet, with a service road between them for most of its length. Based on FAA design standards, the maximum size aircraft that can operate on this existing taxiway ranges from ADG II in the eastern portion to ADG VI between Taxiway R and Taxiway S in the western portion, with the difference being defined by variations in its and the service road's alignment and nearby obstructions (i.e., parked aircraft, etc.). (underline for emphasis)

Question: Since there is an approved MQS for moving ADG VI along taxiway E during good visibility, how often is IFR required at LAX? How many aircraft ops can be accommodated in IFR before movement along taxiway E is impacted? If taxiway E is made to accommodate Grp VI is this a mute question?

Page 4-492 Runway Safety

The FAA completed an RSA evaluation and analysis for LAX in 2006, in accordance with FAA Order 5200.8, Runway Safety Area Program, to reconsider the adequacy of existing RSAs at LAX. The FAA determined that none of the RSAs at LAX met current standards but all are practicable to improve. U.S. Congressional House Rule 305B provides the statutory requirements that airports must comply with current RSA requirements by December 31, 2015.

In light of the above, a Runway Safety Area Practicability Study was conducted by LAXA identifying, evaluating, and recommending preferred RSA improvement solutions for LAX runways within operational, environmental, and financial

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constraints. The Runway 7L/25R Study was finalized and submitted to the FAA for their review and determination in December 2009. These improvements are currently scheduled to take place in 2013.

Identification of potential solutions for noncompliant RSAs in the north airfield was included in an evaluation completed in April 2010. The analysis noted that permanent RSA compliance solutions for these runways can be integrated into all the SPAS build alternatives, such as by extending the eastern end of Runway 6R/24L and by covering the eastern portion of the Argo Drainage Channel for Runway 6L/24R. The FAA has acknowledged that implementation of solutions to RSA compliance issues in the north airfield may not be practicable by December 31, 2015, particularly given overall runway improvements associated with the SPAS alternatives, including RSA improvements, are not proposed to be completed by 2015. The FAA and LAX are coordinating on the identification and evaluation of potential interim solutions.

Although the 2006 RSA evaluation by FAA found none of the RSAs at LAX to comply with current requirements, the FAA acknowledged that RSA improvements for Runway 7R/25L would be made with the LAX Runway 25L Relocation and Outer Taxiway Project (South Airfield Improvement Project), which has since been completed. As such, it was not necessary to identify solutions for Runway 7R/25L in the Runway Safety Area Practicability Study; however, RSA improvements to the other runway within the south airfield complex – Runway 7L/25R – would still be needed and were, therefore, addressed in the Practicability Study.

Ricardo & Associates, Inc., Runway 6L-24R & 6R-24L Safety Area (RSA) Practicability Study, April 2010.

Question: What accommodation has been agreed to by the FAA? With the impending release of AC150/5300-13A are there any changes that will affect these agreements? Where are the documents in footnotes 390 and 391 available?

Question: Has any runway approach changes been made or are any contemplated to respond to the RPZ not being fully clear?

Page 4-498 Runway Safety Based on FAA guidelines, Table 4.7.2-4 delineates the calculated declared distances for runways in the north airfield. To date, declared distances for LAX have not been added to the ALP.

Question: Since offsets have been in place at LAX for some time, why have the declared distances not been added to the ALP since release in 2005? Does this impact safety or is this just an administrative exercise?

Page 4-499 Figure 4.7.2-4 Parcels Within RPZ Baseline Conditions (2010)

Notes: 3/ For planning purposes, all runways are assumed to have approaches with minimums less than 3/4 mile.

Question: What does note three mean? If the approach is > 3/4 mile how does this impact RPZ and safety?

Page 4-501 Other FAA/LAX Safety Measures

The FAA and LAX have worked together in recent years to deploy new technologies and enhanced training to improve airfield safety at LAX. The following provides a summary of these recent and ongoing improvements:

- Airport Movement Area Safety System (AMASS) was installed and fully operational at LAX in 2003.

AMASS is a radar-based system that tracks ground movements and provides an automatic visual and audio alert to tower controllers when it detects potential incursions or collisions on runways and taxiways.

- Enhanced airfield signs, lighting, and pavement markings to FAA updated standards have been installed.

In 2009, Airport Surface Detection Equipment, Model X (ASDE-X) was installed at LAX. ASDE-X provides a more precise surface detection technology than AMASS by providing accurate target position and identification information and thus gives controllers a more reliable view of airport operations. A Phase I upgrade to the multi-lateration receiver units was completed in 2011 and a Phase 2 enhancement and upgrade to the ASDE-X equipment is scheduled for installation at LAX in 2013.

- Recurrent training takes place with all airport, airline, and FAA personnel with access to or control of the LAX airfield movement areas (runways, taxiways, and service roads).

The FAA and LAX are deploying Runway Status Lights (RWLS) technology at LAX. This tool increases situational awareness for aircrews and airport vehicles and thus serves as an additional layer of runway safety against incursions. A Prototype Program (Phase 1) has been installed and operating since June 2009. LAX was the first airport to have RWLS installed on multiple runways.

- In February 2010, LAX and the FAA entered into a Memorandum of Agreement for a full implementation (Phase 2) of RWLS technology. This is to include upgrading existing prototype equipment and new installations on both north and south runway complexes. The design was

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completed in May 2011; however, the FAA informed LAXA that same month that the implementation schedule was on hold due to budgetary constraints. Based on discussions between LAXA and the FAA in December 2011, the FAA is re-evaluating the scope and budget with the goal of initiating the implementation in 2012, in order for the safety benefit of this technology to be fully realized, an airfield geometry designed to accommodate modern aircraft is needed.

As part of the overall goal of improving operational safety at LAX, the FAA has made procedural changes since 2007 that are related to airspace operations.

**Question:** What other improvements, such as more extensive ground movement tracking system which includes all vehicles, are available to improve flight field safety? When can they be implemented? How would improving tower staffing help? Runway status lights were only partially installed three years ago. Why is it taking so long to complete installation of the rest of the airfield coverage? What other situational awareness systems should be installed at LAX for safety?

#### Page 4-502 to 4-504 North Airfield Safety Studies

Seven independent assessments of north airfield safety were completed. The following is a summary of each of these studies:

- LAX North Airfield Special Peer Review, March 2007 - A special peer review process involving airport industry experts was formed to objectively review the facts concerning the north airfield improvements (i.e., various options for increasing the separation distance between Runways 6L/24R and 6R/24L, adding a centerfield parallel taxiway, and modifying the locations designs of taxiway/runway intersections) and to provide the group's insight and advice on the best solution and way to move forward. The Peer Review Group consisted of 13 aviation experts from the private, airport, and public sector with experience in planning, engineering and operations of major U.S. airports.

The Peer Review Group 393 evaluated the north airfield from the perspectives of operational safety,

airfield balance, and efficiency. They found that there is a definite need for improvements to the north airfield, that doing nothing in the region, and massive terminal demolition is not feasible. The Group concluded that shifting the northerly runway 340 feet northward offers maximum safety, balance, and efficiency advantages. This option provides for new large aircraft operations, does not impact the apron/gate terminal infrastructure, presents fewer construction phasing impacts, and provides for a full-length center taxiway to promote safe and efficient aircraft landing and takeoff operations.

- Analysis of LAX North Airfield Alternatives, May 2007 - An analysis of LAX north airfield alternatives was prepared by the International Aviation Management Group, Inc., an aviation planning firm headed by a professor of Airport Operations and Management from Embury Riddle Aeronautical University. The purpose of this study was to provide expert and objective guidance as to which alternatives being considered for the SPAS at the time (i.e., provide more separation between runways by moving Runway 6L/24R north by either 100 feet or 340 feet, or moving Runway 6R/24L south by either 100 feet or 340 feet, or keeping runways in current locations) were most appropriate for further study as they relate to operational safety, aircraft compatibility, capacity, and environmental considerations. The study determined that the alternatives that provided an additional runway separation of 340 feet (LAX Master Plan Alternative D [340 feet south] and 340-foot north alternative) were the most appropriate for further study, while the least appropriate alternatives were the no additional separation and the 100-foot south concepts.

- Los Angeles International Airport North Airfield Assessment, May 2007 - A north airfield assessment was prepared by URS Corporation, a large multi-disciplinary worldwide aviation consulting and engineering firm. The study examined options for reconfiguring the north airfield to address airfield safety related to runway incursions, the need to accommodate ADG VI aircraft, operational efficiencies, and cost factors. The study concluded that several aircraft types create operational challenges to the existing airfield and that addition of a center taxiway, which could occur if there was more separation between the existing runways, would eliminate several risks and problems. The study recommended, based upon FAA standards, pursuing relocating Runway 6L/24R 350 feet northerly and increasing its runway takeoff length. Current FAA design standards require greater separation between parallel runways and between runways and taxiways than what exists in the north airfield today, to safely and efficiently accommodate larger aircraft.

- Los Angeles International Airport Modernization - Tomorrow is Now, May 2007 - Twenty-two members of the Airline Pilots Association (ALPA) formed a committee to present their findings and recommendations in a presentation entitled "Los Angeles International Airport Modernization - Tomorrow is Now." ALPA is an international organization of over 60,000 pilots representing over 40 airlines that is heavily engaged in safety issues and improvements for the airline industry. The ALPA Committee recommended that Runway 6L/24R be relocated northward to provide 623 feet, but not less than 550 feet, of runway to taxiway separation and that mirroring the separation on the south airfield is not an option.

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the taxiways experienced at other airports? Are these center taxiways more effective at airports with much larger land areas?

**Question:** There was only one comprehensive study, the NASS to which the FAA was a significant participant. The DEIR lists seven studies, but in the context of the statements there were eight. The Academic Panel responded to the FAA conclusions and found fault with their methodology. Why are the AP responses to the FAA assertions not included in this DEIR?

#### Page 4-510 Table 4.7-2-7 Runway Incursions/Incidents at LAX (2001-2011)

For the FAA, an incident without an aircraft in potential conflict – such as an unauthorized aircraft crossing an empty runway – was previously defined as a "surface incident" and not a runway incursion. The new definition means that some incidents formerly classified as surface incidents are instead classified as C or D category runway incursions, which are low-risk incidents with ample time and/or distance to avoid a collision. The classification of the most serious kinds of runway incursions, Categories A and B, remains unchanged.

**Question:** There are no category A or B shown for either complex in the table. There was an event in 2011 where a landing aircraft missed an aircraft waiting to take off on 25R by less than 75 feet. Is it true that the FAA fails to post events until the full evaluation is complete? What else is not included in the totals presented? Seven 2011 category C are shown for the north airfield. Please identify their causes and correlate to the design changes in the alternatives. Under the new definitions when two aircraft back into each other is this counted as two?

#### Page 4-512 Runway Safety

Part 77 imaginary surfaces provide a means of identifying objects that require a more detailed safety analysis. This analysis, performed by the FAA, considers the airspace operations and safety requirements applicable to the Part 77 surface, as well as the nature, location, and extent of the object's penetration into the Part 77 surface. The analysis requires detailed runway design and engineering data not available at this conceptual level of planning, and would occur during the normal course of FAA review and approval of proposed airfield improvements. The analysis would set forth and define the appropriate means and measures to address potential safety concerns related to objects located within the Part 77 surface. As described above in Section 4.7.2.3, options for addressing potential safety hazards associated with objects located within controlled airspace areas can range widely and can include (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on aviation maps; (3) lowering, reducing, or removing the object; and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. (underline added for emphasis)

**Question:** This section acknowledges that the Westchester Business District is within the RPZ. The underlined section above states that a Part 77 surface analysis requires more depth than currently available. How, then, can LAXA promise anyone that they will not have to remove our businesses without a commitment from the FAA? What is to stop the FAA from changing their mind after making a verbal or even written commitment to LAXA? If the approach is changed to be closer to homes and businesses doesn't this transfer some risk to those on the ground?

#### Page 4-514 and 515 Table 4.7-2-8

Summary of North Airfield Runways and Parallel Taxiways Compliance with FAA Airport Design Standards

**Question:** The subject table shows runway separations from between 700' to 1050' but separations less than current spacing between the proposed center taxiway to a runway by as much as 300'. How is this presented as safer? All Taxiway E ADG size allowed are shown to be the largest, ADG VI except Alt D with Taxiway D being a mixture of ratings with less than ADG V for parts currently, but all reasonable changes involving no additional separation being ADG V. It also shows runway to taxiway separation is BETTER if the runway is not moved. Based on this safety design standards Alternative 2 is superior. How is this reconciled with the desire to expand north?

#### Page 4-524 Hydrology/Water Quality

Potentially affected areas are mostly developed/urbanized; hence, surface hydrology is characterized primarily by runoff flowing across impervious surfaces into the existing storm drain system, and water quality is characterized by typical urban storm water pollutants (i.e., oil and grease, metals, nitrogen, fecal coliform, trash, etc.). Implementation of the above measures could result in reduced surface runoff to the

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- LAX North Airfield Proposed Runway Configuration - Safety Risk Assessment, May 2007 - The Washington Consulting Group, Inc. (WCG) led a panel of subject matter experts through a safety risk assessment on the north airfield proposed runway configurations. WCG is an Air Traffic Management Systems and Air Traffic Controller Training firm that is expert in conducting an FAA designed Safety Risk Management (SRM) Study. The SRM panel was to identify operational hazards, analyze associated risks, and establish mitigating strategies to ensure the safe and expeditious management of air traffic and then specifically develop and prioritize improvements that will increase the level of airfield safety. The analysis by panel produced a list of ten preliminary hazards associated with airfield operating on the existing north airfield. Table 4.7-2-5 describes the ten hazards.

- LAX North Airfield Safety Study (NASS) - Following the completion of the five studies described above, City of Los Angeles elected officials requested preparation of an additional independent safety study, referred to as the LAX NASS, and formed the North Runway Safety Advisory Committee (NRSAC) composed of LAX stakeholders to oversee the study. The study's objective was to "inform decision makers on the scope and severity of operational safety problems of the north airfield and a range of potential solutions." The primary aim of the study was to estimate as specifically as possible the level of future safety associated with each of the alternate configurations of the north airfield, and, secondarily, look at capacity implications of each. In support of the safety study, LAXA contracted with NASA Ames in May 2006, to perform detailed airfield simulation modeling, and with a six member Academic Panel in July 2006, made up of distinguished professors and aviation safety efficiency experts from the Massachusetts Institute of Technology, Virginia Polytechnic Institute and State University (Virginia Tech), University of California, Berkeley, George Mason University, and University of Maryland.

The Preliminary NASS Report was released in February 2010, and the Final Report with all supportive documentation was submitted in May 2010.398 The following were the Academic Panel's main conclusions:

- The LAX north airfield is extremely safe under the current configuration for the projected 2020 forecast.
- New configurations of the north airfield that include increased runway separation and the addition of a centerfield taxiway would reduce by a substantial percentage (40-55 percent) the risk of a fatal runway collision.
- Since the baseline level of risk is so low, reducing that risk by a substantial level is of "limited practical importance."
- The 340-foot north alternative significantly improves the operational efficiency of LAX and it would improve safety.
- Based on safety grounds alone, the Panel found it hard to argue for reconfiguring the north airfield.

- FAA's Response to the NASS Report - In response to the NASS Report, the FAA's Office of Airports, Office of Accident Investigation and Prevention, Runway Safety Office, Western Pacific Regional Flight Standards Division, and the Air Traffic Organization conducted a detailed review of the study and identified several critical flaws in the assumptions, methodology, and conclusions. In April 2010, the FAA Administrator provided FAA's comments and position on the NASS and the north airfield in a letter to the Mayor of Los Angeles and to Los Angeles World Airports. The FAA stated that they strongly disagree with the study's main conclusion that reducing the risk of a fatal runway collision is of limited practical importance and the study's conclusion that reconfiguring the north airfield on the grounds of safety alone is not a compelling argument. Besides taking issue with several of the assumptions, methodologies, and uses of data in the report, the FAA made the following statements:

- The only complete and single-most significant solution for LAX's safety and efficiency needs must include airfield geometry designed to accommodate modern aircraft. Everything possible must be done to make the north airfield as safe as it can be.
- North airfield safety and efficiency would be greatly improved by further separating the two runways and constructing a center taxiway between them. This would address equally important issues of standards, safety, and efficiency.
- FAA firmly believes the 40-55 percent reduction in risk would be more than sufficient justification for the reconfiguration of the north airfield on safety grounds alone.

**Question:** What information was provided to the review panels to support their conclusions? What number of aircraft operations and flight mix was assumed? What budget were they given to conclude that "massive terminal demolition is not feasible"? What efficiency advantages did they find since the comprehensive NASS study and this DEIR results disagree with that conclusion? Did the Peer Review Group identify the new safety failure modes of erroneous landings on

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existent that existing structures and impervious surfaces are removed, and also reduce or change urban stormwater pollutants to the extent existing urban uses are taken out of service or replaced with lower intensity uses. Construction activities associated with the removal or modification of existing structures could result in short-term erosion and sedimentation and other construction-related water quality pollutants (i.e., from fueling/servicing of construction equipment, storage of materials including temporary stockpiles of demolition debris, etc.). Mitigation of such construction-related pollutants would be accomplished through adherence with the requirement of the State Water Resources Control Board General (Construction) Permit (2008-0009-DWG). Hydrology and water quality impacts are anticipated to...

**Question:** This section states that the major issue is surface runoff, but if this area has unknown sources from Continente Creek and feeds the Dominguez flood plain, can the underground water create more problems and potential flooding than the surface water when there are major utilities needing to be moved and a six lane tunnel being removed along with the modification of the Argo Drainage Channel?

#### Page 4-525 Land Use and Planning

The potentially affected areas are designated in the City's General Plan for Commercial (Community) land use. Similarly, the subject areas are zoned for commercial uses, primarily C1-Light Commercial and C2-General Commercial. The removal of existing uses would not require a General Plan amendment or a change in zoning. The potential replacement of existing uses with other uses compatible with an RPZ would need to be reviewed in light of the provisions of the existing zoning relative to permitted and conditional uses. In general, however, the removal of existing uses and replacement with lower intensity uses is not expected to conflict with the existing land use plans for the area. Similarly, it is not expected to create physical or functional incompatibility with existing land uses nearby. To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses, implementation of LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program, and LAX Master Plan Mitigation Measure MM-RBR-1, Phasing for Business Relocations, would reduce impacts associated with business relocation. With implementation of the commitment and mitigation measure, impacts related to business relocation would likely be reduced to a level that is less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

**Question:** If the construction destroys the Lincoln Blvd and Sepulveda Blvd intersection then traffic on Sepulveda, which Westchester Business District relies, will cause major losses. When construction takes an extended period. Coupled with many closures and forced move of hundreds of businesses there can be a significant impact. When will this be evaluated? It should be done as part of the SPAS process, not wait until a project level EIR is prepared because the consequence is too great.

#### Page 4-525 Transportation

Construction activities associated with the removal or modification of existing structures would result in temporary construction-related traffic and possible lane closures and detours...

**Question:** The DEIR indicates that Terminal 3 will be rebuilt in a different location. How will only a lane closure occur in the CTA when the upper roadway is attached to Terminal 3 at its present location? When LAXA (or CalTrans) starts moving Lincoln Blvd to a totally new location below grade, how can this be achieved with a possible lane closure?

#### Page 4-527 Air surfaces

The improvements proposed at the east end of Runway 6R/24L and the covering of the eastern end of the Argo Drainage Channel would bring the RSAs for the north airfield into compliance with FAA standards...

**Question:** This DEIR indicates that LAXA has not consulted USCOE on modifications to the Argo Channel. If this causes flooding to occur onto the runways how long will the north airfield be closed? How long can operations on one half of the airport support the full complement of arrivals?

#### Page 4-547

As indicated in Table 4.7-2-8, Implementation of Alternative 5 would increase the separation distance between Runways 6L/24R and 6R/24L from 700 feet to 1,050 feet, but would not change the existing capabilities relative to allowing simultaneous arrivals and departures.

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*Question: This (or similar statement) is made for each of the alternatives which increases runway separation. How much improvement is due to the runway separation versus how much is due to the taxiway separation improvement?*

#### Page 4-548 Other Safety Considerations

As described above in Section 4.7.2.3, numerous safety studies have been prepared relative to aircraft operations on the north airfield. While the nature, approach, and scope of analysis may differ between the studies, there is general consensus between the studies that increased separation between runways and the addition of a centerfield parallel taxiway can reduce the potential for a runway collision or incursion and enhance safety, particularly as related to future operations involving a greater number of large aircraft. Additionally, the safety benefits of relocated and redesigned runway crossing points along the last-third of Runway 6R/24L, including the advantage of pilot visibility to the end of the runway, were noted in some of the studies. The airfield improvements proposed under Alternative 5 provide for these desired safety improvements. (underline for emphasis)

*Question: Although the above statement states "general consensus," addition of a centerfield parallel taxiway (CFT) can reduce potential for a runway collision or incursion..." a blanket statement of this type needs proof. Again, what if any is added by the CFT as opposed to fixing the other taxiways and/or changing the location of exit ramps from the runway? How much safety is lost by having the taxiway closer to an adjacent runway as opposed to the larger separation between the two runways? How much does positioning of the gates relative to the landing area impact safety if moved to locations where the landing site is beyond the gate and must taxi back to a fully separated taxiway?*

Page 4-553 Implementation of Alternative 5 would not involve construction of a runway within 10,000 feet of a solid waste landfill or create an attractant to birds. In general, implementation of this alternative would enhance aircraft safety and efficiency, as summarized above, particularly with respect to better achieving compliance with FAA Airport Design Standards for operation of large aircraft. The 350-foot northward shift of Runway 6L/24R would, however, result in a northward shift of the Part 77 imaginary surfaces placing portions of two multi-story structures within Part 77 surfaces. As described above, there are several options available to address potential safety hazards associated with objects being located within controlled airspace areas, ranging from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on navigation maps, to lowering, reducing, or removing the object, and, in some cases, an approach or departure procedure will be modified to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an AUP amendment for such an airfield modification. Such measures would reduce this safety impact to a level that is less than significant. Secondary or indirect impacts associated with implementation of such options could range from no impact, such as in the case of low-risk objects that do not require any safety measures, to impacts typically associated with removal of an object/structure, such as temporary construction-related air quality, noise, and traffic impacts, visual impacts (i.e., changes in existing appearance), and land use impacts. Such secondary or indirect impacts would be similar to those described at the end of the impacts analysis for Alternative 1 above.

*Question: Based on the above statement and this applies to all alternatives: although incursions are important from a safety point, a larger panel of experts and the FAA have stated that excursions are, in general, more serious. This doesn't seem to be addressed in most of these discussions. As you move runways closer to residences and commercial properties doesn't the potential impact of an excursion increase? Where is this addressed? How much less safe is the movement of operations closer to homes and commercial property? If the plan by LAWA is to mitigate impacts on the Westchester Business district by relocating into the Northside Development area what risks are increased and by how much?*

Pages 4-580 and 570 Table 4.7.2-16 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

*Question: Why was the airside redesigned in the alternatives such that Taxiway D was enhanced to ADG VI for Alternatives 3,6 but only ADG V for Alternatives 1,2,5,7? The main difference appears that Alt 5 moves/rebuilds terminal 3, why weren't the others?*

#### Page 4-571 4.7.2.7 Mitigation Measures

Alternatives 1 through 9 would not have a significant impact with respect to safety, therefore, no mitigation is required.

*Question: If the primary reason for runway and taxiway movement is for "safety" why is there "no significant impact?"*

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Page 4-577 4.7.3 Hazardous Materials Table 4.7.3-1 Existing Soil and Groundwater Contamination and Remediation Status Note 1 This list includes only those sites with known contamination, as determined through database and information from LAWA personnel.

*Question: Where was past rocket fuel testing done on the northside? Which areas on the south and west have fuel disposed that pose a significant possibility of leakage? What other potential contamination sites exist based on type of land use airport operation? Where are the lead lined fallout shelters? Why were only those identified by LAWA in a database listed in this table?*

*Question: Must these sites be cleaned up before or during project construction? Are the costs for this clean up included in the cost estimates? Since there are underground springs and water flow under LAX has the distribution of contaminants been evaluated? When this contaminated dirt has been moved to staging areas are these cleaned up? Is there testing data to confirm? Where is this data and how is it presented and available to the public?*

#### Page 4-582 HM-2. Handling of Contaminated Materials Encountered During Construction

Prior to the initiation of construction, LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials encountered during construction.<sup>411</sup> The intent of this program will be to ensure that all contaminated soils and/or groundwater encountered during construction are handled in accordance with all applicable regulations. 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. LAWA will notify the appropriate regulatory agency when contamination has been identified. If warranted by the extent of the contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of...

*Question: Taxiway S, for instance, was recently constructed and dirt excavated. This soil was near the fuel farm and subsequently moved to staging areas. Where is the documentation that this soil was tested? Was the staging area tested for contamination? If this soil was moved from one staging area to another how was it tracked and documented?*

#### Page 4-586 Hazardous Materials

Due to the extent of the VOC contamination associated with the Park One (Former Honeywell/Allied Signal Aerospace) site, it is possible that remediation will still be underway when construction of Terminal 0 and the redesigned entry roadways is initiated. Remediation for this site consists of an SVE system that includes small aboveground vessels for treating the soil vapor, pipes connecting the dry wells to the vessels, and groundwater monitoring wells. Due to the extent of excavation needed for the Alternative-1 improvements, it is likely that part, or all, of the remediation system would have to be removed during construction, if it is still in operation at the time the SPAS improvements are constructed. This would entail destruction of the extraction wells and removal of underground piping and aboveground vessels. Removing the active remediation system at Park One for an extended period would interfere with existing clean up efforts. However, temporary cessation of remediation would not have any impacts on human health as groundwater beneath the site is not used for municipal purposes and contaminated soils lie beneath asphalt and would not be exposed.

*Question: Since the groundwater will be contaminated from this site and the water is then allowed to flow into the ocean what regular testing is done to ensure safety?*

#### Page 4-589 Hydrology 4.8.2 Methodology

The various sources and methodologies used for the hydrology and water quality analyses are consistent with the methodologies as applied in Technical Report 6, Hydrology and Water Quality Technical Report, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report, of the LAX Master Plan Final EIR. Relevant portions of those documents are incorporated by reference and summarized in this section (see Section 1.6 in Chapter 1, Introduction and Executive Summary, regarding where these documents are available for public review)....

Similar to Manchester Square, the Bedford residential area is also being acquired under the Aircraft Noise Mitigation Program; however, the Bedford area is not included in the hydrology and water quality analysis because none of the SPAS alternatives propose a future reuse of that area.

*Question: 4-599 LAWA acknowledges this is tired and relies on old All D reports. One has to question their accuracy. The Manchester Tunnel which extends Lincoln Blvd under the north runway could not have been considered at that time because the key LAWA managers were denying its existence until about two years ago!*

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*Question: 4-599 Note 413 states that the hydrology report excludes Bedford Square because none of the alternatives propose a future reuse of the area. How does a Master Plan not cover a significant piece of LAWA property? What is planned for this area?*

#### Page 4-601 Operational Impacts Wet Weather Flows

Estimating the mass of pollutant load discharged to a water body requires knowledge of surface water runoff volume, discharge location, and pollutant load sources for a given area. Pollutants transferred out of the HWQSA by wet weather flows are the result of non-point pollution sources. A commonly accepted method is to estimate pollutant loads on an average annual basis using average pollutant concentration data from relevant published storm water investigations and monitoring, combined with estimates of annual average runoff from the project area. The U.S. Environmental Protection Agency's (USEPA) National Urban Runoff Program's (NURP) Final Report presents the results of an extensive runoff sampling and analysis program that consisted of collecting samples from more than 2,300 separate storm

*Question: This analysis appears to assume that the wet weather runoff is "normal" as if it were from a residential or commercial street setting. Since it's known that many of the areas within airside are particularly contaminated it would be reasonable to assume more contaminants in the runoff. Where is this documented and how is it controlled?*

#### Page 4-604 Hydrology/Water Quality 4.8.3 Existing Conditions

The affected environment for this evaluation includes the HWQSA. The baseline conditions for drainage and water quality are described separately below.

As previously noted, the only hydrology issue considered for this analysis is drainage. Drainage is discussed as it relates specifically to the management of the systems designed to convey storm water runoff to prevent flooding as well as to the potential to cause or increase the potential for erosion or siltation. The environmental setting with respect to drainage and the potential for flooding focuses on the existing drainage system at LAX, as well as the off-site drainage facilities to which the drainage system at LAX discharges and regulatory issues that apply in designing drainage and flood control structures....

Note 411 The Conceptual Drainage Plan provides the basis by which detailed drainage improvement plans associated with LAX Master Plan projects are to be designed in conjunction with site engineering specific to each LAX Master Plan improvement project.

*Question: 4.8.3 Only hydrology issue consider is drainage. Why were other issues ignored? Why are the LA City and County reports not referenced as noted in the body of the document except for a 2005 City plan? Note 429 simply states that there is a Conceptual Drainage Plan.*

#### Page 4-630 4.8.6.6 Alternative 6

Alternative 6 focuses on airfield and terminal improvements only. However, as noted in Section 4.8.2, for purposes of this analysis, impacts associated with ground access improvements are also considered. The distinguishing changes considered in this analysis relative to hydrology and water quality are the northerly movement and westerly extension of Runway 6L/24R, conversion of a portion of the unlined Argo Drainage Channel into a concrete box culvert (1,400 linear feet), conversion of open space to accommodate the realignment of Lincoln Boulevard, conversion of industrial area for the ITF, and conversion of the Manchester Square area to parking use. (underline for emphasis)

*Question: 4.8.6.6 Alternative 6 analysis of Hydrology/Water Quality talks about extension of Runway 24R west (all this was and is) not part of the submitted plan by pollitioners. What was the reason for ignoring the petitioner input?*

#### Page 4-632 4.8.6.7 Alternative 7 Hydrology

Under Alternative 7, the total impervious area within the HWQSA would increase by 61 acres as compared to baseline conditions of 3,062 acres. Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, this change would represent a marginal increase (2.0 percent) in regional impervious area.

The changes in impervious area would only occur within the Dominguez Channel Watershed, and would represent an increase of 5.5 percent (see Table 22 in Appendix H, Hydrology and Water Quality). As noted above, previous studies indicate that, under baseline conditions, the conveyance capacity of drainage infrastructure within the Argo sub-basin and Imperial sub-basin (including both the Pershing and Imperial components of the sub-basin) is adequate for the LADWP 50-year storm, while the Dominguez Channel sub-basin infrastructure would flood under these same conditions. Detailed analysis of the

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#### Dominguez Channel sub-basin capacity under this design storm for Alternative 7 was not conducted

given the conceptual level of planning associated with all SPAS alternatives at this time as discussed in Section 4.8.2. As shown in Table 4.8-5, the increase in impervious surface in the portion of the HWQSA tributary to Dominguez Channel is 5.5 percent, which would result in a net increase in peak flow rates to be conveyed by the drainage systems serving these areas. As previously noted, the Dominguez Channel is currently over capacity off-site and downstream from LAX; therefore, a 5.5 percent increase in peak

*Question: Why was 50 year storm condition chosen instead of the 100 year storm condition given the criticality of LAX air operations?*

#### Page 4-636 4.8.7 Mitigation Measures Hydrology and Water Quality

Compliance with the Conceptual Drainage Plan, developed in accordance with LAX Master Plan Commitment HWQ-1, would ensure that impacts to hydrology and water quality associated with Alternative 3 would be less than significant. Therefore, no mitigation specific to SPAS is required for this alternative.

*Question: 4.8.7 Mitigation Measures for Hydrology and Water Quality states that since All D was less than significant then so is any SPAS alternative based on All D. At the time of All D the Manchester Tunnel was unknown to LAWA and therefore the impact of underground, unknown sourced water was not considered. Now that this is known LAWA should have done more analysis. What are the results and impacts or mitigations now necessary?*

#### Page 4-638 4.8.7 Mitigation Measures Hydrology and Water Quality

The CDP revision and update will provide the basis and specifications by which detailed drainage improvement plans shall be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative, as well as the remaining LAX Master Plan improvements that would not change due to the SPAS alternative, including, if necessary, improvements to address increased erosion and sedimentation. Consistent with the requirements for the 2005 CDP, the drainage system design and identification of needed improvements shall be based upon providing flood protection for a minimum 10-year storm event. As also required in the 2005 CDP, water quality treatment BMPs, which may include infiltration basins/systems, bioretention, vegetated swales, detention/retention basins/systems, media filtration, water quality inlets, catch....

(underline for emphasis)

*Question: 4.8.7 Mitigation measures. LAWA again states that it bases its Conceptual Drainage Plan (CDP) on the old LAX Plan. However new factors have been raised such as the need to run artesian wells for several years in order to build the Manchester tunnel. These have apparently not been taken into consideration and should be updated. Further, since the potential issue of sandy soil combined with an unknown water source creates more serious consequences from not providing adequate flood protection. This means that LAWA should have provided more adequate mitigation in its plan for beyond a min 10-year storm event. Rather it should have addressed the 50 year or 100 year event to reduce potential consequences. Please provide this information and updated impacts.*

Page 4-640 Figure 4.9-2 Los Angeles County Airport Land Use Plan Land Use Compatibility Table

*Question: The Los Angeles County Airport Land Use Plan, 1991 quoted in the subject table shows "Caution. Review Noise Insulation Needs" for residential land use category from 60 CNEI. Where are the reports in the DEIR showing this review? Contours shown are for 65 CNEI.*

#### Page 4-654 4.9 Land Use Planning

The LAX Northside area provides for the development of uses that are consistent with airport needs and neighborhood conditions, while also serving as an airport buffer zone (comprised of compatible development and landscape) for the Westchester community. It may also serve as a relocation area for businesses displaced by the implementation of the LAX Master Plan....

Note 412 LAX Northside, part of the LAX Master Plan approved by the City of Los Angeles in 2004, is an approved airport development project that includes future development of 4.5 million square feet of commercial and airport-related industrial land uses to be built on 340 acres of vacant land located north of Runway 6L/24R (the northern most runway at LAX) along and north of Westchester Parkway. Currently, LAWA is engaged in the LAX Northside Plan Update, which is considering development of a different land use mix, including mixed-use, community/civic space, office/education/research space, and airport support uses, on 340 acres.

*Question: How can the above uses for the LAX Northside be applied if the existing 1982 Northside Plan was negated by changes assumed in the approval of Alternative D? Is this assuming completion of a new Northside Plan by LAWA? The Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 46*

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above paragraph states that it may serve as a relocation area for displaced businesses. Must the rezoning of the Northside be completed before this is accomplished?

Page 4-667 LAX Plan The policies most pertinent to SPAS-related land use issues include:  
Land Use - LAX Northside

Question: When quoting the LAX Plan policies, why did the DEIR left out P2 and P3 for the LAX Northside as it relates to SPAS? These two policies are P2. Provide community outreach efforts to property owners and occupants through measures such as public notification and public meetings, when new development on airport property is in proximity to, and could potentially affect, nearby residential uses. P3. Orient LAX Northside development to encourage access from Westchester Parkway and other roadways internal to LAX Northside. Since LAWA is stating that this will be used as a relocation site one would expect that these policies would also be adhered to.

Question: Although policies were not listed in order of the LAX Plan, the DEIR deleted only Safety policy P6. Consult with the Los Angeles Fire Department during the design phase of facilities to review plans and incorporate recommendations that enhance airport safety. Why?

Question: The DEIR delineated "most pertinent" policies of the LAX plan and failed to list any Security policies such as: P1. Evaluate, develop and improve, as necessary, Central Terminal Area, Intermodal Transportation Center, and Satellite Terminal FlyAway security – both physical and operational – as part of overall security improvements at LAX.

P2. Develop entry security improvements in the Central Terminal Area by limiting access by non-secure private, public and commercial vehicles.

P3. Design and construct facilities that provide for security of passengers by providing multiple levels of security screening procedures while maintaining ease of use.

P4. Provide law enforcement and fire facilities to enhance the ability to respond to emergency situations and facilitate coordination with other emergency response agencies.

Why does LAWA feel that security policies are not important enough to identify in the document? Why is Circulation and Access also ignored? What about Noise, Hazardous Waste, and Design policies?

Page 4-663 LAX Street Frontage and Landscape Development Plan Update

Question: Has LAWA ever distributed or circulated this Plan for comment or is it considered an internal policy statement only? The one objective listed in the DEIR of "Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities" is laudable, but what other things does this plan call for? Since it hasn't been updated since 2005, are there any updates?

Page 4-664 4.9.3.3 Existing Incompatible Land Uses

Aircraft Noise Mitigation Program

The City of Los Angeles, as the airport proprietor, addresses incompatible land use within the communities surrounding LAX pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). LAX operates under a variance to the California Airport Noise Standards (Noise Standards) that was effective February 13, 2011 and was issued for a period of three years. The variance remains in effect so long as LAWA submits another application one month prior to the expiration date and continues to demonstrate that programs are being implemented to reduce noise impacts. Under the variance, LAWA...

Question: What penalties occur if LAWA fails to adhere to the four items listed? Has LAWA provided the quarterly reports within the prescribed 45 days? Several other variance conditions were stipulated such as the requirement for hush houses for maintenance/testing of aircraft. How has this provision and others not listed been incorporated into the program level plans? If not, why not?

Page 4-665 Noise Variance

As summarized in the ANMP tables updated for 2010, all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for participation in the ANMP. Although the area significantly impacted by noise has been reduced since 1992, and a number of parcels within the 1992 contour are no longer exposed to noise levels of 65 CNEL and higher, all incompatible residential, school, church, and hospital parcels within the 65 CNEL noise contours defined above are eligible for mitigation under the ANMP.

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Question: Has the FAA notified LAWA of changes to the applicability of the 1992 contour? How is this included in the baseline and subsequent comparisons of noise impacts?

Page 4-666 Noise Variance

As presented in the ANMP tables, of the 33,165 residential units identified within the ANMP contours at that time, approximately 12,402 previously incompatible dwelling units were made compatible. Residential sound insulation had been completed for 1,241 units in unincorporated Los Angeles County; 4,827 units in the City of Los Angeles; 677 units in El Segundo; and 2,971 units in Inglewood. Dwelling units have also been made compatible through land recycling, including approximately 816 units in Inglewood and 1,870 units in the City of Los Angeles. El Segundo's residential sound insulation program also includes additional units within the 60 CNEL noise contour identified for the approved LAX Master Plan and is funded by the FAA through the end of 2015. The number of units receiving sound insulation under El Segundo's program is not formally published. ...

Question: How many units remain unmitigated? If jurisdictions in El Segundo, LA County, and Inglewood are allowed to include air conditioners as part of the mitigation, why is the FAA opposed (and LAWA not fighting for) this for LA residents?

Question: The same section discusses a Part 161 Noise Study. Why has it not been completed? Does the Part 161 Noise Study use the same aircraft fleet mix assumptions as the noise contour studies? If not, why not?

Page 4-667 LAWA Voluntary Residential Acquisition/Relocation Program

Question: Footnote 498 lists a BAC action to establish the Voluntary Acquisition Program for both Manchester Square and Bedford Square. How does one get a copy of this very old item since it's not on-line? Most people were aware of the AS aspects, but few, if any knew Bedford Square was a part as it was never shown in other documents or even Alt D. It was raised in SPAS early on, but LAWA has not responded to potential uses recommended.

Page 4-668 Land Use and Planning LAX Master Plan Draft Relocation Plan

The Draft Relocation Plan includes parcel-level detail for the properties proposed for acquisition under the approved LAX Master Plan, an assessment of relocation effects, and procedures for implementing LAWA's LAX Master Plan Relocation Assistance Program (RAP) in accordance with applicable laws, regulations, and policies. The Plan includes an inventory of acquisition and relocation properties, an assessment of acquisition and relocation needs, and an assessment of relocation opportunities. No residential uses are proposed for acquisition. The LAX Master Plan program identifies approximately 34 businesses located on approximately 77 acres that would be acquired to accommodate airport development.

Question: Where are these documents available for review and how do these properties relate to any of the alternatives?

Page 4-673 Table 4.9-4 Summary of Existing Off-Airport Residential Uses and Non-Residential Noise-Sensitive Facilities in the Study Area

Question: What does Title 21 compatible and Title 24 compliant mean?

Page 4.9 Land Use Planning Westchester-Playa Del Rey Community Plan

Most of the topography is level except for an amount of varied, hilly terrain located in the northwest and west portions of the Plan area where there are significant coastal bluffs. The land use consists primarily of low to low-medium density residential uses, with commercial uses concentrated near the transit corridors of Lincoln Boulevard, Sepulveda Boulevard, and Century Boulevard. Residential land uses account for approximately 2,357 net acres with approximately 22,794 dwelling units, of which 49 percent are multi-family units. Concentrations of multifamily residential uses are located near La Tijera Boulevard and Manchester Avenue. ...

Question: Many of the areas within Westchester as well as PDR are already hilly with peaks and valleys which amplify sound from aircraft. The DEIR characterization is inaccurate. How has this been used in the evaluation for sound impact? The concentration of multifamily residential uses is also misleading. It is south of Manchester and east of Airport not as described. How was this description used in the evaluation of impacts?

Page 4-684 Land Use 4.9.4 Thresholds of Significance

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A significant land use impact would occur if the direct and indirect changes in the environment caused by the particular SPAS alternative would result in one or more of the following future conditions:

- Conflict with any applicable land use plan, policy, or regulation (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Create physical incompatibility with existing land uses through increased aircraft noise exposure.

Question: Please define what the second bullet "create physical incompatibility" means.

Page 4-682 Consistency with Land Use Plans - On-Airport Land Table 4.9-5

General Comparison of Acquisition Area Land Use - SPAS Alternatives

No acquisition is proposed under Alternatives 5, 6, and 7 since these alternatives only include airfield and terminal components.

Question: The DEIR indicates no acquisition is anticipated by the DEIR. When will LAWA acknowledge that movement of runways north will require acquisition of a significant portion of the Westchester Business District and some homes? How will those costs be accounted for in the SPAS report which is a part of the DEIR by reference?

Section 4.10 Noise

Question: It appears that the 1992 Contour was not used and that a new baseline contour was recalculated. Is that correct?

Question: Table 4.10.1-5 lists schools expected to be impacted by above 55 interior dBA. Why is St. Bernards not listed despite being in the 65 CNEL contour. Why?

Question: What does Alt 1 "no additional improvements" mean? Alt 1 moves 24R 26S north and Table 4.10.1-9 matches earlier population exposure increase numbers. "No additional improvements" is more equivalent to LAX upgrade alternatives 3 or 4 of the Plan. Alt 2 is correctly described as no greater separation but with 24L extended east. What is the true meaning of the referenced "no additional improvements"?

Question: The ANSI Awakening Probability figures look like the CNEL noise contours, but at night the aircraft are operating in "over ocean" about 80% of the time. Explain the reason for the % probabilities mirroring the contours. What explains the drop in awakenings in 2025? Is this based on Leq8 instead of CNEL and that changes differently than CNEL?

Question: Figure 4.10.1-17 is a sample of contours calculated for 60 CNEL et. al. but it's impossible to compare with the baseline condition to see changes. Please provide an overlay with the baseline for each alternative.

Question: Taking an overview of the contours and awakening the bottom line is that the south gets better, the northeast gets worse most and the north increases about in proportion to the amount the runway moves. This is the basic conclusion from Table 4.10.1-55 regarding CNEL and from Table 4.10.1-57 disruptions are about the same regardless of what alternative is chosen again reinforcing the notion that it doesn't matter which is chosen overall, but the noise is definitely worse on the north regardless of which is chosen. It's not said in those few words, but is this the conclusion we should be drawing?

Question: Doing a sanity check on the aircraft numbers used for noise needs some clarification. In 2001 68MAP resulted from 800K ops or about 85 passengers per aircraft. Given the increase in load factor and increase in aircraft size that number should increase to about 110 passengers per aircraft or about 78 MAP. Was this the basis for the assumptions made?

Question: A key assumption raised was over ocean ops from midnight to 6:30 AM however in order to get to 78 MAP there will have to be many more flight late at night because peak hours will be moved out around 70 MAP. If over ocean ops ends up turning around at 2 AM instead of midnight then the awakening numbers will change dramatically as well as the CNEL bands because of the night penalty on more flights. How will this impact the contours and the conclusions drawn?

Page 4-930 4.10.1 Aircraft Noise Shifting Noise to Compatible Areas

Shifting Noise to Compatible Areas

Because of obstacles to the direct reduction of aircraft noise levels, it is more effective for airport

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operators to focus on the noise abatement methods that shift noise from sensitive areas (such as residential neighborhoods) to compatible areas (such as industrial areas). This can be accomplished through changes in runway use and arrival or departure routes or through facility changes on the airport itself, such as the modification of runways or the construction of noise barriers.

Runway Use and Flight Route Changes

The use of particular runways for aircraft landings and takeoffs is dictated by several factors, including the length of the runway, the runway gradient (or slope), the instrument approach procedures available to the runway, the minimum departure climb requirements from the runway, and the wind and weather. It is possible to establish runway use programs that encourage the use of runways that direct aircraft over compatible land uses and away from noise-sensitive areas, although allowances for exceptions must be made in recognition of the many other factors influencing the selection of runways for safe flight operations. LAWA previously established and currently implements the Preferential Runway Use Policy to reduce aircraft noise impacts to noise-sensitive uses (i.e., aircraft departures typically occurring on the inbound runways and aircraft arrivals typically occurring on the outbound runways, thereby placing the noise of the two types of operations away from noise-sensitive uses). Subject to certain limitations, aircraft routes can also be altered so that aircraft tend to fly over compatible areas and away from the most noise-sensitive areas. However, numerous constraints on the design of flight routes must be considered before changes are made. In large metropolitan areas with multiple airports, the volume of aircraft alone creates serious constraints. Flight routes must be designed to ensure the safe separation of aircraft and to ensure that arrivals and departures from each airport can be made safely and with relative efficiency. The control of aircraft in flight is the responsibility of the FAA. Thus, if airport operators desire to pursue changes in aircraft flight routes, they must coordinate with the FAA in undertaking the studies required to determine if the modifications are feasible.

Question: Since the FAA SoCal Metrolap redesign is in process, how would these changes impact the contours and the conclusions? Would the approach and take off route changes overshadow that of the runway movements? How about the increase in aircraft? What constitutes a shilling of noise by the definitions fostered by the FAA?

4.10.2 Road Traffic Noise -skipped

4.10.3 Construction Traffic -skipped

Page 4-955 Figure 4.10.3-1 Construction Noise Analysis

Sensitive Noise Receptor Areas and Potential Construction Staging Areas

Question: Why are none of the construction staging areas on the south/west end of LAX along Pershing near the cement recycle activities since LAWA already modified the Imperial/Pershing intersection islands?

Page 4-975 Transit noise

Figure 4.10.4-1 provides an overview of several different types of non-project specific noises from transit sources and, for comparison, non-transit sources, and what the typical sound level is in A-weighted decibels (dBA) for those sources. Traffic noise, defined as unwanted sound, is associated with highway/transit projects and is usually in the form of loud or persistent noises from cars, trucks, and buses. Traffic noise, as may occur along the busway proposed under Alternatives 1-2 and 8, is generated primarily from engines/transmissions, mufflers, wind shear, and tire contact with the roadway. APM noise, as may occur under Alternatives 3 and 9, is generated primarily from electric control systems and traction (electric) motors, gear systems, wind shear, and contact between wheels and the rails. While train horns and crossing notification systems can also be typical noise sources for APM/light rail systems, this is not considered to be a concern relative to Alternatives 3 and 9, since the proposed APM systems would be exclusive grade-separated alignments with no vehicle or pedestrian crossings along the routes.

Question: 4.10.4.2.1 Transit Noise. This section states that train horns and crossing notifications are not considered because they would be grade separated. The articulated buses will not be grade separated and may have to use their horns as they weave through traffic. Is this considered in the evaluation?

Page 4-990 4.10.4.7.3 Summary of Impacts Transit Noise

Alternatives 1, 2, and 8 would result in significant transit noise impacts at noise-sensitive receptors (homes) associated with the elevated/dedicated busway system proposed under these alternatives. Although Alternative 8 proposes the same elevated/dedicated busway system as that of Alternatives 1

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and 2, the average daily travel noise levels and associated impacts of Alternative 8 would be comparatively greater due to greater number of hourly operations during the daytime hours (i.e., 128 trips per hour versus 54), which is mostly attributable to the CONRAC proposed under Alternative 8.

Alternatives 1 and 2 would result in a significant transit noise impact at two hotels (Four Points Sheraton and Hilton Hotel), while Alternative 8 would result in a significant transit noise impact at three hotels (Courtyard by Marriott, Four Points Sheraton, and Hilton Hotel).

**Question:** If the rail line (either Green Line or Crenshaw LAX Line) went into the CTA what impacts would be improved? What service level improvements would be seen?

Page 4-1013 4.11 Fire Protection

**Question:** The statement is made repetitively that because a center line taxiway will be present the demand on the fire stations will be reduced. However, there will be a substantial growth in passengers at LAX and isn't 95% of all fire department calls for paramedic services? Where is that considered? How much more paramedic services will be required?

Page 4-1019 4.11 Law Enforcement

**Question:** The section again mentions general efficiencies plus TSA, and ICE efficiencies will reduce stress on law enforcement. However, as the number of passengers grows doesn't crime and general civil police support increase? Where is that discussed? Also specialized support should go up as the number of operations continues to increase. Where is that discussed? Why aren't roadway cameras and weight scales mentioned as well as other security enhancing equipment and procedures?

Page 4-1043 4.12.1 On-Airport Transportation

**Question:** Section 4.12 Page 4-1043 the evaluations use an average day, but shouldn't the calculations be done to see what happens on a peak day as well? Doesn't capacity have to be able to handle the peaks?

Page 4-1043 4.12.1 On-Airport Transportation

As further described in the introduction to Chapter 4, "baseline conditions" used in the analysis of certain environmental topics, such as air quality, aircraft noise, and traffic, were based on a full year's worth of airport operations data in order to best delineate the relevant existing operational characteristics of the airport. The Notice of Preparation (NOP) for the SPAS EIR was published in October 2010 and while that time period is used to define "baseline conditions" for most other topics in the EIR impacts analysis, that specific point in time does not account for the fluctuations in airport activities that typically occur through the course of a year and would not accurately represent the existing conditions relevant to air quality, aircraft noise, and traffic. As such, LAX activity data for Calendar Year 2009 (i.e., a full year's worth of airport activity data prior to publication of the NOP) is taken into account in defining "baseline (2009) conditions" for the On-Airport Transportation analysis.

**Question:** Note 659 discusses baseline conditions and the desire for a full year of data. The argument is that a full calendar year would be from start of 2009, but why, for instance was it not July to July or something closer to the 2010 NOP date?

Page 4-1044 On-Airport Transportation

This comparison is provided for the purpose of identifying impacts pursuant to the requirements of CEQA; however, it is hypothetical in nature given the underlying assumption that all of the ground access improvements proposed to be completed by 2025 under each alternative theoretically exist today and apply to the baseline (2009) condition.

**Question:** 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

Page 4-1044 On-Airport Transportation

That Future (2025)

scenarios does not include any of the ground access improvements proposed under the various SPAS alternatives, and also does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025. Rather, that "Future (2025) Without Alternative" condition assumes the same 2009 passenger activity levels daily flight schedules as in the baseline.

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(2009) condition, and serves as the basis for comparison for the "Future (2025) With Alternative" condition scenario. The Future (2025) With Alternative traffic condition scenarios consists of: (1) the baseline (2009) physical conditions and configuration of the CTA plus reasonably foreseeable on-airport ground access system improvements anticipated to occur by 2025, independent of, and separate from, SPAS; (2) the 2025 passenger levels and daily flight schedules; (3) reasonably foreseeable regional (nonairport) programmed improvements and ambient growth in off-airport traffic, as may affect on-airport traffic; and (4) the proposed SPAS improvements associated with each of the alternatives. It is important to note that the impacts analysis associated with comparing the Future (2025) With Alternative condition to the Future (2025) Without Alternative condition is very conservative, because the increase in on-airport traffic volumes assumed for each with-alternative scenario would actually be attributable to natural growth in passenger activity predicted to occur at LAX by 2025 regardless of SPAS. (underline for emphasis)

**Question:** 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

Page 4-1046 On-Airport Transportation

On-Airport Traffic Data Collected in 2009 - As noted above, data collected for the Bradley West Project EIR was supplemented with additional data collected in 2009. This included data from the in-pavement vehicle loop detector system which records the volume of all traffic entering and exiting the CTA and the AVI system which uses transponders to record the number and types of AVI equipped commercial vehicles entering and exiting the CTA. These counts representing baseline (2009) conditions were collected for Fridays in August 2009. Since August is considered to be the peak month for airport-related passenger and traffic activity at LAX, and Fridays are typically the busiest day of the week for the airport roadway system, the new intersection turning movement counts were collected for the departures level on Friday, August 14th and for the arrivals level on Friday, August 21st and 28th during the a.m., mid-day, and p.m. commuter peak periods. Video from August 2008 obtained at the entrance to the CTA and at the departures level roadway in front of the Tom Bradley International Terminal (TBIT) from the airport's Closed Circuit Television (CCTV) system was also used to serve as a source for traffic counts and vehicle classification.

**Question:** P 4-1046 how was the 2006 data compared with and combined with the 2008 data as well as the August 2009 data? Were there significant differences in the older data from the Oct 2 and Oct 9 2009 data? What were they?

Page 4-1046 On-Airport Transportation

Note - As Applied Management & Planning Group, 2006 Air Passenger Survey Final Report Los Angeles International Airport, December 2011. The 2006 survey is the most recent complete published passenger survey for LAX. Although an updated passenger survey was undertaken in 2011, the survey results are still in the process of being compiled and reviewed. Preliminary results of the 2011 survey data, subject to further review and confirmation, show an increase in connecting passenger percentages, suggesting that LAX is becoming less of an "Origin and Destination" (O&D) airport, which, in turn, reduces vehicle trips to and from the airport. For the purposes of this EIR analysis, the information contained in the 2006 survey is still considered to be reasonably representative of the existing airport traffic conditions and trip generation, which provides a more conservative impacts analysis than if airport trips were reduced based on lower proportions of O&D activity.

**Question:** Note 685 states that LAWA is relying on a 2006 survey. Since economic conditions were much worse in 2006 and traffic was lower along with changes in the Open Skies conditions how is this six year old study whose data is necessarily earlier a valid use?

To further supplement the existing data sets, additional data were collected during field surveys conducted on Friday, October 2nd, 2009, and Friday, October 9th, 2009 between 10:30 a.m. and 12:30 p.m. on the departures level, and between 8:30 p.m. and 10:30 p.m. on the arrivals level. Specifically, the following surveys were conducted:

- Intersection turning movement counts - for intersections along Center Way
  - Vehicle classification survey - at lower level entrance to the airport
  - Vehicle dwell time survey - at Terminals 1, 4, and 7
  - Vehicle license plate survey - at Terminal 1 and Terminal 7 lower level curbsides
  - Public parking garage entry counts - Parking Garages 1, 3, and 7
- The survey data represents activity on a typical busy day on the CTA roadways and curbsides at LAX. Survey times were established based on the peak passenger activity in the CTA which was determined

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from the 2008 (design day) gated passenger schedule.

After reviewing and compiling the field data, the results were adjusted from October 2009 conditions to August 2009 conditions using multiple control data sources including passenger schedules, AVI, and in-pavement loop detector data as well as turning movement volumes.

**Question:** The above section talks about vehicle dwell time at Terminals 1, 4, & 7. Were there differences in dwell time by time of day? How did the number of traffic officers change the amount of dwell time? Was there a difference in dwell time noted for passengers with or without baggage to be checked? Were the differences significant? Was a preponderance of the traffic due to business travel or personal? Did dwell times change significantly when buses were competing for the same curb space?

Page 4-1047 On-Airport Transportation

As in probability theory, a Poisson process is a stochastic process which counts the number of events and the time that these events occur in a given time interval. The time between each pair of consecutive events has an exponential distribution with parameter  $\lambda$  and each of these inter-arrival times is assumed to be independent of other inter-arrival times.

**Question:** P 4-1047 CTA Traffic Conditions Baseline Was there any changes in signage between the survey times? Was there any construction or changes to where the buses and taxis were instructed to stop? How would a change in airlines location from one terminal to another impact the numbers calculated?

Page 4-1048 Prepare Level of Service Analysis

Prepare Level of Service Analysis - The roadway model provides a quantitative representation of the traffic operations associated with the CTA curbsides, CTA roadways, and CTA intersections as needed to assess the potential effects of project traffic. Model outputs were post-processed to calculate the Level of Service (LOS) for each terminal building curbside and curbside roadway segment during each peak period analyzed. This model uses peak hour vehicle volumes combined with average dwell time by vehicle mode to estimate the demand for curbside frontage on both the departures and arrivals levels. To account for non-uniform arrival rates during the peak-hour, the model applies a statistical "surge" factor based on a Poisson/666 arrivals distribution to obtain an estimate of occupied "spaces" during the peak hour. These estimated space requirements are multiplied by the average length of the vehicle (including a buffer to represent the space between two parked vehicles and lost space due to parking inefficiencies) to determine the demand for curbside frontage in linear feet. The linear distance representing these stopped vehicles was then divided by the linear curbside length along the terminal frontages to calculate a ratio that is used to define curbside LOS which is further discussed in Section 4.12.1.3.13 below.

**Question:** P4-1048 4.12.1 On-Airport Transportation How would a backup of traffic going into the CTA impact the traffic dwell time? IE: As traffic builds up the parked car may not stop all the way next to the curb in order to be able to get out after dropping off the passenger. This reduces the amount of practical, usable curb space. How was this considered in the calculations?

If cars have to go around multiple times to pick up or drop off a passenger how does this impact the calculations due to the increase in lane changes that will be necessary?

Page 4-1048 Prepare Level of Service Analysis

Note - The on-airport transportation analysis includes Alternatives 1, 4, 6, and 9. The on-airport transportation analysis results for Alternative 1 are identical to those for Alternatives 2, 5, 6, and 7, and any reference to results from Alternative 1 can be considered valid for Alternatives 2, 5, 6, and 7. Alternative 3 was not considered for the on-airport transportation analyses.

**Question:** Footnote 669 on future traffic conditions page 4-1048 states that results for All 1 are same as those for Alls 2, 5, 6, or 7. Since 5, 6, 7 do not include a busway or APM but Alls 1, 2 use a busway, how is this justified?

Page 4-1050 4.12.1.3.2 On-Airport Landside Facilities

The on-airport landside facilities are comprised of the CTA curbsides, roadways, and public parking facilities. The two-level on-airport curbside and roadway network is accessed from the following three off airport roadways:

- Century Boulevard
- Sepulveda Boulevard
- 96th Street Bridge/Sky Way

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**Question:** Sec 4.12.1.3.2 On-Airport Landside Facilities lists three accesses: Century, Sepulveda, and 96th St Bridge. During SPAS briefings we were told that traffic entering the CTA was 1/3 from Century, 1/3 from Sepulveda south and 1/3 from Sepulveda north (which would include 96th St bridge). We were also told that the amount of traffic from the three entry sources differed substantially by time of day. Were the time of day studies completed? What were the results? How will they impact back up of traffic in the CTA? How does this specifically impact terminal 1? Are the terminal 1 impacts different from points further into the CTA? The "annual traffic studies" recently posted on the LAWA website do not address this critical question that is necessary to assess what mitigations can work most effectively.

Page 4-1057 4.12.1.3.7 Peak Month Activity

Monthly traffic data in the vicinity of LAX over the past eight years were reviewed to identify the typical peak month of traffic activity associated with airport operations. The average daily traffic (ADT) volumes accessing the CTA by month for January 2003 through December 2010 are provided in Table 4.12.1-2. As shown in bold within Table 4.12.1-2, CTA traffic reached peak activity during the summer months of July and August. August is typically the peak month for airport roadway traffic followed closely by July. For the purpose of this analysis, August 2009 was used as the peak month for traffic data.

**Question:** Table 4.12.1-2 CTA Average Daily Traffic Volume shows an average day in each month and then a total which includes only one day of the month! When these numbers are extrapolated to corrected totals (the number of trips into the CTA is still less than 0.5 per passenger. Is there a breakdown of types of vehicles to match this table (ie bus which holds 10, bus that holds 30, van or taxi holding 4) so that a reasonable number of trips into the CTA matches with the MAP?

Page 4-1067 Figure 4.12.1-5 Arriving and Departing Passenger Flow at Curbside Baseline and Figure 4.12.1-9 2025 Arriving and Departing Passenger Flows at Curbside for SPAS Alternatives

**Question:** The numbers of vehicles in this chart are inconsistent with those from other sections and seem low. Translating the baseline into specific hourly numbers results in a total annual count of 139250 monthly or about 50 MAP instead of the 61 MAP in 2009. The values for 2025 is closer and calculates to about 73 MAP. How were these values determined and if they are off how does it impact the LOS conclusions? Even if they are off, however, it is noted that there is substantial congestion now and it will continue in 2025. The future estimate of arrivals and departures appears to represent about 72-73 MAP not the 78.9 listed for all alternatives in the summary section. If this is low, are the calculations for impact also low which will result in worse than predicted levels of service?

Page 4-1073 4.12.1.3.12 Vehicle Trip Generation and Distribution Model Calibration

The purpose of developing the vehicle trip generation and distribution model is to have a tool that accurately projects future vehicle volumes based on a future passenger volume. Before the model could be used to project future peak hour traffic volumes, it was necessary to calibrate the model to ensure that the results would reliably predict actual observed baseline traffic conditions as represented by the balanced roadway volumes. This process involved comparing model output for the CTA's departures and arrivals peak hours with roadway and curbside traffic data from the balanced roadway network. A review of the passenger data for August 2009 indicated that, for model validation purposes, the departures peak hour occurred between 9:59 a.m. - 10:59 a.m., and the arrivals peak hour occurred between 10:59 a.m. - 11:59 a.m.

**Question:** 4.12.1.3.12 Model Calibration: What was the percentage off of 2009 actuals to the 2009 predicted? In other words, what accuracy was determined for the model prediction?

Page 4-1083 Table 4.12.1-10 Peak Hour CTA Signalized Intersection Turning Movement Volumes and Level of Service Analysis - Baseline (2009) Conditions

**Question:** General question regarding methodology is that this effort is only done during a couple peak hours. In the SPAS meetings we're told that entry into the CTA is about 1/3 Sepulveda going south, 1/3 Sepulveda going north, and 1/3 Century going west. The issues is that it is not consistent by time of day where during the day Century is frequently empty as opposed to later in the evening when it is totally backed up. The assumption is that it has to do with 405 congestion encouraging people to get off the freeway before getting to Century. How can this be taken into account with the modeling? What will it take to get representative answers about level of service during peak arrival or departure hours when total traffic including non-airport traffic results in a shift of total traffic peak hours?

Page 4-1139 CTA Intersection Impacts

Table 4.12.1-29 delineates the contribution of Alternative 1-2 to cumulative impacts by comparing the signalized intersection operations for the Future (2025) With Alternative 1-2 traffic conditions measured against the Future (2025) Without Alternative traffic conditions. As shown in Table 4.12.1-29,

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implementation of Alternative 1-2, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels of on-airport intersections that exceeds the aforementioned thresholds, with the exception of the World Way South and Center Way intersection (Intersection #9) during the arrivals level peak hour. The cumulative impact to this intersection is considered to be significant, and the contribution of Alternative 1-2 to this cumulative impact would be cumulatively considerable. This impact is unavoidable as potential measures to mitigate this impact are infeasible, as explained in Section 4.12.1.10.2 below.

**Question:** Generally, there are not a lot of changes to the CTA configuration so it is expected that vehicle traffic LOS will remain poor. Has the amount of curb space been calculated to ensure good LOS? How do "non-SPAS" projects such as Terminal 1.5 or Terminal 2.5 fit into the calculations? Were they included? Is there a summary list of these projects? What are they?

Page 4-1167 Table 4.12.1-40 Public Parking Demand - Capacity

**Question:** If the demand is as low as predicted, is it still possible that there are times of the day that the lots will be full? What is planned to level out demand?

Page 4-1168 Table 4.12.1-41 Summary of Curbside Impacts

**Question:** The impacts shown in the chart are "no" for virtually everything, yet we know that the CTA is already gridlocked during peak hours and the passenger handling need will be increased dramatically by 2025. How is this reconciled with the observation that LOS is already poor and traffic will be increasing substantially as the number of passengers increases.

Page 1183 4.12.2 Off-Airport Transportation

#### 4.12.2.1 Introduction

The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs.

This analysis also considers remote facilities that serve airport-related functions, such as parking and off-airport cargo. The impacts of passengers, employees, cargo, ancillary, and collateral development (non-airport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On-Airport Transportation.

The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport passenger activity projected to occur by 2025, the buildout horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

**Question:** Page 4-1183 Off-Airport Transportation states that the growth in passenger activity levels is independent of SPAS and would occur regardless of projects to the same 78.9 maximum. The question, then, is what traffic capacity enhancements are proposed that will reduce the impacts on airport service and surrounding communities. This section appears to imply that there isn't much to do to improve the situation. Is that correct? What if the traffic were spread to other regional airports? Would service levels improve? What about mass transit improvements? Will that improve the level of service?

Page 4-1183 Off-Airport Transportation

Footnote *ex* The airfield and terminal improvements associated with Alternatives 5 through 7 could ostensibly be paired with the ground access improvements proposed under Alternatives 1-2, 8, or 9. Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same as addressed herein for Alternatives 1-2, 8, and 9, depending on which set of ground access improvements one of those alternatives is paired with.

**Question:** Footnote 679 page 1183 states that "... Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same..." This is saying that there is no capacity improvement for any of the runway alternatives? So why spend the major

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dollars for no improvement since the Northside Safety Study showed that the safety improvement is minuscule when the percentage improvement is tied to the degree of safety.

Page 4-1201 Table 4.12.2-6 Estimated Project Alternative Transit Demand

Footnotes: <sup>a</sup> Assumes an Average Vehicle Ridership Factor of 1.4. <sup>b</sup> Assumes a 5% public transit mode share.

**Question:** What is the basis of these two assumptions? Wasn't a factor of 1.7 determined by LAWA in the past? Isn't public transit currently only 3% or does this include taxis, shuttles, et. al. not just buses and trains?

Page 4-1204 Figure 4.12.2-2 LAX SPAS Traffic Model Components

Peak Period to Peak Hour Factors Derived from Traffic Counts...

**Question:** Were the off airport peak hours chosen based on the airport traffic or the rest of the traffic patterns? Since there is limited north-south capacity that is generally full whether LAX is at peak or not this should be evaluated and solutions sought.

Page 4-1205-6 Table 4.12.2-7 and text: "As shown in Table 4.12.2-7, the LAX SPAS Traffic Model meets and exceeds the guidelines for model accuracy in the a.m., m.d., and p.m. peak hours for unconstrained roadways," and "As shown in Table 4.12.2-8, the model demand volume estimates closely match count volumes for uncongested locations (i.e., model volumes only higher by 4 percent or less). For congested locations, the model's peak hour demand volumes are higher than the constrained peak hour counts by 24 percent and 18 percent in the a.m. and p.m. peak hours, respectively. Therefore, the LAX baseline year (2010) traffic model is considered to be valid to 2010 traffic conditions and acceptable for forecasting future year traffic volumes. ... Reasonably foreseeable and funded improvements were included if they would be constructed by 2025 (see Appendix K2-1).

**Question:** If the model assumes unconstrained roadways is this a valid assumption? Why?

**Question:** How sensitive is the traffic around LAX to the number and location of the parking slots? Can the model be used to recommend changes? Was this done? When calculating LOS values for the intersections the value of use/volume capacity is shown. If a street has major traffic on one street and limited to none on the second is the LOS artificially better? Even if "accepted practice" allows this can this be reviewed and solutions sought?

Page 4-1307 4.12.2.7.2 Recommended Mitigation Program

Implementation of LAX Master Plan Commitments ST-8, ST-12, ST-14, ST-17, ST-18, ST-19, ST-20, ST21,716 and ST-22 and LAX Master Plan Mitigation Measure MM-ST-14 would reduce construction-related off-airport transportation impacts associated with Alternatives 1-2, 3, 4, 8, and 9. No additional measures are available to address construction-related off-airport transportation impacts at this stage of planning. There would be significant impacts to some CMP arterial monitoring intersections and freeway monitoring stations under Alternatives 1-2, 3, 4, 8, and 9. Physical mitigation is available for Intersection 26 (La Cienega Boulevard and Centinela Avenue) as shown below under MM-ST (SPAS)-10. No additional measures are feasible and available to address the impacts to other impacted arterial and freeway facilities.

**Question:** Since LAX is only allowed to pay for improvements in proportion to the traffic directly from/to LAX is there any estimate how much money would be required to implement the mitigations identified even if not all can be identified at this time? What is the total cost? What is LAWA's share? The mitigations all relate to intersections. How about signage to direct airport traffic onto LaCienega to Century during the day when both streets are relatively empty?

Page 4-1330 4.13.1 Energy

LAWA operates a CUP at LAX, which provides heating and cooling to the Central Terminal Area (CTA). The CUP houses a co-generation system that generates electrical power, which is sold to the City of Los Angeles Department of Water and Power (LADWP), in addition to producing electricity, the CUP's cogeneration facility reduces fuel usage by 10 to 30 percent compared to separate electricity and heat processes. Additional information regarding the CUP is provided below.

**Question:** The Scattergood Power Generation Plant is about to change over the next five years and there will be significant excess natural gas generated at Hyperion Water Treatment Plant which was being provided to Scattergood. Has LAX explored using some of that gas to support its power needs? When will solar panels be installed on the roofs of all buildings? Has LAWA investigated low profile wind turbines near the runways?

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Page 5-2 Cumulative Impacts Table 5-1 Summary of Cumulative Land Use Assumptions

**Question:** Table 5-1 Westchester-PDR area is a bedroom community with considerably more people during the day and is a major thru way for transportation from the South Bay to West LA/Santa Monica (with people stopping here. How was this considered? See the W-PDR Community Plan EIR for details.

Page 5-12 Cumulative Impacts

**Question:** Only one of the office buildings #121 is shown in the list for Howard Hughes yet there are half a dozen approved including a dozen story building. Why are these not included?

Page 5-17 5.3.1 Airfield-Related Improvements

**Question:** Where is the additional RONs listed in previous EIRs or the 3 Hush hangers previously promised and required in 2015 by the CalTrans noise variance? What about new projects like the Runway Status Lights (there are many upcoming improvements on this). What about curfew tower projects/changes to address the several non-visibility issues that remain and new ones created by the TIBIT design? What improvements to the remote gates are planned? As outsiders it is not for us to guess what LAWA has in mind.

Page 5-18 5.3.2 Terminal-Related Improvements

**Question:** The list presented fails to mention the parking structures bridges or terminal 0 add-ons or cargo improvements or terminal 1.5 or terminal 2.5. As outsiders it is not for us to guess what LAWA has in mind.

**Question:** When is LAWA going to create a comprehensive list and generate a ROM cost estimate for all of these projects so that BOAC can actually plan on how it can finance them?

Page 5-21 5.3.3 Infrastructure/Security Improvements

CTA Second Level Roadway Expansion Joint and Deck Repairs - Repair and/or replacement of expansion joints and bearing pads on the CTA upper level roadway as well as repair and sealing of cracks of the roadway surface. Scheduled for completion in 2014.

**Question:** What about the creeping rust issues that requires more than resealing? What about the additional security issues recommended by RAND more than seven years ago and reiterated by the Israeli consultants? I.e. Blast Glass installations, cameras embedded into the roadway entrances, weight scales in the roadway, and more?

Page 5-22 5.3.4 Land Development and Miscellaneous Improvements

Manchester Square/Belford - In conjunction with residential acquisition occurring under the Aircraft Noise Mitigation Program, voluntary land acquisition within the Manchester Square and Belford areas will continue on an ongoing basis and involve the demolition of acquired structures. Following demolition, properties are fenced, landscaped, and maintained.

**Question:** What is planned in these locations so that impacts can be assessed and included?

Page 1655 Cumulative Impacts 5.5.2 Air Quality

**Question:** When will the three year late air quality apportionment study be released? Why is none of the first two phases considered in the evaluations for this DEIR?

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The questions in this attachment are in addition to those previously attached that came from various members for LAWA to answer and are in no particular order:

**Question:** The Master Plan is to allow for future LAX growth and effectiveness within a regional network. How was HSR or other major rail considered in the design to facilitate accesses?

**Question:** How does this DEIR account for AC150/5300-13A changes (the draft released several months ago and went into effect September 30, 2012) that increased space requirements for ADG V and VI? Similarly, the FAA is starting phase 2 of the Southern California Metroplex airspace redesign in October 2012. How has this been considered in the design of the airport since it can modify approach paths and change environmental impacts?

**Question:** Please confirm that any building or facility in Lot C will be no higher than one floor and fulfills the runway safety area and runway protection zone areas requirements without waiver.

**Question:** Please address the potential consequences in the table below:

Action	Potential Consequences
Removal or mitigation of the 1960s six lane, 740' Manchester tunnel that was to segment from Lincoln on the north to El Segundo was decommissioned because it was destabilizing the runways. It remains under the current runways.	LAWA estimated \$14M whereas it was \$10M to add a "welcome to LAX sign" in the median of Sepulveda. We're told it could be several \$billion to do it right. Not doing it right could cause major sink hole problems. It's related to an unknown underground water source. There's also a concern of leaching contamination from the airfield or from the Park One (Garrett and Rocketdyne did fuel and rocket testing on the north areas). During the years the tunnel was built they had to run an artesian well. There was steam and water in the tunnel during the drought. LAWA has refused to check the tunnel since the rains.
The Major Hyperion sewer lines goes right where they want to put the runway.	They may need to move the sewers. It will be a long, expensive process because they don't know the precise locations.

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Realignment north of the runway necessitates Lincoln Blvd movement by LAWA or CalTrans. The DEIR calls for Lincoln into a tunnel or below grade plus a new interface with Sepulveda Blvd.	Major loss of N-S traffic capacity for extended period. 405 already gridlocked. Again, cost is a major factor along with interruption of traffic and Westchester Business District (if it survives).
Argo Flood Channel (they call ditch) would need to be turned into a covered, limited capacity flow channel.	Messing with this area could cause changes to the underground water. Inadequate capacity could flood the runways or north into Westchester. It might even impact the north terminals after a major 50 or 100 years storm. Is the permeable covering on the ditch strong enough to hold a fully loaded A380? If not, what technology will be used to ensure that it is?

Question: What capacity must the people mover be capable of handling from the Consolidated Rental Car facility to the CTA?

Question: When applying the SIMMOD model did LAWA take the numbers of each type of aircraft and plug them in to predict which runways for landing and takeoff they would logically be assigned to by the FAA? Is the model validated to ensure safe spacing distances and to match available runway capacity?

Question: What "special handling" was necessary for the north or south complex since the specific aircraft available for inclusion is airline gate assignment dependent and since they appear to have used the "black box" method of not using specific gate locations how does the model know if an aircraft was destined for a gate on the north or south or for that matter specific area of gates since not all aircraft fit into all gate locations?

Question: Appendix matrix J1-1 Aircraft Noise Technical Analysis Table 7 et.al contain specific tracks assumed. Alts 1, 5, 6, and 7 are predicted to be exactly the same in 2025 but very different from the 2009 Baseline percentages. How is this explained?

Question: A chart of the annual number of operations was presented to the LAX-Community Roundtable. 2009 is about 10% less when compared with 2011 (with 2009 at a low point). How would this impact the noise and pollution analysis results?

Question: Since LAWA is attempting to move aircraft and facilities closer to communities what biological contamination precautions are being improved?

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Question: Several 2007 runway safety studies are mentioned in the DEIR/SPAS Report. Several technical improvements such as runway safety lights are available and RSL are installed at some, but not all intersections. None of those studies seems to have assumed that any of the technical improvements were to be implemented. If they are all implemented, what is the impact on runway safety? What is the perceived cost?

Question: Regarding DEIR meeting outreach: What list of people or organizations did LAWA notify? At one of the hearings we noted the scarce attendance and asked who had received postcards. We were told that LAWA couldn't find the lists or prior meeting participants to which to send postcards. Many of those initial lists are published in the preliminary SPAS report! We did a quick survey at the last two Westchester Neighbors Assn general meetings and found that only two people had received postcards out of approximately 60 at each meeting (approximately 1/4 in attendance had attended prior LAX meetings).

Question: When LAWA did a security analysis, did it take into consideration all of the RAND studies? What perimeter assumptions and accesses did LAWA assume? What controls into the CTA and also what airfield (and through the fence) assumptions were made? Who actually conducted the study and who approved the contractor?

Question: What kinds of safety studies were conducted? Was it assumed that all structures were sound and in good repair? If not where are cost estimates and identification of the refurbishments that will be needed? How many vehicle accidents are assumed to occur at LAX and was this accounted for in the traffic analyses? Was taxiway and gate locations considered as part of the safety studies? What about line of sight issues (and non-visibility areas) in all areas of the airside? Are sink holes considered a safety issue? How often and to what extent have sink holes limited regular flow of vehicles and aircraft on the airside? What other landside safety evaluations were conducted? What were the results?

Question: The DEIR states that the project would, "provide a better balance between north and south airfields." Does the DEIR ever state the current balance and how it intends to improve this balance? Since there are differing numbers of gates on the two complexes does balancing equally make operations less efficient when aircraft are moved to the complex away from their gate location? How does the existence of cargo operations concentration on the south complex impact the definition of "balanced?" Since the Stipulated Settlement called for resolving the issues addressed by the yellow light project, how is this applicable except to be a noble objective to "share the impacts equally?"

Question: Table 4.7.3-8 compares many runway spacing characteristics. The distance between taxiway and runway is particularly interesting and is LESS than runway

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spacing between runways for EVERY alternative when a centerline taxiway is installed. There appears to be controversy between FAA and NTSB about the proper spacing between runways, runway-taxiways, and runway-objects. The ACRP Airport Cooperative Research Program studies addressing lateral deviation of aircraft during landing and take offs away from the runway centerline show potential safety problems. Also, there are numerous reports of erroneous landings on a taxiway in error. Does the parallel nature of runway-taxiway create another failure mode that can lead to an air disaster? How is this accounted for? Fifteen years ago the FAA changed its emphasis from right angle taxiway exits from runways to high speed turn offs and is not going back to right angle exits. What does LAWA anticipate will be the next change? The standards changed during the reconstruction of the South Airfield Project so that NLA's like the A380 are now discouraged from the south. Instead these larger aircraft operate on the north where LAWA/FAA management initially told us that these aircraft could not safely land. In view of all of these reversals of standards and opinion of what is the safest method of operation and knowing that the runway-taxiway spacing requirements of AC150/5300-13A was just invoked this month, what IS the best design that we should plan for?

Question: Section 4.5 Cultural Resources (page 4-349) indicates the prior EIR was relied upon. There have been sections of historical roadway identified by local residents that remain within the airfield boundaries. Are any of these roads that date back to the late 1800s into the 1930s a potential source of artifacts or cultural information? Since they were not identified earlier and LAWA now intends to tear up some of these areas shouldn't they be more completely scrutinized? Why not? Has LAWA consulted the Centinela Valley Historical Society to find out about older artifact locations? If not, why not?

Question: The impact of the reconfiguration of Runway 6R/24L eastward to meet FAA runway safety requirements seems to have the biggest noise impact, since Alternative 4 would result in the greatest number of newly exposed units and population. However, this impact seems to be overwhelmed in the other alternatives that also have this extension but relocate runways. So relocating runways north tends to obscure the significant impact to our neighbors to the east.

Question: Is this your understanding of the finding? What is the definition of the term "newly exposed" in either the report or Appendices J1-1 or J1-2? Where is, and/or please provide, the data used to calculate the number of units or population exposed by the various alternatives that supports the findings?

Question: Is "newly exposed" the best or only noise impact metric to use in comparing alternatives. Newly exposed would seem to indicate how many people would suffer certain unacceptable levels of noise that wouldn't have that exposure without the change. What factors result in Alt 5 scoring so well with that metric?

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Question: What would be the ranking of the alternatives if cost impact of mitigation measures, such as additional soundproofing, were used?

Question: In the section on noise impacts LAWA created some interesting charts on % awakening. What assumptions were made on these comparative alternatives? Was the condition of over ocean operations assumed for all nights? If not, why not? If yes, why are the numbers so imbalanced?

Question: What is the basis for the 15% assumption for midsized jets moved over from the south to the north?

Here's a spreadsheet with assumptions and base numbers presented overall...

	Newly Exposed	1.5 DB INCREASE	
	SFH MFH	POPULATION SFH MFH	POPULATION
Alt 1	4120 9325	13445 9937	13608
Alt 2	413910187	14326420913826	18035
Alt 3	4394 9049	134433819 1120	15099
Alt 4	422110470	14691429912362	16661
Alt 5	4183 9076	132593811 9962	13773 GREATER W-PDR
Alt 6	4031 8861	138923404 9301	12705
Alt 7	410010076	14176439315089	19482
TOTAL ADDL IMPACT			
Alt 1	412019262	27053	
Alt 2	834824013	32361	
Alt 3	821310169	28542	
Alt 4	852022832	31352	
Alt 5	799419038	27032	
Alt 6	743519162	26597	
Alt 7	849325165	33658	

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Question: Turning to the Off-airport Transportation Analysis, the "bottom line" seems to be captured on page 4-1242, where the report concludes that "all of the alternatives would result in significant impacts relative to Future (2025) conditions. This conclusion is supported on page 4-1318, where many of the significant Westchester intersections have "N.F.M." (no feasible physical mitigation) under all the scenarios. Interestingly Alternatives 5, 6, and 7 weren't studied, since they have no changes to ground transportation. Moreover, although the report claims that Future (2025) conditions were studied with and without alternatives, where is the report of the 2025 impacts without Alternatives.

Question: Numerous suggestions were made during the SPAS meetings led by LAWA. Why are none of them referenced or identified and analyzed? For instance, more than 5 yrs ago an off site passenger check in was suggested for location near the 405 Freeway in Howard Hughes Center with a bus or people mover to improve the CTA. This commuter passenger option at Howard Hughes, was suggested so that their single vehicle transportation need not drive all the way from the freeway to LAX. Howard Hughes passengers would be taken by mass transit instead. It's nowhere in the DEIR. Why not?

Question: LAWA acknowledges what we've concluded in the first paragraph (underlined) below that a solution is not known and the direct passenger growth is larger than any of the options' impact. Aren't there changes that can be made? What about mass transit? What flyaway's were assumed in the analysis? What about benefits of regionalization?

#### Page 1183 4.12.2 Off-Airport Transportation 4.12.2.1 Introduction

The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs. This analysis also considers remote facilities that serve airport-related functions, such as parking and offairport cargo. The impacts of passengers, employees, cargo, ancillary, and collateral development (nonairport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On-Airport Transportation. The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport

passenger activity projected to occur by 2025, the buildout horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

Question: <http://navigate.la.lacity.org/index.cfm> allows for review of the sewers impacted by the movement of Lincoln Boulevard. So does the attached picture so one of the three outfall sewers. Sections 1 and 2 (i.e. page 1-18 and table 2-3) is where nominal, incomplete information is located for the realignment and tunneling of Lincoln is discussed. This is in an area of highly concentrated utilities including major outfall sewers which can't be moved. What depth is anticipated for this realigned roadway? How will it interface with Sepulveda and where? How much more impact on other roadways and traffic should be expected during construction and afterwards? Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation.

1. Will the tunnel height restrict certain vehicles from entering?
2. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
3. Will there be hazardous materials restrictions for the tunnel?
4. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
5. Will there be emergency evacuation areas or exits? How many and where? Call boxes?
6. Will there be traffic controls such as stop lights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
7. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

Question: Why is the totality of the Master Plan not addressed? Elements such as Terminals 1.5 and 2.5 are referred to in the DEIR, but never explained. The DEIR states that these are outside of SPAS. These elements, however, are not in the approved 2004 Alternative D Master Plan. In which portions of the environmental assessments were these projects included? Which version of gate alignment and size were assumed? How will this be incorporated into the Master Plan?

Question: Traffic issues are generally noted as significant and not mitigatable and/or not addressed. Adequate alternative plans as well as cumulative impacts are understated because several key major projects are not fully listed such as planned buildout of several Howard Hughes towers. Mass transit into and/or around LAX would significantly impact businesses but are not addressed. None of the mass transit

alternatives have capacity for more than a few million annual passengers. How will the rest of the passengers be serviced?

Question: Not all reasonable traffic routings were assessed. What additional studies will be done to reduce traffic (and attendant congestion, noise and pollution) in residential neighborhoods?

Question: "Section 4.11.2 Law Enforcement talks about staff reduction facilitated by improved scale of efficiency, but as the number of travelers, service vendors, and gate facilities and more terminals increase won't there be an increased need for staff? Will there not be increased crime due to the sheer increase in numbers of people passing through LAX? As traffic increases and the number of entries into the CTA remain large how will staffing be increased to adequately support security as well as traffic control? Doesn't more traffic mean more vehicle accidents as well? How will these needs be met?"

Question: How does the DEIR address ensuring the law enforcement staffing numbers of LAWAPD will do better than merely keeping up with attrition because growth in numbers are needed to keep up with the anticipated growth of LAX?

Question: What is LAWA doing to ensure that staffing of LAPD resources do not again violate in whole or in part either Los City Charter Sections 635 or 636 or any other parts of the FAR pertaining to federal revenue diversion as we have seen in years plan?

Question: How does proper staffing at LAWA impact the staffing of LAPD resources which are vital and are much needed elsewhere in the City of Los Angeles and are part of the Mayor's promise to have 10,000 LAPD officers on the streets of LA?

#### Section 4.7.1 Health Risk Assessments

...These estimates show that program-related cancer risks for all evaluated receptors (residential adults, residential children, school children, and adult workers) are predicted to be below the threshold of significance of 10 in one million for Alternative 1 and are expected to result in decreases in cancer risks due to anticipated decreases in DPM emissions. Therefore, cancer risk impacts to human health under Alternative 1 would be less than significant and would be beneficial. As noted above, these beneficial impacts are primarily due to ongoing implementation of more stringent motor vehicle emissions standards, cleaner future fleet mixes, and the decrease in stationary source emissions attributable to the replacement CUP, currently under construction. These reductions in future emissions, particularly those associated with future motor vehicle emissions, are anticipated to more than offset the estimated increases in other types of emissions, such as from aircraft, APU, and GSE....

Question: What is the basis for saying that LAWA additional emissions are compensated for by future vehicle reductions per vehicle? Where is this assumption scoped and demonstrated?



### 1.1 - Research (Phase I)

Any conditions completed in Dec. 1995 will not include any impacts established by the terrorist attack on 9-11-01. Therefore should be completely redone including the new model of security and the difficulties with the downturn in economic conditions the number of operations is actually down and the million annual passengers dropped at 77 net 98 million annual passengers.

### Concept development (Phase II)

Any study before the 2001 lawsuit should be rendered null. There is now a legal settlement in place that supersedes anything before the SPAS agreement. Please explain why?

### Environmental Review and Approval (Phase III)

Final Environmental Impact Reports were shoddy, flawed, contradicted itself and no mitigations were ever built. See 2003 lawsuit and the 7,000 page EIR/EIS.

Where are the Cilt D have you asked mitigations, that have since been installed? What changes were made to community interconnections to change things? How have topics further just been mitigated from construction? Since 1995 explain why there hasn't been a train accident to the CTA to keep lower community. SPAS-PC00130

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We would like to see a solid 20-foot block wall along the north and east side perimeter to help contain ground generated particulates within the airport flight field. Where is the study? Why has no action occurred for 17 years?

1.1.2. The stipulated settlement agreement Westchester, Playa del Rey, was promised a return of street lights the fare removed. Where are the documents that show how this was approached with the fare? Since this was an airport related activity and part of the settlement agreement show where this exists in the current document?

### Figure 1-2

Why doesn't the map of the existing airport include reference to all of the underground tunnels? Please redo map including tunnels, sewers, hot oil pipes and explain why they exist and how to mitigate them?

### Figure 1-3

Why create the maps made to scale? Explain why ground related projects stayed during settlement agreements were not built? SPAS-PC00130

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Projects including the Ground Transportation Center, tunnel, associated structures, and equipment was a "yellow light" project. However the automated people mover was still designated a green light project. Why have the SPAS committee not seen plans for said project in last years? We as part of SPAS have not seen any practical mitigation plans that minimize environmental impacts on the surrounding communities. Please list and show drawing of all such plans. Since 2003 LADA has done nothing to encourage airlines to go to other LADA owned facilities. Please list and describe 20 conditions that LADA intends to enact to each of her other properties that will reduce LAX of at least 25% of flights, cargo. Why have not of the conditions been met? Why are you 8 years out of compliance?

Since the flight field at LAX has a capacity of 120 MAR as a currently constructed, why are you adding more capacity? Who benefits from this?

What new technology has LADA implemented in the last 8 years to move traffic out of LAX adjacent communities? How many vehicles has LAX removed? Why is LAX allowing so many empty buses to circulate? SPAS-PC00130

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CTA? Why hasn't LAX made the rental car agencies that use LAX to use only 1 consolidated vehicle every 15 minutes? Why hasn't LADA completed its settlement of 10 flyaway buses? Why are they asking funds from the flying public when the idea was to cut traffic? How many car trips have been cut since the institution of the existing flyaway service? Why haven't similar services been instituted at Ontario, Van Nuys, and Palmdale?

How many van pools for employees exist from LADA airports to other airports?

### Project Objectives

1. Provide North Airfield Improvements that Support the Safe & Efficient Movement of Aircraft at LAX.

The study completed by Hase and the University experts deemed the North complex safe. Expansion of the runways would provide a statistically insignificant improvement in safety. By placing a centerline topography to the North with an ABED located on it how much closer would the aircraft be? Would moving the runway cause more blind spots from the tower? How does the airport plan to operate at full levels while both north runways are closed for tunnel repairs? SPAS-PC00130



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cover huge overcrowding on the small runways? How does LAXA plan to co-ordinate repair of the 2 tunnels, 3 sewers, hot oil pipes, movement of Spenser Blvd, closure of Sepulveda at LAXA? How will this be paid for? Since LAXA has such poor relations with Caltrans, DWP, Dot and local communities, how many studies will LAXA produce to make sure any new runway or any old runway will be safe during the moving of sewers, movement of streets, water issues etc? How does LAXA intend to pay DWP for the redevelopment of 3 new major sewers currently under the northern runways? How long will this take? How long is LAXA expecting full closure of the northern complex with the LAX taking little more than a year we expect DWP to take 3 years to relocate new sewers. 1 year for planning and at least 2 years for building will the above Sepulveda, Spenser, Manchester, and Rosebush Parkway? Is so how long? Will it come before or after the other repairs? Who is paying for all this?

FAA people have informed us that by improving the taxiways next to the northern complex will increase throughput 20% or more. Why hasn't LAX built a fully standard group to improve taxiways?

to the northern complex? How much cheaper would the taxiway be than the moving of the runway? If ground vehicles are interfering with taking aircraft on nearby service roads, why not move the service road out of aircraft taxiways?

LAX Master Plan Improvements again have been covered in the Nasa Ames report, proving the north airfield has extremely high safety standards. Please explain how putting more aircraft closer together, further from the tower will improve safety? How many safety issues would wide heavy been caused by concrete taxiways? Besides the accident landings on centerline taxiways what other types of accidents have occurred? If centerline taxiways prevent incursions why are there still incursions on the small complex?

Why remove remote gates? If there isn't sufficient space to hold arriving flights?

2 Improving Ground Access

How does LAXA intend to stop blocking curb areas with smokers, people waiting for pick up, cabs, shuttles, and how is LAXA going to improve ground access?

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How is LAXA planning on intercepting the people mover and the green line train to all nine of the terminals? Will LAXA be paying for the train? If so what percentage and out of what pool of money? How will these 2 items affect pedestrian traffic and how will they change the plan to accommodate handicapped people.

What plans in detail does LAXA have to repair the structural nature of the upper roadway? Who will pay for this and how? How long will the upper roadway be closed in order to eliminate issues with the bridge (upper roadway) and the structural damage due to creeping rust? Who endorses this part of the airport? Who would be responsible in case of catastrophic failure? Where would the money come from? If it were to fail how long would access to central terminal area be closed?

Since LAXA is using public streets during peak access times how much money is LAXA reimbursing LADOT and Caltrans? Where is this money coming from? What percent is LAXA currently reimbursing? Is LAXA paying AGMD for the extra idling time associated with waiting cars? Has LAXA implemented any programs to lower the amount

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of excessive pollution caused by idling cars waiting to access the CTA? If so what plans are currently in effect? Where have they been implemented? Who at AGMD is in charge of this program? Where does the money come to pay for this? How does LAXA intend to handle these issues as they worsen? Has LAXA started a medical fund for employees and local people who have been affected by excessive exposure to pollution? If so who is paying for this? How would someone gain access?

Who covers the liability of travelers on public roads trying to access the CTA in case of a terrorist attack? Where does the money come from? Who covers the liability of travelers on public roads trying to access the CTA in case of earthquake? Who is managing these funds and how were they accumulated? Who at LAXA covers the liability of travelers on public streets, in and around the airport in case of flooding? If hurricanes, merchandise buildings, cargo, public streets, homes, are affected by poor engineering of surface water, aquifers, the cargo build and sewer. How does LAXA intend to manage the liability and how will this affect the ability of LAXA to sell bonds and not change its credit ratings?



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How does LAX curb demand is unevenly distributed. How will LAXA rearrange Airlines, cargo, and take off and landings so that during peak hours curbside demand is no longer unevenly distributed.

How does LAXA looking to reclaim the access roadway to especially accommodate security screening? How does LAXA expect to pay for these improvements? What does the TSA have to say about how effective current models are? LAXA has been paying an Israeli team for their expertise on terror what have they recommended and why have it any of these procedures been implemented.

Saner LAXA expects to use both the Greenhouse and Greenline trains what percentage of these projects is LAXA paying for? Are they buying and/or parking land? If so which land? How is it being paid for? If issues between passenger cars and metro trains occur which agency will be in charge and whose insurance will cover the liability? Should a bus car be hurt or killed by a metro train on LAXA property who will be responsible? Do both agencies put in excess funds into the LA city's general fund to cover any insurance issues?

3. Where does the study that says SPAS-PC00130

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is the premier international gateway? How is LAX supporting and for advancing economic growth? LAX has not supported vitality of the Los Angeles region. There has not been any effort on LAX's part to revitalize freeways, access roads, terminals, and surrounding communities. Why if the goal is to revitalize the city of Los Angeles hasn't LAX made areas surrounding it appealing to tourists? Open space, walkable districts, off ramps that are used to help support traffic to LAX and public streets used to support access should be maintained by the airport. How are they planning on doing this? Where are the funds coming from?

How does LAX expect to maintain a key role when they have removed thousands of jobs (Alternative D), thousands of homes (Manchester Square, and the area now considered the northside, and the southern homes of Playa del Rey). How does LAX expect to remove those areas, replace the schools and open at least long term jobs to the people who lost their positions?

LAX is already accommodating newer larger aircraft. The SAIP was said to be done to accommodate the NLA and none of the new EIR options fit the new. FAA accommodations as did no group SPAS-PC00130. This has shown a way to set a full

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Group to airfield on the north in the Nasa study please show that option.

It is very nice that LAX is supplying jobs. How how many more jobs would be created if all of LAXA airports were fully developed. Did the LA EDC have any studies showing employment at the other LAXA airports? Where are they and who was responsible for them?

LA city owns LAX and we would like to know how many of the permanent jobs are going to the residents of Los Angeles? How many are new jobs?

During construction of the cross field runway and Bradley what huge piles of toxic earth have been piled on the perimeter of LAX. They have been in existence for over a year and been inadequately kept intact creating huge quantities of fugitive toxic dust. What will these tons of toxic earth cost to mitigate? Has LAXA involved the department of toxic? If so, will they remain on hand while real work is being done on the remaining toxic soil? What involvement has the AQMD had with the fugitive toxic dust? What are LAXA's plans to mitigate the fugitive toxic dust in the neighboring communities? Is LAXA running air samples in their child care facility next to the piles toxic fugitive dust? What are the liabilities associated with fugitive toxic dust? Who will be responsible? Does LAXA have special insurance to cover this SPAS-PC00130

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4. There are more than 153 passenger gates at present. Remote gates were not included in the passenger gate count. How many passenger gates including the remote gates does LAX have?

5. Eight years into the space program LAX has not completed any extra security recommended by the Rand Company study of 2001. Explain why? Also recommendation of East glass in the frontage of all terminals was never studied, why not?

6. To minimize environmental impacts on surrounding communities why hasn't LAX removed the toxic fugitive dust? Why hasn't looked to filter the ambient water coming from the flight field? Why haven't local schools been equipped with indoor air filters? Why hasn't the airport flight field been surrounded with ultra high solid fences to keep in particles generated by aircraft on the ground? Why hasn't LAX installed a device to lessen noise pollution on the north?

7. Explain how airport improvement grants work. Where does the money originate? Explain where passenger facility charges are approved. What is the top and bottom limits of the PFC's? Who is responsible for bond sales? If the project's cost of funds is 10 times higher than estimated SPAS-PC00130



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How will those funds be raised? Are the bonds insured? If so by what entity? What other expenses associated with the 9 alternatives will other agencies be responsible for? The metro, DOT, DWP, public works, Caltrans, AQMD, Santa Ana, right of ways, closures of neighboring businesses, moving of sewers, groundwater issues, black outs, department of toxic and environment of hot oil pipes. If the airport fails to raise enough funds how will these things be paid for? If bond sales or construction cause devastation who is responsible?

1.2.2 What waivers of operations are currently in effect at LAX? If LAX builds a specific alternative and the FAA once again changes its standards and refuses operational waivers what would be the consequences? Who would be responsible for the expense? What is the current separation between the north airfield runways at both the east end and the west end? What base assumptions of taxiways were these alternatives generated? Does it include taxiways called for in Alt D yet not yet completed or both cross field taxiways although only 1 is complete? Has money already been put aside for removing taxiways? What is the condition of a center line taxiway piece aircraft closer together than on the existing field? Even at the highest separation mentioned in the 9 alternatives with inclusion of a center line taxiway of 100 ft to meet

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new FAA requirements and therefore still require waivers? How many new bond sales on runway 24 R. Will be needed for each of the alternatives?

How long would Lincoln Blvd and Sepulveda have to be closed to traffic during modification? Who will do the modifications on Lincoln and Sepulveda? Will the airport pay for all of the modifications?

How long would the Cogo water channel be closed to incorporate modifications? If the surrounding areas begin flooding what entity is responsible for damage? Who is doing the modification of the Cogo flood channel? Has the Army Corp of Engineers been consulted on the flood channels alterations? In case of flooding what is being done to prevent flight field topics from polluting ground water? If flooding is severe what is being done to prevent pollution in the Santa Monica bay? If pollution occurs who will be responsible for the cost of cleanup? If the flight field floods would the runways need to be closed? How much of a cost would it be if one or both runways needed to be closed? If the rains are excessive would the airport be able to survive the financial hit for 1 month? How long could the financial health of the airport survive without use of the north airfield?

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If Runway 24 is extended 1250 feet where will you move the holding lot? Because of the proximity to the 78th Street bridge will new safety requirements be installed? Will the bridge need to be moved?

How often does the FAA change standards associated with runway protection zones? Moving outboard runways west will increase the compact of homes in Playa del Rey. How does the airport plan on mitigating that? It will also damage property values on Southern Playa del Rey will the airport pay landowners the difference in value? If not willing to make residents whole will the airport have to pay the city General Fund for the tax decreases? Or pay the state?

What staff person wrote about RSA? It wasn't explained what it is and the foot notes muddy the explanation further. Please reexplain RSA, declared obstacles and displaced thresholds. What is surface criteria? Who is responsible for them?

Taxiway E, Taxiway D, service road and aircraft parking positions are not included in the illustrations. Where are they located? What assumptions have been made? What simulations were you referring to? Who wrote this section? Why didn't the airport hire a more capable technical writer?

Why will building limit lines differ between alternatives? Why are taxiways

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for alternatives? The accepted alternative might need a D all taxiways and limit building lines should be based on that.

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Having been a part of the spec process it's hard to be interested that the number of gates that were to be a part of the mid-field terminal were to be included in the new TBIT build out. I see that a new mid-field terminal is now to be included. Why would the airport spend the money on building a mid-field terminal when the number of gates is remaining static at 159? What does LATA think could be gained? Any extra floor space for international travelers could have been done with an extra floor on the new TBIT building. The airport is giving up space for 50 additional concessions, who is making up for the financial difference?

Again, who wrote about the ground access summary? Show what is described as an APM. When alternative D was accepted the technology described did not exist. Has someone at LATA invented the necessary technology? If so who? Does this process belong to LATA or some other engineering group? If the patents are in LATA's name I suggest marketing them to other airports & charges to pay for terminal improvements.

What designs are for ITC? Are they included in all options? It was granted eight & years ago why has no progress been made?

The consolidated rental car has been collecting money from rental car travelers

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for several years. How much money have they collected? What are the plans for building the concourse? Because Los Angeles is in big need of jobs why hasn't this project gone out to bid? Wouldn't having all the rental cars in one place cut the number of buses in the LTA and optimizing traffic?

What does "fully integrated" mean? Why weren't diagrams of all 9 alternatives included at this point? Discussion at this point is useless.

Alt 1

Again what does "fully integrated" mean? Where is Taxi Lane D? Is there is Taxiway & where is the Service road? Most important where is the plan? Where is terminal D and what modifications to the terminals are you referring to?

What MISC mean? How is Sky West being modified? Why was ITC moved from near the Q closest freeways to next to the closest community? How does LATA plan to mitigate traffic & pollution due to idling cars?

Why use a bus when LATA already owns fleets of shuttles? Why wouldn't this dedicated bus help service the hotels?

Looking at the plan for Alt 1 the consolidated car rental is missing. It's obviously not fully integrated.

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Consolidated car rental isn't built when will the car rental companies return the money? Who will pay to research who gets their money back? Is LATA going to pay for the prototype? How long do they go to keep the money? Are the car rental people paying back taxes on the money they collected?

Alt 2

It's interesting that LATA is preparing high-speed highways on the north which it just paid millions of dollars to remove them on the south air compact. Will the result not be the same? Won't the number of incursions increase the way they did on the South air field with their solution?

### Habitats & Associations

Because loose soil from the flight field contains huge quantities of toxins before any staging could occur the soil must be cleared of toxins. How does LATA plan on cleaning the soil? If the soil isn't cleaned and sensitive habitats are affected how would LATA pay for this? What toxins are currently on the soil? How does LATA intend to handle run-off?

How does LATA plan to keep dust, dirt, and debris off of public streets? Will they be having a 24-hour team

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up dirt, insects etc so that there are no incursions into local communities? Especially in the case of large wind storms.

Some LATA expects to remove mature trees in order to expand. Why don't they replace those trees with mature (not as old) trees now? That way there would be less impact to nesting raptors. Had this been done when Alt D was granted trees could be up to 30 years old.

### Human Health Risk Assessment

What is meant by environmental cancer risks? If environmental cancer occurs in surrounding communities will LATA be paying for the expense of treatment? If the cancer is untreatable will LATA be paying death benefits to family members? If so how much? Where will the funds come from?

What are environmental chronic non-cancer hazards? Please name all non-cancer hazards. Again if someone in the community surrounding LAX will feel subject to one or more of these hazards will LATA be paying for the treatment? If not subject to one will LATA pay death benefits to family members? Where will the money come from?

What are the thresholds of significance? How acute is a significance of 1? How many thresholds are there? Who is measuring? And passenger is the only people affected?

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Why hasn't LHA implemented the form of air purification we've called "hot spots"? Is taking time of aircraft on the ground in a major sense, why hasn't aircraft being slowed by clear air been considered? Wouldn't airlines, some significant amounts of money on fuel be being saved? How much fuel is required for its entire life? Would it be a hazard? By what agency? Who would be measuring?

How much difference is there between hazard level 1 and hazard level 2? What impacts are expected exactly? How many impact systems does this represent? Why isn't LHA looking at some form of mitigation that would clean the air going beyond the fence line and providing filtered face masks for all workers exposed?

Your plan states there are no direct cumulative health risk impacts anticipated. What has happened to the 12 year study that was supposed to define the dangers? Why has this plan not been complete? Why haven't measures recommended all for been instituted? Who at LAX is responsible for the study?

What individual thresholds of cancer risk does LHA consider significant? If LHA doesn't consider any of this significant then we suggest that all upper level employees be housed in offices near the

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fence line. They could use their individual health markers as to whether they are of significance. Buildings in this area would help block the neighborhood from lower emissions and feel how high real thresholds are. What difference is there to the community between threshold of less than 1 to over 3

Spill

Your document states there is no solid waste facility within 5,000 ft of LAX. What facilities do exist in & under LAX that could cause contamination and leaching of toxic into the water table?

How does covering the Argo flood channel add to ponding in & near the air field?

How would the LAX northside development cause fear if there is no development now? Just plan whatever development not to interfere with FAR Part 77.

Hazardous Materials

Your document says that LAX would require excavation in areas of known contamination. Where are areas of known contamination? How many are there? Is any of the soil piled up west of the Westchester

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Have known sites been mitigated? Do any of those sites affect the water table? Do any of the known contamination show up in current records? Have you found any contamination in the Argo flood channel? Is so, what contaminants are any of the contaminated contiguous with the neighboring communities? What are the known health hazards associated with those contaminants? Does the Department of Health or any other department have records showing clusters of people suffering from those health hazards? If so, is the airport approached those people, the city or county in which they live and offers to pay for treatment or death benefits?

Hydrology

What indications for hydrology are you implementing? Flooding seems to be a major issue in all but ALT 3, why? Are you having major issues with flooding now? If so how is it affected? Why hasn't LHA moved forward to mitigate pollution to local watersheds?

How does the Manchester tunnel figure into airport flooding? Where is the water source currently in the Manchester tunnel coming from? Is the water in the tunnel polluted? What pollutants have been identified in the tunnel? What health

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risks are associated? Does airport flooding impact the runways with sink holes? If so since the last flight field improvements (north runway) how many sink holes have occurred? How much money has been spent repairing sink holes? How many aircraft have been damaged because of sink holes and flooding? How much money has this cost?

Why are the new designs being made from all impervious materials? Please list all reasons impervious materials are being used. Please list all unpervious materials considered acceptable for runways and taxiways? Unless this green building code what percentage of land must be left as open space to use impervious materials? Exactly how many square feet will be covered by impervious materials in each alternative?

Should storm water capacity be exceeded where would the excess water move to? Would all excess water remain on the flight field? If not would LHA pay for flooding damage to adjacent areas? Over clearing of basins? If flooding proceeds into terminal areas would LHA's insurance plan be sufficient to cover all the damages? Where does the LHA record account for excess

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in the account?

Who designed the LAX Conceptual Drainage plan? Has the Army Corp of Engineers been consulted? How about the engineers of Caltrans and SCA city DOT? Has ROWA approached the City Engineer Department of Water & Power about storage of excess storm water? If so, what plans have been put forward?

Describe in detail the 11/11-11/12 Conceptual Drainage Plan, revision and updates. Does the plan include pollution controls?

What mitigations for each of the alternative for curbside, has LAX planned for? What are those mitigations?

How would flooding affect the sensitive land areas next to LAX? Which plants and endangered species would be affected? Should the changes to Corp flood channel fail?

What is the LAX storm water pollution prevention plan?

Table 1-14 is less than useless. How can massive expansion plans abrogate impacts? How did LAX come to these conclusions?

Table 1-15 has no details. Explain how CNEL was calculated? Explain the relationship CNEL has with Topography? Where are the noise monitors for Stage del Rey, Westchester and North Imperial Court? How does CNEL modeling account for

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Spacing issues and course corrections? 1-84 states that implementation of the Spas alternatives would have a considerable contribution to future aircraft noise impacts on existing & potential future noise-sensitive uses within the 65 CNEL noise contour. How will each of the Spas Alternatives affect surrounding areas to the 65 CNEL area? Will there be special attention to schools, old age homes, hospitals or open air recreation areas? Please list all of the schools, old age homes, hospitals or open air recreational areas that will be either impacted (65 CNEL) or affected (over CNEL) within 8 miles and explain for each alternative how they would be impacted.

Please explain why Alternative to page 1-83 would have the least impacts? Then on page 1-84, you state: Alt 5 would result in the least change, followed by Alt 1, Alt 6, Alt 7, Alt 3, Alt 2 & Alt 4. Why do these studies disagree with each other? How can modeling runways compare to not increase runways or new impacts? Explain in detail how these results were reached. Who did the studies?

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Spas says page 1-92 that there will be no cumulative transit noise or vibrations from either the Spas Alternatives or the Chomahaw Metro LAX line. Since LAXA has no idea which Alternative they will use or what the Metro LAX line will look like how can they say that it won't be noisy and/or have vibrations? Who is responsible for this data?

Here

LAX SPAS states "Airfield improvements under alternatives 1-7 would enhance the safety & efficiency of the airfield compared to base line conditions. How would Alt 1-7 enhance potential need for emergency fire response? Please explain each alternative separately. What improvements to fire stations is LAX planning? What are the LAFD Design Recommendations? What does PS2 have to do with fire safety response? How does fire and Police facility space and sitting requirements increase response time? What is FAR? How does FAR ensure maintenance of adequate staffing?

LAX Spas states "Construction of ground access improvements under Alt 1, 2, 3, 4 & 7, would reduce traffic congestion at curb front demands. How? In reading of the alternatives I have seen no improvements to widening streets, removing buses, moving cars or even improving side walk space for pedestrians, why? Without measures to access from behind, between, & in front of

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an improved traffic flow, why didn't LAX put in an emergency vehicle only access?

Law Enforcement

LAX SPAS states page 1-97 "Airfield improvements under Alt 1-7 would enhance safety and efficiency of the airfield compared to base line conditions, thereby decreasing demand on law enforcement services & personnel associated with airfield accidents." I thought that the entire purpose of making airfield improvements was to handle more planes, passengers, and cargo thereby increasing demand on law enforcement. If airfield improvements bring no further business and the NASA study shows the airfield safe why pay billions of dollars to save the cost of a police officer's salary?

How do you explain the reduction in curb-front demand? Are all collisions, automobile & pedestrian conflicts due to curb-front demands? Where did the study information come from? How did you reach these conclusions?

Where would LAX be placing the new LAX public safety building? Has that added traffic been added to the LAX traffic plan?

Curbside operations

It appears that only curbside operations at the TAT have been analyzed. Why? Does



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How not expect any other increases at the other 10 terminals? Why not? It appears that the concerns are only at the arrival level, not at departure?

Interactions p. 1-96

Spas only interactions impacted in short way, South & Center way, and yet in many of the SPAS alternatives they speak of Realizing Greater Div and Migration of Population why weren't these interactions studied?

Off Airport Transportation (1-99)

Table 1-27 Chart makes no sense. New studies should be run and someone who speaks English should write a more comprehensive set up. Please explain what CNP stands for? Why ~~are~~ numbers that represent vehicles shown? Why aren't more mass transit answers added in? Why hasn't LAX complied with the rest of the flyways required by their settlement agreement? Free or extremely cheap mass transportation could cut traffic and free up parking places. Construction workers could be picked up at remote locations and bused to work. They could be safely cleared at other than LAX.

Energy

Because more passengers use more power, water, and natural gas, why hasn't LAX put in solar & wind power? The flat roofs should make enough to cover most

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only the needs of the airport but some of the surrounding areas. Why haven't they switched from natural gas to electric and use solar & wind turbine power? I know LAX uses Gray water for their land reaping but they sit on top of one of the largest springs in Southern California why aren't they tapping that water, cleaning it and using it to support their own water supply?

Transportation-Related Fuel

LAX states on page 1-101 that a substantial portion of the increase in fuel is associated with an increase in flight operations. Why hasn't LAX required the use of more fuel efficient planes? Why hasn't solar power been substituted for other fuels? More efficient forms of organization also can save fuel like grouping all of the LAX office people together and using car pool type shuttles. Electric vehicles to shuttle employees in the airport and passengers in the terminal areas supported by solar energy and or wind makes greater fuel unnecessary. Why hasn't LAX investigated more environmental means of expansion.

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Do they have programs for recycling of paper products and recycling of plastic? If so why aren't such programs detailed? Do you have some program from the concessions? If so please describe? What are the largest sources of solid waste from LAX?

Wastewater Generation

LAX states on page 1-102 "the projected wastewater generation for each alternative could be accommodated by existing wastewater treatment facilities at the Hyperion treatment plant." Is LAX increasing their payments to Hyperion? Is LAX giving extra aid to Hyperion to expand their facilities?

Water Supply

LAX states demand for water would be increased, why hasn't LAX developed their own water source? By removing LAX water needs the city of Los Angeles would have less need to conserve and/or ration.

We appreciate the maximum use of reclaimed water, however we believe that LAX should supply their own water source.

Evaluation of Amendments to the Specific Plan

What kind of administrative amendments to the Specific Plan is LAX planning? Please describe each amendment for each alternative.

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1.5 Environmentally Superior Alternative  
~~High Alternatives that are environmentally~~

North Airfield Improvements

1. The north complex was expanded to cover newer larger aircraft, then the FAA changed these qualifications. Although the north is currently handling the newer larger aircraft none of the alternatives as stated would accomplish the new FAA qualifications. Please explain the new FAA qualifications for the newer larger aircraft?

Why wasn't a one runway alternative considered? Explain why the only way to handle the newer larger aircraft would have been 1 runway with removed taxi ways.

Please describe FAA Engineering Brief No 75

What are ADG V and VI aircraft?

Why are you looking to accommodate a larger percentage of departing aircraft? Before the South air field project the airfield together could accommodate 100 MAP, now they can accommodate 120 MAP without improvement, why spend billions of dollars when the airport is capped at 78.9 map?

Ground Access System

So far documents haven't stated how the roadway would be improved. Please

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Explain the improvements. How do you plan on reducing "bottlenecks" & congestion? How are you planning to reduce the volume of private vehicles? What other alternative drop off and pick up areas are you developing? How much is LAXA counting on the metro Cinchaw station to reduce traffic?

#### Maintaining LAX's position

How has it been determined that LAX serves a key role in the region's economy? Since LAX is providing good in the region, why hasn't LAXA completed the rest of the greenlighted improvement projects?

Con Improvements 153 Passenger Gates 24  
This section makes no sense at all. How is LAXA making terminals 123 consistent? Are they all to be the same size? Are they all look the same?

#### Enhance Safety

When is LAXA planning on putting into effect the road projects & security solutions to safety? Why hasn't LAXA put in blast class? Why hasn't LAXA installed a license plate reader at all egresses of the airport? Why aren't there more cameras in the CTA?

#### Minimize Environment Impacts

Every way to minimize local impacts is develop the other airports.

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Why hasn't LAXA constituted any form of renewable energy (ie solar, wind)? Knowing that rental cars are a huge problem why hasn't LAXA built a consolidated car rental? Why hasn't LAXA offered discounts to airlines who lessen their peak times take offs and/or landings?

#### 1. Reducing an Improvement Program pg 24

The document says improvements are a major undertaking, our experts are saying that LAXA is majorly underestimating costs, construction time, and starting with the most dangerous of the projects. If the experts are correct and the amount to fund the projects is over 100% more than predicted how does LAXA plan on paying for the projects? If severe damage is done because of the Manchester tunnel, or the cargo flood channel how does LAXA plan on paying for that? How much money exists in the current insurance policy? Could the current insurance cover 35 billion? How long would it take LAXA to sell bonds to cover 35 billion? How sustainable would LAX be? How does this situation keep LAX fiscally responsible? How long is LAXA guessing that the north airfield will be closed? Can the south airfield handle all of the traffic currently on the north airfield? If so for how long? Terminals 1, 2 and 3 won't be approvable

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from the north or south airfield what is LAXA's plan for those airlines currently leaving those terminals?

#### 2.3.1. Alternatives Addressed in Draft EIR

Other than a quick mention of Alt D, I haven't seen any plans for development of the ground transportation center. Where are the plans for the BTC? What plans are being made for the baggage tunnel? In the original Alt D model of the BTC safety was based on non-existent technology what is LAXA planning on instead? What are the associated structures and equipment you are referring to?

The automated people mover is currently in alt 7 as well as Alt 3 what are the differences? Where are the stations and related facilities & equipment going to be? How will the check in center for the new mid-field project affect the people mover?

Why is terminal 3 being demolished in all of the alternatives? What is the plan to deal with the black mold currently in terminal 3? Where will LAXA put the air lines currently using terminal 3 while the terminal is out of commission? How long does LAX expect terminal 3 to be workable? Will it take longer than the eight years that the TBIT is taking? What assumptions have been made regarding terminal 3? Is the black mold progressed

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to the underground tunnel between terminal 3 and the Concourse?

What road improvements are associated with the development of the BTC and the APM? I haven't seen any last 2 chart detailing any of the improvements, why?

#### Problems North Airfield assumptions

What parts of LAX meet FAA standards for ADG V and VI Aircraft without waivers? How does a centerline taxiway help with weather restrictions? If no centerline taxiway results in less incursions than why does the south airfield with a centerline have more incursions and larger sized than the north airfield?

The NASA Remedy Report says that the runway was operational now are safe and the operation restrictions would be statistically insignificant. So why would LAXA want to risk 50 billion for little benefit? LAX has been told by experts that repairing & tarping would improve operations as much as 20% and still be under 1 billion in expenses why is there no chart showing those improvements?

If the BTC is not being built replacement parking is an unnecessary expense, who pays to rebuild parking? Where is the SPAS document written by Cindy Missakiki? Please repeat



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this document.

To what extent would Lincoln Blvd need to be moved, changed, and/or closed? What else would need to change? Who would do the work on Lincoln Blvd? Would the sewer be moved while the street was closed? Would Sepulveda Blvd have to be closed while the sewer is being moved?

You mention covering part of the Arroyo flood channel, how much of the channel are you covering? If it floods who is responsible for damages?

By extending 1300 eastward GR/BL how would this balance large aircraft to the South airfield? Heavy aircraft are usually loaded with cargo and the cargo is loaded on the south would it increase take time and be an air pollution problem?

#### RSA'S 2-7

Any runway movement north will destroy the Westchester business district. How does LAX plan on compensating the business community? How does the airport plan on compensating the community for the jobs and the ability to have another business community? Will LAX give away land and new buildings to those businesses that will be displaced? Will they pay for moving

Separation of Taxiway and runway, SPAS-PC00130  
Why doesn't LAX extend the Taxiway

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into park 1 so that the Taxiway as it could handle the NLA's? Your document states an intent to fix the Taxiway in all alternatives and therefore there is no need to move the runway. Why does LAX insist on both?

#### Terminal improvements 2-7

Moving Terminal 3 would result in LAX dealing with the black mold issue. How does LAX plan on dealing with the mold? Wouldn't moving T3 cause building over the passenger underpass between T-BIT and T3? What improvements would be made to ensure the safety of pedestrians?

Where does LAX plan on eliminating gates so that Terminal 0 and the Midfield Terminal don't exceed the Gate limit?

We were told during Spas meetings that underground access to a mid field terminal would not be possible because of underground issues or above ground because of the inability to predict the size of future planes. How does LAX plan on assessing the mid field? Are they going to do buses? If so why not just keep the remote gates? How much would a mid field terminal cost?

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What changes to on airport roads are you planning? What specific transportation facilities are you planning? What changes to parking locations?

How much money does the airport have put aside for the COBRAC? Where is the money account? Who is in charge of it? Why are they waiting to build it?

#### Overview 2-8

Alternatives 14 are "fully integrated" according to LAX plan, what does that mean? Does it mean we could build Alt 3 with Alt 4 and Alt 7? Does that mean that all the studies done so far aren't completely accurate? Why would you build more than one alternative? What about "non-Spas" projects? Doesn't building more than one project impact the environment impacts? How does it change air quality, road waste, and traffic? Will you build an APM and a bus way?

#### Alternative 1 2.3.1.1

What do you mean by fully integrated? All alternatives have airfield terminal and ground access components. Are you adding more than one alternative at a time? There is no order in which improvements are listed why?

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How long are you expecting the north airfield to be closed while these components are being built? Why aren't those disruptions included in the LAX costing?

We've been told in many meetings that no land acquisition will be necessary in order to build this alternative explain how this is possible? Why this plan hasn't included a consolidated car rental?

How potential gates on the north side of TBIT won't interfere with the gates on the western side of Terminal 3?

Who will be responsible for the relocation of Lincoln Blvd? What plans has the airport made for the relocation under Lincoln Blvd? Why weren't those cost included in the project?

What portion of Lincoln Blvd would be below ground? Why hasn't there been any mention of sewers in that area?

What improvements to Taxiway D are being proposed? Why is that an improvement? How much will that cost? What improvements to Taxiway E are being proposed? Why is that an improvement? How much will that cost? What is the difference between a Taxiway and a Taxiway? Where is the current service road? Why do you want to relocate it? Why are you calling the proposed new terminal Zero? It sounds as if you

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are anticipating failure.  
What modifications of Sky Way  
are you proposing? Why have you  
connected Alt 2 & 3 with this proposal?  
If Manchester Square is future parking  
where are you planning on the CONRAC?  
Why would bus/shuttles require an ITP?  
Why not have stops at CONRAC, Chanshaw  
Stations, lot 3, and each of the terminals?

### 2.3.11. Airfield

This airfield design could put  
airplanes closer together by having  
a plane on the centerline taxiway.  
Why do you consider this safer than  
the current set up?

### Runway Modifications

What order would these modifications  
be done? How long would the north  
airfield be closed for the Manchester  
tunnel. How long for the removal of  
the 100 year old hot oil pipe? How long  
will it take to remove the fuel station?  
Where will you park VIP (ie the president)  
planes with the new set up?

What is the difference between this  
alternative and the 300 alternative  
in the notice of preparation? by widening  
the runway to 200 feet you're moving  
30' north. Or are you clipping off the  
extra 50' from the centerline taxiway?  
Will this impact the covered well?

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What is the force of water in the  
Manchester tunnel?

### Runway 02/24L

Your people keep saying that  
this alternative wouldn't require  
land purchase, however by extending  
eastward haven't you placed  
some of the hotels into the BPZ?  
If so which ones? Do you own any  
of these adjacent hotels already?  
What does RSTA stand for? Explain  
what the difference is between  
runway length and displaced  
threshold? What is grade compliance?  
Do you have topographical maps showing  
grades on the airport? Which way would  
excess flood water go?

### Taxiway Modifications 29

#### Centerfield

These numbers are different than  
the ones in the previous explanation  
which numbers are correct?

According to these numbers you  
would be moving north 292' not 260'  
and that doesn't include the extra 50'  
width of the new runway. Explain why?  
What do these inconsistent plans do  
to the studies for water, traffic, pollution,  
etc? Does it completely nullify everything?  
How does this change house construction?  
What does this do to the realignment of  
Lincoln Blvd? Does it increase the

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Amount of Sewer Replacement? If so how  
much?

### Taxiway E

Where is Taxiway E? How does extending  
this taxiway allow for planes to leave  
the terminals with greater speed? By  
holding more aircraft, aren't you  
increasing the amount of pollution?  
More idling time?

### Covering of the Argo Flood Channel 2-10

What kind of covering are you  
planning on using to cover the flood channel?  
By converting the unlined flood channel  
to a concrete box culvert where will  
you be directing the flood water? What  
is the topographical layout of the north  
airfield? If water over runs the flood  
channel where would the excess go?  
Would it flood towards the other runway?  
Would it flood towards the business center?  
Would it flood the dunes? How is this  
process insured?

### Relocated Lincoln Blvd 2-10

Exactly how far north would Lincoln  
Blvd be relocated? How far west would  
this run? What utilities, drainage pipes,  
electrical wires, and sewers are located  
currently beneath Lincoln Blvd? Where  
will they be relocated? How does HNTB  
planning on dealing with the cap?

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What agency will be responsible for  
the tunneling? What agency will be moving  
the sewer? How much trouble would moving  
of the sewer take? How long will Sepulveda  
and Lincoln be closed? Does object free  
refer to the perimeter fence? If it  
doesn't how will LAWB secure the flight  
field?

### Taxi lane E and Taxi lane D 2-10

By improving to full Taxi lane size  
how much more operational efficiency  
are you expecting? How long will the  
runway 24L be out of commission  
during the building of the new taxi lanes?  
Will both 24L & 24R both need to  
be closed? Are you looking at building  
the centerline at the same time?

Please explain ADQ V standards  
and illustrate them.

What does APLL stand for? Why does  
the APLL need to move?

### 2.3.1.1.2 Terminal Facilities 2-10

Please rename terminal O with the  
name terminal 1 annex or something

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updating the remaining part of Terminal 1?  
 Is so what other modernizations of Terminal 1  
 planned? Who pays for that?

Terminal 3 has a bad case of black  
 mold. In demolishing of Terminal 3  
 how is LAWA planning on dealing with  
 this issue? What can we expect for containment?

How is LAWA handling the issue of  
 Terminal 3 being one of the major  
 supports of the upper roadway? Will  
 LAWA first do a complete rebuild of  
 the upper roadway to make it a stand  
 alone roadway? Or LAWA planning on  
 leaving the roadway as a canalized  
 bridge? If so please explain why?  
 Who will be paying for the tear down  
 of terminal 3? What is the plan to  
 accommodate the airlines currently using  
 those gates? Will the demolition of  
 terminal 3 affect the new taxilane?  
 Would the demolition be done  
 at the same time as the Tom Bradley  
 North pavilion?

What are the exact FAA standards  
 LAWA is trying to meet? How is LAWA dealing  
 with the standards currently? Will the  
 new area of the gates and/or taxilane  
 be blind to the tower?

What does MSC stand for? What  
 are the FAA, ADA & V standards? How is  
 LAWA dealing with those standards currently?  
 What commuter facility is currently in  
 use east of Depueville Blvd?

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Why isn't the commuter facility  
 currently being maintained? What is  
 its use? Who uses it?

When the West remote gates are removed  
 where will LAX park vip planes?  
 Where will LAX park the air force 1?  
 How will it be possible to maintain  
 remote gates during construction of the  
 new north airfield? Won't they be on the  
 way?

2.3.1.1.3 Ground Access Facilities 2-13  
 1. What CTA roadways would be improved  
 in order to maintain private vehicle  
 access to the CTA?

Exactly where is LAWA planning  
 on relocating Sky Way roadways?  
 How much more curbspace will exist  
 in front of Terminal zero?

Exactly where is the new commercial  
 building being relocated to? What is  
 currently in that location?

What are the current FAA RSA and  
 RPZ standards? How is LAWA currently  
 dealing with them?

Please include a detailed map on  
 the new ITF. Explain what is currently  
 located in this area. How does LAWA  
 expect this area to function? Why was  
 this moved from Continental City between  
 2 freeways and 2 trainlines to the  
 new location?

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What roads would be involved?

Why is LAWA putting more parking  
 in Manchester square? Don't buildings  
 a consolidated Rent a car facility  
 require most of the space?

How many people are currently  
 being serviced by the shuttle bus  
 at the green line? Will LAWA pay  
 transfer fees from green line to Orange  
 line? Why another bus? Why not have  
 the train come all the way into the  
 airport and ship bus way for a pm?

Exactly where will the new  
 metro station be built?

### Parking 2-13

Explain how the existing structures  
 in the CTA won't change? How is  
 LAWA dealing with the water damage?  
 Will LAWA be reconstructing the damaged  
 passenger bridges?

What is meant by future parking  
 structures? How are you planning on  
 which places would be long term or  
 short term parking? Why isn't LAWA removing  
 the employee parking in the CTA? Shouldn't  
 parking be in the ITF?

What does LAWA mean by mixed-flow buses?  
 How does that differ from mixed-flow traffic?  
 What are the future plans for parking  
 lot E? Are traffic studies being done  
 so accurate counts of car trips are included?  
 Where is parking lot D? Where is the ferry lot?

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Why aren't they included in the alternative  
 map? How many trips will 3,944 parking  
 spots require in? Since the location is unknown  
 what is LAWA planning on doing to help  
 clear the air pollution associated with  
 the parking? We recommend that the lot  
 be revegetated with among helpful trees and  
 at a minimum of 7,500 car trips we think  
 at least 1,000 new trees.

An extra 4,900 short term parking  
 spaces and a drop off area would increase  
 car trips by how much? Again to help  
 pollution standards that another 1,000  
 among helpful full canopy trees be added.

So LAWA is adding 10,000 parking  
 spaces most of which will be impacting  
 Westchester. So what plans does LAWA  
 have to mitigate local traffic? What plans  
 does LAWA have to mitigate air quality?  
 Why are LAWA shuttles being discontinued?

How many parking spaces in park one  
 are being eliminated? What parking  
 currently exists north of 11th Street?

Where do you plan to put the console?  
 It isn't shown in the alternative 1 plan.

### 2.3.1.2 Alternative 2 2-14

What is meant by fully integrated?  
 How much cheaper should Alternative 2  
 be to institute? How much money would  
 it cost to rebuild the Argo flood channel?  
 How much would it cost to red-spray  
 the Manchester Tunnel? Don't miss the...

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it cost to relocate Lincoln Blvd? How much will it cost to move the 3 sewers? How much will it cost to move the hot oil pipes?

### 2.3.1.2.1 Airfield Facilities 2-14

What are the current FAA standards for ADG-V with a category II/III airfield runway? What are the current FAA standards for ADG-V with a category I runway? What are the restrictions in place today to hold larger ADG-V and ADG-VI aircraft?

### Runway Modifications 2-17

How much better will the north airfield operate by percentage with the improvements to the taxiways?

### 2.3.1.3 Alternative 3

Your first sentence (in paragraph) says alt B is actually alt D and concurrently no action plan, please explain how this can be?

Please explain the \$7,000 previous EIR for alt D and how much completion of this project will cost?

### 2.3.1.4 Alternative 4 2-22

Please explain what is meant by the first paragraph?

What does NBC stand for? What is a related new passenger processor and connector? What terminal improvements

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are being considered? Does this Alternative deal with the black mold currently in terminal 3?

As a Spas member we were told that the Connae would need to be built underground in order to meet FAA Safety Standards. Is this still true? Does host C in its current condition meet current FAA Safety Standards?

What portion of the Argo drainage channel would be covered? What are the RST improvements? Why isn't the Argo flood channel included in the illustration? Runway modifications 2-23

If there is no change to runway, why is it necessary to change the Argo flood channel?

### Alternative 5 2-26

#### Overview

How much of Lincoln Blvd would need to be underground? Who would pay for this? Would it be like the Sepulveda Tunnel and flood every time it rains? How would covering the Argo flood channel interfere? What is the plan for moving the fuel station? What is the plan to relocate the 100 year old hot oil line from the Baldwin Hills oil field? Where are you planning on moving the sewers to? How much money would this alternative cost? Does the cost include redevelopment of the Manchester Tunnel? Has L.A. AHA determined the source of water flowing into the tunnel?

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Does this Alternative include a new tower that can see all of the airfield and taxiways? Where is L.A. AHA planning on locating the new tower?

### 2.3.1.6

Some comments on the covering and converting of the Argo flood channel. What other things on the northern airfield would need to be removed? Where would those things be moved to?

This Alternative also requires changes to the Manchester Tunnel why aren't those changes included?

How many sewers would L.A. AHA need to move to implement this plan?

Why isn't the widening of the runway included in the amount of just the outer edge of the runway is moving?

Why aren't ground access things included with Alternatives? Is the plan just to leave them off? How can fuel impacts be determined in pieces?

### 2.3.1.7 Alternative 7 2-34

How do these taxiway improvements compare to Alternative 1? How much cheaper would this alternative be than Alternative 1? How much cheaper would this alternative be than Alternative 4?

This alternative is showing improvements in all terminals on the northern airfield except terminal 2, is that correct?

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The illustration figure 2-7 shows a centerline taxiway, this change will require complete rebuilding of the Manchester Tunnel. How long would the north airfield need to be closed in order to do this?

### 2.3.1.7.2 Terminal Facilities

What commuter facilities currently exists east of Sepulveda Blvd.

### Alternative 8 2.3.1.8

What are the differences between the ground access improvements in alt B compared with alternatives 1-4? Why have alt 5, alt 6, and alt 7 incompatible with alt 8?

In your illustration Fig 2-8 you show a Consolidated Car Rental. Unfortunately your illustration shows no access to the public or exit by public. Why? There doesn't seem to be any new roads to access the freeway for Century Blvd, why?

The same observations with the parking currently located in the Hertz lot. How are the cars to access or exit and have street studies been done? If so where are they?

Why is L.A. AHA removing parking from downtown City? What are L.A. AHA's plans for this area?

### 2.3.1.9 Alternative 9 2-41

This document shows no illustration of the type of APM being considered.

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The APM in Alt D EIR wasn't technically available yet in the APM in this DEIR. Technically available? How does this APM differ from the APM in Alt D?

The best part of using an APM over an elevated Bypass would be that it wouldn't be subject traffic vagaries in the CTA. How would an elevated Bypass overcome the traffic in the CTA?

Your overview should be rewritten! The second to the last sentence could use some verbs. Why are only Alt 1 and Alt 2 comparable? All of the alternatives have flight field improvements, ~~what~~ why does HAWA consider that Alt 3, 4, 5, 6, and 7 don't contain flight field improvements?

Where are your arguments over the elimination parking lot E? What are HAWA's future plans for this area and continental City site?

I haven't seen in any of your illustrations a cell phone lot. Why? Who decided to remove the cell phone lot? Is the extra trips associated with no cell phone lot included in your traffic studies? If so where? How many extra trips have you determined no cell phone lot to cause?

Table 2-2 2-45

The distances referred to seem to be added incorrectly. Why? The width of the new centerline in Alt 1, plus the distances between the runways and the new width of

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The runway indicate Alt 1 is actually 340' north, Alt 5 would be 400' north, Alt 3 400' south. Why aren't HAWA's numbers correct? This is a huge concern that a different group do the lay out so that there isn't any confusion as to where things are supposed to be?

2.3.1.10 Existing Facilities 2-49

Table 2-3 Navigational Aids Talks about moving radar north of Westchester Parkway. Is this project in the northside EIR? How does HAWA propose to protect the radar from vandalism?

North Mantance Road Why aren't the specific lengths included? What operational restrictions would exist on the eastern end? Why isn't this information included?

Argo drainage channel This channel isn't properly denoted. The name is Argo flood channel. How will water reach the flood channel if it is covered? Where does HAWA expect the water to go? Why doesn't HAWA cover the 50 year storm and the 100 year storm? How does HAWA intend to pay for covering the flood channel result in flooding? How long can HAWA run without the north airfield? Is HAWA planning on sending the water through Lincoln Blvd and Spaulveda interchange?

North Orfield Manchester Tunnel The tunnel will need attention in any alternative containing a centerline <sup>Table 2-3 p. 45</sup> ~~terrace~~ <sup>SPAS-PC00130</sup> is 740' not 720'. What would the tunnel

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be filled with? Have you found the source of water in the tunnel? Will you be using the well dug to keep the tunnel dry during its construction? I don't see any reference to the air shafts dug for tunnel use, how does HAWA plan on dealing with them?

Airport Operations Area The table doesn't say where this area is, where is it located? What is it currently guarding?

Lincoln Blvd How long would it take to tunnel Lincoln Blvd 540'? How long would it take to tunnel Lincoln Blvd 765'? How long will it take to tunnel Lincoln Blvd 252'? Who would be responsible for the Blvd? Who would be moving the utilities beneath Lincoln? What does HAWA plan to do about sewers in the area? What about the hot oil pipe?

Who will pay for these jobs?

96<sup>th</sup> Street 2-50 Removal of this roadway should be done! It is in danger of pulling the upper roadway in the CTA down and it causes gates in terminal 1.

Taxi Holding lot We agree taxis should not be that close to the flight field.

Urgent Care This facility is the only medical care available to the traveling public in an emergency! If this facility is to be removed a newer version should be built before the old ones removal. Who owns this building? Is HAWA operating

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this building?

HAWA Police Where is the new facility being planned? How big would the new facility be? Did you include an area for animals? One you including a kennel area?

Garage One Does the no relocation of parking not include the 16,000 new parking spots? How many parking spots are currently in park one?

West remote gates If these gates are to be removed where is HAWA planning on parking VIP aircraft? (in the president) Will celebrities have a special gate facility? What is the 19X gate build out plan? It is not described in the DEIR.

HAWA Construction & Maintenance Since construction and storage is to be shipped to continental City, will HAWA be putting in sound walls well landscaping in front of them to maintain the area? Will the toxic dirt removed from the airfield and placed next to the business center be moved there as well?

Fedex 2-51

How would the facilities be reconfigured? How could they be consolidated? What does AOA mean?

On Orfield Fuel Truck how would the fueling station be reconfigured?

Southwest Airlines 2-51

Where would you move the facilities?

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Airfield Bus Parking Area 2-51

Where on the HOA would you relocate the Bus parking area?

LAX Fuel Why only on Alternatives 3, 5, and 7 would the facilities be consolidated on the existing site? What will occur with the other alternatives?

US Airways Maintenance Where would this facility be moved? How much square footage would the new building be?

Auto Car Rental I thought Alternatives 8 & 9 were to be used in conjunction with another alternative. Could these alternatives be used as a stand alone measure?

What property on 11th St does LAXA own?

What other properties does LAXA own?

Travelodge & Ramada Restaurant 2-52

What does LAXA plan to put in the Travelodge/Ramada location? Will LAXA give them other land that they own and pay to build a new facility? How many jobs would be effected?

Navigation Aids What are you referring to as navigation aids? Is it just radar? Are you including runway status lights? What does ASR refer to?

Road Maintenance Road Widenment Movement 500' north place the maintenance road on top of the Cargo flood Channel? Is the plan to put the maintenance road in the flood Channel?

Cargo Drainage Channel This is improperly named it is called the Cargo flood Channel.

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If the channel is to be converted what plans has LAXA made to clean the water before returning it to the Santa Monica Bay? What kind of surface are you looking at to cover the channel? Where else do you know of has a covered flood channel with a permeable surface that can support an aircraft? Have they had an difficulty with flooding, collapse, or contamination? If this situation does not exist anywhere else where is the technology coming from and does it come with a guarantee?

Manchester Tunnel The tunnel is 740' long and 720'. The tunnel has never been open to public use but has been open in the past. Have you found the source of water in the tunnel? What do you plan to do about the air vents? Any use of a centerline taxiway would contribute to collapse of the tunnel because it is only reinforced at the current north taxiway.

Figure 2-10

It is located incorrectly please get a surveyor to find the actual location and length. Where are the current access vents?

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76th Street Bridge/Highway under all the alternatives (except 3) this bridge should be removed and reconfigured. This bridge blocks the interior gates to terminal one and is straining the connection to the upper roadway increasing the chance of collapse of the upper roadway at the canalover junction of terminal one.

Commercial Holding lots Has LAXA looked at putting the taxi holding lot in the parking lot within the central terminal? It would allow cars and vans to pull to whatever side of the horseshoe (CTA roadway) to get to waiting passengers more quickly. What other commercial holding lots does LAXA have? Where are they located?

Urgent (Medical) Care Facility Please have this facility relocated within the northside development. This facility is of major concern to the traveling public. It should be as close as possible to the airport yet not in the airport. Have you checked with Maxine Waters office about removing this facility? The negoential its presence when Daniel Freeman Hospital was being sold. If there is an accident anywhere on airport grounds because of distance and traffic people could die.

LAX Police Station/Facilities What is the LAX public safety building? What are the supporting facilities? Are you including animal space? Will you have a walking area for the dogs?

Park One Parking and Billboards Always happy to hear of the removal of billboards

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West Remote Aircraft Gates 2-55 What does MSC stand for?

LAXA Construction and Maintenance We recommend that these areas be consolidated and put in continental city.

Fed Ex Maintenance Where else could these facilities be located? Employee parking could be consolidated with a parking structure.

On-Airfield Fuel Truck Filling Station Having this fueling station so close would seem somewhat dangerous where else could it be relocated?

Southwest Airlines GSE Facility Exactly where are you considering relocating this facility?

Airfield Bus Parking Area - We recommend that these 44 parking spaces be relocated near the employees on World Way West. The building exists, there are bathrooms and food nearby. Buses could be used to shift employee parking to lot C or Continental city.

LAX Fuel Farm Same comments as Fuel Truck

US Airways Maintenance Building This building could be retained if LAXA would shorten the length of the runways.

Auto Rental Car - Anything to finally get a Conraser Burger King - How much does buying this business cost? Does LAXA currently own this property?

What other property does LAXA currently own? Travelodge Hotel 2-57 What airport facilities would replace the business? Would LAXA allow these businesses to open

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on other property owned by LAWA.P  
2.3.11 Acquisition 2-57

We have been told over and over again in public meetings that no acquisitions would be necessary. Who is responsible for saying this? What is LAWA's plan to accommodate the 493 employees who will have lost their jobs

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#### Comments and Questions concerning Lincoln Boulevard Re-Aligment in Alternatives 1, 5, and 6.

In addition to these questions, there are further detail and more questions in the attached Letter from Bureau of Sanitation and the ARSAC White Paper: PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS RE: THE LINCOLN BLVD. TUNNEL PROJECT

1. Based upon the attached Bureau of Sanitation letter dated September 14, 2012, will LAWA be impacting any sewer lines? Which sewer lines will be impacted? How will LAWA mitigate these sewer lines? Considering that the three outfall lines running under LAX to the Hyperion Treatment Plant provide almost all of the sewage treatment capacity for the City of Los Angeles and some adjoining cities, is the risk of realigning Lincoln Blvd by LAWA too great as to prevent Angelenos from flushing their toilets?
2. Is the proposed Lincoln Blvd realignment in Alternatives 1, 5 and 6 a Program Level EIR or a Project Level EIR? Please see the White Paper for a detailed analysis. Please explain your answer with relevant citations from CEQA.
3. Which agencies has LAWA consulted with regarding the proposed Lincoln Blvd realignment?
  - a. Was CalTrans consulted? What was their response? Who at CalTrans was contacted and who from CalTrans replied?
  - b. Was the Los Angeles Department of Water & Power consulted? Who was contacted and who from LADWP replied?
  - c. Was the Bureau of Sanitation contacted? Who was contacted and who from LADWP replied?
  - d. Were oil pipeline operators contacted? Who was contacted and who from the oil pipelines replied?
  - e. Were fiber operators contacted? Who was contacted and who from the oil fiber operators replied?
  - f. Were other underground utilities or right of way users contacted? Who was contacted and who from the oil fiber operators replied?
4. Does LAWA face any challenges with regards to outfall sewers or abandoned sewer lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
5. Does LAWA face any challenges with regards to water lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
6. Does LAWA face any challenges with regards to storm drains in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
7. Does LAWA face any challenges with regards to electrical lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
8. Does LAWA face any challenges with regards to fiber lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?

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9. Does LAWA face any challenges with regards to other subsurface users of the road or right-of-way in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
10. Is the proposed Lincoln Blvd realignment considered to be a minor street modification, an improvement or something else? Please explain your answer.
11. In the Light and Glare section, why does LAWA discount the significance of possible light and glare problems by proposing to move Lincoln Blvd 350 feet closer to homes, schools, churches and businesses.
12. In the Air Quality Section 4.2 (beginning page 4-88), why is the proposed Lincoln Blvd realignment not listed as a construction area?
13. In the Cultural Resources Section 4.5 (beginning page 4-337), the memorial marker for LAWA Police Officer Tommy Scott on Lincoln Blvd is not listed. On April 29, 2005, Officer Scott was the first LAWA officer killed in the line of duty. Since LAWA has not listed the memorial marker on the maps, it is not clear if the proposed Lincoln Blvd realignment would affect access to this location. What mitigation measures does LAWA propose to preserve access to the Tommy Scott memorial marker?
14. In the Green House Gases Section 4.6, why did not LAWA study old petroleum lines? Why did not LAWA study old sewer lines that in some cases date back to the 1920's?
15. In the Hydrology Section 4.8, the intersection of Lincoln and Sepulveda was not studied as a hazard? Why in Section 2.3.1.1, Acquisition, did not LAWA list Lincoln and Sepulveda as a potential acquisition?
16. On page 4-988, why is there no impact measured for transit vibration? Lincoln Boulevard is a major highway and carries significant transit, public and private.
17. In the Utilities Section 4.13, why are the utilities underneath Lincoln and Sepulveda discussed and examined?
18. Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation. This series of questions relates to the proposed tunneling of Lincoln Blvd.
  - a. Will the tunnel height restrict certain vehicles from entering?
  - b. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
  - c. Will there be hazardous materials restrictions for the tunnel?
  - d. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
  - e. Will there be emergency evacuation areas or exits? How many and where? Will there be call boxes?
  - f. Which agency or agencies will respond to accidents and emergencies in the tunnel?
  - g. Will there be traffic controls such as stoplights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
  - h. Will LAWA consult with LAWA Police Department, LAPD, LAFD, CHP, the FAA, TSA and other relevant agencies for preventing the tunnel from becoming a terrorist target?

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- i. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

ARSAC WHITE PAPER-  
PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS  
RE: THE LINCOLN BLVD. TUNNEL PROJECT

#### INTRODUCTION AND SUMMARY

The SPAS Report and DEIR recently released by LAWA purports to be a Program Level EIR, not a Project Level EIR, despite the fact that numerous specific projects are identified including an automated people mover, consolidated rental car facility, movement of taxiways and runways on the airfield and modernization of terminals.

This white paper is written to examine one of the projects specifically identified in the documents in the context of the Program versus Project Level EIR debate.

The specific project considered herein is the realignment of Lincoln Boulevard to accommodate the move northward of the outboard runway of LAX. This project will in effect swing Lincoln Boulevard, California State Route 1, on a wider arc around the airfield, bringing it much closer to homes, businesses, churches, schools and other sensitive uses in the Westchester community. It will also require that Lincoln be depressed below grade into a tunnel of a length that will depend on the extent of the runway move. A cost estimate in the SPAS Report puts the cost of this project in excess of \$1 billion with many elements admittedly not included. A cost figure three or four times larger would be more realistic.

This white paper does not undertake to study all aspects of the runway move. A similar white paper could be written about the implications of converting the Argo Trench to a box culvert or the elimination of the old tunnel that still exists under the north airfield.

Three of the alternatives proposed by LAWA would involve extending the perimeter fence of LAX hundreds of feet into the community and realigning and tunneling Lincoln Boulevard, California State Route 1. All would involve realigning and tunneling Lincoln Blvd.

Alternative 1 relocates runway 6L/24R, the outboard runway of the north airfield, 260 feet to the north; Alternative 5 relocates this runway 350 feet to the north; and Alternative 6 relocates this runway 100 feet to the north. Each of these alternatives requires that 6080 feet of Lincoln Blvd. be realigned and each would require that it be depressed into a tunnel. In the case Alternative 1, the tunnel would be 252 linear feet; Alternative 5 would require a 765-foot tunnel; and Alternative 6 would require a 540-foot tunnel.

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In contrast to Alternatives 1, 5 and 6, Alternative 2 would not require moving the LAX perimeter fence or realigning and tunneling Lincoln Blvd.

The subject of Program Level versus Project Level EIR's is dealt with the California's CEQA Guidelines. Under the regulations stated therein, a Program Level EIR may be used to adopt a general plan for the conceptual planning of a district or area. It is designed to provide some level of analysis of "future and unspecified development" (CEQA Guideline 15146(b)).

In summary, this white paper demonstrates that the realignment and tunneling of Lincoln Blvd. is a specific, tangible, identified project, not a "future and unspecified" project. A high level of technical analysis has been performed on the project, far more than the "conceptual planning" sanctioned by the Guidelines for a Program Level EIR.

The DEIR and SPAS Report analyze the Lincoln Blvd. project in significant detail including its alignment, length of tunneling and sloping, and cost. Doing so reveals that a "project", not a "program" is being proposed. Having opened the door of technical analysis, LAWA is obligated to perform the analysis completely and accurately. LAWA cannot escape the effects of faulty, incomplete, misleading and inaccurate analysis by claiming only a "program level" analysis is required.

The opinion expressed herein is that LAWA cannot have its cake and eat it too. It cannot disclose innocuous or general details and conceal specific details that reveal serious flaws. It cannot calculate and state the costs of a project without including all of the costs. And it cannot identify some of the impacts of the project without revealing all of the impacts.

One does not need to be a civil engineer to discern that if LAWA is able to calculate the exact length of the tunnel required for the realigned Lincoln Blvd., then it must know Lincoln's proposed path including how much closer it will be to residences, businesses, schools, churches and other sensitive uses. It must also know how deep below surface level the tunnel must be placed including the extensive web of oil and gas pipelines, outfall sewers, water, electrical, fiber optic and other subsurface facilities which will have to be identified, located, and relocated as a result of the project. None of these factors are addressed in the DEIR or SPAS Report.

Having clearly revealed that it has taken the Lincoln Boulevard realignment project past conceptual planning and into preliminary engineering, LAWA must be forced by either community outcry or by court decree to treat the outward expansion of the LAX perimeter fence and the realignment and tunneling of Lincoln Boulevard as a project which can only be entitled by means of a project level EIR.

During the scoping phase of the SPAS process, numerous comments were offered asking that the subsurface structures below Lincoln and Sepulveda boulevards be studied. The failure to do so, or the failure to disclose the result of doing so, constitutes a fatal flaw in the DEIR.

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A word about the real-world context of this program versus project level debate: Gina Marie Lindsey and other advocates for moving the north runway 24 Right to the north are openly and repeatedly refusing to defer the issue of the movement of the runway to a later time when more is known about LAX's passenger levels and the success or failure of the New Large Aircraft which the runway move is designed to accommodate. They are declaring that no other projects at LAX can be planned or implemented until the location of the runway is established. Clearly, this statement reveals that a program level EIR is simply not what LAWA needs at this time. At this time LAWA needs and should produce a Project Level EIR to move the runway. If LAWA has determined that the runway move and the attendant realignment and tunneling of Lincoln Blvd. is the linchpin for all other LAWA projects, then it should withdraw the Program Level EIR, isolate the runway/Lincoln Blvd. project, study it thoroughly and circulate a project level DEIR which discloses and adequately studies all elements of the project.

#### WHITE PAPER METHODOLOGY

At page 4-3 of the DEIR LAWA quotes CEQA Guideline 15146(b) to the effect that a program level EIR should "provide an effective means of delineating and comparing and contrasting the overall characteristics, performance levels and environmental impacts of each alternative."

With respect to the runway relocation proposed for the LAX north airfield, this means that sufficient information must be given to compare and contrast Alternatives 1, 5 and 6 which would move the runway to Alternative 2 that would not.

This whitepaper will review both the SPAS Report and the DEIR on this issue. It will identify both what LAWA has disclosed and what it has not disclosed about the Lincoln Blvd. realignment and tunnel project.

The SPAS Report will be considered first. The SPAS Report states the study requirements agreed to by LAWA in the settlement agreement and gives background information and data which are as useful as a starting point for the consideration of the legally mandated and court enforced Environmental Impact Report.

The DEIR is organized, as required by the Guidelines, in terms of thirteen categories of environmental impact such as Aesthetics, Air Quality, etc. Within each such category the DEIR gives general background followed by a specific discussion of each of the nine alternatives. Within the discussion of each alternative there is a heading "Northern Boundary" within which the Lincoln Blvd. realignment is discussed. Within the "Northern Boundary" discussion is a section dealing with impact during operation and impact during construction. Hence each of the thirteen areas of environmental impact is outlined as follows:

- Environmental impact category
  - General background
  - Specific alternative
    - Northern Boundary issues
      - Operational impacts
      - Construction impacts

The balance of this white paper will review and discuss LAWA's treatment of the Lincoln Blvd. realignment and tunnel project.

#### REVIEW OF THE "PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT"

At pages 1-4 through 1-16 SPAS Report basic descriptions of the nine alternatives are given together with diagrams of each. For Alternatives 1, 5 and 6, the "distinguishing airfield improvement feature" is said to be the northward movement of runway 6L/24R 260 feet, 350 feet and 100 feet respectively.

The narrative description of these three alternatives gives no indication that a necessary element of the runway move is the expansion of the airfield and the realignment and tunneling of Lincoln Blvd. Only in a small note on the diagrams is this revealed. A member of the public trying to understand LAWA's intentions would reasonably believe that the narrative would accurately describe the project and would not omit such a significant component as the complete realignment of Lincoln Boulevard, California State Highway 1.

After an extended review of the history of the LAX Master Plan and the SPAS process, Section 5.5 of the Report begins the discussion of the current, on-the-ground situation as LAX. This section, which begins at page 5-79, is entitled Refinement Of Second Iteration of SPAS Concepts.

At page 5-105 the following passage concerning Lincoln Boulevard appears:

##### Lincoln Boulevard

Similar to the Argo Drainage Channel, relocation of Runway 6L/24R to the north would place portions of Lincoln Boulevard within the RSA and/or OFA. Consequently, new alignments of Lincoln Boulevard were developed (including covered and below grade sections) in order to comply with FAA standards. Concepts with greater runway separation would require portions of the alignment to be covered and below grade.

The conceptual alignments are provided in Section 5.6 beginning at page 5-110. Major elements of each of the nine alternatives are placed into one of three categories: "airfield improvements," "terminal improvements" or "ground access improvements." The

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Lincoln Blvd. realignment is placed in the "airfield improvements" category and the issue is framed thus:

The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;

A strong argument can be made that it is highly misleading to characterize tunneling and realigning more than a mile of Lincoln Blvd. thereby taking it hundreds of feet closer to sensitive uses as a "modification."

Section 5.7 of the Report sets forth numerous alternatives that were "rejected" and not carried forward in SPAS. The fact that many of those alternatives had great potential for achieving the purposes of SPAS with less community impact than expanding the LAX fence line and realigning Lincoln is not the subject of this whitepaper, but should be noted.

Section 6, SPAS ALTERNATIVE PROJECTS, constitutes the real substance of the Report.

The three goals of SPAS are recited at page 6-1, one of which is to achieve 78.9 million annual passengers. At page 6-3 passenger counts for the years 2007 through 2011 are given.

Discussion of Alternative 1 begins at page 6-12. At page 6-13 the following appears:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway, and depress the eastern portion of the road segment to be compatible with the object free area requirements for the east end of Runway 6L/24R, which would require approximately 540 linear feet of the road segment to be tunneled.

Discussion of Alternative 5 begins at page 6-51, and the following appears at page 6-52:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 765 linear feet of the eastern portion of the road segment to be tunneled.

The following appears at page 6-52:

With the combination of the runway improvements (including the easterly extension of Runway 6R/24L and improvements to 6L/24R), associated improvements to Lincoln Boulevard and the Argo Drainage Channel, and establishment of displaced thresholds, the Alternative 5 north airfield

configuration would be fully compliant with FAA RSA standards for Runways 6L/24R and 6R/24L, addressing hazards relating to the potential for aircraft to overshoot, undershoot, or experience excursions from the runways.

Just as it is a misrepresentation for LAWA to characterize realigning Lincoln Blvd. for more than a mile and tunneling it for more than 750' as a "modification," so too is characterizing this very large project as a mere "improvement."

A serious question will be whether Caltrans will consider the conversion to a tunnel and the realignment of California State Route 1 by more than a mile to be a minor street "modification" or "improvement." Apparently LAWA considers the permitting of the "Lincoln Boulevard Realignment and Tunnel Project" to be a mere detail to be handled by staff at a later date.

Discussion of Alternative 6 begins at page 6-57, and the following appears at page 6-58:

Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 252 linear feet of the eastern portion of the road segment to be tunneled.

As was the case in its discussion of Alternative 1 and 5, the realignment and tunneling of Lincoln Blvd. is labeled "an improvement."

In stark and simple contrast to the expand-the-airfield, tunnel-and-realign-Lincoln approach of Alternatives 1, 5 and 6, the following is stated about Alternative 2 at page 6-34:

Improvements associated with Runway 6L/24R under this alternative, including connecting taxiways, are different than Alternative 1. Because there would be no northerly relocation of Runway 6L/24R under Alternative 2, it does not require the modifications to the Argo Drainage Channel (other than those required under existing conditions to meet federal RSA requirements) and Lincoln Boulevard described above for Alternative 1.

For purposes of this whitepaper this ends the relevant narrative discussion of the SPAS alternatives (although Report Chapter 8 on dollar costs awaits), and the question can be posed, has LAWA fairly described the alternatives and allowed a member of the public who simply wants to understand this important infrastructure project to compare and contrast the alternatives? Asked in another fashion, does characterizing the realignment of Lincoln Boulevard by hundreds of feet and its depression into a tunnel for as much as 765 linear feet as a "modification" or an "improvement" accurately portray what LAWA intends to do? The question answers itself.

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The financial underpinnings of LAWA's much desired expansion is strategically placed where LAWA obviously wants it, at the very end before which most members of the public will long since have given up. In fact, Chapter 8, Financial Analysis, is exceptionally informative and, not surprisingly, misleading.

Sections 8.1 through 8.3 provide discussion of LAWA's governance structure, accounting and cost center structure, governing bond documents, and key business agreements. Section 8.4 sets forth key assumptions. All make for interesting reading.

However it is Section 8.5, Estimated Alternative Costs, Section 8.6, Approximation of Funding Sources<sup>1</sup>, and their associated Table 8-1 that are of interest herein.

Section 8.5 incorporates an earlier discussion about the dollar cost of other, non-SPAS planned projects at LAX. A total of \$6.5 billion is planned to be spent at LAX on non-SPAS projects. Of this amount \$2.1 billion is currently in construction with \$4.4 billion in the planning phase. Examples of projects in planning are the Midfield Satellite Concourse, renovations to existing terminals and the ongoing soundproofing program.

Now, on to the cost of SPAS and the Lincoln Blvd. Realignment and Tunnel Project:

To review the Report's analysis of the cost of SPAS one must turn his or her laptop a quarter turn clockwise and rest it on its right side because Table 8-1 is in landscape, not portrait, format and LAWA has made precious few hard copies available. For one reviewing the report on a desktop computer, you will need to rest your left ear on your desk and just do the best you can. The fact the font is nearly invisible and the size is in the 2 to 3 range does not help.

Table 8.1 is a summary of costs associated with each of the SPAS alternatives. Directing attention to the table for Alternative 5, one learns the following. The cost of the airfield component of Alternative 5, which is the component that includes expanding the airfield and realigning and tunneling Lincoln is said to be \$808,660,000 in 2010 dollars or \$1,099,792,000 in escalated dollars. Rounded that is \$800 million if the projects had been built two years ago and \$1.1 billion if the projects broke ground this year. Of course it is impossible to predict what it will cost if the work commences in 2025, the earliest year it is predicted LAX will actually reach 78.9 MAP, so we will work with \$1.1 billion.

Table 8.1 states that the total escalated cost of Alternative 5 including terminal and ground access improvements to be \$9,091,629,000 and the total identified funds available to be \$3,601,629. The wisdom of undertaking a program that is underfunded by two-thirds is beyond the scope of this whitepaper, but is alarming.

In clear contrast to the cost estimates for Alternative 5, airfield improvements for Alternative 2 are estimated to be \$205,200,000 in 2010 dollars and \$279,760,000 in escalated dollars. Thus, the cost of Alternative 2 is approximately three percent (3%) of Alternative 5.

What follows in Chapter 8 is a number of charts and graphs that provide visual representations of the costs of various alternatives with and without various other alternatives concluded. Each is based on the specific dollar figures previously stated.

Where did these specific dollar figures come from? The answer to that question is buried even deeper in the Report in Appendix G, Preliminary Rough Order of Magnitude Cost Estimates. (On your way to Appendix G be sure and stop off at Appendix F that shows that LAWA achieves NO significant operational efficiencies by any of its proposed airfield modifications.)

Table AF-1 of Appendix G purports to summarize cost of the airfield improvements of the various alternatives. The cost of realigning and tunneling Lincoln is explicitly not included but the cost of removing the abandoned tunnel under the north runway and the cost of converting the unlined Argo Trench to a concrete box culvert are included. The cost of airfield improvements for Alternative 5 is placed at \$716,700,000. The cost of airfield improvements for Alternative 2 is stated to be \$205,200,000.

Parenthetically it can be noted that in addition to the cost of realigning and tunneling Lincoln, the following costs are identified in a footnote as not included in these estimates: site clearing, roadway work and facility demolition in support of Taxiway D and E work; security fence and guard post costs; right-of-way and land acquisition costs; costs of the Community Benefit Agreement or costs for the Mitigation Monitoring Plan; project phasing costs; tenant relocation costs; off-airport property acquisition and relocation costs; or mitigation costs of for the Lincoln (Park West) Apartments or 8939 S. Sepulveda office building. Cost of these items is left to the public's imagination.

Following summary Table AF-1 is seven pages of tightly constructed and very detailed estimates of the cost of moving runway 6L/24R. Examples of the level of detail achieved in the underlying cost estimate are "Removal of runway concrete pavement 19" thick", "Removal of shoulder asphalt 4" thick" and "Removal of Econocrete 12" thick."

Following the detailed seven page estimates to move the runway is our target prize: The estimated costs to realign and tunnel Lincoln Blvd.

Table AF-3 summarizes the cost to realign and tunnel Lincoln Blvd. as follows:

- Alternative 1 - \$61,210,000
- Alternative 5 - \$89,960,000
- Alternative 6 - \$45,290,000

The cost to realign and tunnel Lincoln Blvd. for Alternative 2 is zero of course.

Following summary Table AF-3 are five pages of detailed estimates for the specific cost items of realigning Lincoln Blvd. including such items as "water for compaction" (\$15,000), "base course 8" thick" (\$208,000), and "subbase course 12" thick" (\$216,000).

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At this point the question posed at the very top of this whitepaper can be restated: Can it be fairly said that LAWA is only engaged in "conceptual planning" when it has obtained an estimate for 8" thick course base at \$208,000 and for 12" thick subbase at \$216,000. It is a remarkable "program level" EIR which includes an estimate for the precise amount of subbase required.

Table AF-4 is similarly illuminating of the level or project work completed by LAWA to date. This table states quite precisely the exact number of feet that will be flat, sloped, depressed and in a tunnel for all of the potential runway moves. For example, Table AF-4 indicates that if runway 6L/24R is moved 300 feet, then 6080 feet (more than a mile) of Lincoln Blvd. will be rerouted of which 350' will be in a tunnel, 600' will be "sloped" and 280' will be depressed and 4,850' will be flat. (It might be noted that the tunnel lengths listed in Exhibit G, Table AF-4 seems to be far off from the tunnel lengths listed in the body of the Report).

Is LAWA simply engaged in "conceptual planning?" Hardly.

Exhibit G in total is 56 pages of tightly constructed estimates for very specific projects pertaining to airfield modifications, terminal improvements, and ground access improvements including the Automated People Mover (APM) and the Consolidated Rental Car Facility (CONRAC).

"Conceptual planning" for a master plan involves favoring bike paths and housing near transit stations. It does not include a calculation the cost of concrete subbase 12" thick.

#### CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Simply stated, LAWA has placed itself uncomfortably on the horns of a dilemma. Otherwise stated, it has hoisted itself on its own petard.

It has claimed that what it seeks is a "Program Level" EIR such as would occur in a community's broad general or zoning plan at the "conceptual planning" stage. And yet it is quite clear that it has gone far, far past "conceptual planning" and is deeply into preliminary engineering on a specific, project-by-project basis.

In recent conversations with Westchester and Playa del Rey community members, LAWA Executive Director Gina Marie Lindsey has been asked whether she would be willing to move forward with the terminal modernization projects and the ground access projects before LAWA proceeds with the airfield projects. Considering the limited

acceptance and safety problems faced by the New Large Aircraft (NLA), the sluggish world economy and the "restrained" at best growth in traffic at LAX, such a question is justified.

Ms. Lindsey's response has been clear, unambiguous and simple: No, we can't move forward without knowing what is going to happen with the north airfield.

The community's response to Ms. Lindsey should be equally clear, unambiguous and simple. We believe it is the same answer she will receive in Court: If you want a specific project such as moving the runway and realigning and tunneling Lincoln Boulevard, then do a Project Level EIR. If the world of LAX revolves around one project, that being moving the runway, then all other projects should be put aside and the runway project should be resolved. Don't try to obtain a backdoor approval or confuse the public by throwing in community-serving projects which you have no intention of delivering. Withdraw the "program level" DEIR and prepare a "project level" EIR forthrightly stating that you seek to move the runway and realign and tunnel Lincoln.

Perhaps the expression that should be used in characterizing the Report should not refer to dilemmas or petards. What it is, is "neither fish nor fowl." It is far too detailed and advanced to be considered as a program level EIR and yet it falls far short of what would be necessary to be approved as a project level EIR.

#### POSTSCRIPT TO CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Back to Exhibit G, Table AF-3, the cost breakdown to reroute Lincoln.

The Sepulveda Boulevard right of way is an old and historic one in Los Angeles. It was not always as urbanized as it is now. For many years it was the main route for subsurface pipelines to transport oil from the oilfields in the Baldwin Hills to the refineries in the South Bay including the Chevron refinery in El Segundo and the Mobil refinery in Torrance. It is still in use today for that purpose.

In more recent years one of the City of Los Angeles most important facilities was constructed and recently modernized, that being the Hyperion waste treatment plant in Playa del Rey immediately south and west of LAX. Fed by outfall sewers as much as 20' in diameter, Hyperion treats and disposes of tons of raw and treated sewage daily. The path of the outfall sewers, through Culver City and Westchester intersecting Sepulveda and Lincoln boulevards around LAX.

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The major underground pipelines are all in addition to the innumerable public utility and private entity cables and pipes under the Sepulveda corridor at its intersection with Lincoln.

The spider web of pipes under Sepulveda Boulevard has been well known to the community for many years. Longtime Sepulveda property owner and civic activist Howard Drollinger knew it well and spoke of it often.

LAWA steps onto a very slippery slope when it undertakes to expand its campus and depress Lincoln Blvd. into a tunnel in this area, particularly considering that when it moved the southernmost runway it discovered a runway ON ITS OWN CAMPUS that it had no record of. This runway was a north-south runway that had existed behind the west side of the Tom Bradley International Terminal. Westchester Golf Course was the Runway Protection Zone (RPZ) for this former runway.

Not one word in the SPAS Report concerning the realignment and tunneling of Lincoln indicates that the underground situation around the Lincoln/Sepulveda intersection has been carefully studied. And the estimates to reroute Lincoln set forth in Exhibit G, Table AF-3 give no comfort, it appearing that the estimate contains no allowance for the discovery or relocation of such facilities. Third-party agreements are a major cost item for such projects and yet Table AF-1 specifically indicates that costs for right of way and land acquisition are NOT included in the cost estimates.

The fundamental purpose of the Scoping process is to advise the project sponsor of items which must be carefully studied. If by some stretch of the imagination LAWA didn't know that it needed to study facilities under Lincoln and Sepulveda boulevards, it was certainly advised to do so in many comments and written correspondence during the Scoping process.

During the scoping phase of the CEQA effort numerous individuals and entities, including ARSAC requested that the subsurface conditions and structures in the Lincoln/Sepulveda intersection area should be carefully studied. The SPAS Report fails to show that this has been done. Nevertheless, Appendix G purports to give a cost estimate to realign and tunnel Lincoln Blvd. Having opened the door to a consideration of cost, LAWA cannot omit from consideration an element so important and costly and utility identification and relocation. To fail to study and/or disclose this cost item is to mislead and indeed deceive the public and public policy officials. While the question of whether this misrepresentation is intentional or inadvertent may be open to debate, the FACT that it IS a misrepresentation is not.

LAWA has either not studied a significant environmental issue or it has intentionally withheld the results of the study from the public. In either case, the DEIR should be withdrawn, re-scoped, properly prepared and re-circulated.

#### REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

The preceding sections of this white paper, with a few digressions, dealt with two questions:

First, can the mistakes and omissions in the two documents LAWA is currently circulating be overlooked because it is only a "program level" effort. As demonstrated, LAWA is pursuing a very specific project, namely the movement of the northernmost runway 350' north and the realignment and tunneling of Lincoln Boulevard. For this project precise dimensions and costs have been calculated. A project level EIR should and must be done for this project.

Second, has LAWA met its obligations to study all relevant and significant issues raised in the Scoping sessions for the project? Using as a test case the issue of subsurface structures under Lincoln and Sepulveda boulevards where LAX would be tunneling, this obligation has not been met and LAWA's effort is flawed at least based on a review of the Preliminary LAX SPAS Report. Having failed to consider the cost of identifying and relocating major subsurface facilities and structures, LAWA's cost estimates, already grossly underfunded, become laughably worthless.

The question now presented is simple: Having failed in the Report to show that this significant topic was studied, does the DEIR go further or otherwise indicate that the issue has been considered by LAWA? The answer is no, and as a result the DEIR itself is fatally flawed.

#### WHITE PAPER METHODOLOGY RE DRAFT EIR

If the challenge in this section of the white paper is to determine whether LAWA has studied the subject of subsurface structures and facilities below Sepulveda and Lincoln boulevards, then perhaps the most direct approach would be to do a word search for such terms as "oil and gas," "petroleum pipelines," "outfall sewer," "Hyperion," "fiber optic cable," and "Dig Alert (811 service or Underground Service to locate underground pipelines and cables before digging into the ground)." This was not possible because LAWA did not enable the public to word searches on the online or disk versions of the Draft EIR and SPAS Report.

CEQA requires the EIR sponsor to specifically consider each of thirteen designated topics for each project alternative presented. Chapter 4 of the DEIR is LAWA's effort to meet this requirement. For each of the thirteen areas LAWA gives an Introduction, discussions of Methodology, Existing Conditions, Thresholds of Significance, and Master Plan Commitments and Mitigations followed by a review of each of the nine alternatives. The DEIR further divides each topic into a discussion of construction impacts and operational impacts once the project is completed.

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If LAVA studied and reported on the impact of subsurface structures under the Lincoln/Sepulveda intersection then one would certainly think that it would be revealed in its comments about Alternative 5 which would relocate runway 6L/24R 350' north. Hence, the methodology used herein is to review LAVA's discussion of each of the thirteen study areas focusing on the Alternative 5 portion of the discussion. Particular attention is given to the Transportation (4.12) and Utilities (4.13) sections that would seem to be the logical locations for consideration rerouting and tunneling Lincoln Blvd.

## REVIEW OF ALTERNATIVE 5 DISCUSSION IN DEIR

### AESTHETICS, Section 4.1 of the DEIR

The discussion of the impact of the nine alternatives on area Aesthetics commences on page 4-6 and limits itself to consideration of "aesthetic qualities, views and lighting conditions at LAX and surrounding areas." Certainly one would assume that Caltrans would require Lincoln Blvd., California State Route 1, to have very bright overhead lighting at all times. Further, impacts of a major construction site including staging and laydown areas could be expected to be significant. Hence, one would assume moving Lincoln Blvd. 350' closer to the residential community would have significant implications for light and glare.

Discussion of the impacts of Alternative 5 begins at page 4-63 with the light and glare impacts beginning at page 4-65. At page 4-66 the following appears:

Therefore, these improvements would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare, and thus associated light and glare impacts along the northern boundary would be less than significant.

Increases in light and glare from rerouting more than a mile of Lincoln Blvd. and constructing a tunnel are similarly brushed off with:

Construction Fencing, impacts associated with light and glare during construction would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, construction light and glare impacts would be less than significant.

Thus, the Aesthetic impact, including light and glare impacts of rerouting more than a mile of Lincoln Blvd. including relocating oil and gas pipelines, utilities and a major sewer structure are viewed as less than significant.

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While the DEIR discussion of the impacts of Alternative 5 at the west end of the airfield adjacent to Pershing Drive, no significant discussion appears about the impacts at the east end of the airfield near the Lincoln/Sepulveda intersection.

### COASTAL RESOURCES, Section 4.4 of the DEIR.

Discussion of the impact of the nine alternatives on Coastal Resources begins at page 4-299, and the discussion of Alternative 5 on page 4-325.

While there could be storm water runoff impacts or other impacts on Coastal Resources from major construction at Lincoln and Sepulveda, other impacts are certainly far greater.

### CULTURAL RESOURCES, Section 4.5 of the DEIR.

Discussion of the impact of the nine alternatives on Cultural Resources begins at page 4-337. Impacts of Alternative 5 with Historic implications appear on page 4-370. Impacts with Archeological implications appear on page 4-376.

As is the case in so many other sections of the DEIR, the Cultural Resource issue is dealt with as if the rerouting of Lincoln Blvd. swinging it further north towards many sensitive uses is ignored. It is as if LAVA failed to advise its CEQA consultants it was part of the project. Buildings older than 45 years must at minimum be inventoried. While the report makes mention of the Union Savings and Loan Building at 9800 Sepulveda, it makes no mention of numerous buildings along Sepulveda that are older than 45 years. If such nearby buildings are outside the technical boundaries of the study area such could be noted. Simply failing to even make mention of such buildings adds to the implication that LAVA is seeking to conceal the impacts of its massive, billion dollar-plus Lincoln/Sepulveda realignment and tunneling project.

### GREENHOUSE GAS EMISSIONS, Section 4.6 of the DEIR.

Discussion of Greenhouse Gas impacts begins on page 4-385, and the discussion of impacts of Alternative 5 appears on page 4-407.

Because the methodology used to calculate Greenhouse Gas Emissions in the DEIR combines the impact of operations with the impact of construction and further combines airfield modifications with terminal and ground access impacts, isolating the effects of the Lincoln Blvd. realignment and tunneling project is virtually impossible.

Still, it would seem unearthing, opening and relocation of decades old petroleum lines would release significant greenhouse gas, both by the heavy equipment used in the process and by the pipeline and surrounding contaminated soil. Though not as old of construction, the same can be said for the major sewer lines in the area running to the Hyperion treatment plant.

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### AIR QUALITY, Section 4.2 of the DEIR.

The discussion of Air Quality impacts begins at page 4-83 of the DEIR. Two Air Quality impacts seem obvious for study, those being (1) the impact of routing Lincoln Blvd. 350' or more closer to homes, business, schools and churches, and (2) the impact of using very heavy construction equipment to unearth and expose oil and gas pipelines, utilities and sewer facilities.

The complete failure of the DEIR to study and report on the implications of realigning Lincoln for more than a mile and tunneling for 765' can be seen at page 4-88 where the following elements of the program are identified as studied:

Construction activities were assumed to be located on the north airfield and at the north terminals, in the Central Terminal Area (CTA), at Manchester Square, in the current Parking Lot C, at the proposed Intermodal Transportation Facility (ITF) site just south of Lot C, on the east side of Aviation Boulevard south of Century Boulevard, on the Automated People Mover (APM) routes along Century Boulevard and 98th Street, and on the west side where hatch plant operations permitted by the SCAQMD and USEPA and project support activities could occur. The analysis was conducted using normalized emissions rates (1 gram per second) for each construction source area to determine the concentration-to-emission ratio (X/Q) at each receptor for each source or source group. This X/Q ratio for a given source or source group were multiplied by the estimated emissions for a specific pollutant to obtain that pollutant's concentration at each receptor for the given source or group. The results for all sources in a given alternative were summed for each pollutant to obtain the project's construction activity contribution to ambient concentrations.

Quite apparently the large, high risk rerouting of Lincoln and extensive subsurface work in an area known to include high volume sewer lines and oil and gas transport lines in addition to large amount of standard subsurface utilities in a street in use for decades has not been studied in terms of Air Quality.

The discussions of Air Quality implications of Alternative 5, the most significant in terms of displacement of Lincoln and subsurface work appears at page 4-112 for post-construction air pollution and at page 4-118 for construction air pollution. In neither are the Air Quality implications of rerouting Lincoln for more than a mile even mentioned in passing.

### BIOLOGICAL RESOURCES, Section 4.3 of the DEIR.

Discussion of the impact of the nine alternatives on Biological Resources begins on page 4-163, and the discussion of Alternative 5 on page 4-250.

This is a subject which LAVA should have studied, was asked to study, but apparently didn't study.

### HAZARDS AND HAZARDOUS MATERIALS, section 4.7 of the DEIR.

Discussion of Hazards and Hazardous Materials begins on page 4-423, and the discussion of impacts of Alternative 5 appear on page 4-452.

The discussion in this section of the DEIR focuses primarily on the production of Toxic Air Contaminants (TAC) and the rate of cancer that results. This section of the DEIR uses two tricks used throughout to conceal and explain away the impact of locating, opening and relocating major petroleum, sewer and other underground facilities despite the apparent risk of release of toxic substances including explosive gases.

The first trick used is to hide behind the screen that "this is only a program level EIR."

Construction of any SPAS alternative is projected to take about 11 years. A detailed evaluation of TAC emissions during the construction phase cannot be accomplished until project-level information on construction staging is available. For purposes of the program-level evaluation in this EIR, possible construction emissions are estimated generically based on projected costs for the various alternatives. This approach provides sufficient information on the relative impact of construction emissions to analyze how important these emissions might be to incremental impacts of the SPAS alternatives. Detailed evaluation of construction impacts at the project level will be completed to help judge how construction impacts might vary from year-to-year as construction starts and moves through different phases across the airport.

If then LAVA is contending it can predict risk of exposure to cancer based on the "projected costs for the various alternatives", then those cost projections must be accurate. Refer to the sections of this white paper on the cost of the Lincoln Blvd. realignment and tunnel project in which numerous cost factors were declared to have been omitted intentionally and with other apparently simply "missed."

The second trick used is to combine cancel out the deleterious effects of air pollution caused by projects which LAVA intends to construct at any cost with the beneficial effects of ground transportation projects which LAVA has little if any intention or funds to construct.

In the discussion of health risks caused by Alternative 5, at page 4-452 it is claimed that the health risks constructing and operating State Route 1, Lincoln Blvd., 350 feet or more closer to residences, business, churches and schools is overcome by purported efficiencies in airfield operation, vehicle mix and transit facilities that are unfunded and probably will not be constructed.

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And the public certainly should not ask for more information or detail. Recall, this is a program level, not a project level EIR.

Section 4.7.3 beginning at page 4-574 deals with Hazardous Materials, especially those that pose a risk to the personal safety of workers or the public or which risk groundwater contamination. At page 4-575 the following appears:

There are 32 sites at LAX where hazardous materials releases have resulted, or may have resulted, in groundwater and/or soil contamination. Of these 32 sites, seven have significant soil and/or groundwater contamination and are undergoing remediation activities under LAFD or RWQCB supervision.

This passage represents further proof, that while LAWA may have studied environmental issues on its own airfield in support of SPAS, it has not put forth a similar level of effort to study environmental issues, including hazardous materials, on the property that will be used for the realignment and tunneling of Lincoln. For this DEIR to be credible LAWA must have as much knowledge about subsurface problems under Lincoln Blvd. and Sepulveda Blvd. as it knows about subsurface problems under the Central Terminal Area. LAWA has either not studied such subsurface conditions or it has studied them but is withholding the information. In either event, this DEIR is fatally flawed as a result.

Proof positive for this proposition appears at pages 4-592 and 4-593 where Hazardous Materials is discussed in the context of Alternative 5. While there is discussion of the construction in and around Terminals 1 and 2 and Taxilanes O and D, there is not one word about Lincoln and Sepulveda Blvds. and yet the construction in that area is the lynchpin of Alternative 5 and has a far higher cost factor than the taxilane work.

#### HYDROLOGY AND WATER, section 4.8 of the DEIR.

Discussion of Hydrology and Water begins on page 4-599. This introduction to the Hydrology section states its purpose as follows:

The hydrology analysis below addresses the potential for flooding to occur as a result of actions under any of the SPAS alternatives. The water quality analysis below addresses impacts to the quality of storm water runoff and dry weather flows as a result of actions under any of the SPAS alternatives.

Surely this is an excellent topic to study. What areas are then studied to learn this important information?

To compare baseline conditions with conditions under the SPAS alternatives, a single HWQSA was used. The HWQSA for this analysis includes the existing LAX property, the Manchester Square area, which is part of a voluntary property acquisition under LAWA's Aircraft Noise Mitigation Program, 413 and areas adjacent to LAX that would be acquired under certain of the SPAS alternatives (see Section 2.3.1.11 for description of acquisition areas).

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By LAWA's own admission then the areas studied on the important subject of worker safety and groundwater contamination are the existing airport property, Manchester Square and properties identified in 2.3.1.11 which reads in full:

#### 2.3.1.11 Acquisition

The alternatives would require the acquisition of properties located east of the airport. The parcels to be acquired vary with the different alternatives. Table 2-4 lists the properties that may be affected and provides information pertaining to each parcel. A composite map of all of the acquisition properties is provided in Figure 2-11. The parcels that would be acquired under each alternative are identified in Table 2-5 and illustrated in Figures 2-12 through 2-14. Following acquisition, the uses would be demolished and replaced with SPAS-related improvements.

The intersection of Lincoln and Sepulveda Blvds. is not on Figure 2-11, is not to be acquired by LAWA, and hence was not studied on the subject of Hazards. In fact it was pushed under the rug and ignored in preparation of the DEIR.

#### LAND USE/ PLANNING, section 4.9 of the DEIR.

Discussion of Discussion of Land Use/Planning begins on page 4-641.

Discussion of Alternative 5 begins at page 4-738. An extended discussion of the numerous land use and planning maps in the LAX area is beyond the scope of this white paper. One sentence on page 4-739 is worth noting. It simply states:

Alternative 5 only includes airfield and terminal improvements.

A multi-billion dollar project to reroute and tunnel Lincoln Blvd. is dismissed as "only an airfield improvement."

#### NOISE, section 4.10 of the DEIR.

Discussion of the Noise component of CEQA begins at page 4-779.

Discussion of Road Traffic Noise impacts begins on page 4-935. Much technical data is presented. Alternative 5 is not even commented upon. Whatever technical processes and evaluations were performed, they apparently did not include the impact of having Lincoln Blvd. 350' or more closer to ones home, business, school or church.

Construction Noise is discussed beginning at page 4-945. The impact of construction noise under Alternative 5 is discussed at page 4-963. Here it is acknowledged that at various sound receptors in West Westchester, the impact of Alternative 5 would be significant including at St. Bernard's High School, along the 91<sup>st</sup> St. community border and at Park West Apartments.

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It is telling that in the sole area where the impact of the Lincoln Blvd. project is considered, a finding of significant impact has been made. The question that needs to be asked and answered by LAWA is what other impacts would be revealed if the Lincoln Blvd. project had been thoroughly studied in all CEQA areas?

Truer to form, the DEIR did not measure the impact of Alternative 5 for Transit Vibration at page 4-988.

#### PUBLIC SERVICES, section 4.11 of the DEIR.

Discussion of the impact of the SPAS projects on Public Services begins on page 4-993. Impact on Fire Services and Law Enforcement Services.

As can be clearly seen throughout the SPAS Report and the DEIR, the magnitude of the billion dollar-plus Lincoln Blvd. project simply is not appreciated or understood by LAWA. It is California State Route 1 that is being moved. Massive disruption around one of the busiest intersections in Los Angeles will occur. The Lincoln/Sepulveda intersection is the pivot point between the South Bay and the Westside of Los Angeles. At page 4-1013 it is admitted that construction of the project has "the potential to hamper or delay emergency response". This delay in emergency response is shrugged off however by saying a "coordination office" will be established. This is a serious risk to the public and deserves more study than saying an office will be created in the future.

The impact of SPAS on Law Enforcement is discussed beginning at page 4-1019. At page 4-1035 the DEIR states:

As with Alternative 1, traffic congestion from construction activities would have the potential to hamper or delay response times and increase traffic patrol and other law enforcement activities.

This serious negative impact of Alternative 5 construction is similarly dismissed by the recitation of certain numbered "LAX Master Plan Commitments."

#### TRANSPORTATION, section 4.12 of the DEIR.

Perhaps nowhere in the DEIR is the failure to study the realignment of Lincoln Blvd. for more than a mile, more than 2000' feet of which would be depressed below surface grade and 765' of which would be in a tunnel more glaring than in the treatment of "Off Airport Transportation at page 4-1281 of the DEIR.

Treating it as if it were a curb and gutter project, the DEIR state shrugs of the realignment of California State Route 1 at page 4-1282 with the following:

In addition to potential disruption of local traffic conditions due to the addition of construction-related vehicle trips, there is the potential for additional disruption in

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the event a project-related improvement requires temporary closure of at least one lane adjacent to its site. Closures of key roadways and intersections could cause delays, except if done for short durations during periods of very low vehicular volumes.

One marvels at the naiveté of LAWA to think it can accomplish the realignment of Lincoln Blvd. by single-lane closures on off-peak hours.

The treatment of Off-Airport Transportation reveals LAWA's strategy for gaming the CEQA process and obtaining the backdoor approval of rerouting Lincoln. At page 4-1281 the DEIR states:

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods.

As appears throughout the DEIR and SPAS Report, it is clear LAWA is currently hiding behind the skirts of the "Program Level DEIR" to prevent a full and complete disclosure to the public and to the elected officials who will be voting on the DEIR by saying that only "conceptual planning" need be done.

#### UTILITIES, section 4.13 of the DEIR.

Discussion of the impact on Utilities begins at page 4-1327. Despite what could be significant disruption from relocating utilities currently under Lincoln and Sepulveda Blvd. this section deals with energy use at the airport. The impact of the Lincoln Blvd. realignment and tunneling project is not discussed.

#### CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

Simply stated, the Lincoln Boulevard realignment and tunnel project is not adequately studied in the Draft Environmental Impact Report. In view of the fact that moving runway 6L/24R northward by up to 350' is LAWA's most important project and realigning Lincoln Blvd. is non-negotiable and critical to moving the runway, this failure must be viewed as fatal.

The DEIR must be withdrawn from circulation, the Lincoln Blvd. realignment project must be adequately studied and the DEIR circulated, preferably as a project level EIR that can receive full, detailed public scrutiny.

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## CITY OF LOS ANGELES

CALIFORNIA

ANTONIO R. VILLARAIGOSA  
MAYOR

September 14, 2012

## BUREAU OF SANITATION

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FAX: (323) 342-8219 OR 342-8211

File: SC.CE.

Denny Schneider  
LAX Specific Plan Amendment - Request for Sewer Relocation Cost Estimate  
September 14, 2012

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Also, in order for the Bureau of Sanitation to permit any entity to relocate a sewer structure interfering with a proposed development project, a minimum of two conditions must be fulfilled. Firstly, the conveyance capacity including the operation and maintenance cannot be compromised and secondly the proposer will pay for one hundred percent (100%) of the cost of such activity.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

Sincerely,

All Poosti, Division Manager for  
Wastewater Engineering Services Division  
Bureau of Sanitation

Attachments:  
Project Construction Cost Estimate

cc: Fernando Gonzalez, WESD  
Doug Walters, WESD  
Abdul Danishwar, WESD  
Adel Hagekhalil, BOS

File: SCARCEQA Review/Final Response/LAX Specific Plan Amendment - Request for Sewer Relocation Cost Estimate

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

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BUREAU OF ENGINEERING  
WASTEWATER CONVEYANCE ENGINEERING DIVISION (WCED)  
PROJECT CONSTRUCTION COST ESTIMATE

FOR INTERNAL USE (REFERENCE ONLY)

Project Title: LAX-SPAS POSSIBLE SEWER RELOCATIONS

Scope: Relocate 8-inch, 15-inch, and 18-inch sewers due to Lincoln Blvd relocation between Loyola Blvd and Sepulveda Blvd construct MH appurtenances, and reconnect house connections.

Work Order: NONE Client Dept.: Bureau of Sanitation

Project Manager: Hortensia Alonso Project Engineer: NONE

Type of Estimate: ☐ Class "A" ☐ Class "C" ☒ Class "D"

Description	Unit	Quantity	Unit Price	Item Total
Shoring of Open Excavation	LF	4,800	\$10	\$48,000
Relocate 8" sewers, Case 1 Bedding	LF	450	\$115	\$51,750
Relocate 15" sewers, Case 1 Bedding	LF	300	\$260	\$78,000
Relocate 18" sewers, Case 1 Bedding	LF	4,050	\$350	\$1,417,500
Install Maintenance Hole, including Frame/Cover	EA	28	\$10,000	\$280,000
Reconnect Existing HC Sewer	EA	21	\$375	\$7,875
<b>Subtotal (1)</b>				<b>\$1,872,250</b>
Mobilization - 6% of Subtotal (1)				\$112,335
Permits - (Assume \$5,000 - Delete this amount if no permits are required)				\$5,000
Allowances - 4% of Subtotal (1)				\$74,890
<b>Subtotal (2)</b>				<b>\$2,064,475</b>
Estimating Contingency - 5% to 40% of Subtotal (2)				\$525,700
<b>Subtotal (3)</b>				<b>\$2,690,285</b>
Escalation - 3% per year of Subtotal (3) Assumed 5 years				\$433,540
<b>Subtotal (4)</b>				<b>\$3,123,825</b>
Construction Contingency - 20% of Subtotal (4)				\$624,761
<b>Subtotal</b>				<b>\$3,888,586</b>
<b>Total Estimated Project Cost</b>				<b>\$4,000,000</b>

Assumptions: The limits of the work are approximate based on Alternative 1, Figure 1-5. The sewer information was obtained from NavLA and was not crossed checked with as-built plans. Per a telephone conversation with Mr. Herb Glasgow of LAWA's SPAS Program the NCOS, NORS, and NORS Diversion outfall sewers will not be relocated as LAWA is fully aware of the economic impact this will have on their budget. The unit cost were obtained from the latest unit price of the Secondary Sewer Renewal Program, if not was available the cost was obtained from BOE's Cost Estimator.

Prepared by: H. Alonso Date: 9-11-12

Checked by: Date:

Approved by: Date:

Client Approval: Date:

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# ARSAC comments Preliminary SPAS Report Operational Analysis Attachment Section F-1

This section lays the ground work for much of the environmental assessments by establishing the flight mix of aircraft used. LAWA must identify the impact on these assessments for any necessary changes or inaccuracies.

## General comments and some questions

1. SPAS Report Section F-1 states that the design data should be 2010, but uses the busiest day in the second highest traffic month- Tuesday, August 18, 2009. July 2009 was apparently the busiest month in 2009. Ground traffic data was gathered on a different date- a Friday in August 2011. Westchester/Playa del Rey residents have repeatedly called on LAWA to choose a traffic data gathering date in mid-September to account for traffic from Loyola Marymount University, Otis Institute for Art and the public and private K-12 schools in the area. Shouldn't the base design year data be the same for all elements of the EIR? Should the air traffic and ground traffic data be on the same date or at least the same month in the same year?
2. The year 2025 was chosen as the future design date. Isn't the LAX Master Plan supposed to run through 2015? Where is the authority in CEQA or NEPA to push out the design date to 2025? (The FAA projects air traffic will double worldwide by 2031. Historically, since the start of the Jet Age in October 1958, worldwide air traffic generally has doubled every 20 years with about 50% of the world's air traffic in the USA.)
3. SPAS Report Section F-1 lists 1,563 daily flights (passenger, cargo, general aviation, military) for 2009 and predicts 2,053 daily operations for 2025. LAX had about 2,000 daily operations in the year 2000 and LAX was bursting at the seams. Go-arounds for aircraft coming into land on the north complex were a daily occurrence, as the airfield could not handle the congestion. At 2,053 daily ops, capacity appears to exceed 85 MAP, well above the 78.9 MAP cap.
4. There are many problems with the fleet mix.
  - a. There is no differentiation between all-passenger and all-cargo aircraft. This is important for determining which aircraft will park where on the airfield: passenger gates or cargo ramps.
  - b. For ADG I and ADG II aircraft, the report breaks them down in Regional Jets and Propellers, however, it does not specify manufacturers and models of these aircraft. This is important to know because US airlines are sending the Bombardier CRJ-200 50-seat CRJ100 and CRJ200 into retirement. The costs to operate these aircraft have become too high and with upcoming major engine overhauls coming, no airline wants to pick up those costs. For the same hourly block hour cost, a US airline can have a 2-class 75 seat CRJ700 or a 90 seat CRJ-900. US airlines may also push out the Embraer regional jets such as the 37 seat ERJ-135 and larger ERJ-140 and ERJ-145 jets. As of November 2012, American Airlines is replacing its American Eagle 44-seat ERJ-140 jet operation at LAX with contracted Skywest 50-seat Canadair CRJ-200's. Larger sized aircraft on a one-to-one flight replacement can result in a capacity increase.
  - c. Airbus A320 series (A318, A319, A320, A321) shows a modest increase from 259 to 273 daily flights. That number appears to be a little low. There have been a huge number of orders for the existing A320 series and the new A320 NEO (new engine option).

- d. Boeing 737 series. Although one of the stated assumptions in Section F-1 is the older aircraft would be retired there again is no breakdown between the 737 Classics Series (-100 and -200, now retired, 300/400/500 series still in operation and being retired), the current NextGen 737 series (-600, -700, -800, and -900 and -900ER) and the new 737 MAX series.
- e. Numbers for A300 and A310 remain at 8. These must be cargo aircraft, but are not specified as such. Number should be lower as FedEx retires these aircraft from their fleet in favor of converted passenger Boeing 757's and new Boeing 767's.
- f. Boeing 767 series shows an INCREASE from 77 to 190 daily operations. This number appears unbelievable as airlines are retiring their 767's in favor of Boeing 787's or smaller aircraft such as Airbus 320 series or Boeing 737 Next Generation (-600, -700, -800, -900) or 737 MAX series.
- g. DC-10 series declines from 11 to 5 daily operations. It is doubtful any DC-10's will be in service in 2025.
- h. MD-11 series increases from 7 to 10 daily operations. Again, this number should decline. Airlines that have MD-11's as freighters are retiring these aircraft due to the cost of operation (e.g. fuel).
- i. Two Lockheed C-130's a day into LAX. Does LAX really have that much military traffic into LAX every day?
- j. The Airbus A350, the competitor to the Boeing 777 and 787 Dreamliner, is not even listed in the report. Airlines at LAX (or previously at LAX and may return- Aer Lingus, Finnair, TAP Portugal) that have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai, and United. Other A350 buyers include Qatar Airways, TAM (Brazil) and Vietnam Airlines.
- k. The ADG V Boeing 747 is way too high, declining from 74 to 65. Many passenger airlines are replacing their 747's with Airbus A380's or Boeing 777-300ER's. Again, there is no breakdown of 747 types here, so one has to assume that there are no more 747-100's, -200's and 300's, but how many are Boeing 747-400 passenger and cargo airplanes? Please list 747's projected in use at LAX by airlines and routes.
- l. The A380 prediction is also very off with 27 predicted. The real number is a low of 12, a high of 16 and most likely 14. This is based upon which airlines have ordered the A380 and how they have announced to deploy them to LAX. For example, LAX may never see an Airbus A380 from Thai Airways (6 orders) or Malaysia Airways (2 orders) because those airlines are using those aircraft on the Kangaroo Route from London through their respective hubs of Bangkok and Kuala Lumpur to Australia.
- m. The 747-8 prediction of 12 is also too high. Again, there is no breakdown between passenger and cargo flights. Most of the 747-8 order book is for the freighter version. Lufthansa (20 orders) has announced 747-8 passenger service between LAX and its 747 base in Frankfurt, Germany. Other likely 747-8 passenger operators include Korean Air (5 passenger and 5 cargo orders), Air China (5 passenger orders) and TransAero (Russia-4 unconfirmed orders). Cargo operators are Cathay Pacific (747-8F already seen at LAX), Cargolux, Atlas Air, Air Bridge (Volga-Dnepr), Nippon Cargo Airlines and Korean Airlines Cargo. A projection of 3 passenger flights and 7 cargo flights for a total of 10 747-8 flights a day is more likely.

## Specific Questions

### Page 16- Table 6

The report notes that August 18, 2009 was used as the design date. Table 6 shows a total of 1,563 average daily operations. In looking at the FAA Aircraft Movements for LAX in 2009, there were 544,833 operations that would average to 1,492 operations per day. According to the LAWA Volume of Air Traffic (VOAT) report for LAX posted on the LAWA website, the August 2009 monthly total for flight operations (scheduled, commuter, charter, but excluding cargo operations) is 50,047; this averages to 1,614 operations per day.

1. How did Ricoondo arrive at the 1,438 daily flights for Scheduled Passenger Operations? Were the 2009 Air Carrier total from the Ten Year Summary of FAA Aircraft Movements simply divided by 365 for a daily average of 1,200 operations and the Air Taxi total from the same chart divided by 238 simply added together to get 1,438 average daily operations? What accounts for the variances between the Ricoondo figure, FAA and the LAX VOAT?
2. Why didn't Ricoondo break out the Air Taxi numbers as a separate figure since there is established data for Air Taxi?
3. Where did Ricoondo obtain data for the average number of Cargo flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual flight data?
4. How was the General Aviation daily average determined? Was this average derived from dividing the annual 16,797 operations by 365 to get a daily average of 587?
5. Where did Ricoondo obtain data for the average number of Non-Scheduled Passenger flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual flight data?
6. For the Military daily average, was this average derived from dividing the annual 3,058 operations by 365 to get a daily average of 87?

### Page 17- Table 7

1. It appears that the data in Table 6 is inconsistent with the data in Table 7 for Scheduled Passenger Operations. In Table 6, the number of operations is 1,438 and in Table 7 the total number of operations is 1,563. In Table 6, the figure 1,563 is a total for all operations (scheduled, cargo, military, etc.). What accounts for this difference?
2. In Seats/Operation, the Domestic and International totals do not add up. Was there a factor applied to the total? Why was this not clearly explained?

### Page 18- Table 8

1. In the ADG I, ADG II and ADG III, propellers and regional jets are not broken out by manufacturer and model (e.g. Canadair CRJ-200, Embraer 140). Why were these not specified? Please list this information.
2. The Airbus A330 has been operated at LAX by Aer Lingus, Air Berlin (formerly Lufthansa), Korean Air and Qantas. Why is the A330 not listed in Table 8?
3. Are the aircraft listed on Table 8 solely passenger aircraft, or a combination of passenger, cargo, combi aircraft (e.g. Boeing 747-400 Combi)? If cargo aircraft is included, then why are the Douglas DC-8 and Lockheed L-1011 not listed?

### Page 21- Table 9



Boeing 777-300ER. Please break out the Boeing 747 series by number of models by airline and route.

9. The figure of 27 for the Airbus A380 series appears to be too high. What data is there in support of the figure of 27? A total of 12 to 16 daily A380 flights appear to be a more reasonable number. What data is there in support of the figure of 27?
10. The figure of 12 for the Boeing 747-8 appears to be too high. What data is there in support of the figure of 12? How many are passenger aircraft and how many are cargo aircraft? A total of 10 daily 747-8 flights appear to be a more reasonable number. What data is there in support of the figure of 12?
11. Why is the Airbus A350 XWB not listed on Table 12? Several airlines operating at LAX have ordered this aircraft and likely will operate it into LAX. Airlines which have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai Airways and United Airlines. Former LAX tenants such as Aer Lingus, Finnair and TAP Portugal have also ordered the A350. Other A350 customer airlines not presently serving LAX include Qatar Airways, TAM (Brazil) and Vietnam Airlines.

#### Page 28: Gating

1. In Section 4.3, it states, "Non-scheduled aircraft were not gated." If LAWA or Ricondo has data concerning non-scheduled flights, then where were these aircraft parked on the LAX airfield?
2. Under Section 4.3.1, it states that "the gating exercise focused on only Alternatives 1 through 4" and that estimating "performance assumptions and projections for Alternatives 5 through 7, as utilized in the aircraft noise and air quality analyses." How can the public and decision makers make an "apples-to-apples" comparison of gate when Alternatives 1 through 4 used one standard of gate assumptions and the other Alternatives 5 through 7 used a different set of gate assumptions? This appears to be a deficiency in the Draft EIR to fail to properly evaluate the alternatives. Who made the decision "taking into account contract scope and budget considerations" to apply different standards to evaluate gating between the different gate configurations? What did the LAWA/Ricondo contract state about how the gates in all of the Alternatives were to be evaluated? Were different alternatives to be given different treatments in the contract?
3. In Section 4.3.3, Methodology and Results, "For programmatic planning purposes and because airline assignments throughout the LAX terminals in 2025 would be uncertain at the time this analysis was undertaken, the focus of this analysis was placed on maximizing the level of service and gate utilization." While many long-term airline leases will have expired by 2025, the focus of gating exercise makes no sense in relation to the reality of airline operations. No airline would want to have their operations spread across 9 different terminals at LAX. With a few exceptions (e.g. United at Terminals 6, 7 and 8), airlines at LAX historically have kept their operations in one terminal to maximize the use of their personnel and for customer convenience, including access to the airlines' respective VIP lounges for their premium passengers. Reference the "LAX Terminal Leases as of 2012" below. Since the airlines in Terminals 4 through 8 have made substantial investments in their facilities and due to consolidation in the airline industry (less airlines), why was the gating simulation not performed on the basis of the existing terminal assignments? For example, in Figure 46, it appears that a Southwest Airlines flight is operating out of Gate 70B to Houston Hobby Airport (HOU). United Airlines, Terminal 7 tenant, operates only to Houston Intercontinental Airport (IAH) from LAX. Southwest has operated out of Terminal 1.

#### LAX Terminal Leases as of 2012

Terminal	Airline	Lease expires	Comment
4	American	December 4, 2024	American Airlines can reject the lease while in reorganizing under Chapter 11 of the US Bankruptcy code
5	Delta	November 1, 2025	
6	United	August 17, 2017	Assumption of Continental Airlines lease
6	Alaska	March 20, 2022	New 10 year lease
7 & 8	United	August 17, 2017	

#### PDF pages 47 to 150- Appendix B- Ramp Charts

1. In the 2025 ramp charts (only Alternatives 1 through 4 were studied; Alternatives 5 through 7 were not studied), there are domestic flights listed at the Tom Bradley International Terminal (TBIT). From 1984 to 1987, World Airways had been the only domestic operator at TBIT. In the beginning of TBIT operations, some domestic World Airways passengers were sent to the US Customs Hall to claim their baggage. Will the new TBIT be set-up for domestic flights to avoid sending domestic passengers into the Customs Hall? Since the focus of TBIT is to be international flights, why were domestic flights included in the TBIT ramp simulations? Will domestic passengers get a good impression of LAX if they are sent to US Customs in error?
2. In the 2025 ramp charts (see Figure 47 specifically), there are two Airbus A380 flights listed as Paris-Charles de Gaulle to Los Angeles and then onward to London-Heathrow and vice versa (CDG-LAX-LHR and LHR-LAX-CDG) at Gates 156 and 154. There are other examples of these as well that seem extremely unrealistic- AKL-LAX-TPE, CDG-LAX-MUC, ZRH-LAX-CDG, BNE-LAX-LHR to list a few. There are no airlines presently operating those routes as described above. Airlines have operated certain flights on the same route and time for more than 50 years. The gating simulation does not appear to be realistic. Were these flight schedules used in the gating simulation derived from actual flight schedules? Were some of the flights invented? Were some of the aircraft choices for the routes arbitrarily chosen?
3. In the 2025 ramp charts (see Figure 50 specifically), there is a 747-400 flight listed at Gate MSC-4 at the Tom Bradley International Terminal (TBIT) with a routing of Dallas/Fort Worth-Los Angeles-Anchorage (DFW-LAX-ANC). This looks like a cargo flight routing. No US passenger airline is operating a 747 on those routes. Were cargo flights listed at passenger gates as passenger flights on the gating charts? What are those flights?

Note that on Page 28- "...taking into account contract scope and budget considerations...the gating exercise focused on only Alternatives 1 through 4." "From a gating standing, the terminal and gate layouts assumed under SPAS Alternatives 1 and 2 are identical." Alternatives 5 through 7 were not analyzed in this section. WHERE IS THIS ANALYSIS COMPLETED? IF NOT, WHY NOT?

#### BACK-UP MATERIALS

#### TEN YEAR SUMMARY- FAA AIRCRAFT MOVEMENTS

Attachment to ARSAC LAX SPAS DEIR Comments Page 6

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Attachment to ARSAC LAX SPAS DEIR Comments Page 5

SPAS-PC00130

[http://www.lawa.org/welcome\\_LAX.aspx?id=806](http://www.lawa.org/welcome_LAX.aspx?id=806)

<http://www.lawa.org/welcomeLAX.aspx>



Statistics — Ten Year Summary — FAA Aircraft Movements

TEN YEAR SUMMARY OF FAA AIRCRAFT MOVEMENTS				
Air Carrier	Air Taxi	Military	General Aviation	Total
1994	418,166	214,473	14,213	689,888
1995	472,134	230,997	3,178	732,639
1996	502,056	233,832	3,262	763,866
1997	524,035	227,479	3,572	781,492
1998	525,089	219,123	3,326	773,569
1999	542,082	215,886	2,646	779,150
2000	565,805	198,306	2,304	783,433
2001	524,014	193,892	2,052	738,433
2002	449,712	177,123	2,115	645,424
2003	433,370	171,199	2,561	622,378
2004	458,774	179,262	3,002	655,097
2005	454,934	178,017	2,607	650,629
2006	463,341	174,745	2,614	656,842
2007	467,193	193,930	2,614	680,954
2008	453,232	150,561	2,316	622,506
2009	438,059	86,919	3,058	544,833

2010	455,340	97,723	2,712	20,060	575,835
2011	473,282	109,885	2,390	18,355	603,912

#### TEN YEAR SUMMARY - PASSENGERS

[http://www.lawa.org/welcome\\_LAX.aspx?id=800](http://www.lawa.org/welcome_LAX.aspx?id=800)

<http://www.lawa.org/welcomeLAX.aspx>



Statistics — Ten Year Summary — Passengers

10 YEAR SUMMARY OF PASSENGERS			
YEAR	DEPARTING	ARRIVING	TOTAL
1994	25,812,087	25,238,188	51,050,275
1995	27,234,353	26,674,870	53,909,223
1996	29,162,942	28,811,617	57,974,559
1997	30,313,688	29,828,900	60,142,588
1998	30,826,859	30,388,853	61,215,712
1999	32,298,944	31,980,627	64,279,571
2000	33,836,077	33,467,105	67,303,182
2001	31,007,930	30,598,274	61,606,204
2002	28,181,481	28,042,362	56,223,843
2003	27,544,606	27,438,232	54,982,838
2004	30,343,873	30,360,695	60,704,568
2005	30,649,324	30,840,074	61,489,398

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2006	30,500,130	30,540,936	61,041,066
2007	31,244,261	31,194,322	62,438,583
2008	29,930,985	29,884,661	59,815,646
2009	28,288,211	28,232,632	56,520,843
2010	29,605,542	29,463,867	59,069,409
2011	30,923,005	30,939,047	61,862,052

## TEN YEAR SUMMARY – AIR FREIGHT

[http://www.lawa.org/welcome\\_LAX.aspx?id=802](http://www.lawa.org/welcome_LAX.aspx?id=802)

<http://www.lawa.org/welcomeLAX.aspx>



Statistics — Ten Year Summary — Air Freight

10 YEAR SUMMARY OF AIR FREIGHT	
YEAR	AIR FREIGHT IN TONS
1994	1,516,567
1995	1,567,248
1996	1,696,663
1997	1,852,487
1998	1,787,400
1999	1,884,526
2000	2,002,614
2001	1,779,065
2002	1,869,932

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2003	1,924,883
2004	2,022,911
2005	2,048,817
2006	2,022,687
2007	2,010,820
2008	1,723,038
2009	1,599,782
2010	1,852,791
2011	1,773,215

## TEN YEAR SUMMARY – AIR MAIL

<http://www.lawa.org/welcomeLAX.aspx>

[http://www.lawa.org/welcome\\_LAX.aspx?id=804](http://www.lawa.org/welcome_LAX.aspx?id=804)

Statistics — Ten Year Summary — Air Mail

10 YEAR SUMMARY OF AIRMAIL	
YEAR	TONS OF AIRMAIL
1994	186,878
1995	193,747
1996	194,091
1997	212,410
1998	264,473
1999	253,695
2000	246,538

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2001	162,629
2002	92,422
2003	97,193
2004	92,402
2005	88,371
2006	80,395
2007	66,707
2008	73,505
2009	64,073
2010	74,034
2011	80,442

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## Appendix E-2 LAX SPECIFIC PLAN AMENDMENT STUDY REPORT Ground Transportation Questions

**Question:** General question covering ground transportation planning. If LAWA was working with SPAS to address this type of issues, why have we not seen any inputs from STV (the writer of this evaluation in the DEIR) prior to the release of the DEIR? Alternatively, why doesn't STV mention any of the suggestions made at SPAS meetings?

Page 11 The study team also examined the disposition of existing CTA real estate, including best-use scenarios for underutilized parcels (e.g., long-term parking areas), current and future use of parking facilities, increase in passenger activity at the TBIT curbside, and the long-term planning of an expansion of Terminal 1 (T1) to the east, referred to as Terminal 0, as part of the LAX specific plan Amendment study (SPAS), and the construction of terminal buildings between T1 and Terminal 2 (T2) and between T2 and Terminal 3 (T3), referred to as Terminal 1.5 and Terminal 2.5, respectively. Terminals 1.5 and 2.5 are LAX Master plan projects independent of SPAS.

**Question:** Appendix E-2 Page 2 identifies Terminals 1.5 and 2.5 as part of the LAX Master Plan projects "Independent of SPAS." Where are these identified in the LAX Master Plan, Alt D?

Page 11 SPAS Support - Various options were developed to support the SPAS process, including location of the following: dedicated busway or APM and its associated stations; ConRAG; employee and public parking; redesigned entry roadways; and support facilities.

**Question:** Appendix E-2 This full design effort and review was never discussed with SPAS. In scanning this section the suggestions and discussions with SPAS Committee for traffic improvements doesn't seem to be identified or discussed. Where are they located and how were they used?

Page 13-15 Traffic bottlenecks occur along the Arrivals roadway at peak travel times, particularly at T1 and on the approach to TBIT. Without improvements to the existing operation, these choke points will further deteriorate as traffic volumes increase. The VISSIM model was calibrated at 59.8 MAP, the LAX passenger activity level in 2008, which was the last full year of data available when STV began its study in 2009, passenger activity in the SPAS EIR baseline (i.e., 2010) was 59.1 MAP. The activity level in 2008 (i.e., 59.8 MAP) is sufficiently close (within one percent) to be considered representative of 2010 conditions. The model showed some queuing along West Way and minor to moderate congestion at various locations along the CTA roadways. Based on output from the model, recommendations independent of SPAS were made to address existing roadway capacity issues and improve traffic flow along the affected areas, including adding a traffic signal at West Way and World Way south and widening World Way across from TBIT between the driveway to p3 and Center Way to accommodate an additional lane of traffic. The latter recommendation was subsequently included as a component of the Cup project currently under construction.

**Question:** Appendix E-2 Page 15 Even though the MAP between 2009 and 2010 were comparable, weren't there some major changes (ie alliance consolidations and airline movements out of terminal 2) that could impact the model results? What changes were made to account for these changes in arrival times to ensure proper estimates of the peak hours?

Page 15 The primary reason for this significant increase was the study's assumption that, at the 79.9 MAP activity level, passengers on flights gated at the MSC and TBIT would be processed through the TBIT Arrivals Hall, and that 41% of all arriving passengers would be processed through the TBIT compared to 19% with the 59.8 MAP level. This growth in passengers arriving on the TBIT curbside during the peak hour resulted in a 175% increase in vehicles trying to access the TBIT inner roadway curbsides. Commercial vehicle traffic, on the other hand, grew at a more moderate pace due to underlying efficiencies derived from high-occupancy vehicles (HoVs), note that an increase of 15 privately owned vehicle (poV) passengers would add 10 additional poVs into the network (assuming an occupancy of 1.5 passengers per poV), whereas, 15 rental car customers would warrant only one additional commercial vehicle (at 15 passengers per rental car shuttle). Based on the 175% (746-vehicle) increase in vehicles attempting to access the TBIT curbside with no accompanying facility improvements, the VISSIM simulation

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showed that vehicles block both the inner and outer roadway lanes from the TBIT curbsides back to the airport entry ramps from both Century and Sepulveda Boulevards. (UNDERLINE FOR EMPHASIS)

**Question:** Appendix E-2 Page 6 if the assumption is that TBIT and MSC are primarily the NLA sized gates which would be for international traffic, what is the justification for such an increase in international passengers? If they are international, is there a difference in percentage that are staying at LAX vs those who are on domestic flights? How is this accounted for in the model?

Page 16 The modeling revealed that if the curbsides are reversed, the overall congestion levels dropped significantly. The outer curbsides operated with some congestion but with significant improvement over the existing operation, on the inner curbsides, the commercial vehicles operated with a reasonable LOS, although the change in congestion levels before and after the reversal of the curbside operations have not been quantified.

**Question:** Appendix E-2 Page 7 Talks about changes in LOC without quantification. Since SPAS was supposed to address the issues resolved by the yellow light projects, was there a quantification of the amount of curb space required or a specific estimate of the number of cars that must be handled identified so that options could be directly compared? If not, why not? If yes, where is this identified?

### Page 16 Reprogramming Arrivals Curbside Operations

This section describes one of the planning initiatives, the reconfiguration of the Arrivals curbsides, that would dramatically change vehicular and passenger circulation and improve LOS. The study team developed three options (options 1, 2, and 3) for reprogramming the inner and outer curbsides of the Arrivals level; bus traffic is relocated to the inner curbsides along with taxis, and private vehicles are relocated to the outer curbside. A fourth option...

**Question:** Appendix E-2 page 7 Discusses the arrivals reprogramming options from inner to outer locations for commercial vehicles. This was actually done during 2011 for at least a short time with the Lot C buses. What were the results and how did it correlate to the model results?

Page 18 under option 1, pedestrian crosswalks are consolidated at a limited number of signalized crossing locations to optimize bus and taxi frontage along the terminal curbs and to facilitate safe pedestrian circulation between the terminals and the relocated private vehicle pick-up areas within the parking structures. Architectural barriers would be added to the curbsides for directing passengers through reconfigured, signalized crosswalks. A new wayfinding program would be introduced to guide passengers to relocated pick-up areas. A future APM right-of-way along the frontages of the parking structures is also incorporated to work in tandem with the proposed private vehicle pick-up areas (Figure 8).

**Question:** Appendix E-2 page 9 talks about option 1 which has drop offs in the parking lots and a reduction of the number of pedestrian cross walks. Although this is, in principle, a good idea to enhance traffic flow how much further must people walk to get across? Is there an ADA requirement for max walking distance? Does this meet that? How will it be accommodated?

Other options discussed early on was to substantially reduce the number of walkway options and to provide for passenger bridges to avoid stoppage of traffic. How was this included in the study? How does it compare to the option discussed?

Page 18 Traffic Simulation Analysis & Findings simulation modeling was performed to determine the advantages and disadvantages of option 1. In summary, relocation of the commercial shuttles to the inner roadway can create an additional lane on World Way; however, the need for additional right-of-way to integrate a future APM alignment along the parking structures may eliminate that advantage.

**Question:** Appendix E-2 Page 9 addresses the elimination of parking spaces on the ground level. Are the structures assumed to be full at most times so that revenue is lost? With all of the network necessary on the LAX SPAS DEIR Comments for Appendix E-2 page 2

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upper roadway, passenger bridges, and parking structures how difficult would a reconfiguration be? Was this considered? Why not?

Page 19 parking structures may require modifications to accept the APM station and support structure requires new passenger wayfinding and passenger education through pamphlets and other outreach materials

**Question:** Appendix E-2 general- several of the options call for rebuilding Terminal three and moving it west. How does this change the traffic curb usage?

Was a third level roadway for commercial and emergency vehicles considered? Why not? What were the results of such a change?

Page 20 Figure 14 provides a section of the proposed inner and outer roadway lanes with the outer curbside island widened from 10 feet to 20 feet to accommodate increased pedestrian activity. Widening the outer curbside towards the parking structures would result in the loss of a travel lane on the outer roadway of World Way. However, the reversed curbside operation also eliminates the need for many of the vehicle slip ramps which currently allow private vehicles and taxis to move between the inner and outer roadways. The closure of these...

**Question:** Appendix E-2 page 11. Has any option for curb space increase been considered? If vehicles are handled at an angle too deep, for instance, and then able to pull out? When congestion increases drop off gets to be very difficult. What provision for drop off protection of pedestrians is provided for those getting out of cars facing the circulating traffic?

Page 23 the p3 and p4 structures and the TBIT was modeled to assess the impact on traffic flow, specific grade-separation concepts have not been developed as part of this study, should a grade-separated pedestrian crossing be constructed at the TBIT, pedestrians currently required to cross the departures level roadway at grade would likely also use the grade-separated crossing, thereby allowing the departure level signals to be removed.

**Question:** When will these grade separations issues be addressed? Doesn't this have a major impact on traffic flow? The document states that grade-separated concepts were not developed as part of this study. Why not? Isn't passenger convenience a priority?

Page 27 The 30-foot-wide inner roadway is currently striped with two travel lanes and one passenger loading lane. While it may be possible to operate large commercial vehicles such as a 40-foot bus in three lanes of the inner roadway along World Way north from T1 to T3, and along World Way south from T4 to T7, the 40-foot design vehicle would not be able to operate safely in three lanes as the inner roadway turns 90 degrees between T3 and the TBIT and between the TBIT and T4. Therefore, the study team proposed a roadway striping alternative for the curved sections of the Arrivals level inner roadway, shown in Figure 23.

**Question:** Appendix E-2 The analysis indicates the difficulties in handling multiple 40' buses. How long are the articulated buses and who many can be handled? Was this part of the assessment that assumes no APM but a busway instead? Where is this addressed?

Page 28 Figure 22 - Plan for installation of 2-phase signal and jug handle at intersection of Sky Way and World Way North

**Question:** Appendix E-2 page 19. Figure 22 shows the current intersection and a 2 phase signal, but virtually all of the options contain a Terminal zero which changes this intersection completely. Where are the results of this changed CTA access analyzed?

Page 29 Figure 24 - Proposed location of Concourse D with realigned Taxi Lane D7 and ADG VI separation standards

**Question:** Appendix E-2 page 20 shows terminal 0 with four ADG IV gates. When all other ADG IV are planned to TBIT and MSC why have four of these gates instead of more mid-sized ones? Has LAWA fixed upon a design for

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T0? If so, what is it? How many gates? From the diagram it shows very little for passenger processing. Is this assumed to occur in T1?

### Page 30 Option3-Tunnel under CTA Loop Roadway

This option looks to provide grade separation, i.e., a tunnel, for the exiting sky Way traffic movement under World Way north. This allows the sky Way approach to shift to the eastern part of park one which provides a separate and enlarged T1 Arrivals curbside, common to the other options (Figure 27).

**Question:** Appendix E-2 has an option to tunnel under CTA Loop Roadway. How in the world is this even considered when the whole area around the CTA was so cluttered that the Central Utilities Plant utilities were removed because it was impractical to bury them?

Page 33 - Summary of Options for realignment of Sky Way

**Question:** Appendix E-2 Table 3 talks about options for realignment of Sky Way bridge on 96th street.

Why has no option for exiting out of CTA from modified skyway been considered? Drop off in an area of Park One could be built and allow for moving sidewalk or other conveyance to terminals 0 and 1 without going through the CTA traffic and instead exiting to Sepulveda. Was this rejected? It was brought up in SPAS.

Page 24 ...were developed: (1) a processor that handled departures only, and (2) a full-service processor. This facility would be implemented independent SPAS; however, it was assumed to be in place in the future background (i.e., 2025) condition in the SPAS EIR.

**Question:** Appendix E-2 page 24 states that a full service processor is assumed to be in place but independent of SPAS. Is this required to support SPAS MSC? How much cost will this be? How will LAWA pay for it along with everything else they plan?

### Page 37 Alternative 2 - MSC Dual-Level Processor

Alternative 2 expands the MSC processor to incorporate an Arrivals function in addition to departures. Adding an Arrivals level component in the processor would increase the size of the facility and potentially preclude the reversal of the Arrivals roadway curbs, described in reprogrammed Curbsides Alternatives 3 and 4, by limiting or removing curbside locations which are proposed to be in the same footprint as the processor. The expanded processor may also require removing p2B and p5, in addition to impacting both levels of West Way as well as Center Way between World Way and West Way.

**Question:** Appendix E-2 page 28. Alternative 2 of MSC Dual level processor points out that reversal of the curbs is precluded. If the previous section already stated that without doing the reversal the traffic could back up to Century why is this even shown as a consideration? If this is still possible, is there another mitigation that could fix some of this traffic? What is it? Alternative 3 follows as a "solution" but one has to ask if this is included in the total costs of the Master Plan and where is any of this included in the approved Alt D?

### Page 40 Intermodal Connectivity

Shuttle/Bus Service Strategies shuttle and bus service strategies to reduce vehicular volumes in the CTA were studied, under these strategies, certain shuttles would no longer be allowed to operate in the CTA as they do currently; rather, these vehicles would drop off and pick up passengers at a facility constructed outside of the CTA. Consolidated buses would transport passengers between this facility and the CTA. For LAWA to accommodate any consolidated bus operation, a convenient facility beyond the CTA would need to be provided to allow for passengers to transfer between individual commercial vehicle modes/services and a consolidated busing operation. The facility should be located in proximity to the CTA to provide convenient shuttle access.

**Question:** Appendix E-2 page 31 talks about an intermodal connectivity center in which commercial vehicles will stop so that passengers can transfer to a consolidated bus. How does LAWA feel that this will improve service by making people change conveyances to get into the CTA? The section noted states that this will include ticketing. Will it include baggage drop off? What percentage of the travelers are expected to use this facility? Does LAWA expect all from the ConRAG to use this?

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Page 45 Figure 50 – Bird's-eye view of Manchester Square Transit Hub illustrating multimodal integration with airport program

Question: Appendix E-2 page 36 illustration figures 49,50,51 of the transit stations would be much more easily recognized if an orientation and approximate scale were provided. What is the relative position to the CTA and 405 freeway?

Page 46: The following summarize the advantages and disadvantages of a Transit Hub at Manchester square.

- Pros:
- direct connectivity with the Metro Crenshaw/LAX and Green Line light rail transit corridors
  - enhanced levels of service for passengers coming to the airport in private vehicles seeking remote weather protected parking with seamless transfer to airport consolidated service
  - potential for economic development, if Manchester square is developed as an airport hub
- Cons:
- potentially requires significant capital investment in terms of property acquisition and infrastructure.

Question: Appendix E-2 page 37 The only Con listed for a Manchester Square transit hub is property acquisition. Doesn't LAWA already own this property?

Page 48 Figure 52 Inbound Departures roadway to accommodate busway, Option 1

Question: Appendix E-2 Busway figures show an elevated structure over Sepulveda. When 24L is extended east where does the RPZ land? Is this structure in it or must a waiver be provided?

Page 54 Specific Plan Amendment Study (SPAS) Support

The SPAS process is being undertaken to identify and develop potential alternative designs, technologies, and configurations for the LAX Master plan program that would provide solutions to the problems that the yellow Light projects were designed to address consistent with a practical capacity of 78.9 MAP. The main ground transportation features of the approved LAX Master plan Alternative d include the following:

Question: Appendix E-2 page 54 states that for SPAS alternative designs are being identified which provide solutions to the problems... What are the target metrics for items being solved? What are the problems being solved?

Page 65 Alternative B, illustrated in Figure 76, is characterized by the following features.

- Ground Transportation
- ConRAC, located in a portion of Manchester square, would include a customer service area and approximately 8,271 spaces for ready/return vehicles.
  - All other ground transportation improvements identified in Alternatives 1 and 2 apply to this alternative

Question: The report goes on to say, "Alternative 9, illustrated in Figure 77, is comparable to Alternative 8, except that an APM system is proposed between Manchester square and the CTA, with an intermediate stop at the ITF." This is inconsistent with the descriptions in the DEIR summary and other locations. What is correct? What was used to reach conclusions of impact?

Page 69 The roadway modeling efforts were suspended on or about June 2010 while a new future 78.9 MAP gated (non-airline specific) flight schedule was reviewed and approved by LAWA. due to delays experienced by the team responsible for completing this non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key assumptions related to how the CTA terminals and roadways will function in the future, the refinement of landscape modeling was discontinued, with the exception of some specific analyses provided in this study report.

Question: Ground transportation Appendix A page 69 App E2 states: "The roadway modeling efforts were suspended on or about June 2010 while a new future 78.9 MAP gated (non-airline specific) flight schedule was reviewed and approved by LAWA. due to delays experienced by the team responsible for completing this non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key

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assumptions related to how the CTA terminals and roadways will function in the future, the refinement of landscape modeling was discontinued, with the exception of some specific analyses provided in this study report." Does this mean that LAWA is acknowledging that their model is inaccurate and not representative? What does it mean?

Page 69 The following field surveys were conducted to support the further development and refinement of the traffic models:

- Turning movement counts for intersections along Center Way
- Vehicle classification survey on the lower level at the entrance to the airport
- Vehicle dwell time survey at T1, T4, and T7
- Vehicle license plate survey at T1 and T7 Arrivals curbside

Question: Ground Eval Appendix E-2, Appendix A page 60 How were vehicle dwell times at T1, T4, and T7 conducted? Was a time recorded or were possible delay causes looked at and extrapolated? What times of day were used? What time of year? If, for instance, people are going to the east coast in winter there is likely more luggage.

Page 70 Figure A-1 59.8 MAP and 78.9 MAP peak hour traffic volumes on the eastern end of the CTA

Question: Figure A-1 of Appendix E-2, page 70 Entry into the CTA is shown from two points (the bridge along T1 and Century) for a total of 3255 vehicles baseline and 3839 future. Why did vehicle entries increase by 18% while MAP increased by 32%?

Page 73 Future Conditions Gated Passenger Schedule Figure A-7 provides a graphic representation of the assumed aircraft gating for the future (78.9 MAP) condition which includes a MSC (see below) but no yellow Light projects. The gated passenger schedule representing the aircraft gating scenario illustrated in the Figure A-7 used as the future condition for this study was created from the passenger schedule for the 78.9 MAP activity level, developed with the assistance of the national Aeronautics and Space Administration (NASA) to support various north airfield simulation efforts.

Question: Appendix E-2 Ground Transportation, p 64, "Future Conditions Gated Passenger Schedule" identifies Figure A-7 to represent the future condition, but doesn't show a terminal D. Why and how is this accounted for in the models? It also says that NASA simulations were used in the development. Were these for the northside safety study or other studies since the design day aircraft was changed by the professors and the Record one wasn't used. What is correct? What will be the different estimated values if conditions were changed?

Page 73 Bradley West Project Mitigations

As a part of the Bradley West EIR, mitigation measures were developed to offset potential CTA traffic impacts generated by the project. The mitigation measures in the CTA included the modification of a left-turn only lane on World Way at Center Way (across from TBIT) to a through/left lane. This will be accomplished by widening World Way beginning at Center Way and continuing along the frontage of p4 to the first pedestrian signal on World Way south. In addition, the Bradley West EIR included a second mitigation which will construct a second dedicated right turn lane from World Way south to the southbound on-ramp to Sepulveda Boulevard. The locations of these projects are illustrated in Figure A-6.

Question: Appendix E-2 Ground Transportation, p73 Bradley West Project Mitigations are alluded to as a left turn only lane and widening of Center Way along P4. What impacts to traffic do these cause? Must people know which lane to be in or be squeezed into a location that they do not desire? How will drivers be alerted?

Page 75 ... through the TBIT based on consultations with LAWA staff. Details on a possible passenger processor facility in the CTA for all or some portion of the MSC's passengers were not available when the project began. As the study progressed, LAWA began developing a preliminary concept for a MSC passenger processor building. This preliminary concept assumed the passenger processor would be a departures only facility with all arriving MSC passengers continuing to be processed through the TBIT.

Question: Appendix E-2 ground access page 75 states, details on a possible passenger processor facility in the

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CTA for all or some portion of the MSC's passengers were not available when the project began. As the study progressed, LAWA began developing a preliminary concept for a MSC passenger processor building. This preliminary concept assumed the passenger processor would be a departures only facility with all arriving MSC passengers continuing to be processed through the TBIT. Since the other sections state that the passenger processing will be arriving as well as departures how is this accounted for in the model and results?

Page 75 Passenger Activity Table A-1 provides the peak hour passenger activity for the Baseline (2008) and for 78.9 MAP future year conditions. The August 2008 gated airline schedule and the future conditions gated schedule with no yellow Light projects were used to estimate a rolling hour of originating (i.e., outbound flight) and terminating (i.e., inbound flight with LAX as the final destination) passenger volumes for each terminal. Originating passenger volumes throughout each hour of the day were adjusted to account for the time passengers arrived at the curbside prior to...

Question: There have been many terminal location changes for varied airlines which changes the times of day that are peak for that airline which has moved as well as the location (which can impact the amount of luggage from a dwell time standpoint) since 2008. How is this accounted for in the model and results?

Page 75 Passenger Mode Splits & Occupancy passenger mode splits were developed from the 2006 LAX Air passenger survey. The survey data included mode share choices of passengers by the time of the day. The passenger mode splits were determined by processing the raw survey data for the peak hours into a passenger mode split which included reviewing the survey questions to determine the exact nature of a passenger's choices. For example, some rental car customers answered that some of the passengers were dropped off at the curbside before returning their rental car. In this scenario, these passengers were factored in the poV mode choice as well as rental car shuttle choice. These mode splits as well as other factors were adjusted slightly during the calibration process for the trip generation and distribution model to yield the number of vehicles (by mode) closely matching the existing conditions. In addition, group sizes were also determined from the same survey data and served as starting point in determining a vehicle mode's occupancy. Table A-2 shows the mode share and occupancy assumptions utilized in the trip generation model.

Question: Appendix E-2 ground access page 75 If the baseline traffic is 2009 and it's based on Aug 2006 gated airline schedule data, how is this reconciled and what impacts on the estimated results? For future predictions the mode of arrival and departure (ie private vehicle vs mass transit) could be different by several percentage points. How is this accounted for and what are the assumed change assumptions (and where is it documented)?

Page 76 Table A-1 Passenger Activity During Arrivals and Departures Levels Peak Hours, Departures section of table...

Question: Appendix E-2 ground access page 67 Table A-1

Terminals 1 and 7 each have 12 gates shown in figure A-7 yet there is a substantial difference in the percentages of peak travel passengers shown for these two terminals. Why? What can be done to change this imbalance?

Page 77 Figure A-8 Rolling Hour Originating Passenger Volumes at the Departures Curbside (78.9 MAP)

Question: Appendix E-2 Figure A-8 and -9 have curbside traffic for each terminal. Why does the summary from DEIR figure 4.12.1-9 differ in the total number of passengers? Figure 4.12.1-9 at noon total passengers is about 13.6K vs. Fig A-8 is about 8K+Fig A-9 is about 7.7K (15.7K).

Page 79 Vehicle Dwell Time

Vehicle dwell times provide an estimate of the amount of time a vehicle will spend at the curbside loading and unloading passengers. Table A-3 provides the average vehicle dwell times and associated standard deviations by mode used in the VISSIM model for T1 through T7. The standard deviation represents the variation in dwell time from the average dwell time that a vehicle type will spend at a curbside. The standard deviation in vehicle dwell times were applied in the VISSIM simulation using a normal distribution. The data used to develop this table was collected at T1, T4, and T7.

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Question: How was the dwell time data collected? What assumptions were made during the collection? What trend changes in dwell time is anticipated in the future? Where is this documented?

Page 79 Results

As discussed previously, the study's simulation modeling efforts were suspended pending the development and approval of a future non-airline specific gated schedule. Due to delays in receiving the new non-airline specific flight schedule, and the subsequent kickoff of the SPAS process which has redefined many of the key assumptions related to how the CTA terminals and roadways will function in the future, the continued refinement of landscape modeling has not resumed. As a result, a number of the facility and operational improvements discussed above either have only been modeled and evaluated from a qualitative perspective or have not been modeled.

Question: Since the actual conditions were not modeled how is any of this information correlated to the real world or used to predict what will occur in the future? What conclusions can be drawn from the evaluations that were not based on actuals but based on assumptions? Where are these assumptions listed?

Page 81 Table A-4 Results of Analysis LOS (Single Level Busing)

Question: Each scenario shown for 78.9 MAP shows Level of Service F for most if not all of the time around TBIT. Where is the analysis to show an analysis of segregating the buses and commercial vehicles on a separate level? Yes, this would require significant vertical movement support, but is LAWA willing to accept a falling grade even before starting the course?

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- 5 TIMES NUMBER OF JOBS
  - 40,908 NOT 7,752
- TWICE POSITIVE CONSTRUCTION-RELATED ECONOMIC IMPACT ON REGION
  - \$5.1 BILLION NOT \$2.6 BILLION
- TWICE DOLLARS BACK FOR DOLLARS INVESTED
  - \$2.67 NOT \$1.35
- 8 TIMES ONGOING TOURIST DOLLARS
  - \$112.8 MILLION NOT \$14.1 MILLION PER YEAR

THE DEIR AND SPAS REPORT STATES THE IMPORTANCE OF LAX AS AN ECONOMIC GENERATOR FOR THE REGION. THE ATTACHED CHARTS PRESENT AN ARSAC ASSESSMENT OF HOW THE VARIOUS ALTERNATIVES RELATE TO JOB CREATION AND ECONOMIC BENEFITS.

Where in the DEIR has LAWA prepared an assessment of economic benefits and job creation to back up the statements made in the document? What are the benefits and job creation factors determined by LAWA?

MODEL OF JOB AND ECONOMIC CONTRIBUTION VS. RUNWAY CONTRIBUTION		DISE 2014-06-18	
TOTAL AMOUNT OF MONEY COMMITTED		1,900,000,000	
TERMINAL IMPROVEMENT			
	Percentage	Dollars	
LABOR	6%	1,150,000,000	
MATERIALS	15%	285,000,000	
OFFICE	3%	57,000,000	
		1,500,000,000	
RUNWAY OPTIMIZATION			
	Percentage	Dollars	
LABOR	15%	285,000,000	
MATERIALS	3%	57,000,000	
OFFICE	6%	115,000,000	
		457,000,000	
PRIMARY JOBS			
	Percentage	Dollars	# of jobs
Electrician & Heavy Machinery	15%	285,000,000	2,850
Carpenter	10%	180,000,000	1,800
Plumber	15%	270,000,000	2,700
Iron Worker	10%	180,000,000	1,800
Painter	10%	180,000,000	1,800
HVAC	10%	180,000,000	1,800
Roofers	10%	180,000,000	1,800
Electricians	15%	270,000,000	2,700
Others	10%	180,000,000	1,800
	100%	\$ 1,520,000,000	25,700
SECONDARY JOBS			
These define jobs created to supplement additional services (handyman, house, etc.)			
Percentage of Labor Dollars	2.2%	\$ 33,960,000	
Percentage Salary of Secondary of Jobs	75.00%	\$ 25,470,000	
Summation of Secondary Jobs		\$ 5,490	
<b>TOTAL JOBS</b>		<b>40,900</b>	<b>7,752</b>
<b>TOTAL LABOR DOLLARS</b>		<b>\$ 1,900,000,000</b>	<b>\$ 356,250,000</b>
<b># OF JOBS: MULTIPLIER OF TERMINAL VS. RUNWAY</b>		<b>5.3</b>	
ECONOMIC IMPACT ON REGION			
Largest Cities and Metropolitan Areas			
Multiplier of Total Labor Dollars	2.3%	\$ 4,365,000,000	\$ 890,625,000
Multiplier of Total Material Dollars	1.1%	\$ 2,190,000,000	\$ 438,125,000
<b>TOTAL IMPACT</b>		<b>\$ 5,063,500,000</b>	<b>\$ 2,358,625,000</b>
<b>TOTAL ECONOMIC IMPACT: MULTIPLIER OF TERMINAL VS. RUNWAY</b>	<b>2.0</b>		
<b>\$ BACK PER \$ INVESTED:</b>	<b>\$ 2.67</b>		<b>\$ 1.35</b>
<b>\$ BACK PER \$ INVESTED: MULTIPLIER OF TERMINAL VS. RUNWAY</b>	<b>2.0</b>		
INCREASE IN CUSTOMER SATISFACTION			
% Increase in Tips & Compliments	40%		5%
% Increase in Customer Satisfaction	7.00%		
% Increase in Tips & Expenditures	0.00%		0.30%
2013 Direct Worker Spending	\$14,100,000,000		
% Increase in Economic Activity	\$12,800,000		\$14,300,000
<b>INCREASE IN ECONOMIC ACTIVITY: MULTIPLIER OF TERMINAL VS. RUNWAY</b>	<b>8</b>		



ALTERNATIVE	SUB ALTERNATIVE	\$ BILLIONS	% LABOR	JOBS	JOBS/\$1 BILLION	Alt. 2 Efficiency vs. Given Alt.
Alt. 1 - 760 North	Base	3.79	55%	39,269	11,920	Alt. 2 is 17% More Jobs Efficient
	w/Alt. 8 Ground Access	3.93	56%	47,468	12,084	
Alt. 2 - Extend 66/241 - No ConRAC	w/Alt. 9 Ground Access	4.78	51%	52,973	11,123	Alternative being compared to
	Base	2.60	67%	37,385	14,370	
	w/Alt. 8 Ground Access	3.24	65%	45,603	14,088	
	w/Alt. 9 Ground Access	4.07	58%	51,089	12,553	
Alt. 3 - 340 South	Base	16.79	60%	216,476	12,892	Alt. 2 is 6% More Jobs Efficient
	w/Alt. 8 Ground Access	1.66	47%	16,876	10,165	
Alt. 4 - Extend 241 - ConRAC	w/Alts. 1-3 Ground Access	3.28	52%	36,618	11,156	Alt. 2 is 30% More Jobs Efficient
	w/Alt. 8 Ground Access	3.92	53%	44,836	11,444	
	w/Alt. 9 Ground Access	4.75	49%	50,422	10,593	
	w/Alts. 1-2 Ground Access	3.16	57%	38,910	12,304	
Alt. 5 - 350 North	Base	3.80	57%	47,129	12,409	Alt. 2 is 14% More Jobs Efficient
	w/Alt. 8 Ground Access	4.63	53%	52,615	11,362	
Alt. 6 - 100 North	w/Alt. 9 Ground Access	2.82	56%	33,946	12,035	Alt. 2 is 16% More Jobs Efficient
	w/Alts. 1-2 Ground Access	3.46	57%	42,164	12,201	
	w/Alt. 8 Ground Access	4.29	51%	47,650	11,110	

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LAX SPAS DEIR Comments on topic of center-line taxiways...

**Question:** Why is operation with a center-line taxiway as conceived for the north complex safer since it results in operation of aircraft closer together and it introduces a new failure mode of errant landings on the taxiway?

Below are data sources showing problems with these taxiways:

#### Taxiway Takeoffs and Landings

By Robert Acherman, Vice President, Alliance for a Regional Solution to Airport Congestion

October 3, 2012

Commercial airplanes landing and taking off on taxiways is a major worldwide problem. Causes include lack of situational awareness by pilots, complex airport geometry and poorly marked taxiways. In 2004, the issue became so pronounced that the US National Transportation Safety Board (NTSB) issued a Safety Recommendation on how to contain the taxiway landing and takeoff problem. The taxiway incidents in Seattle were the tipping point for a call to action. The NTSB Safety Recommendation also recaps other taxiway landings and takeoffs at Palm Springs, CA; Las Vegas McCarran, NV; and Tucson, AZ.

<http://seattletimes.nwsource.com/news/business/links/ntsb06-24-04.pdf>

FAA response to NTSB

<http://seattletimes.nwsource.com/news/business/links/aaa03-09-05.pdf>

NTSB response to FAA

<http://seattletimes.nwsource.com/news/business/links/ntsb08-08-05.pdf>

The FAA performed research and produced the following report. Several other US airports had taxiway operation problems including Palm Beach, FL; Lincoln, NE and Memphis, TN.

<http://www.airporttech.tc.faa.gov/safety/downloads/TN07-54.pdf>

In 2010, the FAA issued guidelines in 2010 on how airports can mark taxiways for increased pilot visibility.

[http://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm?gldocument=current/documentNumber/150\\_5340-1](http://www.faa.gov/airports/resources/advisory_circulars/index.cfm?gldocument=current/documentNumber/150_5340-1)

Aviation safety requires eternal vigilance. It requires the active participation of pilots, controllers, airport operators and the general public. Good taxiway design and technology can help resolve part of the taxiway landing and takeoff problem. Ultimately, though, the burden falls upon the pilot with the oversight of controllers to not land or takeoff on taxiways.

#### ARTICLES ABOUT AIRCRAFT LANDING ON TAXIWAYS

#### Seattle-Tacoma Airport (SEA)

1999-2004 various incidents

[http://seattletimes.com/html/business/technology/2002621198\\_seatac13.html](http://seattletimes.com/html/business/technology/2002621198_seatac13.html)

#### Newark, NJ (EWR)

October 26, 2006, Continental Airlines Boeing 757 lands on taxiway

[http://www.nj.com/news/index.ssf/2008/04/lighting\\_a\\_factor\\_in\\_newark\\_ta.html](http://www.nj.com/news/index.ssf/2008/04/lighting_a_factor_in_newark_ta.html)

#### Palembang, Indonesia

October 2008, Garuda Boeing 737-400 lands on taxiway

<http://news.aviation-safety.net/2011/05/09/report-misaligned-vor-track-factor-in-indonesian-taxiway-landing/>

#### Cagliari, Italy

April 21, 2009, Ryanair Boeing 737 lands on taxiway

<http://www.flightglobal.com/news/articles/inquiry-as-ryanair-flight-lands-on-taxiway-at-cagliari-325060/>

#### Atlanta Hartsfield-Jackson International Airport (ATL)

October 2009, Delta Boeing 767 from Rio de Janeiro lands on taxiway

[http://articles.cnn.com/2009-10-21/us/taxiway.landing\\_1\\_taxiway-approach-lights-main-runway?\\_s=PM:US](http://articles.cnn.com/2009-10-21/us/taxiway.landing_1_taxiway-approach-lights-main-runway?_s=PM:US)

#### Paphos, Cyprus

September 21, 2011, Thomson Airways Boeing 737-800 lands on taxiway

<http://www.avherald.com/h?article=44355a86&opt=0>

#### ARTICLES ABOUT AIRCRAFT TAKING OFF ON TAXIWAYS

##### Anchorage, Alaska (ANC)

January 25, 2002, China Airlines Airbus A340-300 takes off on taxiway

[http://www.asc.gov.tw/asc\\_en/accident\\_list\\_2.asp?accident\\_no=126](http://www.asc.gov.tw/asc_en/accident_list_2.asp?accident_no=126)

November 16, 2005, EVA Airways McDonnell Douglas MD-11 takes off on taxiway

<http://news.aviation-safety.net/2005/11/16/md-11-cargo-plane-takes-off-on-taxiway-instead-of-runway-at-anchorage/>

##### Oslo-Gardermoen Airport, Norway



October 23, 2005, Pegasus Airlines Boeing 737-800 takes off on taxiway

[http://www.asc.gov.tw/asc\\_en/accident\\_list\\_2.asp?accident\\_no=126](http://www.asc.gov.tw/asc_en/accident_list_2.asp?accident_no=126)

February 25, 2010, Aeroflot Airbus A320 takes off on taxiway

<http://aviationsafetynetwork.wordpress.com/2010/12/14/report-airline-airport-and-controller-were-factors-in-a320-taxiway-takeoff-at-oslo-gardemoen/>

**Hong Kong International Airport (HKG)**

September 13, 2008, Hong Kong Airlines Boeing 737 attempts takeoff on taxiway

<http://www.topnews.in/pilots-suspended-trvng-lake-taxiway-hong-kong-269191>

November 27, 2010, Finnair Airbus A340 aborts takeoff on taxiway

<http://news.aviation-safety.net/2012/01/14/hong-kong-rad-issues-final-report-on-a340-attempted-taxiway-takeoff/>

**Amsterdam, The Netherlands**

February 10, 2012, KLM 737-300 takes off on taxiway

<http://www.flightglobal.com/news/articles/klm-737-crew-lost-position-awareness-before-taxiway-take-off-366475/>

Question: Why is the NASS study response to FAA questions not included in the DEIR or SPAS report?

From the Academic Panel's responses to the FAA which was neglected to be included in the DEIR...

This is on PDF page 17 (print out page 15) (the hard copy pages of 8, 9, and 14-18):

"Note that only the 3 Runway (3R) configuration (one runway on the north complex) would meet FAA Group VI standards! This one would also eliminate runway incursions caused by runway crossing. There would be no runway crossing here as the same runway would be used for takeoffs and landings. ARSAC recommended the 3R configuration to be studied in the NASS."

Page 15 (hard copy)

"The Panel was asked to estimate the safety of operating the North Airfield under certain configurations and levels of demand, and not to assess the consistency of these operations with FAA design standards. The AP Panel recognizes that all the North Airfield configurations studied except 3R (a three-runway airport) would fall short of at least one FAA design standard. For example, the recommended lateral separation between parallel runways (for VFR Operations) for ADG V and VI is 1,200 feet (FAA AC 150/5300-13 Paragraph 208). This implies configurations Baseline, Baseline-S,

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100-N, 340-N and 340-S all fail to meet the recommended standard. A second recommended standard for simultaneous approaches and departures recommends 1,200 feet of runway separation for ADG V and ADG VI. Again, only 3R would meet such a standard (as there is no parallel runway under this alternative). The South Airfield, as modified with the new centerline taxiway, does not meet that standard either.

In short, if deviations from recommended FAA design standards were enough to invalidate a configuration, there would have been no point in conducting the study.

Babbitt did say that runway incursions decreased 50% between 2009 and 2010 (25 to 12). He highlighted the Runway Status Lights technology. He did not say explicitly that RWSL contributed to the decline in runway incursions. RWSL are a tool in reducing incursions - see Fact Sheet below.

2010 Press release from Randy Babbitt at Boston Logan where RWSL was installed.

[http://www.faa.gov/news/press\\_releases/news\\_story.cfm?newsid=11959](http://www.faa.gov/news/press_releases/news_story.cfm?newsid=11959)

FACT SHEET on Runway Incursions

2010 to 2011, 50% drop of incursions from 12 to 6.

[http://www.faa.gov/news/fact\\_sheets/news\\_story.cfm?newsid=12783](http://www.faa.gov/news/fact_sheets/news_story.cfm?newsid=12783)

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Business & Technology | Pilots mistake taxiway for runway at Sea-Tac | Seattle Times Newspaper Page 1 of 5

## The Seattle Times

Friday, November 13, 2009 - Page updated at 12:00 AM

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### Pilots mistake taxiway for runway at Sea-Tac

By David Bowermaster  
Seattle Times aerospace reporter

When Roger Soher flew a 37-seat Air Canada Jazz turboprop into Seattle-Tacoma International Airport in January 2004, he was aware of the "Taxiway Tango" problem.

He'd flown into Sea-Tac many times and knew pilots arriving from the north sometimes confused the western landing strip, Runway 16 Right, with the nearby taxiway, called T or Tango. He also knew Sea-Tac had placed a 25-foot-by-25-foot "X" at the end of the taxiway to prevent potentially catastrophic landings there.

So after touching down that morning, as he later reported, Soher and his co-pilot were startled to hear from the control tower: "You have landed on taxiway."

At least eight times since December 1999, experienced pilots from five different airlines have mistaken Taxiway Tango for Runway 16R.

Three planes, including an American Airlines MD-80 carrying 111 passengers and crew members, actually landed on the taxiway. Five others — most recently in January of this year — either performed last-minute "sideslips" to shift course and land on 16R, or aborted their landings before circling and touching down safely on the runway.

The incidents have alarmed the highest levels of the National Transportation Safety Board (NTSB), which has repeatedly warned that the confusion could cause a collision between incoming jets and planes or vehicles on the taxiway.

Acting NTSB Chairman Mark Rosenker wrote in an Aug. 8 letter to Federal Aviation Administration Administrator Marion Blakey that "the Safety Board believes the Taxiway T situation at Sea-Tac is a serious problem that has the potential to contribute to or cause a major accident, yet the FAA is unwilling to take interim steps to mark the taxiway."

The FAA and NTSB have been feuding over the issue for years, but local FAA and Sea-Tac officials were unaware of the August letter until a reporter brought it to their attention late last month.

They disagree with the NTSB's conclusions, as did several pilots interviewed by The Seattle Times. They cite multiple steps taken in recent years to make Sea-Tac's runways more visible and to educate pilots, and they insist passengers have little to fear.

"I believe the problem's fixed," said Mark Coates, manager of operations at Sea-Tac.

"We haven't had an unsafe landing on Taxiway Tango yet. Every one of them was wrong, and every one of them should not have happened, but they were not unsafe."

The NTSB wants Sea-Tac to take additional actions that sound simple, such as painting warnings on the taxiway surface itself. But FAA and Sea-Tac officials say there is no proof those measures would work.

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#### Confusion from the start

Taxiway Tango is lightly used, mostly by small private planes and corporate jets rolling to the general aviation hanger on the airport's west side. Those planes represent just 1 percent of the traffic at Sea-Tac.

Commercial jets use Tango less often, mostly to reach parking spots on the edge of the taxiway during weather delays or when overnight parking at the terminal is full.

The taxiway was completed in October 1999, an accessory to the planned third runway that has been delayed for years by court battles.

Pilots noticed it right away.

"We started having issues with that [taxiway] almost from day one," said a senior commercial pilot who has been flying into Sea-Tac since 1977. His employer allowed him to speak only on condition neither was identified.

From the air, the taxiway's pristine pavement draws the eye, pilots say.

"When you're 15 or 20 miles from the airport, you pick up this piece of concrete first because it's newer and brighter," said Jack Wilkes, an Alaska Airlines 737 captain with 34 years of experience and air-safety chairman for Alaska's pilots union.

The first-known instance of a pilot mistaking Tango for Runway 16R occurred two months after Tango opened. In an anonymous report filed with a voluntary federal air-safety database, the pilot of a 737-800 said he lined up to land on the taxiway "because of the intense glare from the sun where the taxiway was clearly visible and the other landing surfaces were not able to be seen."

When he realized his mistake, the pilot executed a "sideslip," lined up with Runway 16R and landed safely. At least one other pilot — in the 737 just ahead of the 737 — made the same mistake that day, but that incident was not formally documented.

The most recent incident happened in January. The pilot of a Southwest Airlines 737 was just 500 feet above the ground when he realized he was about to land on Taxiway Tango. He executed a "go-around" at 260 feet and landed on Runway 16R.

Elements of Tango's design add to pilots' confusion.

Both the taxiway and Runway 16 Right are made of concrete, which has a white-ish appearance from the air. Runway 16 Left is made of asphalt, which looks dark.

"16L just kind of blends in because it's black, and looks like the ramp area" in front of the main terminal, said the senior pilot who spoke on condition of anonymity.

The dimensions of Tango and Runway 16R are similar as well. Counting the landing surface and the adjacent shoulders, Runway 16R is 200 feet wide, close to Tango's 180-foot span. Runway 16L is much wider at 250 feet across.

Additionally, Tango is just 400 feet from Runway 16R. Runway 16L is 600 feet from 16R.

Seattle's geography and weather complicate matters further.

Each of the erroneous approaches has involved planes flying from the north toward the southern sun. And they've occurred between December and March, when the sun is low on the horizon and most likely to be shining into pilots' eyes.

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Several also took place on days when rain showers doused the runways, followed by bright sun breaks.

"If the sun is peeking below the clouds and the surface is wet, you're going to see one heck of a glare," said Tom McRae, regional safety coordinator for the Air Line Pilots Association and an Alaska Airlines captain.

#### Steps taken so far

Sea-Tac officials have tried several strategies to keep pilots from landing on Taxiway Tango.

In May 2000, they placed a small "X" on the ground about 200 feet north of the taxiway.

It didn't do the trick.

About six months later, a 14-passenger Cessna 208 operated by Harbor Air became the first plane to land on Taxiway Tango.

The problem got more attention after the heavily loaded American Airlines MD-80 landed on Taxiway Tango on March 14, 2003. The NTSB, FAA, Sea-Tac officials and pilots formed a working group to study the problem.

Soon after, in May 2003, Sea-Tac installed the yellow 25-foot-by-25-foot "X" near the end of the taxiway.

Also, an audio warning about Taxiway Tango was added on the weather and conditions radio broadcast that pilots check before landing at Sea-Tac. Yet the incidents continued, most notably the Air Canada Jazz landing on Tango in January 2004.

Seher, the captain, could not be reached for comment. But he told NTSB investigators neither he nor his co-pilot saw the X during their final approach, though they knew it was there.

"Despite the airport's efforts, flight crews continue to mistake Taxiway T for an active runway," the NTSB wrote in June 2004.

Sea-Tac in late 2004 added runway and identifier lights (REILs) to draw pilots' attention toward the two runways.

But the lights "were very disappointing," admitted Bob David, manager of FAA's airport-safety and operations divisions. One problem: REILs are easy to see when a plane is lined up on the runway, but not when the plane is off to one side.

The flight crew of the Southwest Airlines 737 that lined up on Taxiway Tango in January 2005 told NTSB investigators they did not see the REILs until after they aborted the first landing.

More recently, the FAA persuaded the publishers of flying charts and maps for Sea-Tac to include written warnings about the Taxiway Tango situation.

#### What else can be done?

In June 2004, the NTSB recommended the FAA allow Sea-Tac to paint "TAXI ONLY" or "TAXIWAY" repeatedly on Tango, along with a serpentine center line.

Other airports have used such markings with good results.

When Palm Springs International Airport added a second parallel runway in 1991, planes began landing on the taxiway between the two landing strips. Twenty taxiway landings took place in 1995 alone, although most involved small private planes rather than commercial jets.

Steve Zehr, systems aviation director at Palm Springs International, said the airport in the late 1990s painted several "TAXI" and "TAXIWAY" labels on the taxiway and added a serpentine center line.

"The incidence of errant landings dropped dramatically," Zehr said.

Airports in Las Vegas and Tucson took similar precautions, with similar success.

But Matt Cavanaugh, manager of the safety and standards branch of the FAA's Pacific Northwest office in Renton, said: "The flight tests we've done have verified that when it's wet and shiny, you cannot see markings."

"The water on the surface will obscure those markings," agreed Alaska pilot Wilkes.

Max Tidwell, head of runway safety in the FAA's Pacific Northwest office, said such markings work best at airports where pilots fly past the airport before landing, allowing them to look down and see the taxiway.

"At this airport all you have are straight-in approaches," said Coates, manager of operations at Sea-Tac. "You don't have an opportunity to fly beside a taxiway and look out a window and say, 'What's that?'"

The FAA says it tested paint on the taxiway last February and concluded it would not be visible.

The NTSB said the FAA painted only small strips on the taxiway's dark asphalt shoulders, rather than on the bright concrete surface, and didn't try running a serpentine line down the taxiway.

"Given this information, the Safety Board questions how the FAA could determine that these measures were ineffective," the NTSB wrote in its Aug. 8 letter.

#### Target fixation

No matter how Taxiway Tango is marked, electronic instruments can guide pilots precisely to Runway 16R.

When the coordinates for Sea-Tac are dialed in to a plane's navigation system, it indicates whether the final approach is on target.

But on clear days pilots generally opt for visual approaches rather than relying on their instruments. Both airlines and air traffic controllers prefer this because it allows shorter distances between incoming planes. Kathryn Vernon, air-traffic hub manager for the FAA in Seattle, says most airlines' policy is that pilots should check their electronic guidance anyhow when doing a visual approach.

Yet even highly experienced pilots occasionally forget to look back at their instruments once they see what they think is the runway.

"You pick it up, you get locked in and you land," Wilkes said.

The FAA's Max Tidwell said the agency and Sea-Tac officials are trying to correct the taxiway problem at that early point in pilots' decision making, so they do not let their eyes deceive them.

Coates said he thinks the cumulative effect of all of the measures taken by Sea-Tac has greatly diminished the possibility of another airplane landing on Taxiway Tango. But he said he, air traffic controllers, the FAA and the NTSB will keep a close eye on the situation this winter.

Because as long as Tango remains at Sea-Tac, more errant landings remain a possibility.

"The only 100 percent solution is to remove that taxiway," Wilkes said, "and I don't believe that's going to happen."

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## The Seattle Times NATION & WORLD

Saturday, November 4, 2006 Page updated at 12:00 AM Copyright © 2006 The Seattle Times Company **Runway errors spur call for tech upgrades**

By David Porter  
The Associated Press

NEWARK, N.J. — To an experienced pilot, Runway 29 at Newark Liberty International Airport is hard to miss. It is half a football field wide, and like all jet runways, it is marked by white lights on each side and down its center line.

All of which has left some aviation officials alarmed that a Boeing 757 mistakenly landed on an adjacent taxiway last weekend.

Aviation experts said the incident last Saturday night points up the need for better runway-safety technology.

Although no one was injured last week, "it's an incredibly dangerous thing," said Justin Green, a New York lawyer specializing in aviation litigation and a former Marine accident investigator.

Deadly airplane crashes can happen on runways because they're too short, improperly lit, poorly designed or lack safety equipment. A minor procedural error by a pilot or an air traffic controller can turn tragic if a vehicle or another airplane is in the way.

Federal safety investigators are looking into three other runway mishaps this week alone: An Alaska Airlines jet took off on the wrong runway at Seattle-Tacoma International Airport on Monday, and two airlines clipped wings while taxiing at the Newark airport.

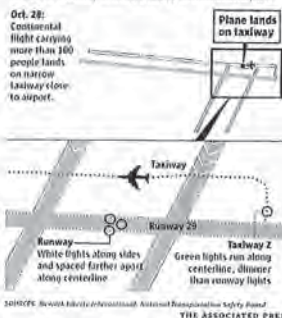
Over the years, airlines have taken off or landed on the wrong runway. In August, for example, 49 people died when a commuter jet made a wrong turn and took off from a too-short runway in Lexington, Ky.

It is rare for a jet to set down on a taxiway, however. Sea-Tac, for instance, had three such landings over a recent four-year span. Officials there issued special warnings to pilots and painted a 25-by-25-foot "X" near the end of a taxiway.

#### Missed runway at Newark airport

Taxiways are differentiated from runways by size and lighting, so officials were puzzled about why a Continental pilot recently landed on a taxiway at Newark Liberty International Airport.

Oct. 28:  
Continental flight carrying more than 160 people lands on narrow taxiway close to airport.





The National Transportation Safety Board (NTSB) is investigating last weekend's incident, which involved a Continental Airlines flight carrying 154 people from Orlando, Fla. Both pilots have been grounded by the airline.

The NTSB said Thursday it was still awaiting statements from members of the flight crew. Jill Andrews, who is leading the investigation, said it was up to Continental to decide whether to test the pilots for drugs or alcohol. A Continental spokeswoman had no comment. The names of the pilots have not been released.

The plane set down on a taxiway that runs parallel to the runway and is close to it. The taxiway is used to tow airplanes between parking areas and other parts of the airport, and smaller vehicles use the area just off the taxiway to move other equipment.

According to the NTSB's preliminary report, Flight 1883 was initially cleared for an approach to Runway 22L. Runway 22L is equipped with an Instrument Landing System (ILS), which displays in the cockpit whether a plane is lined up with the middle of the runway. The plane was then directed to turn and land on Runway 29, which is not equipped with ILS; pilots line up the plane visually.

The "ILS circling approach" to Runway 29 is common, said Russ Halleran, president of the air traffic controllers union at Newark. Planes are often ordered to land on that runway when there are strong crosswinds from the west, as there were last Saturday.

That could present a challenge to pilots, particularly if they are unfamiliar with the airport's layout, some experts said. The landing also occurred at dusk, which could have been a factor, they said.

"Being cleared to land on a different runway than the one you are flying the approach to introduces a whole new set of complexities to the pilots at a very critical time, especially when the landing runway does not have a precision approach," said Denis Braslin, an American Airlines pilot and spokesman for the Allied Pilots Association, the airline pilots union.

Halleran said the air traffic controllers that evening followed all normal procedures for the landing. And Green, the aviation attorney, suggested the pilots' mistake was probably beyond the ability of the controllers to catch.

"Clearly it was primarily a pilot issue," Green said.

Wrong-runway incidents may have occurred more frequently than the Federal Aviation Administration (FAA) previously thought. The agency searched 5.4 million records over 10 years and found flight crews said they were confused about runways 117 times, FAA spokeswoman Laura Brown said.

As a result of the search, Brown said, the FAA is exploring ways to prevent pilot confusion.

[http://seattletimes.nwsource.com/html/nationworld/2003344482\\_runway04.html](http://seattletimes.nwsource.com/html/nationworld/2003344482_runway04.html)

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November 29, 2010

Mr. Herb Glasgow  
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Re: Revised Notice of Preparation of a Draft EIR Report (SCH No. 1997061047), dated October 8, 2010 "LAX Specific Plan Amendment Study"

## INTRODUCTION

In accordance with the February 2006 Stipulated Settlement with the City of Los Angeles calling for significant revisions to the 2005 LAX Master Plan Alternative D, ARSAC has been a member of the Specific Plan Amendment Study Committee.

We continue to be dedicated to a safe, secure, and convenient LAX of which the residents of this City can be proud. However, ARSAC is adamantly opposed to expanding LAX into the surrounding communities, especially any proposals that move Runway 24 Right to the north. ARSAC provides these comments in hopes that LAWA will revise its conduct so that the Amendment Study and EIR will be consistent with the Settlement Agreement, and will be sensitive to the impacts on the surrounding communities. ARSAC incorporates, by reference, the attached reference documents as noted throughout this document.

On the whole, the project options presented in the Revised NOP lack the specificity that is needed to fully assess the environmental impacts or operational efficiency of aircraft ground traffic. We expect LAWA to refine the options and to provide a level of detail in the EIR so that the social impacts as well as financial costs and other impacts of the project can be assessed by decision makers. The ultimate purpose of this EIR is to help the decision makers decide upon a preferred alternative of a Master Plan to be built. All costs—financial, health, environmental, and social—need to be addressed in order to make an informed decision.

The Specific Plan Amendment Study (SPAS) was initially envisioned as an opportunity for LAWA to work cooperatively with stakeholders to rapidly update the LAX Master Plan and to facilitate renovation of LAX facilities. Contemplated schedules are overdue.

We encourage LAWA to work closely with stakeholders to get this EIR completed in a timely manner and to ensure that it addresses all of the issues so that delays and litigation are avoided. As a part of the Specific Plan City Ordinance and the Stipulated Settlement Agreement, LAWA was supposed to conduct outreach to affected stakeholders. It is unclear what outreach LAWA has been conducted and would like an enumeration of meetings showing what types of stakeholders participated, what suggestions were considered by LAWA and which, if any, were incorporated into their proposed options.

Since the NOP has divided the option elements into sections to be mixed/matched to be assembled into full Master Plan options, the comments of this letter are organized to accommodate LAWA response.

## NORTH RUNWAY MOVEMENT OPTIONS

No runway movement is our preferred alternative for the north complex.

LAWA and the FAA spent most of the past five years using incursion reduction and runway safety improvement as justification for expanding the separation distances between the north runways. ARSAC has repeatedly stated that we want the safest runways practical and that there are other, more cost effective options to improve runway safety.

The FAA stated our case most eloquently in their FAA Runway Safety Report, Executive Summary June 2008 when it put runway incursion experience into context by stating, "Of the 24 serious incursions [nationally] in FY2007, eight involved commercial flights. At this rate (eight in over 25 million operations) a person could fly on one commercial flight every day for as many as 4,280 years without encountering a serious runway incursion." An appendix to this report provides numerous potential additions to airport safety that can be added without runway movement. One of the many examples provided was the one at Long Beach-Daugherty Field, Final Approach Occupancy Signal (FAROS). Another, Runway Status Lights, has only been partially installed at LAX with promises that a full installation will be made. Note that the most serious incursion at LAX occurred on the South runway complex at an intersection where it is believed that RSL could have avoided the incident. Like the FAA report, ARSAC has provided LAWA with numerous suggestions to improve airfield safety through enhanced marking, lighting and signage; installation of Runway Status Lights and systems such as Enhanced Final Approach Runway Occupancy Signals (eFAROS). We went one step further by advocating for a full staffed control tower of highly experienced controllers. LAWA should conduct an unbiased evaluation of the options before the alternatives are finally selected for inclusion in the Draft EIR.

The Revised NOP uses descriptors for runway safety conditions which are word crafted and biased toward justifying expansion north. NOP Section 2, item i, under Project Descriptions, for example, states "could create even greater safety..." implying significant possible improvements when the Academic Panel/NASA North Airfield Safety Study (NASS) stated "limited practical importance."

How has LAWA planned to incorporate each of the system improvements in the 2008 FAA Runway Safety Report into its safety and efficiency studies for each option?

The North Airfield Safety Study conducted by the Academic Panel came to a similar conclusion when it deemed the existing north runway complex as extremely safe. Their report states, "All of the proposals to create new configurations of the North Airfield would reduce by a substantial percentage the risk of a runway collision." Followed by "However, because the baseline level of collision is so low, reducing that risk by a substantial percentage is of limited practical importance." The NASS report concluded increasing runway separation would result in 72 deaths vs 80 deaths in 200 years with the current north airfield configuration.

Runway options devised by LAWA expanding north to accomplish wider north runway complex separation are unacceptable because they increase the impacts on the communities along the north boundary, eastern areas, and on the south by facilitating increased air and ground traffic.

During the September 2010 Specific Plan Amendment Committee meeting, LAWA presented the options that they intended to include in the NOP. In addition to the "no action" and "approved Alternative D of 340' south" configurations, each of the options called for moving runways north toward Westchester-Playa Del Rey.



If further runway separation is deemed mandatory, ARSAC stated that LAVA should move Runway 24 L south instead. After further discussion LAVA agreed to include an option moving runway 24L 100' south along with upgrading the taxiways to accommodate the newer, larger aircraft. ARSAC observed that the current taxiways were built for smaller aircraft in the 1960's and that substantial efficiencies could be achieved if special handling were avoided for larger aircraft around the terminals. LAVA agreed to prepare drawings of an alternative after consulting with ARSAC, but instead prepared two south alternatives moving runway 24L 100' south without input. Their plans failed to respond to our pre-NOP release requests and disappointingly, the LAVA runway south alternatives are the only ones included in the revised NOP.

LAVA stated that their two "100' S alternatives" would receive "at least cursory study" but the criteria for acceptance for formal, complete study have not been revealed in the NOP or other documents. ARSAC informed LAVA that both of "their" options are unacceptable because they fail to include what we requested for taxiway layouts. We request a modification of the existing LAVA plan to extend taxiway D without creating a potential bottleneck along the northern edges of Terminals J and 3.

LAVA should adjust its alternative to meet the criteria ARSAC described to modify the taxiways as requested. ARSAC requested that the second LAVA alternative also be modified. This is the one which has a Group VI Taxiway E all along Runway 24R and a Group V Taxiway D that is interrupted near the terminals. We requested that Taxiway D be extended straight instead of diverging away from the terminals. It will impact a small number of gates, but these impacted gates on the ends of the terminals can be replaced on the north complex in the area known as Park One by a new two-sided terminal.

The only runway option in the NOP that addresses the limited spacing taxiways to accommodate the larger aircraft adequately would be that requested by ARSAC. None of the options moving north addresses this issue.

At the present time LAVA-owned property located between Runway 24 R and Westchester Parkway is zoned for airfield-serving commercial purposes. This area includes property both inside and outside of the perimeter fence of LAX. Construction of buildings to accommodate such uses would provide a significant environmental buffer between airfield operations and the community to the north with respect to community safety, noise, vibration, light, air pollution, and aesthetics, in addition to the economic benefit of such uses for LAVA and/or the City of Los Angeles. Movement of Runway 24 R to the north will preclude construction of such buildings and hence the environmental and economic benefits of such uses. The environmental cost and financial loss if such land uses are precluded must be identified and studied.

LAVA's knowledge of what lies below its runways is inadequate as proven by the discovery of a previously unknown runway below the south runway complex during construction of Runway 25 L and the adjacent taxiway. It is known that one and perhaps more than one tunnel exists below Runway 24 R. To understand the environmental, construction and economic cost and impact of moving the runway north, an extensive program of borings along the entire length of the north airfield must be undertaken and the environmental impact and financial cost thereof studied.

The intersection of Lincoln Blvd. and Sepulveda Blvd. adjacent to the LAX North Airfield is one of the most important roadways in all of Los Angeles County. It links all of the residential communities,

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projects and the reasonably foreseeable [that is all that is required] worst case scenarios for projects on LAVA owned or controlled land.

The LAX Specific Plan distinguishes between "green lighted" projects and "yellow light" projects which require additional consideration and study. ARSAC's interest in the "green lighted" projects is how soon these can be completed. The way the "yellow light" projects delineated in Section 7.H have been addressed to date is problematic. The Stipulated Settlement calls for enumeration of the impacts for each of the yellow light projects in Section V, paragraphs C. (minimizing impacts) and D. ("...solutions to the problems that the Yellow Light Projects were designed to address..."). Despite numerous requests for quantifiable, detailed impacts that the new project elements are to address, LAVA has failed to provide with the requested information. LAVA provided a handout at the NOP hearings listing general nature issues that were not quantified. A more detailed, quantified list of problems should be prepared to identify those issues that each yellow lighted project was designed to address. These highlighted, quantified issues should then be used as a gauge for assessment of the project's mitigation.

LAVA has provided general descriptions of the alternatives that they identified for study in the EIR and stated that cursory review will be conducted and some will receive full assessment based on their ability to meet LAVA stated objectives. Quantifiable objectives and the judgment criteria to be used to evaluate each alternative needs to be stated prior to selection of projects to be scrutinized with a full assessment and before any elements of a "preferred" alternative are selected.

Stipulated Settlement section D2 ("...security, traffic, and aviation activity...") calls for inclusion of substantial security elements in any design. This is not normally a required element of an EIR, but must be assessed for each alternative along with any environmental impacts created. ARSAC notes that several of the 2003 Rand Corporation security recommendations remain unaddressed, such as incorporating blast glass in the terminals. We note that Mayor Villaraigosa has recently convened a task force on safety and security. LAVA has failed to incorporate fixes for prior security and safety issues highlighted into the planned study options. We call for LAVA to identify the design criteria which they used to ensure that LAX is safe and secure when they designed their study options. Further, we call on LAVA to incorporate community ideas of coordinated camera systems from the community presented by Arnie Corlin (short synopsis attached) as well as security improvements such as scales and cameras embedded in each of the roadway entrances to the Central Terminal Area (CTA).

LAVA is required to conduct detail evaluations of airport efficiency in accordance with the Stipulated Settlement based on the location of gates, taxiways, and other airport features. Alternative program designs need to include the details of these elements so that this requirement can be met. LAVA should also analyze the environmental impacts that would result if all terminal buildings and taxiways specified in the plan are not built or are deferred.

LAVA has separated the north runway complex from other design features and has told ARSAC that they plan to mix/match the north runway plan portion (i.e. airside) with the landside design (i.e. terminals, parking garages, etc.) option of choice. ARSAC is concerned that insufficient attention is being paid to landside projects. Only a narrow range of options is provided for vehicle traffic mitigation and elements, such as the Automated People Mover (APM) system, and it is not described with sufficient detail. One example is the APM-to-terminal interface in the Central Terminal Area.

Since this is not a normal EIR but part of a settlement required SPAS Study, the identification of major cost factors should be identified. Examples include, but are not limited to, impacts from eminent domain powers, the costs of such exercise, the cost of dealing with existing tunnels, hydrology impacts, external infrastructure requirements, and construction phasing.

ARSAC Comments to LAX Master Plan SPAS Study NOP 11-29-2010 Page 5 SPAS-PC00130

businesses and land uses of the Westside (Marina del Rey, Venice, Mar Vista, Santa Monica, Pacific Palisades, Brentwood, Westwood, Beverly Hills, etc.) with the communities, businesses and land uses of the South Bay (El Segundo, Hawthorne, Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, Palos Verdes, etc.). If the perimeter fence of LAX is extended outward to accommodate the north movement of the runways, it will have an immense impact on these people, businesses and land uses both during construction and after completion of construction. In fact, the entire region will be impacted if the perimeter fence is moved outward. For each option that is to be evaluated identify the extent of roadway movement and the environmental cost and financial cost of doing so. Each option should be studied including, without limitation, the impacts both during construction and after project completion on the region as a whole and on local traffic, air quality, noise, etc.

Similarly, any impacts from sewer lines and oil pipelines rerouting must be assessed with adequate cost projections. The Hyperion treatment plant located adjacent to the southwest corner of LAX is the City of Los Angeles' most important waste water treatment plant. Huge sewer lines bring storm and sewer water to Hyperion near LAX. If the runways of the north airfield are moved and/or if the perimeter fence of LAX is extended outward to accommodate the north movement of the runways, it will likely impact the Hyperion pipeline feeder system. The environmental and financial cost of relocating sewer and storm water pipelines must be thoroughly studied including, without limitation, the impact both during construction and after project completion on regional and local traffic, land use, etc.

Westchester Central Business District impacts must be fully disclosed, including impacts on traffic, the costs of traffic improvements, and the economic losses that would occur if the 6L/26R runway is moved north. The Westchester Central Business District is the life blood of the communities on the north of LAX. Depending on the runway option chosen, the impact could be to decimate as much as half of the business district due to FAA required removals to enforce the runway protection zone and runway safety area.

What would the effect be on the various schools and churches that are along the Westchester Parkway corridor - St. Bernard's, WHS, St. Anastasia, Paseo del Rey, Loyola Village, Visitation, etc.? This could include air and noise pollution or a safety risk if there was an air disaster.

In 2009-10 LAVA investigated some interim runway safety improvement projects which moved Taxiways W and Y and several other actions. An NOP was released in June and ARSAC comments are attached. If they are not considered part of the proposed runway option changes, why not?

Although LAVA has inadequate funding to construct all of the program projects that it wishes, approval of any Master Plan expanding north may have consequences for surrounding communities even before delayed projects are built. Schedule uncertainty can devastate businesses which would defer new projects. It would hurt property owners as businesses vacate to more stable environments, and resident values would suffer anticipated impacts.

#### PROCEDURAL ISSUES

The initial NOP (Reference 1) calls for "project tiering" and use of prior data and studies as justification for specific project approvals. The revised NOP amends and supplements the initial one from 2008. The revised NOP states that conditions studied in support of the approved Master Plan Alternative D have changed. The Revised NOP Section 2, Project Background, acknowledges several major changes. Although it lists six specific items, far more items are of consequence, such as LAVA's purchase of the Manchester Square and Belford Square communities and numerous new development projects proposed and/or completed within the area of LAX impact. We call on LAVA to prepare a complete environmental study that does not rely on any old data and includes all of the known potential impact

ARSAC Comments to LAX Master Plan SPAS Study NOP 11-29-2010 Page 4 SPAS-PC00130

Please annotate the Monitor Mitigation Reporting Program document prepared annually by LAVA addressing the Alternative D LAX Master Plan environmental mitigation commitments; commitments made as part of the out-of-court settlement agreement with the LAX Coalition (such as the air quality apportionment study); and commitments in Stipulated Settlement Agreement and then show how these actions were (and will be) used in the establishment of criteria for the ultimate selection of options to be assessed.

ARSAC has, over the past five years, presented numerous runway safety and efficiency improvement projects that do not require movement of runways. If LAVA is to engage non-runway airside improvements (i.e. FAROS as in Long Beach or improved aircraft tracking with enhanced ground radar; in-cockpit airport moving maps and Electronic Flight Bags) into its plans, then how will LAVA calculate the improved efficiency for each of the options that it finally analyzes?

#### DESIGN OPTION ISSUES

The possibility of installing another control tower is not addressed in any option. There have been reports in the news that LAVA and the FAA are investigating how to mitigate blind spots from the control tower at TBIT. Similar studies are necessary for the midfield terminal before it is built. To assure optimal airfield safety, Tower Controllers must have unobstructed views of the airfield to have appropriate situational awareness of aircraft and vehicles. Changes of this magnitude can impact any airside efficiency study and must be discussed in the EIR. Numerous option conditions needing study are noted in the attachments and are incorporated as a part of these comments.

How is LAVA intending to address the environmental impacts of major safety issues such as finalizing installation of the Runway Status Lights, new roadway signs, redesign of the CTA curb areas, and other airfield safety fixes?

Is LAVA preparing a cost-benefit analysis comparing the costs of extended maintenance versus replacement of facilities such as the parking structures or pedestrian bridges from the structures to the terminals? ARSAC has identified and LAVA has acknowledged maintenance issues in the parking structures, CTA roadway, and pedestrian bridges (although there may be disagreement as to the extent of resolution required). Is LAVA planning to factor in the maintenance costs when deciding if it is desirable to modify traffic flow in the CTA? For instance, it is recognized that the passenger bridges are in need of repair. Has LAVA considered replacing them entirely with a much wider bridging structure to accommodate all foot traffic above the ground level in the CTA? We understand that closing the ground level to pedestrians would greatly improve traffic flow. Also, what reviews and options have been considered to create a third level on the CTA roadway for buses and VIP vehicles that could be used as an emergency evacuation path? Has LAVA considered moving bus and other commercial vehicle drop offs to the parking structures? How would that change the traffic flows and resultant EIR evaluations?

Mandated air quality studies have not been completed as scheduled but are an important part of the assessment of air quality impacts. Particle matter monitoring and assessment is a requirement for study in this DEIR. We want to ensure that LAVA includes the impacts of 0.1 micron particle size as shown to be important in the UCLA study of LAX air quality in June 2007. See the extended comments in the Reference 2 comments to the 2008 LAX NOP.

LAVA has indicated that it plans to assume displaced thresholds at each end of the northern runway, Runway 24 R. Although we are told that the portion of runway beyond the threshold limit will not be utilized for take-offs on either end, we cannot assume that these displaced thresholds won't be summarily removed and/or mid-field take offs facilitated by the longer runways. How does LAVA intend to account for threshold changes and mid-runway takeoffs in the environmental review?

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Terminal 0 and use of Park One needs refinement and resolution before options are fixed.

LAWA knows that parking structures and pedestrian bridges are in poor condition and has discussed creating larger bridges above the ground level to improve vehicle traffic flow. LAWA has discussed using bridges as pathways to the terminals that are wide enough to include concessions and even allow for self check-in kiosks (that is becoming more normal in the airline industry) that could ultimately pay for these improvements. It would also free up space in the terminals. Why are they not included in the options to improve LAX?

The described roadway designs are very basic and ARSAC wants more detail on what improvements are expected to result. A roadway to TBIT directly out of the Central Terminal Area is an improvement, but why have other suggestions that have been made, such as a third level to separate buses and VIP vehicles, that would serve as emergency lanes and evacuation routes not been addressed? Why are evacuation routes, especially from the CTA, for various potential disasters not included?

Why have surrounding area roads outside of the CTA have not been addressed in the document to fix flows during peak hours? LAWA should present data to show the extent of vehicles entering the CTA by direction during the peak hours and adjust their designs accordingly.

The FAA has granted waivers to use the taxiways that were designed for smaller aircraft in the 1960's in the proximity of terminals. Since larger Group V aircraft (i.e. Airbus A340-600 and Boeing 777-300ER) and Group VI aircraft (i.e. Airbus A380, Antonov An-124 and An-225, Lockheed C-5 Galaxy) require special handling procedures. We understand that they restrict free flow of aircraft to the runways. Why do none of the options to move a runway north address this critical taxiway efficiency issue?

What will be the Automated People Mover location and how will it facilitate traffic improvements? LAWA has discussed several locations including part of Park One, the parking structures, and terminal roofs. How will each of these options impact flow in the CTA? The structural integrity of existing structures that will be expected to carry the additional weight must be addressed in the DEIR.

Only movement of Consolidated Rental Car Facility (ConRAC) to Manchester Square is described in the NOP and no other options are shown in the NOP. A ConRAC should significantly reduce bus traffic into the CTA by reducing the number of bus trips required to pick up and deliver rental car clients to one location. What is the specific location proposed in Manchester Square for ConRAC placement and how will people be moved to the CTA? What will be the anticipated vehicular traffic flow from the ConRAC and how is this modeled in the overall assessments of traffic for LAX?

Measures to reduce the use of rolling billboards (rental car and hotel buses) trips through the CTA must be addressed, as they distract drivers and thus create safety hazards.

What kinds of traffic impacts are anticipated from the additional uses of Manchester Square, Belford Square and the areas between 96th Street and 98th Street? Are there plans by LAWA to help make these areas walkable from the hotels? Please describe them. Also what levels of vehicle traffic are anticipated to be added?

How will the Metro plans for a train system to LAX be accounted for in the LAX planning and the DEIR? What train assumptions are made (both routes and stations)?

Explain the effects the Next Generation Air Traffic Control System (NextGen) Performance-Based Navigation (PBN) may have on the environmental impact conclusions of this program level study—especially aircraft safety, aircraft traffic flows, noise, pollution (from airfield taxiing impacts) and from

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this to be accounted for in cost assessments? Specifically, the Manchester Tunnel which runs north-south from Lincoln Boulevard under Runway 24 R toward El Segundo was found to have latent moisture. Has the source of the moisture been identified? What remediation efforts will be required?

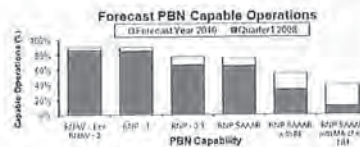
Below are specific EIR topics listed in the CEQA Check list that we ask LAWA to address specific issues.

- I. Aesthetics  
Light and glare studies for air traffic controllers. Light glare was cited as a factor by the controller responsible for the 1991 USAir/SkyWest ground collision at LAX.
- II. Agricultural and Forest Resources
- III. Air Quality  
Where is the Human Health Study promised in the LAX Master Plan commitments, LAX Coalition settlement and the Stipulated Settlement Agreement?  
The DEIR should include study of PM 0.1 (one-tenth). Recent reports from AQMD indicate that these are potentially much more harmful to humans than the larger PM 2.5 particles. The study by John Froines of UCLA in 2007 highlighted the condition that the measurement of PM 2.5 particles is not a good monitor for the smaller particles.
- IV. Biological Resources  
Are there still any Riverside Fairy Shrimp at LAX? Where are they located? Are there any in Continental City?
- V. Cultural Resources
- VI. Geology and Soils  
The stability of the soils in and around the Manchester Tunnel and Lincoln Tunnel under the North Airfield needs to be studied.
- VII. Greenhouse Gas Emissions
- VIII. Hazards and Hazardous Materials  
During the early and mid-1900s, the area surrounding Mines Field (now LAX) was largely an oil field. Active oil production was carried out in the tidal areas of Venice and Playa del Rey. Much of the area around LAX was owned by oil companies, including McCullough Oil, Superior Oil, and other oil companies. A major oil field still is in production in Baldwin Hills, and the Chevron refinery in El Segundo remains one of the most important economic forces in the region. Sepulveda Blvd. at its intersection with Westchester Parkway and Lincoln Blvd. is believed to be a location where numerous major oil pipelines converge. If the perimeter fence of LAX is extended outward to accommodate the north movement of the runways it will likely require the relocation of major petroleum pipelines which will have a large environmental and financial cost.
1. The DEIR should include hazardous materials such as jet fuel, avgas, lubricants, Skydrol, lavatory fluid and other liquids carried by aircraft, and ammunition and weapons carried onto aircraft
2. Parts that have fallen off aircraft including landing gear components, engine cowings, blue ice (frozen lavatory fluid), etc. These risks should be evaluated.
- IX. Hydrology and Water Quality  
LAWA had put together a Conceptual Drainage Plan for the South Airfield Improvement Project. Please create one for the North Airfield DEIR study.  
Please include a study of all sewer lines running underneath LAX. There are sewer lines dating back to the 1920's and more recent ones such as the North Outfall Sewer project in the 1990's.
- X. Land Use and Planning

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changes to air approaches and take offs for both easterly and westerly operations), etc. Please map out the change in noise and pollution impacts for the surrounding areas. The maps should highly newly impacted areas and any increases or decreases in currently affected areas. What will be the noise and pollution mitigation plans? Discussion of NextGen considerations need to include design and implementation of automated flight paths as well as for airspace design and obstacle clearance via Radar Area Navigation (RNAV) procedures in place and anticipated and Required Navigation Performance with on-aircraft performance and alerting capability (RNP). What percentage of Continuous Descent Approach and Tailored Arrivals are assumed now and in the future? Please address this topic in relationship to anticipated implementation per the chart below from the FAA website ([http://www.faa.gov/news/fact\\_sheets/news\\_story.cfm?id=8768](http://www.faa.gov/news/fact_sheets/news_story.cfm?id=8768)):



7/26/10 PBN Capability Report, NHTRE 2006

Several additional design option questions are listed in the 2008

What is the assumed fleet mix for the DEIR? Please list the make and model of aircraft including engine make and model and Auxiliary Power Unit (APU) make and model cross-referenced by airline. Include the current and expected fleet mixes.

What is the assumed flight schedule for the DEIR? Please include the current schedule and future expected schedule. The schedule should include time, origin or destination airport, airline, aircraft make and model, engine make and model and APU make and model.

For each aircraft make and model, please provide noise and pollution data for each engine configuration and APU. The noise and pollution tests should be conducted from 50 feet, 100 feet, 500 feet, 1,000 feet, 1/2 mile and 1 mile every 30 degrees from a centerpoint of the aircraft. The tests should also collect the noise and pollution data at different power levels—start, taxi, takeoff, cruise and landing. What substances are being emitted by the engines and the APUs? Please describe the toxics. In what quantities? Are any of these substances toxic to human beings?

#### SPECIFIC COMMENTS TO INITIAL STUDY AND CHECK LIST DATED OCTOBER 14, 2010.

The Initial Study checklist notes existing zoning as A, L, and N. The LAX Plan figure 1 only designates Open Space, Airport Landside, and Airport Airside. Some of the land in these areas owned by LAWA are still RX, CX, or MX, especially on the Northside Development, Manchester Square and areas south along Aviation boulevard, and Belford Square. Has LAWA identified areas of discrepant zoning? Which properties are specifically zoned other than A, L, and N? The checklist states "conforms to Plan," but the zoning doesn't match the LAX Plan (the sub-Plan to the City General Plan).

In both the 2008 and 2010 checklists "Geology/Soils" was left unchecked indicating no significant issues, yet there may be issues with tunnels, sink holes, toxic elements from gas and oil, and aquifers. How is

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LAWA checked as, "No impact" that the proposed project would physically divide an established community. In the proposals to move Runway 24 Right to the north, LAWA has produced maps that show land acquisition will be necessary for the Runway Protection Zone (RPZ). The land required would take over 25% of the Westchester Central Business District which provides local residents with jobs and services; services for airport employees and visitors and reliable property tax and sales tax revenue for the City of Los Angeles.

Please explain why lopping off the Westchester Business District has no impact?

Please enumerate by address (including suite numbers where applicable), potential job losses and business tax and property tax losses.

XI. Mineral Resources

XII. Noise

XIII. Population and Housing

What property acquisition is required for each concept?

Although Manchester Square is under a voluntary residential acquisition program, would LAWA consider building in this area even if all of the residential properties have not been purchased by LAWA through the voluntary program?

XIV. Public Services

Please study the noise and health effects on each public and private school in the Westchester/Playa del Rey area. These include Los Angeles Unified School District Schools, church schools, private schools, Otis Art Institute and Loyola Marymount University. Identify mitigation measures and the costs of these measures that can be provided to reduce the effects of airport operations at these institutions.

XV. Recreation

LAWA checked no impact for this section, however, ARSAC would like LAWA to study noise and pollution impacts on Nielsen Park, Westchester Golf Course, Westchester Park and the Del Rey Lagoon.

XVI. Transportation/Circulation

Utilities

XVII. LAX has experienced blackouts due to antiquated and vulnerable electrical lines. In one case, a crow had flown into a transformer at 98th Street and Vicksburg. Please address in the DEIR the adequacy of utilities serving LAX (e.g. electricity, water, sewage, telecommunications including high speed Internet lines, pipelines), redundancy and security measures to protect them.

XVIII. Mandatory Findings of Significance

Are there no Mandatory Findings of Significance highlighted?

#### QUESTIONS ABOUT THE NOP DOCUMENTATION AND OPTIONS TO BE EVALUATED

In the airfield alternatives, the descriptions and the figures do not match. For 100 feet north, 200 feet north, 300 feet north and 400 feet north, there is only a description of extending Runway 24 Right 604 feet west. The drawings show 604 foot runway extensions on the east and west ends of the runways. What is LAWA proposing?

There is no description on the drawings (NOP Figures 12, 13 and 14) of the future midfield satellite processor where the Parking 3 and 4 garages are presently located. This future facility should be included in the DEIR.

The runway alternatives in the NOP do not include all of the runway alternatives studied in the North Airfield Safety Study conducted by the Academic Panel and NASA. A one-runway alternative is requested in the "Consideration of other alternatives" in this letter.

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There is no discussion of Runway Protection Zones or Runway Safety Areas and their potential impact on surrounding land uses including possible land acquisition. The FAA has stated that they will no longer grandfather existing structures with new or existing construction. Therefore, this impact needs to be included in the DEIR.

There is a taxi and shuttle van holding lot north of 96<sup>th</sup> Street and west of Sepulveda. There is no discussion of the existence of this holding lot and any potential relocation sites if Runway 24 Left is extended to the east. Possible relocation of this holding lot should be included in the DEIR.

The LAX Medical Clinic and the LAX Police Department station may be in the path of a relocated Sky Way and 96<sup>th</sup> Street bridge. Where would these facilities be relocated?

Where will any lost parking resulting from the closure of Park One be relocated?

The proposed Transportation Facility is on a site where parking is used for office buildings on Century Boulevard. Does LAWA own this parking lot? Are there any parking covenants or leases with the office buildings concerning the use of this parking lot?

Manchester Square property acquisition is being conducted under a Voluntary Residential Acquisition Program. If Manchester Square is utilized for a Ground Transportation Center or Consolidated Rent-a-car facility, then how will LAWA assemble needed properties that are not voluntarily willing to sell? Has LAWA identified which properties are essential to make a functional GTC or ConRAC?

LAWA needs to identify ingress and egress for all proposed projects and resulting traffic flows.

LAWA needs to discuss the existence of two tunnels underneath the North Runway Complex, the Manchester Tunnel which runs south from Lincoln to the Tom Bradley terminal and the Lincoln Tunnel which runs southeast from Lincoln to the Sepulveda Tunnel. In addition, LAWA needs to study all EIR topics with the tunnels.

The DEIR must address the restructuring of the Sky Way and 96<sup>th</sup> Street Bridge.

#### ITEMS THAT NEED SPECIAL EVALUATION IN THE EIR

When calculating the noise impacts on surrounding communities, LAWA should not only provide the "normal" CNEL bands, along with using 3 dB increases as a threshold for significance, but also calculate out to 60 DNL levels as is done in some parts of the country. Further, to give the decision makers more information upon which to make decisions, LAWA should identify affected communities on the basis of single event frequency over 65 dB using modeling techniques as seen in reports from Wyle Labs. Air quality impacts are substantial around airports. What has LAWA determined are all of the noise sources and how are they currently controlled? Will there be improved control measures? If so, they must be clearly defined.

Since this is a special planning activity, what impacts on health are anticipated for noise and air quality? What controls will be initiated as mitigation?

Construction impacts and controls were highlighted in the Stipulated Settlement for the South Airfield Improvement Project and each of the subsequent project EIRs have stated that LAWA intends to handle these impacts "just like the way it was done for the SAIP." Is LAWA continuing this commitment and when will we see the implementation of a construction hotline that will answer issues within minutes and a complementary Noise Plan?

#### ADDITIONAL QUESTIONS

What outreach did LAWA make to other stakeholders such as the hotels, surrounding businesses, airlines and other tenants, and FAA concerning concepts in this NOP? Please provide meeting dates when LAWA met with organizations and/or individuals who were not members of the SPAS Committee to obtain input. Did LAWA solicit and respond to input or just show LAWA's intended plans options? Which community ideas did LAWA incorporate into this NOP? Which ideas were rejected and why? See the attached note from ARSAC presented to LAWA in 2006 at one of the SPAS meetings.

#### ALTERNATIVES PROJECTS NOT YET SET TO BE ANALYZED


Since LAWA is insisting on a full range of alternatives, additional alternatives for study should include the following:

1. A linear terminal to replace Terminal 1, 2 and 3. See Attachment 6 (ARSAC Concepts for SPAS PowerPoint). The linear terminal would be 200 feet wide with a 200 foot wide apron. The linear terminal would start 200 feet east of the Parking Limit Line of Taxilane "D10," which currently services Terminal 3 and the Tom Bradley International Terminal. The linear terminal would be set-up primarily for narrow body (single aisle) aircraft such as Airbus A320's and Boeing 737's. The concept of this linear terminal is Common Use for Low Cost Carriers (LCC's). A linear terminal would benefit passenger convenience by shortening the distance from the curb to the gate and increase efficiency of short-haul, high frequency airline operations such as those by LCC's. The linear terminal could be used with any concepts where Runway 24 Left is moved south.
2. Please add to the DEIR study of North Airfield concepts the following:
  - a. A single runway concept with Runway 24 Left. In this concept, Runway 24 Right is closed and covered or removed.
  - b. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 240 feet to the south
  - c. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 140 feet to the south
  - d. Relocating Runway 24 Left 340 feet to the south and Runway 24 Right 40 feet to the south
  - e. For items b, c, and d above, consider no centerline taxiway and adding a centerline taxiway between the two relocated runways equidistant between the two runway centerlines.
3. Please add to the DEIR study of APM's two APM lines: a north line servicing Terminals 1, 2, 3 and terminating at the Tom Bradley International Terminal and a south line servicing Terminals 4 to 8 and terminating at TBIT. Ideally, these tracks will be above the terminals. The eastern end of each line would terminate at Manchester Square. There should be two options for trackage for the north and south lines. Option 1 is one set of tracks for north and south. Option 2 is two sets of tracks for north and south. For both options, the tracks will converge east of Sky Way and World Way into two tracks leading back to Manchester Square via 98<sup>th</sup> Street.

#### DEIR COMMENT PERIOD

When the Draft EIR is completed we anticipate that it will be of the length seen in before Alternative D was approved. Since this could be many thousands of pages, ARSAC requests that the comment period be set for 120 days or at least 90 days based on the volume of data to be reviewed to allow the public adequate opportunity to study and comment on this complicated DEIR.

We understand that we have identified an enormous amount of issues with the proposed plans and look forward to working with LAWA to refine them into forward planning proposals. Please contact us if you have any questions: (310) 641-4199 or (213) 675-1817, [denny@regional-solution.org](mailto:denny@regional-solution.org)

  
Denny Schneider  
President  
Alliance for a Regional Solution to Airport Congestion

#### Attachments:

1. ARSAC Comments to LAWA Notice of Preparation dated March 12, 2008 (same SCH No. 1997061047) dated June 17, 2008 to H Glasgow (Concept attachment removed and updated version. Item 2 included with this letter).
2. ARSAC Concepts for SPAS PowerPoint- Update of Linear Terminal Concept dated Nov. 28, 2010 (original was part of item 1)
3. ARSAC Pre-NOP [re-release], September 15, 2010 to LAWA Executive Director Lindsey
4. 2006 SPAS Activity Request
5. Summary Paper on Extended Security by Arnie Corlin
6. John Fromes air pollution study on LAX, 2007
7. ARSAC comments to Interim North taxiways NOP 7-2010.pdf

#### ARSAC Alliance for a Regional Solution to Airport Congestion

322 Culver Blvd., #231 Playa del Rey, CA 90293

[www.RegionalSolution.org](http://www.RegionalSolution.org)

June 17, 2008

Mr. Herb Glasgow  
Senior City Planner  
City of Los Angeles Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Comments re: Notice of Preparation of a Draft Environmental Impact Report (SCH No. 1997061047), Los Angeles International Airport (LAX) Master Plan Specific Plan Restudy

Dear Mr. Glasgow:

The Alliance for a Regional Solution to Airport Congestion (ARSAC) appreciates this opportunity to comment on the Notice of Preparation for the Specific Plan Amendment Study. In addition to these comments, ARSAC has adopted the attached "Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR."

#### A. The Proposed Reliance on Tiering is Problematic.

The NOP (p.4) indicates that "[t]he SPAS EIR will be a Supplemental EIR that is tiered from the LAX Master Plan EIR..." This statement requires clarification, and the tiering approach requires reconsideration by LAWA. While tiering may be appropriate when a Lead Agency has already certified an EIR for a project, in this case ARSAC strongly cautions against relying too heavily on the previous Master Plan EIR. Tiering is only appropriate when the later project is "consistent with the program, plan, policy, or ordinance for which an environmental impact report has been prepared and certified." Pub. Res. Code § 21094(b). Case law also stresses the need for consistency between the subsequent project and previously certified EIR. See *Koster v. County of San Joaquin* (1996) 47 Cal. App. 4<sup>th</sup> 29, 36. The very purpose of the project now proposed is to change some of the key underlying assumptions of the Master Plan EIR. Therefore, it is very difficult to argue that the SPAS EIR project could be consistent with the previously certified Master Plan EIR.

The NOP for the SPAS EIR proposes significant changes to the Master Plan,



including movement of Runway 6R/24L; changes to the proposed closure of the CTA to surface traffic; development of an off-site ticketing facility; and the future of Terminals 1, 2, and 3. Given the magnitude of the changes, ARSAC questions the viability of the Master Plan as a document off of which LAVA may appropriately tier the SPAS EIR. While some aspects of the Master Plan remain unchanged, the better approach would be to incorporate by reference the portions of the Master Plan unaffected by the proposed changes (see Guidelines Section 15150), but develop the SPAS EIR as a primarily stand alone document that address the significant, and previously unstudied, impacts of the project now proposed.

In addition, tiering is not appropriate under Section 21094(b) when a Lead Agency determines that the provisions of Public Resources Code Section 21166 apply. The existence of the NOP and proposal for the SPAS EIR make the applicability of Section 21166 self evident. Section 21166 requires a subsequent or supplemental EIR when "[s]ubstantial changes are proposed in the project which will require major revisions to the environmental impact report." Pub. Res. Code §21166(a). LAVA has rightly determined that this section applies. However, because this section applies, the tiering provisions of Section 21094 are inapplicable, and LAVA should prepare a primarily stand-alone document.

LAVA should also rethink the proposal to develop a Supplemental EIR. Preparation of a Supplemental EIR should occur when "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed condition." Guidelines §15163(a)(2). By contrast, a Subsequent EIR is required when "[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR..." Guidelines §15162(a)(2). The proposed changes are clearly substantial and go well beyond "minor additions" to the Master Plan. Therefore, LAVA should not treat the SPAS EIR as a Supplement to the Master Plan, but rather as a stand-alone Subsequent EIR.

## B. Analysis of Impacts.

The checklist of impacts in the subject NOP includes specific comments that raise numerous concerns for ARSAC. First, greenhouse gas emissions should be specifically addressed in the impacts analysis, as is acknowledged on the Initial Study, Attachment A, p. 3. However, the scope of that analysis appears too narrow. Since greenhouse gas emissions were not analyzed in the 2004 EIR, the analysis of emissions should not be limited to the construction and operation of the LAX SPAS alternatives, but should include all airport operations.

ARSAC expects LAVA and the City will have to find significant impacts in the areas of aesthetics, air quality, emission of greenhouse gases, biological resources, cultural resources (i.e. the "Sea to Shining Sea" mosaic tile mural in Terminal 3), geology

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golf courses in the City of Los Angeles. Earlier this year, LAVA also held a public meeting at Loyola Marymount University to gather ideas for uses of the LAX Northside property. Many of these uses that garnered positive responses were recreation uses. Furthermore, LAVA may be deficient in producing this EIR if LAX Northside land use issues were not discussed. The FAA's 2005 Record of Decision on the LAX Master Plan specifically excluded approval of the LAX Northside from the Airport Layout Plan on the basis of inconsistency due to, "markedly different assumptions underlying the analysis of environmental impacts that may be expected to result from the LAX Northside portion of the LAX Master Plan."

We request that each of these potential impact areas be thoroughly addressed, even when LAVA feels that impacts can be avoided or reduced by feasible mitigation measures or alternatives.

## 2. Specific Concerns Regarding Particular Impacts.

### a. Traffic Impacts.

Sources of pollution outside of those from LAX operations are cumulatively significant and must be included in the study. In addition to pollution sources from vehicular traffic, aircraft flying in the skies surrounding LAX are also expected to have increased impacts. Additionally, pollution from local refineries, treatment plants, and other sources should be considered additive when determining impact significance.

The communities surrounding LAX are generally used as thoroughfares for north-south traffic and few alternative routes exist. The 405 freeway, Vista del Mar and Pershing on the west, Lincoln Blvd., Sepulveda Blvd., and La Cienega all bear heavy traffic, including that associated with LAX operations. The environmental impact analysis must include those above and beyond the normal operations of LAX, but also the impacts on traffic by travelers and cargo operations forced to go long distances within Southern California to get to LAX. Traffic on the 405 freeway can become bumper-to-bumper at any time of the day or evening. The 405 traffic "spill off" can cause level E and F service on the few other major routes or other alternative routes through the communities. The economic impacts and health impacts of these delays should be identified and quantified.

Community growth is increasing the number of people within the communities surrounding LAX. We want to ensure that any related impacts to the community growth are included in the total impact. Population growth and traffic increases resulting from all further land utilization allowed by zoning within community plans must also be considered. LAVA should use maximum use zoning in their analysis, not just those projects that have been approved. City Community Plans call for substantial increases in housing density with resultant traffic and increased numbers of people who will be impacted by airport related

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and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/circulation, and utilities.

## I. The list of impacts proposed for study is incomplete.

### a. Geology/Soils.

Although LAVA has not checked off plans to study geology and soils, population and housing and recreation, LAVA should include these in the EIR. Geology and soils are critical concerns with any construction project. Several projects and/or ongoing geology/soils concerns should be considered in the EIR. Presently, there are proposals to build a ground water runoff retention basin on the northwest corner of the LAX airfield. An underground storage facility is also proposed. LAVA should examine the potential for leaks, and to the impacts on the soil above. As this location is near the El Segundo Dunes, the soil tends to contain more sand than the eastern boundaries of the LAX property. Additionally, there are old sewer lines running underneath LAX dating back to the 1920's. Some of these lines in Playa del Rey (such as on Zitola Terrace) have collapsed, and the City of Los Angeles has had to buy out certain homeowners (e.g. James Marcinkus). Another proposed project could affect LAX is the Woodside Natural Gas pipeline that will use part of LAX property in the El Segundo Dunes and will traverse underneath Westchester Parkway to a facility near 98<sup>th</sup> Street and Bellanca. The EIR should address potential cumulative geology/soils impacts.

### b. Population/Housing.

Population and housing are expected to increase in the Westchester/Playa del Rey/Playa Vista community plan area. Although this area presently has over 50,000 residents, Playa Vista will be adding more housing stock as will the new apartment complex on the corner of Manchester and Lincoln (former Furama Hotel site). Furthermore, the proposed revision to the Housing Element to the City of Los Angeles General Plan seeks to double housing in the Westchester/Playa del Rey/Playa Vista area. With increased housing and population come increased traffic and pollution impacts as well as additional stresses on infrastructure such as roads, water usage, power consumption and sanitation (trash pick-up and sewer). The EIR should address any cumulative impacts.

### c. Recreation.

Recreation is another area that must be studied. For nearly two decades, LAVA has promised to restore the 3 holes removed from Westchester Golf Course when Westchester Parkway was constructed. The Westchester Golf Course is one of the most heavily used

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pollution. The numbers projected by the Westchester-Playa del Rey Community Plan EIR should be used after modification for further increases enabled by other LA City ordinances such as transit corridor bonuses and affordable housing bonuses and the Housing Element of the LA City General Plan.

LAX physical layout changes and/or operations at LAX should be considered when determining ground traffic pollution contributions.

### b. Air Quality Impacts and Public Health.

Recent studies of pollution sources have identified serious impacts by air pollution on human health. LAVA should consider the latest air quality information from AQMD and California Air Resources Board to assess the various project alternatives for pollution impacts. Average pollution over a long period of time should be determined, but also pollution concentrations in any four-hour period since air and ground traffic tend to have peak hours.

Please see and analyze in the EIR the attached reports from the following websites as examples of the air impacts that have been studied.

<http://www.arb.ca.gov/newsrel/nr052208.htm>  
<http://www.arb.ca.gov/research/health/pm-mort/pm-mort.htm>  
<http://www.arb.ca.gov/research/health/pm-mort/pm-mortdraft.pdf>

LAVA is conducting an air pollution contribution apportionment study to fulfill a Settlement promise. Along with an air pollution contributions analysis, LAVA will be following up a study contract ("Monitoring and Modeling of Ultrafine Particles and Black Carbon at Los Angeles International Airport," Froines, John, ARB Contract 04-325, 3-5-2007) in which ultra fine particle studies smaller than those normally measured were correlated with aircraft operations. Additionally a 2000 report by McDonnell (<http://www.nature.com/jes/journal/v10/n5/pdf/7500095a.pdf>) highlighted a method to investigate particle impacts on health that should be followed in the assessment of air quality impacts. "This study did not have direct measures of PM2.5 but relied on TSP and PM10 data. In a follow-up analysis (McDonnell et al. 2000), visibility data were used to estimate PM2.5 exposures of a subset of males who lived near an airport." We ask that air quality measurements be taken on LAX property and in surrounding communities that are in close proximity to LAX.

### c. Operations Analysis.

In examining all alternatives, LAVA must examine the use of, and the impact of, operating the LAX in various configurations including Westerly operations, Easterly

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operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inboard runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes. Further, any changes in facilities should trigger personnel safety reviews to identify and mitigate potential hazards on both the landside and airside of LAX.

### C. Specific Questions that Should be Addressed.

ARSAC's comments in the attached "Table of NOP Comments" pose questions that should be addressed in the course of the EIR preparation. The comments have been made to correspond with the NOP document organization.

We understand project impacts deleted from Alternative D by the Stipulated Settlement, and designated as "yellow light projects," will not be analyzed, except for the no action alternative. However, the EIR should analyze the worst case for each of the individual projects' impacts. Further, if a derivative of a yellow light project is proposed in one of the alternatives (e.g., moving runway 24L 340' south), the impacts shall be segregated and not tied to a requirement to impose other yellow light elements, but any worst-case alternative use must be included.

In 2004, LAWA took credit for the reduction in development at the Northside Development area from the 4.5 million square feet assumed in the 1982 EIR to 1.5 feet 5 million square of light industrial and commercial space. However, the ROD excluded the Northside Development. The DEIR should clearly specify what is planned at this time, and the full impact of such development. Similarly, all proposed uses of the Belford Square area should be delineated in the assumptions used to assess the impacts.

The new alternatives all contain a new transportation center at Century and Imperial. Changes to traffic flows and pollution impacts should be highlighted along with those from any automated people movers (APM) that would go from that facility to the central terminal area. The stops of the APM can have a significant impact on ground traffic. The locations assumed for stops must be identified in detail.

Although the Consolidated Rental Car facility location was approved for project analysis by the Stipulated Settlement in the Lot C location, it is our understanding that alternative locations have been considered. The impacts on ground traffic should be assessed separately for each alternative location.

One alternative discussed modifications to the ingress/egress along the 98<sup>th</sup> Street bridge for the Central Terminal Area near the present Terminal I. This proposed solution called for a structure in the area where Park One currently is located. This proposal allows people going to the north terminal, especially Terminal I, an opportunity for drop

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this EIR. This alternative reduces the impacts on Westchester and Playa del Rey, while improving airport efficiency.

Besides analyzing alternative runway configurations and diverting flights to other airports, the EIR must consider and provide a quantification of all airfield operational scenarios in evaluating the alternatives—westerly operations, easterly operations and over-ocean operations. The noise, pollution and safety impacts on the surrounding communities differ depending upon the operational state. For example, during easterly operations, aircraft taking off on the north runway complex have cut across parts of Westchester such as Westport Heights that are normally not over flown by aircraft at very low altitudes.

The February 2006 Stipulated Settlement specified in SECTION V. LAX SPECIFIC PLAN AMENDMENT STUDY PROCESS, Item C states a goal of "...minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." In particular we want detailed analysis of the north runway complex impacts to show that they are less than that of the current condition of no runway change or in the worst case, Alternative D that was previously approved.

When any of the alternatives are examined for impacts, a key element that must be assessed is the quality of life. Will a runway protection zone require the removal of homes and businesses? The analysis should include all cost factors of eminent domain and loss of values for the surrounding communities that might lose their community serving businesses.

In terms of ground traffic analysis, petitioners are allowed to add up to 15 additional intersections for review, and these intersections may require additional mitigation in several communities. Regardless, the Settlement does not limit the intersections and highways that must be mitigated to accommodate LAX projects.

### 2. Consideration of Additional Alternatives.

The NOP provides the opportunity for the submittal of additional reasonable alternatives to be studied within the EIR. ARSAC submits two additional proposals to be included in the EIR and the North Runway Complex Safety Study. ARSAC has generated these proposals to increase the range of alternatives that may be considered. The narratives of both proposals are included as attachments. A short summary is below. ARSAC feels that it imperative that no alternative be selected as a preferred alternative until after the North Runway Safety Studies and analysis have been completed and examined. Furthermore, ARSAC requests data from the South Airfield Improvement Program to determine the effectiveness of those improvements, such as the centerline taxiway, in reducing incursions.

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off without entering the major CTA traffic loop. The benefits from this potential project should be segregated so that they may be added to any of the alternatives.

Each of the new alternatives contains a Midfield Terminal and the addition of gates to the backside of Tom Bradley International Airport. LAWA should specify the locations of the taxiways and taxiway intersections. All ground and air impacts of this set of projects must be included in the analysis of each of the alternatives.

In examining all alternatives, LAWA must examine the use of, and the impact of, operating LAX in various configurations including Westerly operations, Easterly operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inboard runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes.

### D. Analysis of Alternatives.

#### 1. The Proposed Alternatives.

The NOP identifies two no project alternatives and four alternatives. ARSAC is *unalterably opposed* to the alternative of moving the runway 24R 340 feet to the north, and strongly supports analysis of the alternative of keeping the existing runways at the present location and implementing operational improvements to enhance safety. Only if safety risks remain after such operational improvements have been implemented can the costs and disruption of runway movement be justified. LAWA has demonstrated the capability of landing Group VI aircraft on both the north and south complexes, albeit with some adjacent taxiway use restrictions. When the South Airfield Project was presented for approval, LAWA indicated that it would be capable of handling the Group VI aircraft and it is our understanding that a ground terminal access route using the south runway 25L has been formally approved for use by the FAA. In the ground air traffic analysis, LAWA should consider the benefits of moving the runways south, and how that would improve the deficient (but legal) taxiways near the terminal gates.

When analysis is performed on the north and south runway complexes, we want the assumptions for operational efficiency and safety impacts of the Runway Status Lights to include both the proposed Pilot Program, which is promised to be installed in 2009, and a complete system which includes the other runways and taxiway intersections which have not been included.

In addition to the alternatives already under consideration, ARSAC requests that an additional alternative, moving runway 24L 340 feet to the south with the revised terminal configuration described in the attachment to this letter, be analyzed as part of

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#### a. One Single Safe North Runway Alternative.

This proposal was presented at the Specific Plan Advisory Committee meeting where it was agreed by the Petitioners that all concepts submitted to the LAX Master Plan EIR would be studied, including new one such as the one runway concept. This concept would reduce the number of runways on the north runway complex from two runways to one runway. Runway crossings are the leading cause of runway incursions. Airports that have runway layouts where aircraft do not have to cross one runway to access another runway have very low incidences of runway incursions. Munich Airport (MUC) in Germany has one runway on each side of the terminal complex. One runway is used for landings and the other runway for takeoffs. Since its opening in 1992, MUC had only one runway incursion. London Heathrow Airport (LHR), the world's third busiest passenger airport, has a similar runway layout and is able to handle 70 million annual passengers.

#### b. 340 feet south / Airline Alliance Plan.

This plan, presented to LAWA Executive Director Gina Marie Lindsey on May 7, 2008, is similar to Alternative D except that in place of replacing Terminals 1, 2 and 3 with a concourse for widebody aircraft, Low Cost Carrier terminals would be constructed. Airlines that have airline alliances would be relocated to terminals with their domestic airline partners, or to the Tom Bradley International Terminal for most foreign airlines. The Central Terminal Area (CTA) parking garages would not be torn down in this plan. The Consolidated Rent-A-Car (RAC) facility would be located in Manchester Square and connected to the CTA by an Automated People Mover. An elevated roadway would connect the 405 freeway to the RAC and CTA.

### 3. The Need for Development of a Regional Plan.

ARSAC continues to believe in a regional solution to airport congestion. The Stipulated Settlement provided that "The first regional strategic planning initiative *will* be prepared by December 31, 2006." Unfortunately, this commitment was not kept. Not only was the Plan only recently submitted to the County of Los Angeles, but it has now been withdrawn. ARSAC is disturbed by LAWA's failure to aggressively pursue development of a Regional Strategic Plan, and asks that members of the SPAC have an opportunity to comment upon the draft plan prior to the time it is finalized and adopted by the Board of Airport Commissioners, and that this effort be treated as a high priority by LAWA.

Regardless of what is done with the Regional Strategic Plan, LAWA should examine in the DEIR the increased utilization of LAWA controlled airports at LA/Ontario

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International (ONT) and LAX/Palmdale Regional Airport (PMD), as opposed to expanding LAX. There is precedent for this kind of study. During the late 1990's, in the LAX Terminal 4 EIR to modernize the American Airlines terminal, a cursory examination was made of shifting some flights to ONT and/or PMD. The failure of the Terminal 4 EIR was that it did not fully examine all of the environmental effects through increased utilization of ONT and PMD, versus LAX. ONT and PMD are large investments for LAX and they both have the potential for greater economic, operational and environmental value if properly marketed. For example, the "Fly Ontario" marketing campaign did increase the public's awareness of ONT and several new flights were added to ONT, with the notable addition of ExpressJet's west coast hub.

The EIR should analyze all of the environmental benefits to the area surrounding LAX that would occur if some international flights were shifted to ONT. ONT currently has staffed Federal Inspection Facilities (FIS- Immigration, Customs, Agriculture). Additionally, LAX should analyze the benefits of shifting some cargo flights from LAX to ONT.

LAX should also consider the impacts of benefits of shifting some domestic flights to PMD, as was identified in the 2001 TriStar Marketing report on PMD and subsequent destination studies. LAX should also discuss the LAX/US Air Force Plant 42 Joint Use Agreement (JUA) for PMD, and how the JUA could be revised to accommodate more flights, allow for development of the LAX owned property, and remove the domestic flight restriction to allow for international traffic at PMD.

LAX should discuss how a "multi-airport discount rate" system could encourage the shift of flights or the addition of new flights to ONT and PMD. The "Multi-Airport Discount Rate" would give airlines that operate at LAX, ONT and PMD more favorable landing fees and terminal rents than operating solely at LAX. Airlines that operate solely at ONT and/or PMD would get even better rates for not operating to LAX. The "multi-airport discount rate" plan should be available to international carriers, as well as domestic carriers. For international flights, there would have to be parity between those international flights operated by domestic and foreign airlines.

LAX should examine changing the financing model at LAX (residual vs. compensatory) to allow for cross-subsidization of ONT and PMD to support the "multi-airport discount rate" system.

European and Asian airlines have expressed interest in operating out of ONT. Please discuss how new, smaller, highly efficient widebody aircraft such as the Boeing 787 Dreamliner and the Airbus A350XWB can help make ONT more viable for international flights, while lessening the impact on the environment. Many foreign airlines have ordered these aircraft. Continental and Northwest are the only U.S. airline customers for the Boeing 787, while US Airways and Hawaiian Airlines are the only U.S. airlines to order the Airbus A350 XWB. Domestic airlines are adding international routes

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to meet demand for more non-stop services between new cities, and to feed their domestic networks. Also, please discuss how new multi-lateral and bi-lateral agreements, such as the United States-European Union Open Skies Agreement and the new US-Australia Bilateral Air Services Agreement, can provide ONT with more opportunities for international air service development. Discuss LAX's past, current and future efforts to attract more air service to ONT and PMD.

Finally, LAX needs to address the issue of Orange County residents using LAX for their air travel needs. It has been estimated that one-third of the passenger traffic through LAX is destined for Orange County, and that LAX handles 90% of Orange County's air cargo. LAX should discuss the possibility of working with the Walt Disney Company to rename LAX/Ontario International Airport to Walt Disney International Airport and then re-package the airport as the gateway airport to the Disneyland Resort, and the primary international gateway airport for the Orange County and Inland Empire regions. In your analysis, please assume that the Right of Way can be obtained for a monorail or high-speed rail between ONT and the Disneyland Resort and/or the Anaheim Transportation Center. This way, ONT will be provided with the necessary critical mass for ground transportation. The rail line could be operated by LAX, Disney, or in cooperation with the California-Nevada Super Speed Rail Commission.

#### E. Enhancing Airport Security.

Security is another matter that needs to be carefully examined in the EIR. RAND performed two security studies on the LAX Master Plan. The first was done at the request of Congresswoman Jane Harman. The second study was commissioned by the Board of Airport Commissioners (BOAC). To date, the public is unaware of how, if at all, LAX is implementing the RAND recommendations. Please discuss what, if any, follow up with RAND has been occurred, and the status of implementation of its recommendations.

#### F. Processing of the EIR.

Although the NOP has been released, ARSAC believes the NASA study should be completed and evaluations conducted by the selected members of the academic community have been published before the Draft EIR is released so that the studies will inform the selection of a preferred alternative. This would also allow LAX to first have experience with operations at the South Runways before selecting a preferred alternative.

When the Draft EIR is released, ARSAC requests that it, and all related documents, be provided electronically in searchable format, as well as in hard copies.

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To the extent that the new EIR relies upon the 2004 LAX Master Plan Environmental Impact Report, that EIR contained many conflicting comments within its 17,000 pages, and numerous deficiencies that were identified by ARSAC and other petitioners in the lawsuit that resulted the Stipulated Settlement of 2006. To assure greater clarity, and avoid some of the problems that occurred in the past, whenever any of the prior documentation is referenced in the upcoming EIR, we request that specific paragraphs and page number references be included for documents referenced in the DEIR. We also strongly request that the EIR and all supporting documents be provided in a format that is searchable electronically.

Finally, so that the best possible public review and participation will occur, we also ask that the Draft EIR circulation time be increased from 45 to 120 days. Forty-five days for review of an extremely complex and technical document is simply inadequate.

Please feel free to follow up with any questions you may have about these comments or recommendations.

Sincerely,



Denny Schneider, President

#### Attachments:

1. Environmental Review: Table of NOP Comments
2. Petitioners' Overview of Guiding Principles for Environmental Analysis
3. One runway option overview
4. Low cost carrier option overview

#### Attachment to ARSAC Comments to SPAC Environmental Review: Table of NOP Comments:

NOP paragraph	NOP pg ref	Comment
1.0 Project Location	2	Figure 2 does not distinguish the elements of the SAIP. The date of origin of this photo should be identified.
2.0 Project Background	2	In the City Council hearings 07-0541-S1 8-30-2007 a Specific Plan Amendment to remove the west satellite concourse from the projects requiring maximum scrutiny was approved. The "Midfield Terminal" discussed during these hearings was equated to the "west satellite concourse." Does the approval of this amendment authorize use of only project level EIRs for the Midfield Terminal including the concourse, additional gates on the back of TBIT, and associated taxiways and taxiways?
3.0 Project Description	4	Clarification: The gate limitation is not 153, but no more than 153 per Section IV C of the Stipulated Settlement.
SPAS Options	5	What are the northside runway complex airfield restrictions that were resolved by Alternative D? If the north runway complex is not reconfigured, what will be the operational restrictions on NLAs? Which restrictions can be mitigated by changing the locations of taxiways and runway intersections or gate locations rather than moving runways?
340' option, Alt D	5	With the extension of runway 24L 1000' to the east, this 340' S option says takeoffs would be closer to the community all the way back to Sepulveda. What specific sections and paragraphs in the 2004 EIR provided impact analysis? How many flights would be taking off from this newly located east end of the runway? What noise and pollution studies were included in the 2004 EIR in the assessment? What will be the impacts in easterly operations or in over-ocean operations?
Move 24L 100' South	6	LAX should identify what relocations and runway extensions they plan to study. Are these decisions being made on the basis of simulations underway with the NASA study? How will the alternatives for this be evaluated and compared for environmental impacts? Will location selections of taxiways be done to improve operational efficiency of NLAs? What specific criteria are being used to evaluate the improvements? What will be the impacts in eastern operations or over ocean operations?



Keep existing locations	6	This option was supposed to include an as yet unidentified taxiway and intersection modifications to improve aircraft movement. When this alternative is evaluated for safety and operational effectiveness, what assumptions will be made about the gate locations? What about taxiway and intersection locations? What will be the impacts in eastern operations or over ocean operations?
Move 24R 100' North	6	This 100' N says takeoffs would be closer to the community all the way back to Sepulveda. How many flights would be taking off from this location? Where is the noise and pollution study to justify this? This appears to be one of the deficiencies of the original EIR. What would be the impacts on eastern operations or over ocean operations? This 100' N alternative should include two sub-options: extension of 24R west and no further extension that are both evaluated.
Move 24R 100' North	7	If terminal demolition of 1, 2, 3 is "yellow-lighted," why doesn't LAVA consider the associated taxiways or other CTA activity related to this issue "yellow-lighted" instead of presuming only a project EIR is required? If changes are to be made, what are they to be and how would it affect the CTA traffic (and any environmental issues related thereto)?
Move 24R 340' North	7	Calls for extending 24L. To where will the vehicle holding area be relocated? Has this been included in the environmental reviews including traffic study?
Move 24R 340' North	7	This option calls for modifications to taxiways. LAVA should identify what relocations and extensions they plan to study. Will the selection of locations and extensions be made on the basis of simulations underway as part of the NASA study? How would the various alternative taxiway locations be evaluated and analyzed for relative environmental impacts? Will location selections of taxiways be based upon improving operational efficiency of NLA? What specific criteria will be used to evaluate the improvements?
3.1.2 CTA Demolition	7	The NOP states: "Under the LAX Specific Plan and Stipulated Settlement, only the Demolition of Terminals 1-3 is a Yellow-Light Project. If the terminal demolition is yellow-lighted, why aren't the taxiways or other CTA activity related to CTA demolition also treated as yellow-light per the Stipulated Settlement? If changes are to be made, what are they and how will it affect the CTA traffic (and any environmental issues related thereto)?"

3.1.3 Ground Transportation Center; Problem to be addressed	8	LAVA has stated that they want to improve CTA traffic flows and in the surrounding community, but has never provided a quantified measure of levels of traffic that are needed to be accommodated in various locations. For instance, how many cars (per hour and at peak periods) much be accommodated along the curbsides within the CTA? What were the levels of adverse impacts that were to be mitigated by the GTC that was eliminated by the Stipulated Settlement? The aggregate numbers are important so that replacement concepts can be measured and judged against a consistent yardstick. Is it 1000 cars per day and 50 cars during peak hours in the CTA or is it 100 times that?  How will traffic be segregated and how will any proposed mitigations address the traffic impacts in the CTA as well as in the surrounding community? What alternatives been identified such as van and bus drop offs and pickups in the parking structures or another location? What plans exist for a people mover to accommodate passengers dropped off outside the CTA in an area local to LAX for people to get into the CTA? Please provide detail information about the way in which cars currently enter and leave the terminal areas. Ensure that the directional information is broken down by hours and volume from each of the directions entering the CTA (Sepulveda N, Sepulveda S, 98th street bridge, and Century Boulevard.  What levels of vehicle types can be accommodated by the no project, existing conditions? LAVA has established programs to reduce the number of vans and busses in the CTA. What assumptions are made about the effectiveness of these programs and what baseline numbers are used in the assessments? What programmatic changes are "in the works" that apply as a baseline condition for the numbers of hotel and car rental courtesy rolling billboard busses that frequently block curbside access for cars?  Identify how luggage would be handled. Would the approved tunnel be constructed? Although the Manchester Square GTC was yellow-lighted by the Settlement, the tunnel was not specifically mentioned. How would safety/security for the tunnel be handled? What would be the mitigations for ground traffic associated with the use of the tunnel? How will disabled and elderly travelers be handled? Adults with excessive baggage or with children? Since the methods for handling people and location/directions of car trips would dramatically change, how is this to be addressed for environmental impacts?  Is there an assumption that better traffic flow is facilitated by improved signage over the lanes and along the CTA terminals? How much improvement is expected from signage improvements?
Close Access to GTC	8	

Transportation Center at Manchester Square and Aviation/Imperial and new Terminal 1 drop-off where Park One is located	9	A connection to the APM or a moving sidewalk can provide access to all of the north side terminals. How many and what percentage of people do you expect to be served by this new access? Would this increase total access capacity? By how much?
3.2 No Action Alternatives	11	Given that there are two different "no project" alternatives—one with all of the yellow-light projects of Alternative D and one based on the existing configuration with several non-Master Plan improvement projects that are underway. The second paragraph segregates the "no project" into two conditions; when all yellow light projects are assumed to have been built and when none are built. How will the EIR assess the overall impacts of these two "baselines" if some yellow-light projects are subsequently built? If the yellow-light projects overlap with other project elements that have been approved, and are therefore part of the "other" base how will the other alternatives be assessed in comparison to the baseline? If, for instance, a newly designated intermodal transportation were built at Century/Aviation to accommodate a Green Line extension would all of the impacts of the totality of the baseline projects be used to assess other project impacts in addition to the yellow-project designated ones?
3.3 Probable Environmental Effects	13	Under aesthetics, the NOP acknowledges excessive lighting is a potential issue. Does this include runway lights if moved north? Are Northside development impacts included? If yes, what version (s) of the Northside development?  What new Manchester Square development is assumed? Are there any other projects such as APMs and where would they stop and flow to from? This could impact local communities with noise, pollution and traffic in various ways depending upon the paths used and the locations of the stops.  This is another concern for neighbors and also for the flora and fauna. Introduction of new species from LAX arrival flights? Although good faith attempts to stop the arrival of foreign plants and animals is made, the locations of the aircraft and the handling of baggage and cargo can impact how an unwanted species can be spread to the surrounding areas outside of LAX.  What about impacts on Riverside Fairy shrimp locations? LAVA was caught filling in Continental City with asphalt-laden dirt about 2003. LA Building & Safety halted the non-permitted filling. Where are all of the areas impacted by the 2003 action? What sensitive species are in surrounding areas? Why did the relocation area for the Riverside

		Fairy Shrimp change from the former El Toro Marine Corp Air Station to an area in Redondo Beach? Can LAVA simply leave the Riverside Fairy Shrimp in tact at LAX and place some sort of netting or fishing lines over the shrimp habitat so that the shrimp will not have to be moved?  Where are the earthquake prone areas?  What are the amounts and types of pollutants from aircraft? How will these pollutants be mitigated? What will be done to reduce the greenhouse gases from LAX operations?
3.4 Comments and Next Steps	13	45 days circulation for review is inadequate. This should be as much as 120 days so that the maximum time will elapse to obtain South Airfield incursion experience.  The NASA study should also be complete before this comment period begins. Figure 1- Project Location None The grayed area shows all of LAX, but also lands that were transferred from the Westchester-Playa del Rey Community Plan to the LAX Plan during Alt D approval. Not all of this is being considered for cumulative impacts during the EIR reviews of the SPAS airport projects. Please delineate which areas are specifically included in the impact studies.  Figure 2- Existing Airport What is the date of this photo? On what date is the existing airport based? This photo does not show the completed the SAIP project, but we assume that it is part of the existing airport. Earlier in the document, Paragraph 3.2 identified two different no action alternatives. Please detail what airport elements are part of the two "no action" alternatives and their relationship to the baseline conditions against which new projects are being judged.  Figure 9- Potential Alternative -Runway 6R124L 100' South Green Line stop is shown along Century instead of in Intermodal Transportation Center. How much traffic of each transport mode is expected? How would the traffic impact the type and quantity of mitigations required?  Figure 11- Runway 100' North Green Line stop is shown along Century instead of in Intermodal Transportation Center. Although ARSAC supports the extension this is not part of the approved Master Plan or existing condition. Environmental improvements from this project are not part of the baseline and should be included in the assessment accordingly.



Figure 12- Runway 340' North		See comment for Figure 11 above.
Initial Study and Check List -CEQA Lead Determination	IS-2	Please provide a matrix of which environmental impact studies are being reassessed and which are being rerun and correlate each impact study to the baseline 2004 FEIR paragraph numbers.
Evaluation 6)	IS-3	The document acknowledges the requirement to document source reference in detail. Anything less makes it difficult to identify what has been done and its validity.

Environmental factors potentially affected	IS-3	Three additional impact areas should have been checked. Geology/soils. Proposals to move the runways could be in areas where there are sand dunes and other soil with high liquefaction potential. Transportation/Traffic. To accomplish some of the projects in the LAWA 340' north alternative housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced. Population/Housing. To accomplish some of the projects in the LAWA 340' north alternative housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced.
VI. Geology & Soils (a)	IS-6	There is some seismic potential. A plume of the Inglewood/San Andreas faults is near some of the areas where projects have been suggested along Century, for instance. We call on LAWA to review the most current USGS maps to assess earthquake susceptibility. The 340' N alternative, for instance, calls for moving Lincoln Boulevard and burying its connection to Sepulveda. Additionally we call upon LAWA to address the sandy soil conditions toward the Northside development along Westchester/Playa del Rey and western sections of LAX property for impacts from building any tunnels or from impacts from existing tunnels, underground utilities or sewer lines.
VII Hazards & Hazardous Matls. (a)	IS-7	Could run off with fuel and rubber off the runways create a hazard?
VII Hazards & Hazardous Matls. (f)	IS-7	The ability to get medical care can be impaired since the Medical Center on Sepulveda could be closed off within the boundaries of LAX if an emergency occurs. Insufficient trauma facilities are available within the local area if a medical emergency occurs. The closest is UCLA that would be impossible to get to during most of the day due to heavy traffic on the 405.

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		existing paleontology mitigation program.
VI Geology and Soils:	A-7	What about the water filtration system that is being proposed for the Northside development area? How could this filtration project interface with the potential building set for the entire Northside development area?  The prior EIR claimed that earthquake susceptibility was not significant, but at an SPAC meeting it was acknowledged that there earthquake fault areas that would impact the tunnel that was approved in Alternative D. Where else would earthquake faults impact building or construction?  Soil conditions under the north runway may or may not be significant but more detail is required to ensure against construction or maintenance issues.
VI Geology & Soils (a) ii.	A-8	Seismic ground shaking. During the Northridge quake several back up power systems failed at LAX. Are alternative energy supplies available? What are the evacuation procedures to be followed for the airport in case of an earthquake, and how will this impact the local communities?
VI Geology & Soils (a) iii.	A-8	Seismic related ground failure. Several major water runoff and sanitation processing lines go under LAX. If any of these are seriously damaged what is the potential for sinkholes or other damage to structures at the surface?  Since the LAX area was built on a Coastal plain, what impacts would liquefaction have? Is there potential for natural gas leakage pathways along fault lines from natural sources since the entire Playa del Rey area was once an oil field? Can gas leakage occur at LAX along a fault line from the Gas Company reservoir that is under the bluff in Playa del Rey and under the wetlands near Playa Vista?  What effect, if any, would the proposed Woodside Energy Natural Gas project have on LAX? Please describe how each of the components may affect LAX - gas line connection in or through the coastal bluff, high pressure lines running underneath Westchester Parkway, distribution facility at 98 <sup>th</sup> Street and Bellanca near the Neurogena offices, and WallyPark parking garage.

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VII Hazards & Hazardous Matls. (g)	IS-7	See comments for element (f) above.
VIII Hydrology & Water Quality (i)	IS-8	There was some question about the 100-year flood plain structures in the last EIR due to the drainage canals being fed with much greater runoff due to all of the local developments surrounding LAX. A new urban run-off facility has been suggested for construction at the northwest corner of the LAX airfield. What effect will this facility have on LAX and water quality issues? The sewer lines near and underneath LAX date back to the 1920s. Are these sewers adequate and structurally sound? If not, what hazards do these sewer lines present?
XII Population & Housing (a)	IS-9	LAX traffic causes severe impacts on the local communities. Westchester-Playa del Rey and the other surrounding communities have become thoroughfares for people traveling from the South Bay and further south and the LA Westside. LAX traffic exacerbates this. Has the new LA City General Plan traffic increases due to changes in the housing element been taken into consideration?
XIV Recreation	IS-9	Holes were removed from the Westchester Golf Course to accommodate previous LAX expansion in the 1970s. Restoration of these holes has been a LAX promised mitigation ever since. When will this be accomplished and what other recreation opportunities will be created for the surrounding communities?
Attachment A V Cultural Resources (a)	A-4	Under historic elements, other buildings that are impacted such as the Paradise Building, Centinela Adobe, Randy's donuts should also be addressed due to off airport projects that facilitate these projects. Others items such as the LAX Theme Building and the "Sea to Shining Sea" mosaic tile air travel mural in Terminal 3 should also be addressed.
Attachment A V Cultural Resources (b)	A-5	Have any burial sites been identified? What about pottery or other Indian relics?  What about prehistoric bones on the west and north areas in and around LAX due to the high incidence of oil reserves in the area? Prior LAX layouts have included N-S runways such as the one that existed in the area behind Tom Bradley International Terminal. Are any of these old structures historically significant? Are there any historic elements from the Bennett Ranch or previous ranch owners that used the land that is the present day LAX?
Attachment A V Cultural Resources (c) Mitigation CR2	A-6	The NOP says that mitigation reduces the impact to less than significant and therefore nothing else will be done. Please identify which areas are subject to higher potential impact mitigation per the

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VI Geology & Soils (a) iii.	A-9	Even if there are not major seismic hazard areas identified within LAX, what about nearby areas that can impact access to LAX? If normal access to LAX is blocked are there alternative routes that can handle the traffic loads?  As there was seismic concern about the Manchester Square-CTA tunnel, what about people movers or elevated roadways?  What UBC (Universal Building Code) and IABC (I.A Building Code) requirements are applicable? The LAX Specific Plan Sec. 3 "Relationship to the Los Angeles Municipal Code and other Ordinances" negates Site Plan and "Major" Development Project Ordinances (item D).
VI Geology & Soils (c) soil stability	A-10	Is there any plan to add earthen berms on the north and south borders of LAX to reduce the transmittal of low frequency noise?  Since we don't know precisely where major sewage and drainage pipes are precisely located, and the soil is very sandy, what is the likelihood of sewer or pipes being disrupted? Have there been any ground issues such as sinkholes at LAX in the past?
VI Geology & Soils general	A-11	Since the size and location of facilities is not delineated in the NOP, what special assessments will be made to determine how stable the ground is in areas of new construction? Given that there have been issues with sewer drains in the area and that the area has hundreds of formerly used oil wells that had water pumped into them, is there any likelihood that additional problems will arise slowing construction or requiring special measures?
VII Hazards & Hazardous Matl.	A-12	Since there are numerous carcinogenic items in use at an airport including aviation fuel, could the repeated spillage and evaporation cause a health hazard? What about fuel that is dumped during emergencies or fuel that is released in flight from major accelerations and landing?  What about the potential for terrorism with hazardous materials since LAX is one of the most potent targets on the west coast?
VII Hazards & Hazardous Matl. (c)	A-13	There are many impacts to the community if the runways are moved north. There are many hazardous materials transported through the community. We expect transportation routes for hazardous materials to be carefully delineated and monitored. We expect LAWA to review and consider all of the suggestions from the 2004 Rand study as well.
VII Hazards & Hazardous Matl. (g)	A-13	A-13 Are there any hazard control plans for LAWA that need to be updated? We are certainly concerned that if any disaster occurs the medical care facility that is most convenient would likely be blocked from community use by closure of Sepulveda Blvd.

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VII Hazards & Hazardous Matl. (h)	A-14	Although LAWA noted the lack of concern for wild fires etc. there is still concern that an air accident could cause a major fire due to the amount of fuel held by aircraft. We expect that a valid plan will be identified and any access issues will be resolved. At least one of the plans calls for relocation of Lincoln Blvd that includes a portion of the road inside of a tunnel. A fire in this area could be very disastrous, as would poisonous gas clouds. We are aware of several radioactive containers that have been damaged before or after arrival at LAX. There needs to be very specific plans on how to handle such incidents.
VII Hydrology and Water Quality (a)	A-14	A-14 A master plan for grey water usage should be created to work with Hyperion even though LAWA has a good record in this area. As aircraft and support equipment are produced with new exotic materials there can be a potential runoff issue when repairs are initiated or during maintenance.
VII Hydrology and Water Quality (c)	A-15	There are independent plans being established currently for projects to supplement drainage filtration by the LA Sanitation Dept. in the north quadrant of LAX and in the Northside Development area.  Another potential issue is damaging of critical sewage and dry/wet water runoff control channels during construction and adversely impacting the gravity feed requirements of that system.
IX Land Use and Planning (a)	A-17	If eminent domain is exercised on a significant portion of the business district there could be separation of businesses into less than a critical mass to draw local community support. Also, if the runway protection zones are enforced and homes are taken on the northeast end of LAX, small pockets of remaining homes could be created. This potential must be fully disclosed.
IX Land Use and Planning (b)	A-17	There is some question as to how homes will be impacted if the runways move north. Several large apartment complexes and some schools will be much closer to runway activity with attendant noise and pollution as well as safety issues. A 1980 study on LAX area school children showed that airport noise affected learning abilities. Newer, more effective methods for mitigating noise have been developed since soundproofing was provided to impacted schools. Does LAWA plan to offer sound proofing upgrades and air conditioning to LAUSD, private, and public schools to those located within the 1992 Noise Impacted Contour or for any who will sustain a 1.5 dB increase in noise? When new noise contours are estimated using updated aircraft mix estimates LAWA should assess the impacts.

IX Land Use and Planning (c)	A-17	Habitat issues remain not only in the formal "Blue Butterfly dunes" area, but also the plains areas that were the site of homes on the Northside development property. There were also some habitats on the east end of LAX that may need to be examined including Continental City.  Street traffic is another major issue. Although LAWA is rerunning the traffic studies with a maximum of 15 additional intersections, it must still address all of the central terminal traffic as well. Further, greater use of mass transit must be evaluated.  Open space must be maintained and so must community serving commercial. Wherever the airport has displaced affordable housing it should generate at least that much replacement affordable housing.
XI Noise	A-18	Topography and single noise events should be taken into consideration when determining the areas impacted by noise. Placement of the terminal gates and taxiways, as well as any other relocated or new facilities should take into consideration so that the impacts from aircraft engines are minimized. When calculating noise, the proper aircraft mix should be used and an estimate of the runway uses should be confirmed as well. Although the preferred runway alternative for taking off is inbound, LAWA estimates that 10% are done on the outboard. The health impacts of noise exposure must also be addressed. The use of noise canceling equipment is required to the extent feasible, and the most sophisticated equipment available should be identified and analyzed. Which noise canceling speaker systems been considered?  Please provide a contour map of areas subjected to at least 30 airport/aircraft noise events at 65 dB or above in a day, and/or were subjected to at least two 65 dB or greater events from midnight to 7 a.m.
XII Population and Housing (c)	A-20	This could be significant depending on the home and business displacements for alternatives that propose moving runways north. When LAWA does it's analysis it must assume that Manchester and Belford Square areas are empty and that everything that is constructed there adds to the area traffic.

XIII Public Services (a-c)	A-21	The EIR for the Westchester-Playa del Rey Plan states that a substantial increase in fire and police protection manpower is required to meet current zoning estimates. Much of the community to the north relies on Fire Station 5 for rapid community response. This station deploys both the Manchester Boulevard and Westchester Parkway. This dual access must be maintained. For emergency services at LAX there must be a good emergency health care plan in place with capacity to meeting both LAX and community needs.  If an event occurs at LAX that causes airport closure this facility will be unavailable to the surrounding community. The nearest urgent care for local residents is located on Sepulveda north of Century. In view of the closure of several emergency rooms and Daniel Freeman Hospital does the needed capacity still exist? If not, what solution is proposed?  Several schools will be subjected to increased noise and pollution. Air pollution especially must be assessed for not only 10 and 2.5 micron size but also smaller (i.e. 0.1 as done in the 2007 CARB study of LAX particle pollution). Although several schools have been previously sound proofed during earlier programs, determination should be made if another round of soundproofing is appropriate. Several churches and schools may be subjected to enough noise to cause learning impairment under EPA or other standards (i.e. NIH).
XIII Public Services (d)	A-22	Some airport land, such as Nielson Field and the Westchester Golf Course, is currently used for open space. If this use is diminished or if promised elements (i.e. Golf Course) is not restored the negative impacts of this should be analyzed and mitigated.
XIII Public Services (e)	A-22	Some other governmental uses should be investigated, as well as new housing opportunities for Manchester Square. Certainly the need for additional road access is evident due to the increases of traffic from current levels to the "nominal" 78.9 MAP. Also cargo and other related causes of traffic need to be assessed fully. Traffic should be diverted away from residential communities. Even if there are only moderate increases in traffic from LAX the overall impact may still be substantial due to major increases in present and authorized development zoning changes.

XV Transportation/Circulation	A-23	Potential traffic changes in the CTA must be assessed. Are there better ways to direct the traffic from the surrounding areas into LAX? LOS around LAX is marginal on many streets already. LAX modifications such as the location of the cargo support businesses, consolidated rental car facility, integrated transportation near Continental City and more must be included in the assessments. The total costs and fair share allocations of improvements must be addressed.
XV Transportation/Circulation	A-24	Locations and stops, methods for supporting baggage handling, etc., must be identified.
XV Transportation/Circulation	A-24	Movement of the runways will modify the flight tracks of approaching and departing aircraft. This change must be studied to assess impacts on the number and urgency of go-arounds and other noisy, polluting flight maneuvers.  A July 2007 Airline Pilots Association White Paper on incursions notes modest air traffic increases have resulted in major increases in the number of incursions. Air capacity assessments must be identified and quantified for all key factors, not just the first order limiting factor of capacity growth. Although gate capacity is the current capacity limiting factor, if it is resolved several others can become significant. Several factors of concern are, but not limited to, the number of cars entering the CTA, taxiway routes for aircraft to get to gates, and the number of aircraft operations per unit time as the required separation distance in the sky that limits the number of takeoffs and landings. Otherwise, if the limiting factor for capacity is the only factor addressed, as soon as the Settlement limitation on embarkation gates expires, capacity may be dramatically increased without a former EIR review.  Traffic from parking areas must be assessed after the parking locations are determined. This traffic is a source of noise and pollution, as well as frustrating easy access to the central terminal area. Better signage and other types of improvements must also be identified as mitigations for areas around LAX and inside the CTA.
XV Transportation/Circulation	A-25	Alternative transportation uses must be closely examined. LAWA should look into how and where the new flyaway programs can be used and how all of the bus movements inside the CTA can be reduced to eliminate or at least reduce traffic jams. There are many new potential airside issues. Taxiway locations (especially around the terminal gates) have been noted by LAWA and the FAA to restrict aircraft movement that reduces operational efficiency and adds pollution and noise. Studies must address the movement of taxiways, taxiway/runway intersections, and gate locations to



		determine more efficient ways to handle ground aircraft movement to reduce noise and pollution promulgated into the surrounding communities.
XVI Utilities	A-25	Utility systems should be assessed to determine where additional capacity is required and where back-up systems are required.
XVI Utilities	A-26	Although sufficient solid waste capacity is presumed, there are many opportunities for reducing the generation of solid waste. If we continue the same methods of disposal to Sunshine Canyon and other remote landfills, and there is a substantial increase in waste, we will be adding much pollution and noise due to the long haul disposals.
XVII Mandatory findings of Significance	A-27	The cumulative effects of increased traffic will increase pollution and has serious adverse economic impacts in terms of reduced productivity along with adverse health impacts.

### Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR

*Submitted by Petitioners: City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and Alliance for a Regional Solution to Airport Congestion (ARSAC).*

**Background:** In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the associated Environmental Impact Report (EIR) prepared by Los Angeles World Airports (LAWA) under the California Environmental Quality Act (CEQA). These suits were resolved by a 2006 Stipulated Settlement between LAWA and Petitioners. In response to the Notice of Preparation (NOP) recently released by LAWA for the Specific Plan Amendment Study (SPAS) Draft EIR, Petitioners now jointly submit this overview of principles that should guide LAWA in that environmental review process. Petitioners will also submit detailed individual comments.

**LAWA's Obligation to Avoid and Reduce Impacts to Surrounding Communities.** As LAWA proceeds with refinement and analysis of options as part of the SPAS process, it must continually recognize its obligation to avoid and mitigate impacts to the communities that surround LAX. Options under consideration must be evaluated and ranked based on how they would impact the environment, public health and safety in surrounding communities (e.g., noise, air quality, traffic). All alternatives should be subject to a full and fair evaluation in the SPAS DEIR, and LAWA should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative.

**Continued Consultation with Surrounding Communities.** The alternatives described in the SPAS NOP were developed and selected by LAWA during a lengthy consultation process with Petitioners. That consultation process grew out of the 2006 Stipulated Settlement, which states, in relevant part, that "An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC. LAWA shall consult with the Committee during each significant step of the LAX Specific Plan Amendment Process." Petitioners wish to recognize LAWA's compliance to date with this provision of the Stipulated Settlement. LAWA must now ensure that it continues to consult with Petitioners as the EIR process proceeds and the SPAS alternatives are developed in more detail. In particular, LAWA should take care to consult with Petitioners regarding the details and analysis of the alternatives supported by any Petitioner.

**Extension of Gate Constraint.** LAWA, FAA and the Petitioners all agree that limiting the number of gates at LAX will promote efficient passenger operations and encourage other airports in the Los Angeles basin to increase capacity to serve aviation demand. Accordingly, the long term success of the regional approach to serving aviation demand depends on maintaining appropriate gate constraints at LAX. The 2006 Stipulated Settlement between LAWA and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAWA to begin reducing the number of operating gates at LAX to 153. This settlement provision is operative through December 31, 2020. As part of the SPAS process, LAWA must analyze the continuation of the LAX gate constraints beyond 2020, as well as the possible

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enhancement of these constraints at a level that will efficiently serve up to 78.9 million annual passengers at LAX, while encouraging growth elsewhere in the region, including at the other airports owned and operated by LAWA.

**Airfield Balance.** In the NOP, LAWA indicates that under the LAX Master Plan, one of its goals is to "provide a better balance in operations between the North Airfield and the South Airfield." Petitioners support this goal and urge LAWA to conduct a full analysis of whether and to what extent each of the proposed SPAS alternatives would help achieve better airfield balance. Petitioners agree that total flight operation balance can lead to less operational crowding, which is good for all.

**Regional Approach.** Petitioners strongly support a regional approach to accommodating passenger and cargo aviation demand throughout Southern California. Because the area around LAX is fully developed, and because we must reduce vehicle miles traveled to improve air quality, decrease greenhouse gases, and increase productivity, a regional solution to serving aviation demand is essential. The regional approach, which is fully supported by the Southern California Association of Governments, must be a key component of everything LAWA does, including in the SPAS process. LAWA should vigorously pursue accommodating aviation demand at Palmdale and Ontario, and work aggressively with other airport operators and local governments to advance the regional approach.

**DEIR Public Review Period.** The NOP indicates that LAWA intends to provide just 45 days for public review and comment on the Draft SPAS EIR. In light of the complexity of this project and LAWA's tendency to produce lengthy CEQA documents, Petitioners anticipate that 45 days will not be sufficient.

## One Safe Single North Runway Proposal

**Background:** The Stipulated Settlement Agreement provided for a re-examination of Yellow Light projects such as the north runway complex by the Specific Plan Advisory Committee and to come up with other efficient and community friendly alternatives. The One Safe Single North Runway proposal aims to address safety, efficiency and being community friendly.

Runway incursions continue to be cited as a reason for making improvement to the north airfield complex at LAX. Despite numerous requests, one idea that has not and should be included and fully studied in the NASA north airfield safety study and in the LAX Master Plan NOP and EIR/EIS is this "One Safe Single North Runway." This proposal can provide safety and keep LAX within the desired 78.9 Million Annual Passenger (MAP) limit.

The only runway designs in the world that have been most effective in preventing runway incursions are designs where aircraft do not have to cross one runway to get to another. Munich Franz Josef Strauss Airport (MUC) in Germany was designed with one runway on each side of the terminal complex as a way to prevent runway incursions. Since MUC opened in 1992, there has been only one runway incursion (2006). MUC handled 34 MAP in 2007.

London Heathrow Airport (LHR) in the United Kingdom, the world's busiest international airport, has a similar runway layout with one runway on each side of the terminal complex. LHR has traffic signals operated by two tower controllers, at each runway to permit aircraft to enter the runways. LHR has not had incursion problems. At LHR, one runway is used for take-offs and one runway is used for landings. This is known as Single Mode Operation. In 2007, LHR handled 68 MAP.

London Gatwick Airport (LGW) is a single runway airport that operates in Multi-Mode Operation. In 2007, LGW handled 35 MAP. According to its operator, BAA, "Gatwick is the busiest single-runway airport in the world, the second largest airport in the UK and the sixth busiest international airport in the world." Clearly, a single runway airfield can be successful!

### Requirements for all concepts:

- Runway 24 Right closed and either covered with fill dirt or removed
- Enhanced runway/taxiway lighting, striping and signage on Runway 24 Left
- ASIDE-X and Runway Status Lights on Runway 24 Left
- Noise contours cannot increase in Westchester/Playa del Rey
- No taking of land in Westchester/Playa del Rey
- No northward runway movement and no placement of taxiways north of runway

### Concept 1:

- Use Runway 24 Left in its existing configuration.

### Concept 2: "Super Runway"

- Rebuild Runway 24 Left in its current location to a new 200-foot wide runway and 10,000 feet in length. The runway would be extended up to 1,000 to the east. The associated taxiways near Terminals 1, 2 and 3 and the Tom Bradley International Terminal would be rebuilt as required. Movement toward the center of the two existing runways facilitates the least expensive upgrades to the present inadequate, congestion producing taxiways and taxiways adjacent to the terminals.



# Introduction

ARSAC, the Alliance for a Regional Solution to Airport Congestion, presents these concepts for inclusion for study in the LAX Master Plan Specific Plan Amendment Study (SPAS) Draft Environmental Impact Report (DEIR). These concepts, like the ones Los Angeles World Airports (LAWA) has presented in its Notice of Preparation (NOP), can be "mixed and matched." ARSAC's preference is not to move the north runway, 24 Right, closer to Westchester / Playa del Rey. If runway movement is needed, then runways need to be moved south towards the Central Terminal Area (CTA). These concepts are to broaden the range of alternatives in the DEIR so that a win-win solution for the community and LAX can be found without having to resort to litigation.

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ARSAC SPAS Concepts



# ARSAC Concepts for the LAX Specific Plan Amendment Study

North Airfield, Terminals 1, 2 & 3; Consolidated Rent-a-car Facility, Automated People Mover and Elevated Roadways  
November 28, 2010



Prepared by: Robert Acherman, Vice President, ARSAC  
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# ARSAC Concept Highlights

- Keeps Runway 24 Right from being moved north
- Moves Runway 24 Left 340 feet south
- Terminals 1, 2, 3 and part of north wing of Tom Bradley International Terminal are torn down
- Low Cost Carrier (LCC) Terminals built to replace Terminals 1, 2 and 3
- Airlines regrouped in terminals by airline alliances (e.g. SkyTeam, Star, oneworld)
- No changes to the parking garages in Central Terminal Area
- Consolidated Rent-a-car center (CONRAC) to be located in Manchester Square
- Automated People Mover to connect the CONRAC to the Central Terminal Area (CTA)
- Elevated roadways to connect the CTA to the CONRAC and the freeways

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  5. Elevated Roadways
  6. Proposed Construction Phasing

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## North Airfield Runways

- For all runway concepts presented, all will share the same elements:
  - Runway Status Lights on all runway and taxiway entrances
  - Enhanced Final Approach Runway Occupancy Signal (eFAROS) [currently in test at DFW]
  - Improved runway and taxiway lighting, signage and striping
  - Both runways are widened to 200 feet each
  - DEIR to consider each runway concept with and without a centerline taxiway between Runways 24 Left and 24 Right

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## ARSAC Concept Benefits

- Moves airport and related operations away from residential communities
  - Makes communities safer, quieter and healthier
- Incorporates current airport terminal management practices
- Provides opportunities for both Low Cost and alliance carriers
- Logically arranges airlines by alliances
- Places CONRAC in safer location and better connected to the 405 freeway
- Addresses increased safety and security needs
- Improves customer satisfaction by keeping access to LAX as convenient as possible
- New LCC terminals reduce distance from curb to the gate

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## Runway Concepts for DEIR

- Single runway concept with Runway 24 Left
  - Runway 24 Right is closed and covered with dirt or removed
  - Eliminates runway crossings and thus possibility of incursions
- Runway 24 Left is moved 340 feet south and Runway 24 Right is moved 240 feet south
- Runway 24 Left is moved 340 feet south and Runway 24 Right is moved 140 feet south
- Runway 24 Left is moved 340 feet south and Runway 24 Right is moved 40 feet south

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## ARSAC Concept 1

### North Airfield Configuration



## New LCC Terminals

- Incorporates current trends in airport operations
  - Decreasing the distance from the curb to the gate
  - Common Use Terminal Equipment (CUTE) to allow the airport operator flexibility in use of gates and meet federal airport competition plan requirements
  - Low cost is the hottest trend in terminal operations
- Simplified facilities
  - LAX will continue to have elevators and escalators
- Design allows for rapid turnaround of aircraft
  - Most LCC's gate turn an aircraft under 60 minutes – as little as 30

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## ARSAC Concept 2

Terminal 1, 2 and 3  
Reconfiguration



## LCC Terminal Design

- Terminal designs similar to John Wayne and San Jose
- Terminals and apron are 200 feet wide each
- Terminals are approximately 900 feet long
- Up to 23 narrow-body gates for all 3 LCC terminals



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## Terminals 1, 2, 3 Reconfig

- Compatible with all runway configurations that move Runway 24 Left 340 feet south
- Does not require demolition of Central Terminal Area (CTA) parking garages
- Does not require construction of a Ground Transportation Center (GTC) at Manchester Square
- Allows for logical regrouping of airlines by alliances and Low Cost Carriers (LCC's)
- Provides for better passenger terminal infrastructure for increased passenger convenience and more efficient airline use of gates

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## No changes to the CTA

- Parking garages in the CTA will be unchanged
- Access to the CTA will remain open to private vehicles, busses and taxis
- Passenger convenience is maintained with curb front drop-off and pick-up

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## Airlines grouped by alliances

- Newest trend in terminal management
- Allows for easier connections and shared use of ticket counters, lounges and gate areas
- First implemented at Tokyo Narita Airport on June 2, 2006
  - Terminal 1 South- Star Alliance (ANA, United, Lufthansa)
  - Terminal 1 North- SkyTeam (Delta, KLM, Korean Air)
  - Terminal 2- oneworld (Japan Airlines, American, British)
- Possible to implement at LAX with limited movements of airlines
  - No land acquisition is required!
  - LAWA owns Terminals 1, 2, 3 and Tom Bradley as well as the Park One lot

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## LCC Terminal Design

- All three terminals have same design to save on costs
  - 200 feet wide from front door on landside to windows on airside
  - 900 feet long
  - 4 story buildings
  - 6 to 8 gates per terminal for A320/B737 type aircraft
- 135 feet gate width with extra widths at the west end of LCC Terminal 3
- Gate reductions from existing Terminals 1, 2 and 3 may be partially offset by increased efficiency of gate utilization
- Gate reductions at LCC Terminals 1, 2 and 3 may be offset at other terminals, but still subject to the 153 narrowbody equivalent gate cap in the Stipulated Settlement Agreement
- Incorporates LEED building standards

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## LCC Terminal Design

- Landside
- Airside
- Rooftop- APM station
- Rooftop

• 4th floor- TSA passenger screening	• 4th floor- airline lounges and offices
• 3rd floor- ticket counters	• 3rd floor- gate areas and concessions
• 2nd floor- TSA inline baggage screening	• 2nd floor- baggage sorting area
• 1st floor (ground level)- baggage claim	• 1st floor (ground level)- airline operations

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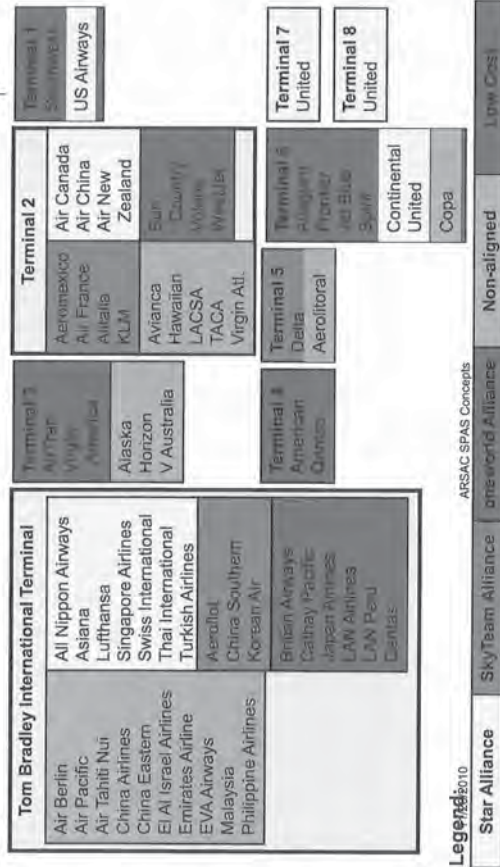
## LAX airline notes- 11-28-10

- U.S. airlines have cut back capacity as much as 20% since 9/11
- Delta and Northwest merged in December 2008
- Midwest Airlines merged with Frontier Airlines
- United and Continental merged on October 1, 2010
- Virgin Group branded airlines are now cooperating- Virgin Atlantic, Virgin America, and V Australia
  - Virgin Atlantic is 49% owned by Singapore Airlines. VS is not in an alliance.
  - Virgin America is 25% owned by Virgin Group due to U.S. Government restrictions on foreigners for owning U.S. airlines.
  - V Australia is owned by Virgin Blue of Australia.
- Terminal 3 is now set-up with Virgin America/V Australia
- LACSA is a part of Grupo TACA
- Avianca and TACA are merging
- Spirit operates flights to Mexico from LAX
- Iberia is returning to LAX; Iberia has merged with British Airways
- Mexicana shutdown in August 2010 and may be revived in 2011

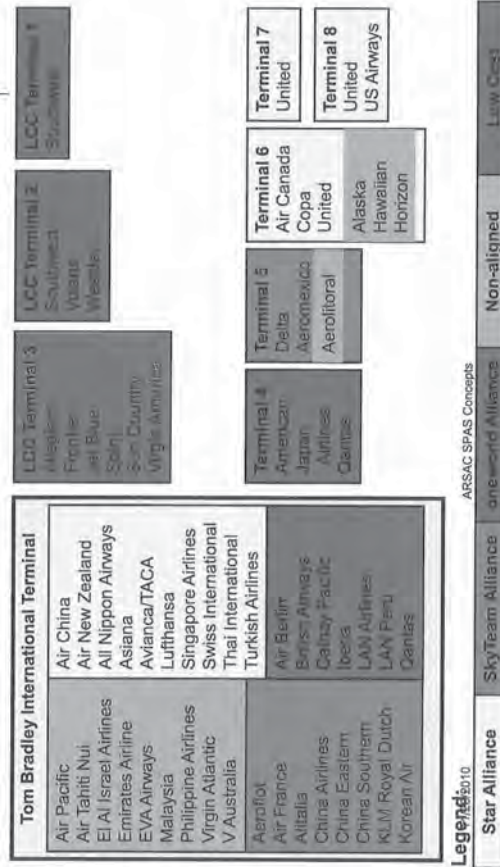
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## Current LAX configuration as of November 28, 2010



## LAX airline alliance / LCC plan projection: November 28, 2015



## ARSAC Concept 3

Consolidated Rent-a-car facility  
(CONRAC)





## Automated People Mover

- APM will connect CTA to CONRAC
  - Two lines- north line and south line
    - North line will start at CONRAC and go to Terminals 1, 2, 3 and terminate at the north side of the Tom Bradley International Terminal
    - South line will start at CONRAC and go to Terminals 8, 7, 6, 5, 4 and terminate at the south side of the Tom Bradley International Terminal
  - Both lines to follow 98th Street from CONRAC to Sepulveda, traverse Park One property to passenger terminals
  - Stations on top of passenger terminals
  - CONRAC station to have two tracks
  - DEIR should study one and two track options for the stations on the passenger terminals

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## CONRAC

- Manchester Square location
  - Multi-story parking garage for all car rental operations
  - Successful models at Seattle and Phoenix
  - Easy direct 405 freeway and LAX access via elevated roadway
  - Connection to Automated People Mover (APM)
  - CONRAC is outside of Runway Protection Zone
  - Alternative D has CONRAC located in RPZ
  - Large set-backs and landscaping will be used to prevent massing of the CONRAC along surrounding streets
  - Station for Green Line and Crenshaw Line at CONRAC

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## ARSAC Concept 5

Elevated Roadways



## ARSAC Concept 4

Automated People Mover (APM)

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## Elevated Roadways

- Connected to 405 north and south
- Into LAX: From 405 at Century to CONRAC and then north of 96th Street on LAWA property; 96th Street bridge and Sepulveda; south turn to World Way entrance bridge (relocated Sky Way)
- Exits to CONRAC and Lot C
- Built in vehicle security screening area along 96th Street portion of elevated roadway
- Out of LAX: From CTA along Century to current 405 south on-ramp at La Cienega
- Elevated roadway will be built on piers installed on south side of Century Boulevard (grass median between south side of street and cargo building areas)
- East of Aviation, elevated roadway will follow along 102nd Street to the 405 freeway

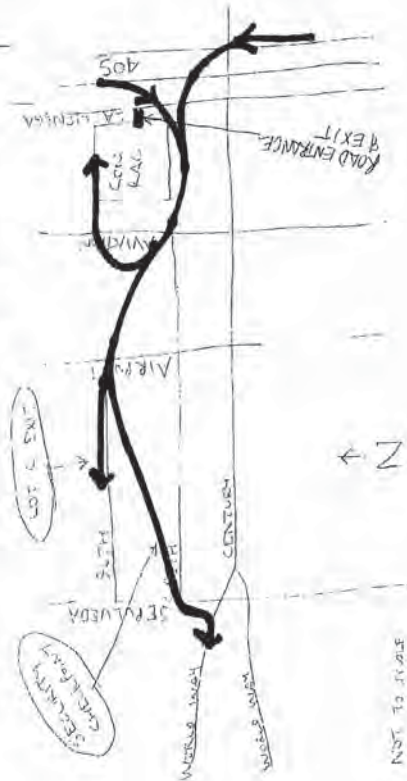
ARSAC SPAS Concepts

11/28/2010

SPAS-PC00130



## Elevated Roadways - inbound



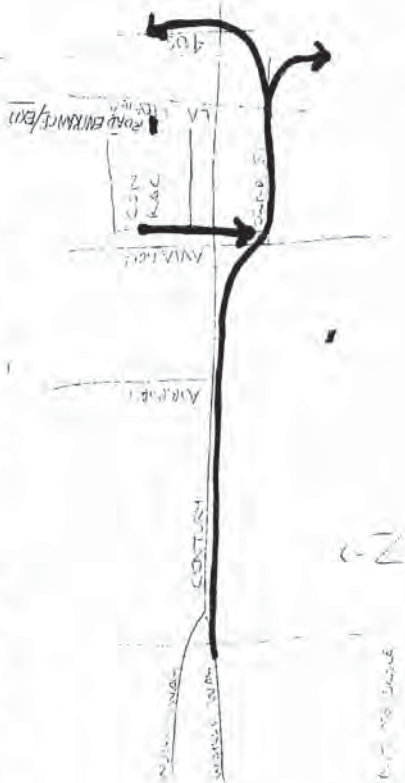
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SPAS-PC00130



## Elevated Roadways - outbound



ARSAC SPAS Concepts

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SPAS-PC00130



## ARSAC Concept 6

Proposed Construction Phasing

SPAS-PC00130





# Proposed construction phases

## CENTRAL TERMINAL AREA (CTA) CONSTRUCTION

- Complete the Tom Bradley International Terminal Bradley West project
- Relocate Air Canada and Hawaiian Air to Terminal 2 and other international carriers from Terminal 2 to TBIT
- Reconstruct Terminal 2 into LCC Terminal 2
- When LCC Terminal 2 has been completed, move US Airways to Terminal 8 and Southwest to LCC Terminal 2
- Reconstruct Terminal 1 into LCC Terminal 1
- When LCC Terminal 1 has been completed, move Southwest back to LCC Terminal 1
- Move Terminal 3 airlines to LCC Terminal 2, Alaska Air and Horizon Air should be in Terminal 6.
- Reconstruct Terminal 3 into LCC Terminal 3
- Move Terminal 3 airlines back to LCC Terminal 3
- Widen Runway 24 Right to 200 feet wide
- Move Runway 24 Left 340 feet south with a 200 foot width
- Build the centerline taxiway, if required

## PARALLEL CONSTRUCTION ACTIVITIES TO CTA WORK

- Build the CONRAC (consolidated rent-a-car facility)
- Complete roadway connections from CONRAC to CTA
- Complete roadway connections from CTA to and from freeways
- Construct Automated People Mover (APM)

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# Questions?

Please contact  
**Robert Acherman**  
Vice President  
ARSAC

(310) 927-2127 racherman@netvip.com

ARSAC SPAS Concepts

11/28/2010

SPAS-PC00130



## Alliance for a Regional Solution to Airport Congestion

322 Culver Boulevard, Ste. 231 Playa del Rey, CA 90293  
info@regionalsolution.org

September 15, 2010

Los Angeles World Airport  
Ms. Gina Marie Lindsay, Executive Director  
1 World Way  
Los Angeles, CA 90045

Comments presented for incorporation into the LAX Master Plan Update EIR Notice of Preparation (NOP)

Dear Ms. Lindsay,

We appreciate the opportunity to provide some preliminary comments to the impending NOP. We desire that the NOP comment period be extended to at least sixty days. Although we do not know the exact timing of the NOP release, we note that the holiday season is almost upon us and want to ensure that full attention can be maintained by the public and all stakeholders. This is not your normal environmental review process as we suggest that as part of the NOP process there be several public scoping meetings to better define the alternatives prior to the evaluations.

The Stipulated Settlement of 2006 was conceived to create a process of cooperation resulting in projects to which all parties agreed. The Specific Plan Amendment Study (SPAS) process that will be used to update the approved LAX Master Plan Alternative D is a major element of that agreement. Throughout the negotiations and subsequently ARSAC has championed a safe, secure, and convenient LAX. Projects upon which there was general agreement were to be started almost immediately under a less rigorous review by the LAX Specific Plan than the "yellow light" projects which had serious negative impacts on the surrounding community. ARSAC is disappointed that the agreeable projects have not progressed as quickly as anticipated.

The Settlement objective is to find mutually acceptable alternatives addressing the issues corrected by the "yellow light" projects while keeping capacity to current levels. Equal in demanding a safe, secure, and convenient airport we have steadfastly repeated strong opposition alternative changes which would impose increased noise and other environmental impacts on the airport neighbors or result in greater removal of homes or businesses. During the Settlement Process moving the runway complex north or extend west was never considered because it was a condition that was found to be unacceptable in the past. It will be important to quantify the effects on noise and pollution on the west end for all operational conditions—eastern and western operations—especially the impacts that can be caused by early turns, go-arounds, and when both runways are used for take-offs or landings.

The planned schedule for the SPAS has been seriously delayed by LAWA actions to raise alternatives which were known to be unacceptable to airport neighbors. Using a rationale of "airport safety improvement" LAWA demanded runway changes that would have devastated one-third to one-half of the Westchester Business District and removed and/or increased impacts on Los Angeles and Inglewood homes and businesses.

LAWA unilaterally commissioned safety studies designed to support moving runways north. A subsequent uproar was supported by elected officials of Los Angeles and surrounding communities at all levels who denounced the thinly veiled expansion plan and a promise that expansion north would not be tolerated unless it was clearly shown to be a major safety issue. A million dollar plus NASA/Asdaimed Academic Panel review of safety was then performed on the North runway complex to resolve the issue. Those favoring expansion denounced the review results which stated unequivocally that safety will not justify the runway movement north.

We have been told that even more onerous runway options will be included by LAWA into the impending NOP. We are disappointed that even greater movement north and west have been proposed and remain adamantly opposed to them.

Given that it is still a LAWA decision of what alternatives to include, several key elements/issues are identified below which should be included in the upcoming Notice of Preparation

1. The methodology and criteria by which each alternative is assessed must be fully defined in advance of discarding any alternative from full evaluation. We propose that all options be fully assessed/analyzed. Per the Stipulated

Settlement assessments of options must be judged to see how they address the issues that the "yellow light" projects were to have fixed. These issues should be identified and quantified.

2. ARSAC opposes any proposed movement of a runway north or west because it causes greater impacts (and effects—less than a "legal" impact) in accordance Section V, C (p9) of the settlement. If LAWA insists on evaluating project options such as the 100', 200', 300' or 400' north as they have indicated that they intend to do, they must separate efficiency assessments for each option allocating the improvements between the improvements due to restoring the taxiways/taxilanes/gate configurations to fully compliant widths and separation distances, and then fully assess those new options against the comparable option runway north option for efficiency, noise, and other environmental impacts.
3. ARSAC thanks LAWA for its recent inclusion of a north runway 24L movement 100' S and expects it to be fully assessed.
4. All new data must be utilized as so much of the old EIR is outdated and was conflicting. Tiering on changes of this magnitude is unrealistic and unwarranted.
5. Detailed build assumptions must be spelled out for each of the assumptions; i.e. two midfield taxiways or one? gate locations of TBIT and/or midfield taxiway? location of ends of runways and any changes to taxiways, all technological improvements assumed and the extent of implementation (ie full runway status lights at ALL intersections). If partial completions are contemplated before the 2020 date then options must be separated to account for incomplete "baseline" changes. This includes FAA tower operational organization and staffing levels.
6. Details of how the assessments will be conducted should be provided for public evaluation as well.
7. Flight mixes must be assessed, details enumerated, and projection sources documented. During environmental assessments will any of the environmentally friendly fuel alternatives be assumed? What more efficient engines?
8. When noise is assessed, modeling should include theoretical assessments showing flight frequency impacts out to 60 DNL (CNEL) using models similar to that from Wyle which includes topographical impacts. What assumptions are made about controlled landing and takeoff approach changes since new way old systems are not being developed by the FAA AND separate contractors for airlines. How is the new GPS/satellite control FAA plans (NextGen) integrated into the assessments? What airspace realignments are assumed?
9. How will aircraft routing on the ground be determined? What air approaches are assumed (i.e. use of preferential runways—landing outboard, takeoff inboard) and what impacts are expected based on ATC staffing or reallocation of tower responsibilities? Is the preferential runway usage assumed? What percentage and time of day is assumed for other configurations of take offs/landings since time of day impacts the amount of air quality impacts due to several factors including wind directional flow. What safety measures are assumed (i.e. full runway status lights, ground radar tracking systems, FAKOS, etc)?
10. What are the assumed placement of new ground access roadways and their impacts on traffic?
11. What growth factors are assumed for the area in general and LAX traffic for sums, buses, vans, taxis? How is cargo growth to be assessed and new vehicles associated with it?
12. What is the planned usage of all LAWA properties not specifically identified or traffic attributed and impacts on environmental assessments (i.e. we are told Bedford Square use is not specified)? If a usage has not "planned" then a range of usages should be assessed and combined with the other usages to assess total impacts.
13. Since this is a unique set of changes and conditions for the modification of a Master Plan, additional study information beyond a normal EIR should be provided for each runway/taxiway/taxilane/gate configuration. LAWA should study and report: 1. Safety 2. Security 3. Pollution 4. Aircraft compatibility (Group IV, V and/or VI) 5. Capacity and 6. Cost and scheduling of implementation. Safety should include both aircraft and restoration of landscape structures which need to be repaired.
14. We also encourage LAWA to consider other alternatives that are "out of the normal box" to achieve results. Each of the LAWA plans includes a center line taxiway that the FAA claims some benefits, but we note it also adds some new modes for incursions as well. The Academic Panel conducting the NORSAC safety study, for instance, added a single, longer runway in place of 24L to achieve Group VI status. Their findings noted that there was only nominal loss of capacity from this option and removed the highest source of risk—runway crossings. LAWA and the FAA demonstrated the capability to operate on three runways throughout the period of the South Airfield Improvement Program (SAIP) construction.

Sincerely,

Denny Schneider, President

cc: Mike Molina  
Mayor Antonio Villaraigosa  
Councilmember Bill Rosendahl

SPAS-PC00130

SPAS-PC00130



November 9, 2006

Specific Plan Amendment procedural improvement questions and suggestions that are presented for discussion purposes rather than as position stances:

#### Committee Operation

LAWA has been presenting their proposals at the meeting and we are supposed to respond on the spot. Discussion topic handouts should be distributed before our meeting.

Public expectation is that the green light items were to go forward and the yellow not. What specific, quantified parameters are not met by the green light projects? What "quick fixes" and procedural changes can address these instead of major construction projects?

We need to go back to ground zero and first establish acceptance of specific, measurable objectives. In the case of "yellow light functionality review" we need concrete goals. If there is inadequate CTA traffic capacity, for instance, what is it now and what must it be in each location around the circle? How much curb space is necessary versus what exists now? Where are the anticipated difficulties with air quality? Approximately how much is produced per aircraft? Where are the traffic bottlenecks creating auto/van air quality issues? For traffic gridlock issues how many cars must get to certain locations and what "quick fixes" can be done to reduce these impacts?

It's time to present full up options that includes all aspects of a Plan rather than piece meal. Each part has an impact on the others.

#### Public Outreach

There is no trust established with the public yet because of past history. When ideas are "floated" people think that they will be rammed down their throats. Ideas that are not truly anticipated to be implemented should be identified as so even if you want to evaluate them for support of a "range of options." Information must be presented prior to the meetings.

State openly what is NOT on the table and what the LAWA objectives are in terms of operations. People hear all of the proposals and do not believe that the plans are not laying the groundwork for another future expansion.

During the meetings the questions must be answered for individuals with actual factual materials and/or where the answers can be found. After the meetings post the answers to these questions and allow for follow up. If you don't know the answer, just say so! Don't make them up as you go along.

SPAS-PC00130

Re: Runway Safety on the North

Arm waiving that we need better and "one is too many" won't cut it when trying to convince most people that major construction and future noise and other environmental impacts will be imposed upon them.

What specifically needs to be addressed? What are the specific human factors that must be addressed for safety? What physical factors? What mechanical factors?

What technologies are available? Distinguish between facilities "improvements" and procedural factors? ie traffic load, pilot familiarity and marking of runways, controller workload, impacts of various aircraft types?

What is NOT in place at LAX that would improve safety? ie AMAS and collision avoidance systems, status light systems, etc?

What can be done about spacing of aircraft coming here to avoid bunching?

If history is our best predictor... What makes our runway on the north unsafe?

Over the past many years there has been two accidents on the north. What were their specific causes and how would have, if at all, separating or lengthening the runways fix this? What are the specific causes of incursions that are being avoided? ie hold bar errors? Lost way on airport? Lost track of aircraft? Etc...

How does the incursion experience at LAX differ with that of comparable sites? I understand that LAX has less on the north than comparables. If this is not sufficient, what kinds of issues are of greatest concern and how should they be addressed?

Explain why the south side has four times as many incursions as the north.

A recent article in the Breeze stated over 50% of the runways in the US fail to have complete RPZ. What waivers has given by the FAA for the north side? What would have to be changed to make them fully compliant?

Denny Schneider, President  
ARSAC

SPAS-PC00130

## LAWA Community Stakeholder Public Safety Initiative

Arnie Corlin

November 22, 2010

Community members, Business owners and LAWA must acknowledge public safety as a key component to improve their community's quality of life and the return on their investments.

LAWA has not sufficiently recognized this and should become a better community partner in order to help control terrorism and other criminal threats at and around LAWA properties.

For law enforcement and government to create efficient and more successful results, a true community partnership is essential. Our Senior Lead Officers who have traditionally been our educators for crime and nuisance issues are not in the community like residents, businesses and LAWA 24/7. Senior Leads also have numerous other assignments making it important to acknowledge and involve more community stakeholder's participation.

Additionally, LAPD does not have the proper resources necessary nor should they be the sole provider to create that partnership for an entity as large and self sufficient as LAWA.

Another obstacle to these successes is that law enforcement typically tries to sell rather than market public safety education. Marketing would engage more stakeholders and improves the ability from just knowing about issues to an elevated understanding of issues. Similar to what is done in Israel.

While programs such as iWatch have good bullet points, most participants tend to forget or fail to pass on important information to others once instructors are gone.

Whether it is one's investment property, their own well being or that of other community stakeholders, it is just as essential to re-enforce the safety from their boundaries going outward as well as from within a given perimeter.

To date LAX has been far too focused on re-enforcing within their perimeter and insufficiently looking outward. Minimal to no partnership of the businesses and other community members has been created. This lack of partnership from LAX may needlessly increase the risk of some criminal behavior and allow the opportunity for it to move closer to or enter LAX property.

An example is the manner with which some cameras have been installed on the exterior clearly shows the lack of identity of perimeter control and boundaries. Even with new tracking software in development, none currently developed would have much value with the manner those cameras have been installed.

I have talked to numerous business and community members who have told me there has been no effort to identify and make use of existing cameras, installing new resources without

identifying and coordinating those that exist is a waste of government resources. Doing so might have allowed others with higher value field of views to be put into place at a lower cost.

Not doing so is a poor risk management model.

Another asset not sufficiently used is that some of the best and most organized Neighborhood Watch Groups and communications in the city exist around LAX. This could and should be a great resource immediately available with minimal expense. Numerous businesses on the perimeter have also told me there is not sufficient communications as to threats or other issues at or around LAX.

All of these stakeholders in many cases would be much more able to identify abnormal behavior than even local law enforcement. It could also be done in a much more rapid manner at a far lower cost.

An LAX or Federally funded component for community stakeholder training and coordination should be immediately required whether or not any LAX improvements are agreed upon.

To enhance the value of funding spent on such a program, this could be identified and implemented as a national model.

November 22, 2010

SPAS-PC00130

SPAS-PC00130





**ARSAC Alliance for a Regional Solution to Airport Congestion**  
 322 Culver Blvd., #231 Playa Del Rey, CA 90293  
 310 641-1199 info@regionalsolution.org

July 12, 2010

Los Angeles World Airports Planning  
 Attn: Chief of Airport Planning, Mr. Herb Glasgow  
 1 World Way, Room 218  
 Los Angeles, CA 90045

Reference: Notice of Preparation of Draft EIR for the Proposed Interim Taxiways Safety Improvement Project (TTSIP) No. EIR-10-019-AD dated June 4, 2010

ARSAC, the Alliance for a Regional Solution to Airport Congestion, understands that this project consists of several taxiway relocations between the north complex runways 24L and 24R which are to reduce the possibility of collision from an incursion.

LAWA has acknowledged that this was never studied in the Master Plan EIR and that this is a fully stand-alone project and is being proposed in the interest of a more rapid path to runway safety improvement. In concept we support this effort but have identified the following issues which should be fully addressed in the draft project EIR.

1. Specify and evaluate the locations where processing of removed taxiway materials are collected, stored, and processed along with the environmental controls to prevent toxic fugitive dust.
2. Specify truck routes for construction purposes as well as parking locations for construction workers.
3. Noise impact evaluations should take topography into consideration. What traffic levels are assumed and what flight mix? NOP Attachment 1 from 2009 is a start, but what is projected when the airport is more fully utilized?
4. Ensure that the assessment will evaluate how (and/or whether) mid-runway takeoffs will impact noise and air quality issues as well as safety.
5. Ensure that the project is evaluated in the context of both what taxiways (and taxiways) will exist at the start of this project as well as projects currently proposed and those authorized by the Alternative D Master Plan. Examples include the taxiways between the new TBIT and Midfield Concourse, Midfield taxiway R (and S not yet authorized).
6. Please confirm that all construction mitigation and control systems used for the South Airfield Improvement Project are utilized for this project.

Specific comments to the CEQA Check List:

1. ID What additional lighting will be added for construction transportation north of 24R? Can this be significant?
2. IID What controls will stop the distribution of contaminated ground particles during construction?
3. IIE Are any sewer lines or other water system pipes impacted during construction? What smells and contamination is anticipated from this?
4. VIA Item iii is very general about aquifers and sand compactness. Is there a map of the ground water in this area near the north runway complex? Of special interest is the eastern half.
5. XLA Include noise from construction vehicle traffic.

We look forward to continuing to work with you. We have attached an appendix of safety related information to aid in your understanding of this complex issue.

Sincerely,

Dennis J. Schneider  
 President

SPAS-PC00130

SPAS-PC00130

**ARSAC Alliance for a Regional Solution to Airport Congestion**  
 322 Culver Blvd., #231 Playa Del Rey, CA 90293  
[www.Regionalsolution.org](http://www.Regionalsolution.org)

June 17, 2008

Mr. Herb Glasgow  
 Senior City Planner  
 City of Los Angeles Los Angeles World Airports  
 1 World Way, Room 218  
 Los Angeles, CA 90045

Comments re: Notice of Preparation of a Draft Environmental Impact Report (SCH No. 1997061047), Los Angeles International Airport (LAX) Master Plan Specific Plan Restudy.

Dear Mr. Glasgow:

The Alliance for a Regional Solution to Airport Congestion (ARSAC) appreciates this opportunity to comment on the Notice of Preparation for the Specific Plan Amendment Study. In addition to these comments, ARSAC has adopted the attached "Petitioners' Overview of Guiding Principles for Environmental Analysis; LAX Specific Plan Amendment Study EIR."

**A. The Proposed Reliance on Tiering is Problematic.**

The NOP (p.4) indicates that "[t]he SPAS EIR will be a Supplemental EIR that is tiered from the LAX Master Plan EIR..." This statement requires clarification, and the tiering approach requires reconsideration by LAWA. While tiering may be appropriate when a Lead Agency has already certified an EIR for a project, in this case ARSAC strongly cautions against relying too heavily on the previous Master Plan EIR. Tiering is only appropriate when the later project is "consistent with the program, plan, policy, or ordinance for which an environmental impact report has been prepared and certified." Pub. Res. Code § 21094(b). Case law also stresses the need for consistency between the subsequent project and previously certified EIR. See *Koster v. County of San Joaquin* (1996) 47 Cal. App. 4th 29, 36. The very purpose of the project now proposed is to change some of the key underlying assumptions of the Master Plan EIR. Therefore, it is very difficult to argue that the SPAS EIR project could be consistent with the previously certified Master Plan EIR.

The NOP for the SPAS EIR proposes significant changes to the Master Plan,

including movement of Runway 6R/24L; changes to the proposed closure of the CTA to surface traffic; development of an off-site ticketing facility; and the future of Terminals 1, 2, and 3. Given the magnitude of the changes, ARSAC questions the viability of the Master Plan as a document off of which LAWA may appropriately tier the SPAS EIR. While some aspects of the Master Plan remain unchanged, the better approach would be to incorporate by reference the portions of the Master Plan unaffected by the proposed changes (see Guidelines Section 15150), but develop the SPAS EIR as a primarily stand alone document that address the significant, and previously unstudied, impacts of the project now proposed.

In addition, tiering is not appropriate under Section 21094(b) when a Lead Agency determines that the provisions of Public Resources Code Section 21166 apply. The existence of the NOP and proposal for the SPAS EIR make the applicability of Section 21166 self evident. Section 21166 requires a subsequent or supplemental EIR when "[s]ubstantial changes are proposed in the project which will require major revisions to the environmental impact report." Pub. Res. Code §21166(a). LAWA has rightly determined that this section applies. However, because this section applies, the tiering provisions of Section 21094 are inapplicable, and LAWA should prepare a primarily stand-alone document.

LAWA should also rethink the proposal to develop a Supplemental EIR. Preparation of a Supplemental EIR should occur when "[o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed condition." Guidelines §15163(a)(2). By contrast, a Subsequent EIR is required when "[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR..." Guidelines §15162(a)(2). The proposed changes are clearly substantial and go well beyond "minor additions" to the Master Plan. Therefore, LAWA should not treat the SPAS EIR as a Supplement to the Master Plan, but rather as a stand-alone Subsequent EIR.

**B. Analysis of Impacts.**

The checklist of impacts in the subject NOP includes specific comments that raise numerous concerns for ARSAC. First, greenhouse gas emissions should be specifically addressed in the impacts analysis, as is acknowledged on the Initial Study, Attachment A, p. 3. However, the scope of that analysis appears too narrow. Since greenhouse gas emissions were not analyzed in the 2004 EIR, the analysis of emissions should not be limited to the construction and operation of the LAX SPAS alternatives, but should include all airport operations.

ARSAC expects LAWA and the City will have to find significant impacts in the areas of aesthetics, air quality, emission of greenhouse gases, biological resources, cultural resources (i.e. the "Sea to Shining Sea" mosaic tile mural in Terminal 3), geology



and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/circulation, and utilities.

# **I. The list of impacts proposed for study is incomplete.**

## **a. Geology/Soils.**

Although LAVA has not checked off plans to study geology and soils, population and housing and recreation, LAVA should include these in the EIR. Geology and soils are critical concerns with any construction project. Several projects and/or ongoing geology/soils concerns should be considered in the EIR. Presently, there are proposals to build a ground water runoff retention basin on the northwest corner of the LAX airfield. An underground storage facility is also proposed. LAVA should examine the potential for leaks, and to the Impacts on the soil above. As this location is near the El Segundo Dunes, the soil tends to contain more sand than the eastern boundaries of the LAX property. Additionally, there are old sewer lines running underneath LAX dating back to the 1920's. Some of these lines in Playa del Rey (such as on Zitola Terrace) have collapsed, and the City of Los Angeles has had to buy out certain homeowners (e.g. James Marcinkus). Another proposed project could affect LAX is the Woodside Natural Gas pipeline that will use part of LAX property in the El Segundo Dunes and will traverse underneath Westchester Parkway to a facility near 98<sup>th</sup> Street and Bellanca. The EIR should address potential cumulative geology/soils impacts.

## **b. Population/Housing.**

Population and housing are expected to increase in the Westchester/Playa del Rey/Playa Vista community plan area. Although this area presently has over 50,000 residents, Playa Vista will be adding more housing stock as will the new apartment complex on the corner of Manchester and Lincoln (former Furama Hotel site). Furthermore, the proposed revision to the Housing Element to the City of Los Angeles General Plan seeks to double housing in the Westchester/Playa del Rey/Playa Vista area. With increased housing and population come increased traffic and pollution impacts as well as additional stresses on infrastructure such as roads, water usage, power consumption and sanitation (trash pick-up and sewer). The EIR should address any cumulative impacts.

## **c. Recreation.**

Recreation is another area that must be studied. For nearly two decades, LAVA has promised to restore the 3 holes removed from Westchester Golf Course when Westchester Parkway was constructed. The Westchester Golf Course is one of the most heavily used

golf courses in the City of Los Angeles. Earlier this year, LAVA also held a public meeting at Loyola Marymount University to gather ideas for uses of the LAX Northside property. Many of these uses that garnered positive responses were recreation uses. Furthermore, LAVA may be deficient in producing this EIR if LAX Northside land use issues were not discussed. The FAA's 2005 Record of Decision on the LAX Master Plan specifically excluded approval of the LAX Northside from the Airport Layout Plan on the basis of inconsistency due to, "markedly different assumptions underlying the analysis of environmental impacts that may be expected to result from the LAX Northside portion of the LAX Master Plan."

We request that each of these potential impact areas be thoroughly addressed, even when LAVA feels that impacts can be avoided or reduced by feasible mitigation measures or alternatives.

# **2. Specific Concerns Regarding Particular Impacts.**

## **a. Traffic Impacts.**

Sources of pollution outside of those from LAX operations are cumulatively significant and must be included in the study. In addition to pollution sources from vehicular traffic, aircraft flying in the skies surrounding LAX are also expected to have increased impacts. Additionally, pollution from local refineries, treatment plants, and other sources should be considered additive when determining impact significance.

The communities surrounding LAX are generally used as thoroughfares for north-south traffic and few alternative routes exist. The 405 freeway, Vista del Mar and Pershing on the west, Lincoln Blvd., Sepulveda Blvd., and La Cienega all bear heavy traffic, including that associated with LAX operations. The environmental impact analysis must include those above and beyond the normal operations of LAX, but also the impacts on traffic by travelers and cargo operations forced to go long distances within Southern California to get to LAX. Traffic on the 405 freeway can become bumper-to-bumper at any time of the day or evening. The 405 traffic "spill off" can cause level E and F service on the few other major routes or other alternative routes through the communities. The economic impacts and health impacts of these delays should be identified and quantified.

Community growth is increasing the number of people within the communities surrounding LAX. We want to ensure that any related impacts to the community growth are included in the total impact. Population growth and traffic increases resulting from all further land utilization allowed by zoning within community plans must also be considered. LAVA should use maximum use zoning in their analysis, not just those projects that have been approved. City Community Plans call for substantial increases in housing density with resultant traffic and increased numbers of people who will be impacted by airport related

pollution. The numbers projected by the Westchester-Playa del Rey Community Plan EIR should be used after modification for further increases enabled by other L.A. City ordinances such as transit corridor bonuses and affordable housing bonuses and the Housing Element of the L.A. City General Plan.

LAX physical layout changes and/or operations at LAX should be considered when determining ground traffic pollution contributions.

## **b. Air Quality Impacts and Public Health.**

Recent studies of pollution sources have identified serious impacts by air pollution on human health. LAVA should consider the latest air quality information from AQMD and California Air Resources Board to assess the various project alternatives for pollution impacts. Average pollution over a long period of time should be determined, but also pollution concentrations in any four-hour period since air and ground traffic tend to have peak hours.

Please see and analyze in the EIR the attached reports from the following websites as examples of the air impacts that have been studied.

<http://www.arb.ca.gov/newsrel/nr052208.htm>  
<http://www.arb.ca.gov/research/health/pm-mort/pm-mort.htm>  
<http://www.arb.ca.gov/research/health/pm-mort/pm-mortdraft.pdf>

LAVA is conducting an air pollution contribution apportionment study to fulfill a Settlement promise. Along with an air pollution contributions analysis, LAVA will be following up a study contract ("Monitoring and Modeling of Ultrafine Particles and Black Carbon at Los Angeles International Airport," Froines, John, ARB Contract 04-325, 3-5-2007) in which ultra fine particle studies smaller than those normally measured were correlated with aircraft operations. Additionally a 2000 report by McDonnell (<http://www.nature.com/journal/v10/n5/pdf/7500095a.pdf>) highlighted a method to investigate particle impacts on health that should be followed in the assessment of air quality impacts. "This study did not have direct measures of PM2.5 but relied on TSP and PM10 data. In a follow-up analysis (McDonnell et al. 2000), visibility data were used to estimate PM2.5 exposures of a subset of males who lived near an airport." We ask that air quality measurements be taken on LAX property and in surrounding communities that are in close proximity to LAX.

## **c. Operations Analysis.**

In examining all alternatives, LAVA must examine the use of, and the impact of, operating the LAX in various configurations including Westerly operations, Easterly

operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inbound runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes. Further, any changes in facilities should trigger personnel safety reviews to identify and mitigate potential hazards on both the landside and airside of LAX.

# **C. Specific Questions that Should be Addressed.**

ARSAC's comments in the attached "Table of NOP Comments" pose questions that should be addressed in the course of the EIR preparation. The comments have been made to correspond with the NOP document organization.

We understand project impacts deleted from Alternative D by the Stipulated Settlement, and designated as "yellow light projects," will not be analyzed, except for the no action alternative. However, the EIR should analyze the worst case for each of the individual projects' impacts. Further, if a derivative of a yellow light project is proposed in one of the alternatives (e.g. moving runway 24L 340' south), the impacts shall be segregated and not tied to a requirement to impose other yellow light elements, but any worst-case alternative use must be included.

In 2004, LAVA took credit for the reduction in development at the Northside Development area from the 4.5 million square feet assumed in the 1982 EIR to 1.5 feet 5 million square of light industrial and commercial space. However, the ROD excluded the Northside Development. The DEIR should clearly specify what is planned at this time, and the full impact of such development. Similarly, all proposed uses of the Belford Square area should be delineated in the assumptions used to assess the impacts.

The new alternatives all contain a new transportation center at Century and Imperial. Changes to traffic flows and pollution impacts should be highlighted along with those from any automated people movers (APM) that would go from that facility to the central terminal area. The stops of the APM can have a significant impact on ground traffic. The locations assumed for stops must be identified in detail.

Although the Consolidated Rental Car facility location was approved for project analysis by the Stipulated Settlement in the Lot C location, it is our understanding that alternative locations have been considered. The impacts on ground traffic should be assessed separately for each alternative location.

One alternative discussed modifications to the ingress/egress along the 98<sup>th</sup> Street bridge for the Central Terminal Area near the present Terminal I. This proposed solution called for a structure in the area where Park One currently is located. This proposal allows people going to the north terminal, especially Terminal I, an opportunity for drop



off without entering the major CTA traffic loop. The benefits from this potential project should be segregated so that they may be added to any of the alternatives.

Each of the new alternatives contains a Midfield Terminal and the addition of gates to the backside of Tom Bradley International Airport. LAVA should specify the locations of the taxiways and taxiway intersections. All ground and air impacts of this set of projects must be included in the analysis of each of the alternatives.

In examining all alternatives, LAVA must examine the use of, and the impact of, operating LAX in various configurations including Westerly operations, Easterly operations and Over-Ocean operations. Safety impacts of the varied scenarios must be assessed. Furthermore, other operational scenarios using outboard runways for take-offs and inbound runways for landings need to be considered, as well as parallel landings on the north or the south runway complexes.

#### D. Analysis of Alternatives.

##### 1. The Proposed Alternatives.

The NOP identifies two no project alternatives and four alternatives. ARSAC is *unalterably opposed* to the alternative of moving the runway 24R 340 feet to the north, and strongly supports analysis of the alternative of keeping the existing runways at the present location and implementing operational improvements to enhance safety. Only if safety risks remain after such operational improvements have been implemented can the costs and disruption of runway movement be justified. LAVA has demonstrated the capability of landing Group VI aircraft on both the north and south complexes, albeit with some adjacent taxiway use restrictions. When the South Airfield Project was presented for approval, LAVA indicated that it would be capable of handling the Group VI aircraft and it is our understanding that a ground terminal access route using the south runway 25L has been formally approved for use by the FAA. In the ground air traffic analysis, LAVA should consider the benefits of moving the runways south, and how that would improve the deficient (but legal) taxiways near the terminal gates.

When analysis is performed on the north and south runway complexes, we want the assumptions for operational efficiency and safety impacts of the Runway Status Lights to include both the proposed Pilot Program, which is promised to be installed in 2009, and a complete system which includes the other runways and taxiway intersections which have not been included.

In addition to the alternatives already under consideration, ARSAC requests that an additional alternative, moving runway 24L 340 feet to the south with the revised terminal configuration described in the attachment to this letter, be analyzed as part of

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this EIR. This alternative reduces the impacts on Westchester and Playa del Rey, while improving airport efficiency.

Besides analyzing alternative runway configurations and diverting flights to other airports, the EIR must consider and provide a quantification of all airfield operational scenarios in evaluating the alternatives- westerly operations, easterly operations and over-ocean operations. The noise, pollution and safety impacts on the surrounding communities differ depending upon the operational state. For example, during easterly operations, aircraft taking off on the north runway complex have cut across parts of Westchester such as Westport Heights that are normally not over flown by aircraft at very low altitudes.

The February 2006 Stipulated Settlement specified in SECTION V. LAX SPECIFIC PLAN AMENDMENT STUDY PROCESS, Item C states a goal of "...minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAVA." In particular we want detailed analysis of the north runway complex impacts to show that they are less than that of the current condition of no runway change or in the worst case, Alternative D that was previously approved.

When any of the alternatives are examined for impacts, a key element that must be assessed is the quality of life. Will a runway protection zone require the removal of homes and businesses? The analysis should include all cost factors of eminent domain and loss of values for the surrounding communities that might lose their community serving businesses.

In terms of ground traffic analysis, petitioners are allowed to add up to 15 additional intersections for review, and these intersections may require additional mitigation in several communities. Regardless, the Settlement does not limit the intersections and highways that must be mitigated to accommodate LAX projects.

##### 2. Consideration of Additional Alternatives.

The NOP provides the opportunity for the submittal of additional reasonable alternatives to be studied within the EIR. ARSAC submits two additional proposals to be included in the EIR and the North Runway Complex Safety Study. ARSAC has generated these proposals to increase the range of alternatives that may be considered. The narratives of both proposals are included as attachments. A short summary is below. ARSAC feels that it imperative that no alternative be selected as a preferred alternative until after the North Runway Safety Studies and analysis have been completed and examined. Furthermore, ARSAC requests data from the South Airfield Improvement Program to determine the effectiveness of those improvements, such as the centerline taxiway, in reducing incursions.

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##### a. One Single Safe North Runway Alternative.

This proposal was presented at the Specific Plan Advisory Committee meeting where it was agreed by the Petitioners that all concepts submitted to the LAX Master Plan EIR would be studied, including new one such as the one runway concept. This concept would reduce the number of runways on the north runway complex from two runways to one runway. Runway crossings are the leading cause of runway incursions. Airports that have runway layouts where aircraft do not have to cross one runway to access another runway have very low incidences of runway incursions. Munich Airport (MUC) in Germany has one runway on each side of the terminal complex. One runway is used for landings and the other runway for takeoffs. Since its opening in 1992, MUC had only one runway incursion. London Heathrow Airport (LHR), the world's third busiest passenger airport, has a similar runway layout and is able to handle 70 million annual passengers.

##### b. 340 feet south / Airline Alliance Plan.

This plan, presented to LAVA Executive Director Gina Marie Lindsey on May 7, 2008, is similar to Alternative D except that in place of replacing Terminals 1, 2 and 3 with a concourse for widebody aircraft, Low Cost Carrier terminals would be constructed. Airlines that have airline alliances would be relocated to terminals with their domestic airline partners, or to the Tom Bradley International Terminal for most foreign airlines. The Central Terminal Area (CTA) parking garages would not be torn down in this plan. The Consolidated Rent-A-Car (RAC) facility would be located in Manchester Square and connected to the CTA by an Automated People Mover. An elevated roadway would connect the 405 freeway to the RAC and CTA.

##### 3. The Need for Development of a Regional Plan.

ARSAC continues to believe in a regional solution to airport congestion. The Stipulated Settlement provided that "The first regional strategic planning initiative will be prepared by December 31, 2006." Unfortunately, this commitment was not kept. Not only was the Plan only recently submitted to the County of Los Angeles, but it has now been withdrawn. ARSAC is disturbed by LAVA's failure to aggressively pursue development of a Regional Strategic Plan, and asks that members of the SPAC have an opportunity to comment upon the draft plan prior to the time it is finalized and adopted by the Board of Airport Commissioners, and that this effort be treated as a high priority by LAVA.

Regardless of what is done with the Regional Strategic Plan, LAVA should examine in the DEIR the increased utilization of LAVA controlled airports at LA/Ontario

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International (ONT) and LA/Palmdale Regional Airport (PMD), as opposed to expanding LAX. There is precedent for this kind of study. During the late 1990's, in the LAX Terminal 4 EIR to modernize the American Airlines terminal, a cursory examination was made of shifting some flights to ONT and/or PMD. The failure of the Terminal 4 EIR was that it did not fully examine all of the environmental effects through increased utilization of ONT and PMD, versus LAX. ONT and PMD are large investments for LAVA and they both have the potential for greater economic, operational and environmental value if properly marketed. For example, the "Fly Ontario" marketing campaign did increase the public's awareness of ONT and several new flights were added to ONT, with the notable addition of ExpressJet's west coast hub.

The EIR should analyze all of the environmental benefits to the area surrounding LAX that would occur if some international flights were shifted to ONT. ONT currently has staffed Federal Inspection Facilities (FIS- Immigration, Customs, Agriculture). Additionally, LAVA should analyze the benefits of shifting some cargo flights from LAX to ONT.

LAVA should also consider the impacts of benefits of shifting some domestic flights to PMD, as was identified in the 2001 TriStar Marketing report on PMD and subsequent destination studies. LAVA should also discuss the LAVA/US Air Force Plant 42 Joint Use Agreement (JUA) for PMD, and how the JUA could be revised to accommodate more flights, allow for development of the LAVA owned property, and remove the domestic flight restriction to allow for international traffic at PMD.

LAVA should discuss how a "multi-airport discount rate" system could encourage the shift of flights or the addition of new flights to ONT and PMD. The "Multi-Airport Discount Rate" would give airlines that operate at LAX, ONT and PMD more favorable landing fees and terminal rents than operating solely at LAX. Airlines that operate solely at ONT and/or PMD would get even better rates for not operating to LAX. The "multi-airport discount rate" plan should be available to international carriers, as well as domestic carriers. For international flights, there would have to be parity between those international flights operated by domestic and foreign airlines.

LAVA should examine changing the financing model at LAX (residual vs. compensatory) to allow for cross-subsidization of ONT and PMD to support the "multi-airport discount rate" system.

European and Asian airlines have expressed interest in operating out of ONT. Please discuss how new, smaller, highly efficient widebody aircraft such as the Boeing 787 Dreamliner and the Airbus A350WB can help make ONT more viable for international flights, while lessening the impact on the environment. Many foreign airlines have ordered these aircraft. Continental and Northwest are the only U.S. airline customers for the Boeing 787, while US Airways and Hawaiian Airlines are the only U.S. airlines to order the Airbus A350 XWB. Domestic airlines are adding international routes

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to meet demand for more non-stop services between new cities, and to feed their domestic networks. Also, please discuss how new multi-lateral and bi-lateral agreements, such as the United States-European Union Open Skies Agreement and the new US-Australia Bilateral Air Services Agreement, can provide OMT with more opportunities for international air service development. Discuss LAWA's past, current and future efforts to attract more air service to OMT and PMD.

Finally, LAWA needs to address the issue of Orange County residents using LAX for their air travel needs. It has been estimated that one-third of the passenger traffic through LAX is destined for Orange County, and that LAX handles 90% of Orange County's air cargo. LAWA should discuss the possibility of working with the Walt Disney Company to rename LAX/Ontario International Airport to Walt Disney International Airport and then re-package the airport as the gateway airport to the Disneyland Resort, and the primary international gateway airport for the Orange County and Inland Empire regions. In your analysis, please assume that the Right of Way can be obtained for a monorail or high-speed rail between OMT and the Disneyland Resort and/or the Anaheim Transportation Center. This way, OMT will be provided with the necessary critical mass for ground transportation. The rail line could be operated by LAWA, Disney, or in cooperation with the California-Nevada Super Speed Rail Commission.

#### E. Enhancing Airport Security.

Security is another matter that needs to be carefully examined in the EIR. RAND performed two security studies on the LAX Master Plan. The first was done at the request of Congresswoman Jane Harman. The second study was commissioned by the Board of Airport Commissioners (BOAC). To date, the public is unaware of how, if at all, LAWA is implementing the RAND recommendations. Please discuss what, if any, follow up with RAND has been occurred, and the status of implementation of its recommendations.

#### F. Processing of the EIR.

Although the NOP has been released, ARSAC believes the NASA study should be completed and evaluations conducted by the selected members of the academic community have been published before the Draft EIR is released so that the studies will inform the selection of a preferred alternative. This would also allow LAWA to first have experience with operations at the South Runways before selecting a preferred alternative.

When the Draft EIR is released, ARSAC requests that it, and all related documents, be provided electronically in searchable format, as well as in hard copies.

To the extent that the new EIR relies upon the 2004 LAX Master Plan Environmental Impact Report, that EIR contained many conflicting comments within its 17,000 pages, and numerous deficiencies that were identified by ARSAC and other petitioners in the lawsuit that resulted the Stipulated Settlement of 2006. To assure greater clarity, and avoid some of the problems that occurred in the past, whenever any of the prior documentation is referenced in the upcoming EIR, we request that specific paragraphs and page number references be included for documents referenced in the DEIR. We also strongly request that the EIR and all supporting documents be provided in a format that is searchable electronically.

Finally, so that the best possible public review and participation will occur, we also ask that the Draft EIR circulation time be increased from 45 to 120 days. Forty-five days for review of an extremely complex and technical document is simply inadequate.

Please feel free to follow up with any questions you may have about these comments or recommendations.

Sincerely,

Denny Schneider, President

#### Attachments:

1. Environmental Review: Table of NOP Comments
2. Petitioners' Overview of Guiding Principles for Environmental Analysis
3. One runway option overview
4. Low cost carrier option overview

#### Attachment to ARSAC Comments to SPAC Environmental Review: Table of NOP Comments:

NOP paragraph	NOP pg ref	Comment
1.0 Project Location	2	Figure 2 does not distinguish the elements of the SAIP. The date of origin of this photo should be identified.
2.0 Project Background	2	In the City Council hearings 07-0541-S1 8-30-2007 a Specific Plan Amendment to remove the west satellite concourse from the projects requiring maximum scrutiny was approved. The "Midfield Terminal" discussed during those hearings was equated to the "west satellite concourse." Does the approval of this amendment authorize use of only project level EIRs for the Midfield Terminal including the concourse, additional gates on the back of TBIT, and associated taxiways and taxiways?
3.0 Project Description	4	Clarification: The gate limitation is not 153, but no more than 153 per Section IV C of the Stipulated Settlement.
SPAS Options	5	What are the northside runway complex airfield restrictions that were resolved by Alternative D? If the north runway complex is not reconfigured, what will be the operational restrictions on NLAs? Which restrictions can be mitigated by changing the locations of taxiways and runway intersections or gate locations rather than moving runways?
340' option, Alt D	5	With the extension of runway 24L, 1000' to the east, this 340' S option says takeoffs would be closer to the community all the way back to Sepulveda. What specific sections and paragraphs in the 2004 EIR provided impact analysis? How many flights would be taking off from this newly located east end of the runway? What noise and pollution studies were included in the 2004 EIR in the assessment? What will be the impacts in easterly operations or in over-ocean operations?
Move 24L 100' South	6	LAWA should identify what relocations and runway extensions they plan to study. Are these decisions being made on the basis of simulations underway with the NASA study? How will the alternatives for this be evaluated and compared for environmental impacts? Will location selections of taxiways be done to improve operational efficiency of NLA? What specific criteria are being used to evaluate the improvements? What will be the impacts in eastern operations or over ocean operations?

Keep existing locations	6	This option was supposed to include an as yet unidentified taxiway and intersection modifications to improve aircraft movement. When this alternative is evaluated for safety and operational effectiveness, what assumptions will be made about the gate locations? What about taxiway and intersection locations? What will be the impacts in eastern operations or over ocean operations?
Move 24R 100' North	6	This 100' N says takeoffs would be closer to the community all the way back to Sepulveda. How many flights would be taking off from this location? Where is the noise and pollution study to justify this? This appears to be one of the deficiencies of the original EIR. What would be the impacts on eastern operations or over ocean operations? This 100' N alternative should include two sub-options: extension of 24R west and no further extension that are both evaluated.
Move 24R 100' North	7	If terminal demolition of 1,2,3 is "yellow-lighted," why doesn't LAWA consider the associated taxiways or other CTA activity related to this issue "yellow-lighted" instead of presuming only a project EIR is required? If changes are to be made, what are they to be and how would it affect the CTA traffic (and any environmental issues related thereto)?
Move 24R 340' North	7	Calls for extending 24L. To where will the vehicle holding area be relocated? Has this been included in the environmental reviews including traffic study?
Move 24R 340' North	7	This option calls for modifications to taxiways. LAWA should identify what relocations and extensions they plan to study. Will the selection of locations and extensions be made on the basis of simulations underway as part of the NASA study? How would the various alternative taxiway locations be evaluated and analyzed for relative environmental impacts? Will location selections of taxiways be based upon improving operational efficiency of NLA? What specific criteria will be used to evaluate the improvements?
3.1.2 CTA Demolition	7	The NOP states: "Under the LAX Specific Plan and Stipulated Settlement, only the Demolition of Terminals 1-3 is a Yellow-Light Project. If the terminal demolition is yellow-lighted, why aren't the taxiways or other CTA activity related to CTA demolition also treated as yellow-light per the Stipulated Settlement? If changes are to be made, what are they and how will it affect the CTA traffic (and any environmental issues related thereto)?"



3.1.3 Ground Transportation Center; Problem to be addressed	8	<p>LAWA has stated that they want to improve CTA traffic flows and in the surrounding community, but has never provided a quantified measure of levels of traffic that are needed to be accommodated in various locations. For instance, how many cars (per hour and at peak periods) much be accommodated along the curbsides within the CTA? What were the levels of adverse impacts that were to be mitigated by the GTC that was eliminated by the Stipulated Settlement? The aggregate numbers are important so that replacement concepts can be measured and judged against a consistent yardstick. Is it 1000 cars per day and 50 cars during peak hours in the CTA or is it 100 times that?</p> <p>How will traffic be segregated and how will any proposed mitigations address the traffic impacts in the CTA as well as in the surrounding community? What alternatives have been identified such as van and bus drop offs and pickups in the parking structures or another location? What plans exist for a people mover to accommodate passengers dropped off outside the CTA in an area local to LAX for people to get into the CTA? Please provide detail information about the way in which cars currently enter and leave the terminal areas. Ensure that the directional information is broken down by hours and volume from each of the directions entering the CTA (Sepulveda N, Sepulveda S, 98th street bridge, and Century Boulevard.</p> <p>What levels of vehicle types can be accommodated by the no project, existing conditions? LAWA has established programs to reduce the number of vans and busses in the CTA. What assumptions are made about the effectiveness of these programs and what baseline numbers are used in the assessments? What programmatic changes are "in the works" that apply as a baseline condition for the numbers of hotel and car rental courtesy rolling billboard busses that frequently block curbside access for cars?</p>
Close Access to GTC	8	<p>Identify how luggage would be handled. Would the approved tunnel be constructed? Although the Manchester Square GTC was yellow-lighted by the Settlement, the tunnel was not specifically mentioned. How would safety/security for the tunnel be handled? What would be the mitigations for ground traffic associated with the use of the tunnel? How will disabled and elderly travelers be handled? Adults with excessive baggage or with children? Since the methods for handling people and location/directions of car trips would dramatically change, how is this to be addressed for environmental impacts?</p> <p>Is there an assumption that better traffic flow is facilitated by improved signage over the lanes and along the CTA terminals? How much improvement is expected from signage improvements?</p>

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Transportation Center at Manchester Square and Aviation/Imperial and new Terminal 1 drop-off where Park One is located	9	A connection to the APM or a moving sidewalk can provide access to all of the north side terminals. How many and what percentage of people do you expect to be served by this new access? Would this increase total access capacity? By how much?
3.2 No Action Alternatives	11	<p>Given that there are two different "no project" alternatives—one with all of the yellow-light projects of Alternative D and one based on the existing configuration with several non-Master Plan improvement projects that are underway. The second paragraph segregates the "no project" into two conditions; when all yellow light projects are assumed to have been built and when none are built. How will the EIR assess the overall impacts of these two "baselines" if some yellow-light projects are subsequently built? If the yellow-light projects overlap with other project elements that have been approved and are therefore part of the "other" base how will the other alternatives be assessed in comparison to the baseline? If, for instance, a newly designated intermodal transportation were built at Century/Aviation to accommodate a Green Line extension would all of the impacts of the totality of the baseline projects be used to assess other project impacts in addition to the yellow-project designated ones?</p>
3.3 Probable Environmental Effects	13	<p>Under aesthetics, the NOP acknowledges excessive lighting is a potential issue. Does this include runway lights if moved north? Are Northside development impacts included? If yes, what version (s) of the Northside development?</p> <p>What new Manchester Square development is assumed? Are there any other projects such as APMs and where would they stop and flow/in from? This could impact local communities with noise, pollution and traffic in various ways depending upon the paths used and the locations of the stops.</p> <p>This is another concern for neighbors and also for the flora and fauna. Introduction of new species from LAX arrival flights? Although good faith attempts to stop the arrival of foreign plants and animals is made, the locations of the aircraft and the handling of baggage and cargo can impact how an unwanted species can be spread to the surrounding areas outside of LAX.</p> <p>What about impacts on Riverside Fairy shrimp locations? LAWA was caught filling in Continental City with asphalt-laden dirt about 2003. LA Building &amp; Safety halted the non-permitted filling. Where are all of the areas impacted by the 2003 action? What sensitive species are in surrounding areas? Why did the relocation area for the Riverside</p>

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		<p>Fairy Shrimp change from the former El Toro Marine Corp Air Station to an area in Redondo Beach? Can LAWA simply leave the Riverside Fairy Shrimp in tact at LAX and place some sort of netting or fishing lines over the shrimp habitat so that the shrimp will not have to be moved?</p> <p>Where are the earthquake prone areas?</p> <p>What are the amounts and types of pollutants from aircraft? How will these pollutants be mitigated? What will be done to reduce the greenhouse gases from LAX operations?</p>
3.4 Comments and Next Steps	13	<p>45 days circulation for review is inadequate. This should be as much as 120 days so that the maximum time will elapse to obtain South Airfield incursion experience.</p> <p>The NASA study should also be complete before this comment period begins.</p> <p>Figure 1- Project Location None The grayed area shows all of LAX, but also lands that were transferred from the Westchester-Playa del Rey Community Plan to the LAX Plan during Alt D approval. Not all of this is being considered for cumulative impacts during the EIR reviews of the SPAS airport projects. Please delineate which areas are specifically included in the impact studies.</p>
Figure 2- Existing Airport		<p>What is the date of this photo? On what date is the existing airport based? This photo does not show the completed SAIP project, but we assume that it is part of the existing airport. Earlier in the document, Paragraph 3.2 identified two different no action alternatives. Please detail what airport elements are part of the two "no action" alternatives and their relationship to the baseline conditions against which new projects are being judged.</p>
Figure 9- Potential Alternative-Runway 6R124L 100' South		<p>Green Line stop is shown along Century instead of in Intermodal Transportation Center. How much traffic of each transport mode is expected? How would the traffic impact the type and quantity of mitigations required?</p>
Figure 11- Runway 100' North		<p>Green Line stop is shown along Century instead of in Intermodal Transportation Center. Although ARSAC supports the extension this is not part of the approved Master Plan or existing condition. Environmental improvements from this project are not part of the baseline and should be included in the assessment accordingly.</p>

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Figure 12- Runway 340' North		See comment for Figure 11 above.
Initial Study and Check List -CEQA Lead Determination	IS-2	Please provide a matrix of which environmental impact studies are being reassessed and which are being rerun and correlate each impact study to the baseline 2004 FEIR paragraph numbers.
Evaluation 6)	IS-3	The document acknowledges the requirement to document source reference in detail. Anything less makes it difficult to identify what has been done and its validity.
Environmental factors potentially affected	IS-3	<p>Three additional impact areas should have been checked.</p> <p>Geology/soils. Proposals to move the runways could be in areas where there are sand dunes and other soil with high liquefaction potential.</p> <p>Transportation/Traffic. To accomplish some of the projects in the LAWA 340' north alternative what housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced.</p> <p>Population/Housing. To accomplish some of the projects in the LAWA 340' north alternative housing would be impacted as well as the community serving businesses. Please identify all units that are subject to removal by any federal or state law regardless of whether it is believed that these laws would be enforced.</p>
VI. Geology & Soils (a)	IS-6	<p>There is some seismic potential. A plume of the Inglewood/San Andreas faults is near some of the areas where projects have been suggested along Century, for instance. We call on LAWA to review the most current USGS maps to assess earthquake susceptibility. The 340' N alternative, for instance, calls for moving Lincoln Boulevard and burying its connection to Sepulveda. Additionally we call upon LAWA to address the sandy soil conditions toward the Northside development along Westchester/Playa del Rey and western sections of LAX property for impacts from building any tunnels or from impacts from existing tunnels, underground utilities or sewer lines.</p>
VII Hazards & Hazardous Mats. (a)	IS-7	Could run off with fuel and rubber off the runways create a hazard?
VII Hazards & Hazardous Mats. (f)	IS-7	<p>The ability to get medical care can be impaired since the Medical Center on Sepulveda could be closed off within the boundaries of LAX if an emergency occurs. Insufficient trauma facilities are available within the local area if a medical emergency occurs. The closest is UCLA that would be impossible to get to during most of the day due to heavy traffic on the 405.</p>

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VII Hazards & Hazardous Matls. (g)	IS-7	See comments for element (f) above.
VIII Hydrology & Water Quality (i)	IS-8	There was some question about the 100-year flood plain structures in the last EIR due to the drainage canals being fed with much greater runoff due to all of the local developments surrounding LAX. A new urban run-off facility has been suggested for construction at the northwest corner of the LAX airfield. What effect will this facility have on LAX and water quality issues? The sewer lines near and underneath LAX date back to the 1920s. Are these sewers adequate and structurally sound? If not, what hazards do these sewer lines present?
XII Population & Housing (a)	IS-9	LAX traffic causes severe impacts on the local communities. Westchester-Playa del Rey and the other surrounding communities have become thoroughfares for people travelling from the South Bay and further south and the LA Westside. LAX traffic exacerbates this. Has the new LA City General Plan traffic increases due to changes in the housing element been taken into consideration?
XIV Recreation	IS-9	Holes were removed from the Westchester Golf Course to accommodate previous LAX expansion in the 1970s. Restoration of these holes has been a LAX promised mitigation ever since. When will this be accomplished and what other recreation opportunities will be created for the surrounding communities?
Attachment A V Cultural Resources (a)	A-4	Under historic elements, other buildings that are impacted such as the Paradise Building, Centinela Adobe, Randy's donuts should also be addressed due to off airport projects that facilitate these projects. Others items such as the LAX Theme Building and the "Sea to Shining Sea" mosaic tile air travel mural in Terminal 3 should also be addressed.
Attachment A V Cultural Resources (b)	A-5	Have any burial sites been identified? What about pottery or other Indian relics?  What about prehistoric bones on the west and north areas in and around LAX due to the high incidence of oil reserves in the area? Prior LAX layouts have included N-S runways such as the one that existed in the area behind Tom Bradley International Terminal. Are any of these old structures historically significant? Are there any historic elements from the Bennett Ranch or previous ranch owners that used the land that is the present day LAX?
Attachment A V Cultural Resources (c) Mitigation CR2	A-6	The NOP says that mitigation reduces the impact to less than significant and therefore nothing else will be done. Please identify which areas are subject to higher potential impact mitigation per the

		existing paleontology mitigation program.
VI Geology and Soils:	A-7	What about the water filtration system that is being proposed for the Northside development area? How could this filtration project interface with the potential building set for the entire Northside development area?  The prior EIR claimed that earthquake susceptibility was not significant, but at an SPAC meeting it was acknowledged that there earthquake fault areas that would impact the tunnel that was approved in Alternative D. Where else would earthquake faults impact building or construction?  Soil conditions under the north runway may or may not be significant but more detail is required to ensure against construction or maintenance issues.
VI Geology & Soils (a) ii.	A-8	Seismic ground shaking. During the Northridge quake several back up power systems failed at LAX. Are alternative energy supplies available? What are the evacuation procedures to be followed for the airport in case of an earthquake, and how will this impact the local communities?
VI Geology & Soils (a) iii.	A-8	Seismic related ground failure. Several major water runoff and sanitation processing lines go under LAX. If any of these are seriously damaged what is the potential for sinkholes or other damage to structures at the surface?  Since the LAX area was built on a Coastal plain, what impacts would liquefaction have? Is there potential for natural gas leakage pathways along fault lines from natural sources since the entire Playa del Rey area was once an oil field? Can gas leakage occur at LAX along a fault line from the Gas Company reservoir that is under the bluff in Playa del Rey and under the wetlands near Playa Vista?  What effect, if any, would the proposed Woodside Energy Natural Gas project have on LAX? Please describe how each of the components may affect LAX - gas line connection in or through the coastal bluff, high pressure lines running underneath Westchester Parkway, distribution facility at 98 <sup>th</sup> Street and Bellanca near the Neutrogena offices, and WallyPark parking garage.

VI Geology & Soils (a) iii.	A-9	Even if there are not major seismic hazard areas identified within LAX, what about nearby areas that can impact access to LAX? If normal access to LAX is blocked are there alternative routes that can handle the traffic loads?  As there was seismic concern about the Manchester Square-CTA tunnel, what about people movers or elevated roadways?  What UBC (Universal Building Code) and LABC (LA Building Code) requirements are applicable? The LAX Specific Plan Sec. 3 "Relationship to the Los Angeles Municipal Code and other Ordinances" negates Site Plan and "Major" Development Project Ordinances (item D).
VI Geology & Soils (c) soil stability	A-10	Is there any plan to add earthen berms on the north and south borders of LAX to reduce the transmittal of low frequency noise?  Since we don't know precisely where major sewage and drainage pipes are precisely located, and the soil is very sandy, what is the likelihood of sewer or pipes being disrupted? Have there been any ground issues such as sinkholes at LAX in the past?
VI Geology & Soils general	A-11	Since the size and location of facilities is not delineated in the NOP, what special assessments will be made to determine how stable the ground is in areas of new construction? Given that there have been issues with sewer drains in the area and that the area has hundreds of formerly used oil wells that had water pumped into them, is there any likelihood that additional problems will arise slowing construction or requiring special measures?
VII Hazards & Hazardous Matl.	A-12	Since there are numerous carcinogenic items in use at an airport including aviation fuel, could the repeated spillage and evaporation cause a health hazard? What about fuel that is dumped during emergencies or fuel that is released in flight from major accelerations and landing?  What about the potential for terrorism with hazardous materials since LAX is one of the most potent targets on the west coast?
VII Hazards & Hazardous Matl. (c)	A-13	There are many impacts to the community if the runways are moved north. There are many hazardous materials transported through the community. We expect transportation routes for hazardous materials to be carefully delineated and monitored. We expect LAWA to review and consider all of the suggestions from the 2004 Rand study as well.
VII Hazards & Hazardous Matl. (g)	A-13	A-13 Are there any hazard control plans for LAWA that need to be updated? We are certainly concerned that if any disaster occurs the medical care facility that is most convenient would likely be blocked from community use by closure of Sepulveda Blvd.

VII Hazards & Hazardous Matl. (h)	A-14	Although LAWA noted the lack of concern for wild fires etc. there is still concern that an air accident could cause a major fire due to the amount of fuel held by aircraft. We expect that a valid plan will be identified and any access issues will be resolved. At least one of the plans calls for relocation of Lincoln Blvd that includes a portion of the road inside of a tunnel. A fire in this area could be very disastrous, as would poisonous gas clouds. We are aware of several radioactive containers that have been damaged before or after arrival at LAX. There needs to be very specific plans on how to handle such incidents.
VII Hydrology and Water Quality (a)	A-14	A-14 A master plan for grey water usage should be created to work with Hyperion even though LAWA has a good record in this area. As aircraft and support equipment are produced with new exotic materials there can be a potential runoff issue when repairs are initiated or during maintenance.
VII Hydrology and Water Quality (c)	A-15	There are independent plans being established currently for projects to supplement drainage filtration by the LA Sanitation Dept. in the north quadrant of LAX and in the Northside Development area.  Another potential issue is damaging of critical sewage and dry/wet water runoff control channels during construction and adversely impacting the gravity feed requirements of that system.
IX Land Use and Planning (a)	A-17	If eminent domain is exercised on a significant portion of the business district there could be separation of businesses into less than a critical mass to draw local community support. Also, if the runway protection zones are enforced and homes are taken on the northeast end of LAX, small pockets of remaining homes could be created. This potential must be fully disclosed.
IX Land Use and Planning (b)	A-17	There is some question as to how homes will be impacted if the runways move north. Several large apartment complexes and some schools will be much closer to runway activity with attendant noise and pollution as well as safety issues. A 1980 study on LAX area school children showed that airport noise affected learning abilities. Newer, more effective methods for mitigating noise have been developed since soundproofing was provided to impacted schools. Does LAWA plan to offer sound proofing upgrades and air conditioning to LAUSD, private, and public schools to those located within the 1992 Noise Impacted Contour or for any who will sustain a 1.5 dB increase in noise? When new noise contours are estimated using updated aircraft mix estimates LAWA should assess the impacts.



IX Land Use and Planning (c)	A-17	Habitat issues remain not only in the formal "Blue Butterfly dunes" area, but also the plains areas that were the site of homes on the Northside development property. There were also some habitats on the east end of LAX that may need to be examined including Continental City.  Street traffic is another major issue. Although LAWA is rerunning the traffic studies with a maximum of 15 additional intersections, it must still address all of the central terminal traffic as well. Further, greater use of mass transit must be evaluated.  Open space must be maintained and so must community serving commercial. Wherever the airport has displaced affordable housing it should generate at least that much replacement affordable housing.
XI Noise	A-18	Topography and single noise events should be taken into consideration when determining the areas impacted by noise. Placement of the terminal gates and taxiways, as well as any other relocated or new facilities should take into consideration so that the impacts from aircraft engines are minimized. When calculating noise, the proper aircraft mix should be used and an estimate of the runway uses should be confirmed as well. Although the preferred runway alternative for taking off is inbound, LAWA estimates that 10% are done on the outboard. The health impacts of noise exposure must also be addressed. The use of noise canceling equipment is required to the extent feasible, and the most sophisticated equipment available should be identified and analyzed. Which noise canceling speaker systems been considered?  Please provide a contour map of areas subjected to at least 30 airport/aircraft noise events at 65 dB or above in a day, and/or were subjected to at least two 65 dB or greater events from midnight to 7 a.m.
XII Population and Housing (c)	A-20	This could be significant depending on the home and business displacements for alternatives that propose moving runways north. When LAWA does it's analysis it must assume that Manchester and Belford Square areas are empty and that everything that is constructed there adds to the area traffic.

XIII Public Services (a-c)	A-21	The EIR for the Westchester-Playa del Rey Plan states that a substantial increase in fire and police protection manpower is required to meet current zoning estimates. Much of the community to the north relies on Fire Station 5 for rapid community response. This station deploys both the Manchester Boulevard and Westchester Parkway. This dual access must be maintained. For emergency services at LAX there must be a good emergency health care plan in place with capacity to meeting both LAX and community needs.  If an event occurs at LAX that causes airport closure this facility will be unavailable to the surrounding community. The nearest urgent care for local residents is located on Sepulveda north of Century. In view of the closure of several emergency rooms and Daniel Freeman Hospital does the needed capacity still exist? If not, what solution is proposed?  Several schools will be subjected to increased noise and pollution. Air pollution especially must be assessed for not only 10 and 2.5 micron size but also smaller (i.e. 0.1 as done in the 2007 CARB study of LAX particle pollution). Although several schools have been previously sound proofed during earlier programs, determination should be made if another round of soundproofing is appropriate. Several churches and schools may be subjected to enough noise to cause learning impairment under EPA or other standards (i.e. NIIH).
XIII Public Services (d)	A-22	Some airport land, such as Nielson Field and the Westchester Golf Course, is currently used for open space. If this use is diminished or if promised elements (i.e. Golf Course) is not restored the negative impacts of this should be analyzed and mitigated.
XIII Public Services (c)	A-22	Some other governmental uses should be investigated, as well as new housing opportunities for Manchester Square. Certainly the need for additional road access is evident due to the increases of traffic from current levels to the "nominal" 78.9 MAP. Also cargo and other related causes of traffic need to be assessed fully. Traffic should be diverted away from residential communities. Even if there are only moderate increases in traffic from LAX the overall impact may still be substantial due to major increases in present and authorized development zoning changes.

XV Transportation/Circulation	A-23	Potential traffic changes in the CTA must be assessed. Are there better ways to direct the traffic from the surrounding areas into LAX? LOS around LAX is marginal on many streets already. LAX modifications such as the location of the cargo support businesses, consolidated rental car facility, integrated transportation near Continental City and more must be included in the assessments. The total costs and fair share allocations of improvements must be addressed.
XV Transportation/Circulation	A-24	Locations and stops, methods for supporting baggage handling, etc., must be identified.
XV Transportation/Circulation	A-24	Movement of the runways will modify the flight tracks of approaching and departing aircraft. This change must be studied to assess impacts on the number and urgency of go-arounds and other noisy, polluting flight maneuvers.  A July 2007 Airline Pilots Association White Paper on incursions notes modest air traffic increases have resulted in major increases in the number of incursions. Air capacity assessments must be identified and quantified for all key factors, not just the first order limiting factor of capacity growth. Although gate capacity is the current capacity limiting factor, if it is resolved several others can become significant. Several factors of concern are, but not limited to, the number of cars entering the CTA, taxiway routes for aircraft to get to gates, and the number of aircraft operations per unit time as the required separation distance in the sky that limits the number of takeoffs and landings. Otherwise, if the limiting factor for capacity is the only factor addressed, as soon as the Settlement limitation on embarkation gates expires, capacity may be dramatically increased without a former EIR review.  Traffic from parking areas must be assessed after the parking locations are determined. This traffic is a source of noise and pollution, as well as frustrating easy access to the central terminal area. Better signage and other types of improvements must also be identified as mitigations for areas around LAX and inside the CTA.
XV Transportation/Circulation	A-25	Alternative transportation uses must be closely examined. LAWA should look into how and where the new flyaway programs can be used and how all of the bus movements inside the CTA can be reduced to eliminate or at least reduce traffic jams. There are many new potential airside issues. Taxiway locations (especially around the terminal gates) have been noted by LAWA and the FAA to restrict aircraft movement that reduces operational efficiency and adds pollution and noise. Studies must address the movement of taxiways, taxiway/runway intersections, and gate locations to

		determine more efficient ways to handle ground aircraft movement to reduce noise and pollution promulgated into the surrounding communities.
XVI Utilities	A-25	Utility systems should be assessed to determine where additional capacity is required and where back-up systems are required.
XVI Utilities	A-26	Although sufficient solid waste capacity is presumed, there are many opportunities for reducing the generation of solid waste. If we continue the same methods of disposal to Sunshine Canyon and other remote landfills, and there is a substantial increase in waste, we will be adding much pollution and noise due to the long haul disposals.
XVII Mandatory findings of Significance	A-27	The cumulative effects of increased traffic will increase pollution and has serious adverse economic impacts in terms of reduced productivity along with adverse health impacts.



### Petitioners' Overview of Guiding Principles for Environmental Analysis: LAX Specific Plan Amendment Study EIR

*Submitted by Petitioners: City of El Segundo, City of Inglewood, City of Culver City, County of Los Angeles, and Alliance for a Regional Solution to Airport Congestion (ARSAC).*

**Background:** In January of 2005, Petitioners filed lawsuits challenging the approval of the LAX Master Plan Program and the associated Environmental Impact Report (EIR) prepared by Los Angeles World Airports (LAWA) under the California Environmental Quality Act (CEQA). These suits were resolved by a 2006 Stipulated Settlement between LAWA and Petitioners. In response to the Notice of Preparation (NOP) recently released by LAWA for the Specific Plan Amendment Study (SPAS) Draft EIR, Petitioners now jointly submit this overview of principles that should guide LAWA in that environmental review process. Petitioners will also submit detailed individual comments.

**LAWA's Obligation to Avoid and Reduce Impacts to Surrounding Communities.** As LAWA proceeds with refinement and analysis of options as part of the SPAS process, it must continually recognize its obligation to avoid and mitigate impacts to the communities that surround LAX. Options under consideration must be evaluated and ranked based on how they would impact the environment, public health and safety in surrounding communities (e.g., noise, air quality, traffic). All alternatives should be subject to a full and fair evaluation in the SPAS DEIR and LAWA should remain open to options that would avoid or mitigate impacts to its neighbors, taking care not to prematurely select a preferred alternative.

**Continued Consultation with Surrounding Communities.** The alternatives described in the SPAS NOP were developed and selected by LAWA during a lengthy consultation process with Petitioners. That consultation process grew out of the 2006 Stipulated Settlement, which states, in relevant part, that "An LAX Specific Plan Amendment Process Advisory Committee shall be created consisting of representatives of the City of Los Angeles, County of Los Angeles, El Segundo, Inglewood, Culver City, and ARSAC. LAWA shall consult with the Committee during each significant step of the LAX Specific Plan Amendment Process." Petitioners wish to recognize LAWA's compliance to date with this provision of the Stipulated Settlement. LAWA must now ensure that it continues to consult with Petitioners as the EIR process proceeds and the SPAS alternatives are developed in more detail. In particular, LAWA should take care to consult with Petitioners regarding the details and analysis of the alternatives supported by any Petitioner.

**Extension of Gate Constraint.** LAWA, FAA and the Petitioners all agree that limiting the number of gates at LAX will promote efficient passenger operations and encourage other airports in the Los Angeles basin to increase capacity to serve aviation demand. Accordingly, the long term success of the regional approach to serving aviation demand depends on maintaining appropriate gate constraints at LAX. The 2006 Stipulated Settlement between LAWA and the Petitioners limits the number of permissible gates at LAX to 163 and, commencing in 2010, requires LAWA to begin reducing the number of operating gates at LAX to 153. This settlement provision is operative through December 31, 2020. As part of the SPAS process, LAWA must analyze the continuation of the LAX gate constraints beyond 2020, as well as the possible

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enhancement of those constraints at a level that will efficiently serve up to 78.9 million annual passengers at LAX, while encouraging growth elsewhere in the region, including at the other airports owned and operated by LAWA.

**Airfield Balance.** In the NOP, LAWA indicates that under the LAX Master Plan, one of its goals is to "provide a better balance in operations between the North Airfield and the South Airfield." Petitioners support this goal and urge LAWA to conduct a full analysis of whether and to what extent each of the proposed SPAS alternatives would help achieve better airfield balance. Petitioners agree that total flight operation balance can lead to less operational crowding, which is good for all.

**Regional Approach.** Petitioners strongly support a regional approach to accommodating passenger and cargo aviation demand throughout Southern California. Because the area around LAX is fully developed, and because we must reduce vehicle miles traveled to improve air quality, decrease greenhouse gases, and increase productivity, a regional solution to serving aviation demand is essential. The regional approach, which is fully supported by the Southern California Association of Governments, must be a key component of everything LAWA does, including in the SPAS process. LAWA should vigorously pursue accommodating aviation demand at Palmdale and Ontario, and work aggressively with other airport operators and local governments to advance the regional approach.

**DEIR Public Review Period.** The NOP indicates that LAWA intends to provide just 45 days for public review and comment on the Draft SPAS EIR. In light of the complexity of this project and LAWA's tendency to produce lengthy CEQA documents, Petitioners anticipate that 45 days will not be sufficient.

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### ATTACHMENT 3 to ARSAC LAX Master Plan NOP Comment Letter, 6-17-08

#### One Safe Single North Runway Proposal

**Background:** The Stipulated Settlement Agreement provided for a re-examination of Yellow Light projects such as the north runway complex by the Specific Plan Advisory Committee and to come up with other efficient and community friendly alternatives. The One Safe Single North Runway proposal aims to address safety, efficiency and being community friendly.

Runway incursions continue to be cited as a reason for making improvement to the north airfield complex at LAX. Despite numerous requests, one idea that has not and should be included and fully studied in the NASA north airfield safety study and in the LAX Master Plan NOP and EIR/EIS is this "One Safe Single North Runway." This proposal can provide safety and keep LAX within the desired 78.9 Million Annual Passenger (MAP) limit.

The only runway designs in the world that have been most effective in preventing runway incursions are designs where aircraft do not have to cross one runway to get to another. Munich Franz Josef Strauss Airport (MUC) in Germany was designed with one runway on each side of the terminal complex as a way to prevent runway incursions. Since MUC opened in 1992, there has been only one runway incursion (2006). MUC handled 34 MAP in 2007.

London Heathrow Airport (LHR) in the United Kingdom, the world's busiest international airport, has a similar runway layout with one runway on each side of the terminal complex. LHR has traffic signals operated by two tower controllers, at each runway to permit aircraft to enter the runways. LHR has not had incursion problems. At LHR, one runway is used for take-offs and one runway is used for landings. This is known as Single Mode Operation. In 2007, LHR handled 68 MAP.

London Gatwick Airport (LGW) is a single runway airport that operates in Multi-Mode Operation. In 2007, LGW handled 35 MAP. According to its operator, BAA, "Gatwick is the busiest single-runway airport in the world, the second largest airport in the UK and the sixth busiest international airport in the world." Clearly, a single runway airfield can be successful!

#### Requirements for all concepts:

- Runway 24 Right closed and either covered with fill dirt or removed
- Enhanced runway/taxiway lighting, striping and signage on Runway 24 Left
- ASDE-X and Runway Status Lights on Runway 24 Left
- Noise contours cannot increase in Westchester/Playa del Rey
- No taking of land in Westchester/Playa del Rey
- No northward runway movement and no placement of taxiways north of runway

#### Concept 1:

- Use Runway 24 Left in its existing configuration.

#### Concept 2: "Super Runway"

- Rebuild Runway 24 Left in its current location to a new 200-foot wide runway and 10,000 feet in length. The runway would be extended up to 1,000 to the east. The associated taxiways near Terminals 1, 2 and 3 and the Tom Bradley International Terminal would be rebuilt as required. Movement toward the center of the two existing runways facilitates the least expensive upgrades to the present inadequate, congestion producing taxiways and taxiways adjacent to the terminals.

## LAX Master Plan

340' south / airline alliance  
realignment proposal

June 17, 2008







## 24 Left moved 340 feet south

- Moves aircraft noise and safety issues AWAY from the Westchester/Playa del Rey community
  - Runway 24 Right has eastern displaced threshold to move RPZ out of Westchester Central Business District
  - Runway 24 Right extended no more than 1,000 feet west to offset the displaced threshold on the east end of the runway
- Creates a modified Group VI airfield to handle New Large Aircraft (NLA) such as the Airbus A380 and the Boeing 747-8 Intercontinental
- Allows for a centerline taxiway to be constructed between the two north runways
- ASDE-X to be installed at LAX
- FAROS and EMAS installed at end of runways
- Runway Status Lights (RWSL) to be added at all runway entrances
- Improved striping, signage and lighting for all runways and taxiways

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## Plan Features

- Moves Runway 24 Left 340 feet south
- Airlines regrouped in terminals by airline alliances (e.g. SkyTeam, Star, oneworld)
- Terminals 1, 2, 3 and part of north wing of Tom Bradley International Terminal are torn down
- Low Cost Carrier (LCC) Terminals built to replace Terminals 1, 2 and 3
- No changes to the parking garages in Central Terminal Area
- Consolidated Rent-a-car center (CONRAC) to be located in Manchester Square
- Elevated roadways to connect the CTA to the CONRAC and the freeways

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## Airlines grouped by alliances

- Newest trend in terminal management
  - Allows for easier connections and shared use of ticket counters, lounges and gate areas
- First implemented at Tokyo Narita Airport on June 2, 2006
  - Terminal 1 South- Star Alliance (ANA, United, Lufthansa)
  - Terminal 1 North- SkyTeam (Northwest, KLM, Korean Air)
  - Terminal 2- oneworld (Japan Airlines, American, British)
- Possible to implement at LAX with limited movements of airlines
  - Delta/Northwest merger helps to resolve Terminal 2 lease situation

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## Plan Benefits

- Moves airport and related operations away from residential communities
- Incorporates current airport terminal management practices
- Logically arranges airlines by alliances
- Provides opportunities for both Low Cost and alliance carriers
- Places CONRAC in safer location and better connected to the 405 freeway
- Addresses increased safety and security needs
- Improves customer satisfaction by keeping access to LAX as convenient as possible

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## LCC Terminal Design

- All three terminals have same design to save on costs
  - 200 feet wide from front door on landside to windows on airside
  - 880 feet long
  - 4 story buildings
  - 6 to 8 gates per terminal for A320/B737 type aircraft
- Gate reductions at LCC Terminals 1, 2 and 3 offset by Tom Bradley International Terminal
  - Access to Gates 119 to 121 remains open
  - Additional gates on backside of TBIT and at Midfield Terminal
- Incorporates LEED building standards

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## New LCC Terminals

- Incorporates current trends in airport operations
  - Decreasing the distance from the curb to the gate
  - Common Use Terminal Equipment (CUTE) to allow the airport operator flexibility in use of gates and meet federal airport competition plan requirements
  - Low cost is the hottest trend in terminal operations
- Simplified facilities
  - LAX will continue to have elevators and escalators
- Design allows for rapid turnaround of aircraft

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## LCC Terminal Design

- |   |  |
|---|--|
| • Landside                                | • Airside                                      |
| • Rooftop- APM station                    | • Rooftop                                      |
| • 4th floor- TSA passenger screening      | • 4th floor- airline lounges and offices       |
| • 3rd floor- ticket counters              | • 3rd floor- gate areas and concessions        |
| • 2nd floor- TSA inline baggage screening | • 2nd floor- baggage sorting area              |
| • 1st floor (ground level)- baggage claim | • 1st floor (ground level)- airline operations |

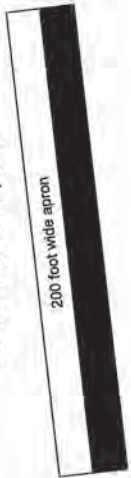
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## LCC Terminal Design

- Terminal designs similar to John Wayne and San Jose
- Terminals and apron are 200 feet wide each

QuickTime™ and a  
TIFF (Uncompressed) decompressor  
are needed to see this picture.

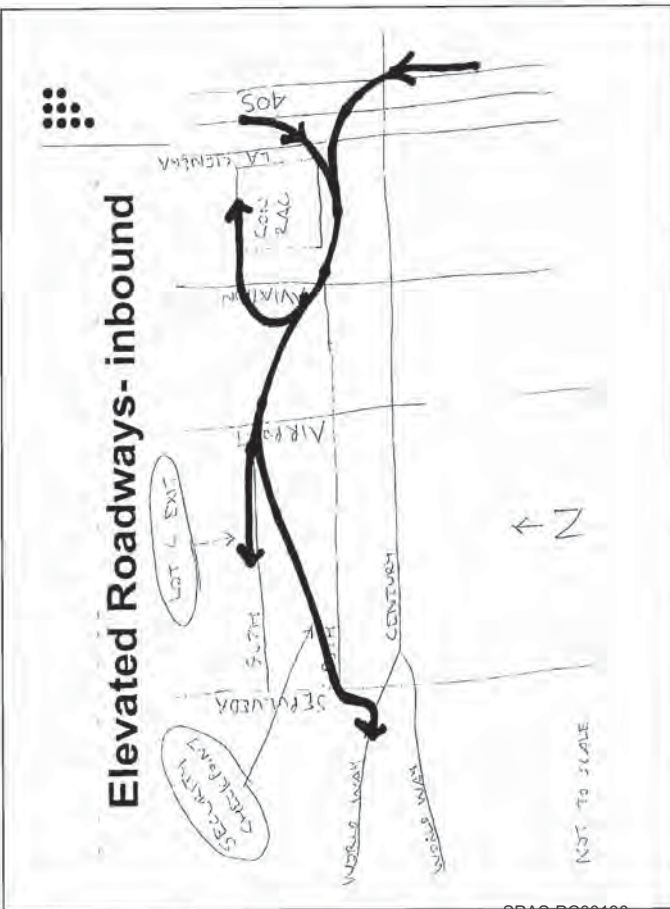


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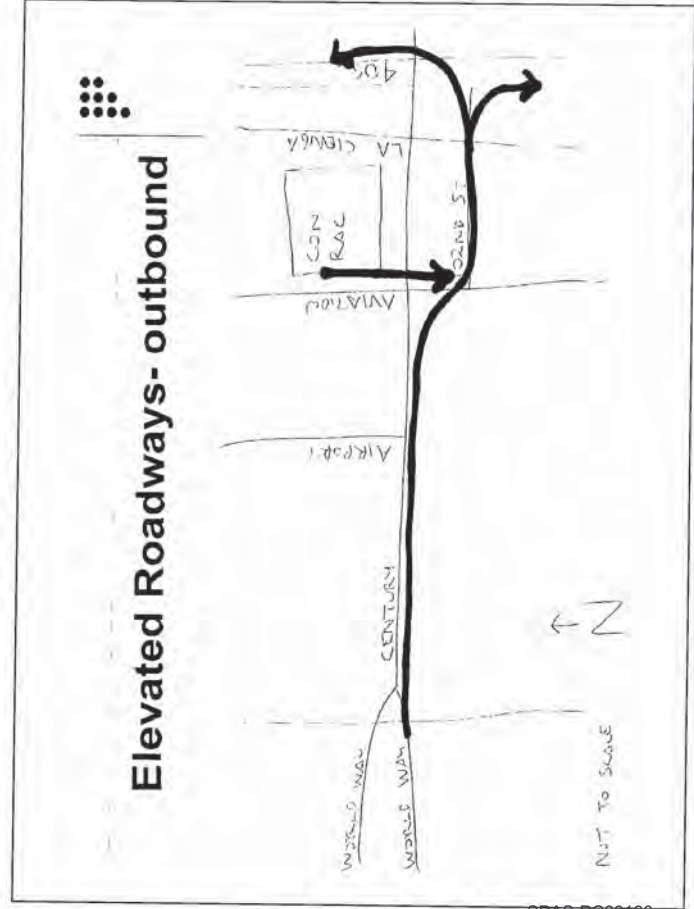




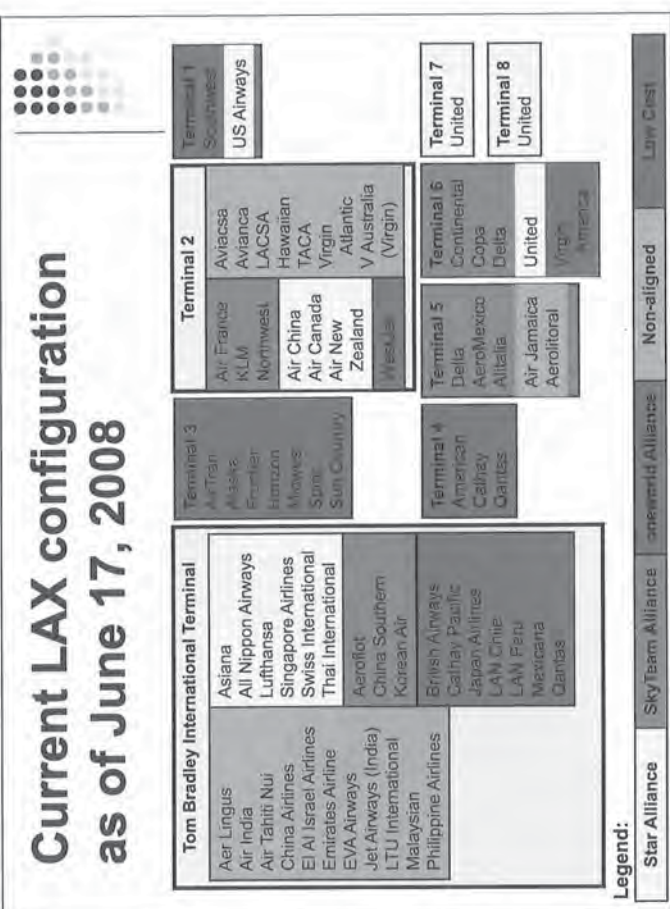




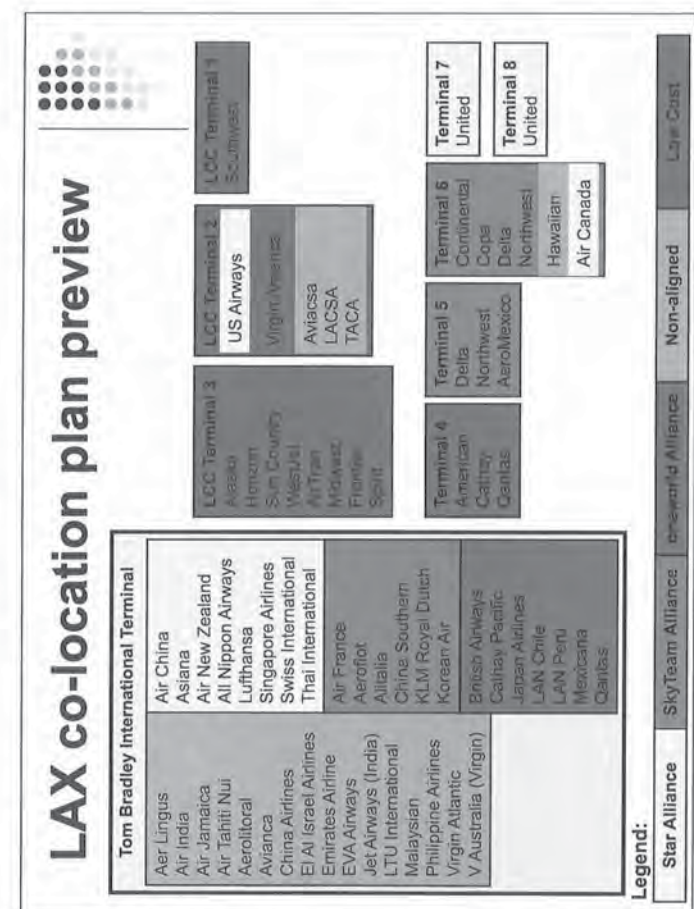
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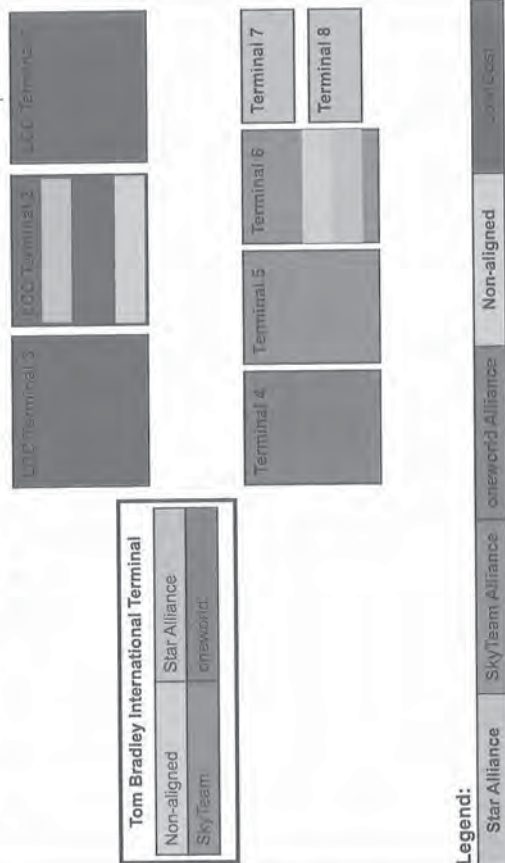


## Construction sequence

- Complete the Tom Bradley International Terminal midfield terminal. Relocate international carriers from Terminal 2 to TBIT.
- Move Continental to Terminal 2 while Terminal 6 is being refurbished. Air Jamaica would move to TBIT. Virgin America would move to Terminal 3.
- When Terminal 6 is refurbished, Continental, Northwest, Hawaiian and Air Canada move to Terminal 6
- Reconstruct Terminal 2 into LCC Terminal 2
- When LCC Terminal 2 is completed, move US Airways to Terminal 8 (requires United's cooperation) and Southwest to LCC Terminal 2
- Reconstruct Terminal 1 into LCC Terminal 1
- When LCC Terminal 1 is complete, move Southwest back to LCC Terminal 1
- Move Terminal 3 airlines to LCC Terminal 2
- Reconstruct Terminal 3 into LCC Terminal 3
- Move Terminal 3 airlines back to LCC Terminal 3
- Move US Airways to LCC Terminal 2
- Move Runway 24 Left 340 feet south
- Build the centerline taxiway
- Complete roadway connections from Rent-a-car facility to Central Terminal Area (could occur sooner)
- Complete roadway connections from CTA back out to freeways (could occur sooner)

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## Terminal layout by groupings



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## Notes on re-location

- U.S. airlines are cutting back capacity as much as 20%
- Delta and Northwest announced a merger on April 15, 2008
- Continental may leave SkyTeam to join oneworld alliance
- United and US Airways merger talks failed
- Virgin America is 25% owned by Virgin Group due to U.S. Government restrictions on foreigners for owning U.S. airlines. This restriction may go away with the second phase of "Open Skies" between the U.S. and European Union
- Virgin Atlantic is 49% owned by Singapore Airlines. VS is not part of an airline alliance.
- V Australia is another Virgin branded airline
- LACSA is a part of Grupo TACA
- AirTran and Frontier are marketing partners
- Frontier is operating in Chapter 11 bankruptcy
- Spirit operates flights to Mexico from LAX
- Copa is partly owned by Continental

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## Questions?

**Please contact**  
**Robert Acherman**  
**Vice President**  
**ARSAC**  
**(310) 927-2127 racherman@netvip.com**

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Included in this attachment a 2007 LAX Town hall presentation by Denny Schneider and David Voss which questions some of the assumptions made by LAWA early on and promulgated into the report and DEIR which we feel are invalid. When is LAWA going to address these?

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## **Moving North Runway Closer to Westchester is Unnecessary**

- ➊ 1) LAWA'S PROPOSAL HARMS WESTCHESTER/PDR AND VIOLATES SETTLEMENT DEAL
- ➋ 2) RUNWAY SEPARATION IS UNNECESSARY
- ➌ 3) LAWA'S HIDDEN AGENDA: "LOAD BALANCING"

## **Opposition to LAWA's North Runway Complex Expansion Proposal**

Denny Schneider, President  
Alliance for a Regional Solution to Airport Congestion

David Voss, Former Airport Commissioner  
Chair – Airport Relations Cmte.,  
Neighborhood Council of Westchester Playa del Rey  
Chair – LAX Coastal Chamber of Commerce, Airport  
Policy Cmte.

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# 1) HARMS WESTCHESTER/PLAYA DEL REY

## The Three Pillars:

- ➊ No "Ring Road" or design that pushes traffic into community
- ➋ No Further damage to business district or additional homes
- ➌ No Western terminal with traffic access from west
- ➍ No new study of noise contours from moving runway North and making them longer

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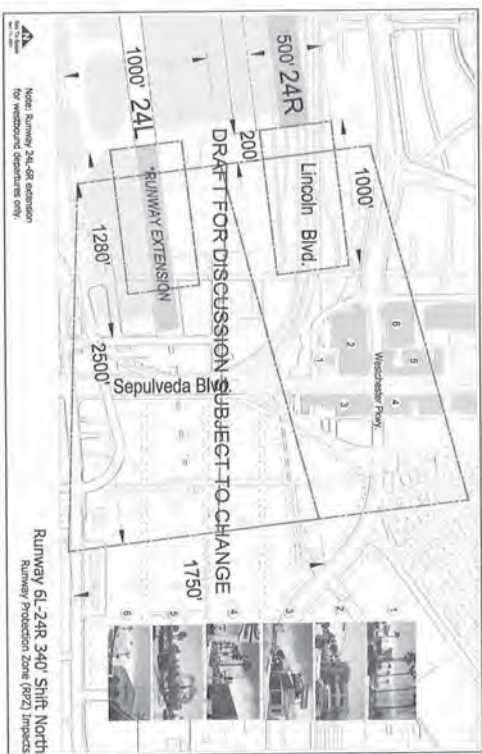
# Community Under Assault over 25 years

- ➊ 1983 – CTA Second level added -capacity about 40 million annual passengers (MAP) - 1 million annual tons (MAT) cargo.
- ➋ 1994 New Master Plan update started.
- ➌ 1994-2005 Small, incremental growth projects enacted—gate additions, taxiway updates, terminal remodels.
- ➍ 2005 Alternative D passed — flawed Plan and flawed EIRs.
- ➎ 2005 Legal Challenge Settlement creates Specific Plan Amendment Committee for cooperation in development of new Master Plan.

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# 1) HARMS WESTCHESTER/PLAYA DEL REY RPZ tears out the heart of the Westchester Business District



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# 1) HARMS WESTCHESTER/PLAYA DEL REY

Settlement Broken: LAWA's proposal violates the settlement by going beyond the Alt. D worst case scenario – Requires new EIR!

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consistent with previous local and federal approvals, identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA.



## 2) RUNWAY SEPARATION IS NOT NEEDED

### a. Runway "Incursions" Not Solved by Centerline Taxiway

Stats of other airports are presently worse than our North runway experience without changes.

An incursion is two aircraft or aircraft and another entity coming too close on ground.

Types of Incursions range from imminent danger "A" to minor infraction of rules with low likelihood of any collision "D."

LAX North runway accident in 1990s (or other examples raised by LAWA) were controller/pilot errors that would not have been averted by runway changes.

2007 Incidents Mischaracterized: Only prove that South Runways are NOT safer and do not support centerline taxiway on North

End Around Solution

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## LAWA Released 5 north runway "studies" at the end of last week

🔗 Safety Risk Assessment (Washington Consulting)

🔗 Special Peer Review

🔗 Airline Pilots Assn comments

🔗 Northfield Assessment (URS)

🔗 LAX North Airfield Alternatives (Internat'l Aviation Mgmt Grp)

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## 2) RUNWAY SEPARATION IS NOT NEEDED

### a. Airport improvements can be made that are not airfield facility dominated

Reduce air traffic and time bunching-regionalize. (Added flights increases pollution and noise ensuring more health impacts for our area.)

More Complete Staffing of Tower. Controllers Union has called for more staff and less hours.

Runway Status Lights and other collision avoidance systems.

In-Cockpit Voice Warning System.

Better air traffic control system equipment.

Better taxiway and runway signage

SPAS-PC00130

## 2) RUNWAY SEPARATION IS NOT NEEDED

### b. Health and Safety Improvements other than Moving Runways North

Reduce air traffic and time bunching-regionalize. (Added flights increases pollution and noise ensuring more health impacts for our area.)

More Complete Staffing of Tower. Controllers Union has called for more staff and less hours.

Runway Status Lights and other collision avoidance systems.

In-Cockpit Voice Warning System.

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## Safety Assessments

- ➡ Assumptions and questions not all relevant to basic question.
- ➡ All push for "operational efficiency" and capacity enhancement rather than addressing if current conditions are unsafe.
- ➡ None address inadequate taxiways along terminals and all dismiss going south.
- ➡ Don't consider "End Around"
- ➡ All dismiss impacts on local community as irrelevant.
- ➡ Where is OUR NASA Study???



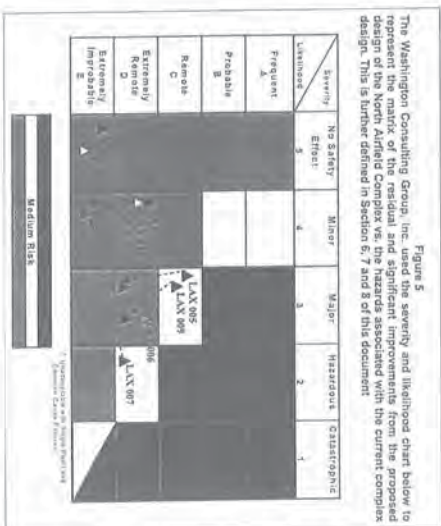
Do the Studies Answer the Basic Question of Is the north complex safe? And if not, are a set of alternatives identified?

NO

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## Safety Risk Assessment "Remote"

- Identified risks are deemed at worst "remote" with 8 of 10 extremely remote or extremely improbable.



"Safety Risk Assessment" – WCG, Inc.

- ✎ Found that the "The hazards and risks associated with the current LAX North Airfield configuration ... have been mitigated to an acceptable level of risk based on present day usage...
- ✎ Substantial portion of assessment is on south complex.
- ✎ Assumptions Section states "The proposed North Airfield Runway configuration specifically facilitates these concerns."

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## ALPA Review

- ✖ "Expect virtually every B747-400 to be replaced with an A-380 [Group VI] ... in the next ten years." – NOT CREDIBLE
- ✖ "Severe operational penalties, restrictions, and human factors issues will occur if the south field is used for Group VI aircraft operations"
- ✖ "Because of South Side problems, Group VI aircraft must be accomplished on the North Side"
- ✖ "Human factors errors will likely increase"
- ✖ Suggests 623' increase separation for max efficiency did not discuss south separation.

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## IAMG "North Airfield Alternatives"

- ✖ Never says that current airfield is unsafe
- ✖ Calls for wider spacing for operational efficiency
- ✖ Enhanced Technologies: ASDE-X airfield surface detection equipment as "part" of any solution.

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## "Special Peer Review"

- ✖ REVIEW DONE IN ONE DAY
- ✖ GIVEN ONLY ONE ALTERNATIVE TO CONSIDER!
- ✖ BIASED INDUSTRY GROUP
- ✖ Assumes safety, operational, and efficiency problems...that required significant redesign to solve...
- ✖ LAWA provided assumptions that includes larger operational loads and balancing requirement.
- ✖ Operational safety was only one of three major elements upon which to base conclusions.
- ✖ No mention of inadequate taxiway size or spacing.

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## "URS - North Airfield Assessment"

- ✖ Never states that existing cannot operate safely
- ✖ Expressly notes many airports including LAX are given waivers from FAA "standards"
- ✖ Never considers moving south due to cost of moving terminals
- ✖ Recommends largest possible movement for operational factors.

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## Advantages of Moving South

- Accommodate the A380 and other NLA's
  - The Unified Plan proposes back-siding TBIT – this is a green light project that can be implemented today – allows quicker build-out of NLA gates
  - The Unified Plan never requires the use of remote gates to service NLA's
  - The Unified Plan reconfigures terminals 1, 2 and 3, which provides more flexibility in handling the NLA's
- Minimize Impacts to Community and Environment
  - Only the Unified Plan proposal moves the noise and pollution away from the community
  - Does not destroy additional local businesses
  - New linear design of terminals 1, 2 and 3 eliminates the need for towing on the north side, thereby reducing pollution
  - Flexibility in gate design reduces idling while waiting for gates

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## Advantages of Moving South

- Efficiency in Operation
  - The Unified Plan minimizes the distances between connecting flights
  - New linear design of terminals 1, 2 and 3 eliminates the need for towing on the north side
  - Flexibility in gate design reduces idling while waiting for gates
  - Allows for extending and widening 24L to balance aircraft loads on runways
- Safety on the Airfield
  - Runways separated by additional 100 ft would allow for a desired centerline taxiway
  - Fixes the substandard taxiways on the North Airfield – this reduces controller activity and provides the controllers with a greater margin of error
- Modernized Facilities / Improved Customer Service
  - Consolidates TSA and FTS activities
  - Only the Unified Plan addresses the dilapidated terminals in the CTA
  - The Unified Plan minimizes the distances between connecting flights

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## North Runway Configuration



SPAS-PC00130

## 3) LOAD BALANCING

### Assumptions all include "Load Balancing" as a goal

El Segundo and LAWA want airport operations changed so that more of the very large aircraft traffic/noise is shifted from the South side of the airport to the North side of the airport.

On page 11 in LAWA's "Concept Development Goals" #3 is "Balance long-haul departing aircraft operations between North and South Airfield."

Load balancing in layman's terms means moving more take offs and landings - and in particular "Long Haul Heavy Aircraft Departures" - from the South Airfield, to the North Airfield. Despite the fact that on p.17 they point out that currently "existing North and South Airfields are generally in balance based on Total Operations" on p.18 they point out that 75%-80% of the Long Haul Heavy Aircraft Departures occur on the South runway complex. This is because the South runways are longer.

There is no safety need for "Load Balancing"

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## Runways Not Shown to be Unsafe

- North runway complex incursion rate history is superior to similar airport complexes that have already been "fixed."
- Neither LAWA nor the FAA can identify any north complex incursion that would have been averted by runway separation that could not be addressed by less expensive measures.

SPAS-PC00130

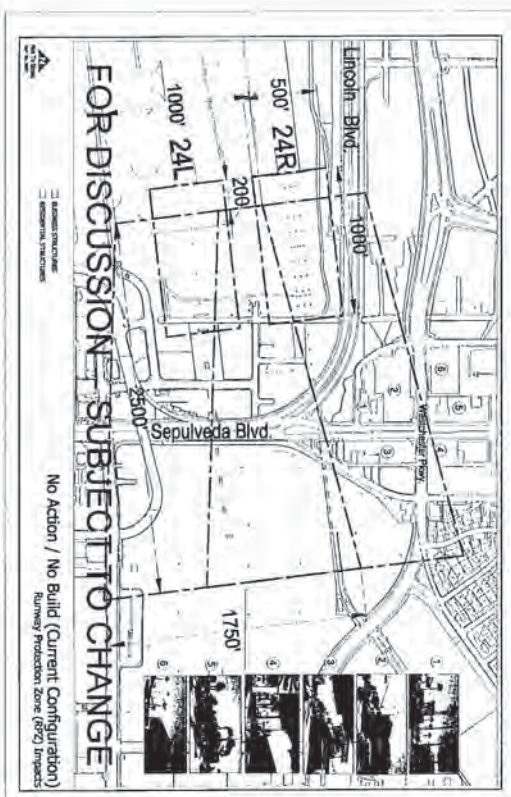
## Alt D Northside Runways

Approved Master Plan North Airfield



SPAS-PC00130

## Runway Protection Zone – As is



SPAS-PC00130

## Is North Runway Complex "safe?"

When the FAA felt that the south runway complex was unsafe they were vocal calling for changes. On the north side the FAA is unwilling to mandate changes, but says they will "evaluate any LAWA proposals presented." NTSB and LAWA says "One incident is too many!" but no runway can be ABSOLUTELY SAFE, what is the incremental improvement of a runway movement cost over lower cost alternative improvements?

No Separation/taxiway improvement data has ever been presented.

FAA NASA Aames 2002-4 south runway simulation studies do not correlate to north side; no north simulations have been planned.

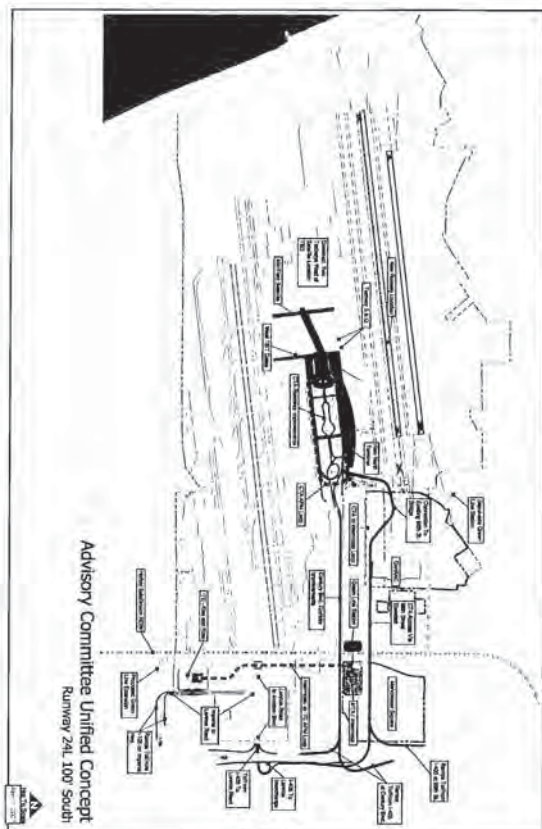
Many factors impact safety...i.e. North / South sides are both dual, parallel runways, but 80% of incidents occur on South!

5-6 "Peer" reviews were promised, but not delivered. None will be formal analysis, but will be full of "educated opinion."

Runway protection zone issue on north.

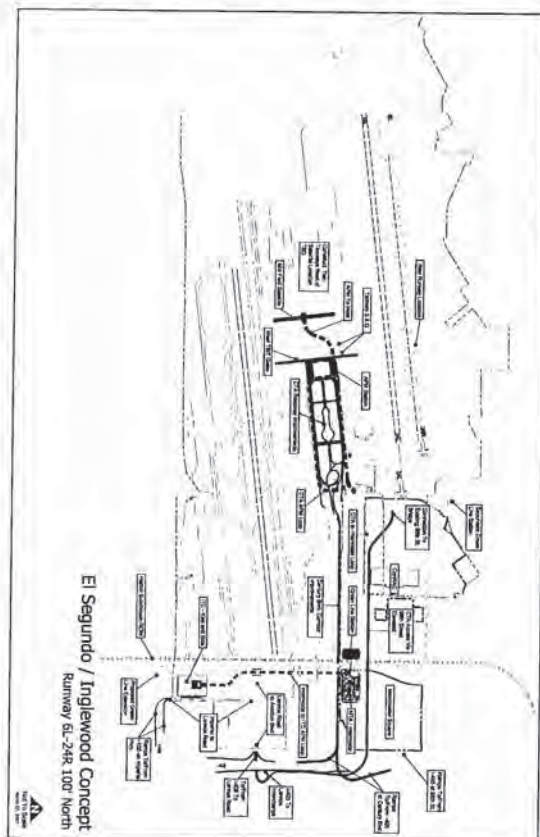
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SPAC Advisory Compromise-- DRAFT FOR DISCUSSION

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El Segundo - Inglewood Concept-- DRAFT FOR DISCUSSION

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**ARSAC** Alliance for a Regional Solution to Airport Congestion  
 322 Culver Blvd., #231 Playa del Rey, CA 90293  
[www.regionalsolution.org](http://www.regionalsolution.org)

## News Release

For More Information, Call:

Denny Schneider (310) 641-4199 voice  
 (310) 338-1150 voice/voice mail/fax

For Release 10:AM PST  
 Date July 26, 2012

### **Released LAX Specific Plan Amendment Draft Environmental Impact Report (DEIR) is an Affront to Angelinos' Common Sense\***

The DEIR and Specific Plan Amendment Report released today cost millions to prepare but fails to fix the most basic airport services that visitors to the City of Los Angeles and region deserve. The LAX state of disrepair is embarrassing and must be fixed NOW.

ARSAC President Denny Schneider stated, "Our crumbling LAX needs more than a makeover of fresh paint. The LAX Plan will be neither convenient nor safer yet will cost billions to implement. LAWA ignored solutions to the poor tourist and traveler service."

Mr. Schneider continued, "LAWA has lost its fiscal sanity. They capitulated to special business interests by including costly, unnecessary, runway construction instead of critically needed landside infrastructure changes and repairs. Their cost estimates are as big a joke as the ones in 2004 when they approved a plan cost that has grown from \$12 Billion to well over \$100 Billion."

Read FAST! Only five years behind in their draft release schedule, LAWA is allowing the public 75 days to fully assess and vet the approximately 6000 pages of documents.

Please see our attachment for additional details.

**ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders promoting a regional solution to the future commercial aviation demands of the entire Southern California region.**

\*The release date of this News Release is one day ahead of the DEIR based on our knowledge of LAWA intent to release their documents on Friday, July 27. We expect that LAWA will have released preliminary information copies to you. We have not seen the draft EIR nor been briefed on project details or the assumptions used to analyze alternatives. These comments are based upon what we have been told and promised by LAWA prior to the release.

###

LAX Specific Plan Amendment DEIR Release Statement

SPAS-PC00130

SPAS-PC00130



**ARSAC Alliance for a Regional Solution to Airport Congestion***Attachment to July 26 News Release***1. LAX NEEDS REPAIRS FAR MORE THAN IT NEEDS EXPANSION NORTH. NO EXPANSION SHOULD EVEN BE CONSIDERED BEFORE BASIC IMPROVEMENTS TO PASSENGER BOARDING AND CARGO HANDLING ALONG WITH TRAFFIC AND ACCESS IS FULLY ACCOMPLISHED.**

Every issue comes down to priorities and money. There will never be enough to do everything that LAX wants to do. The Tom Bradley Terminal Improvements is one of the biggest LA projects ever done, yet is only a drop in the proverbial bucket in terms of what is really needed to fix and modernize LAX. Runways are not the capacity constraint and safety is already high.

There are ways to facilitate further improvements at more reasonable expense, not by proposing runway movements.

**LAX WORK MUST BE DELAYED NO LONGER.** CTA and infrastructure projects provide twice the number of construction jobs as runway projects and eight times more economic impact for the local economy. **THEY MUST TAKE PRIORITY.**

There is no safety problem on the north. Destruction of a business corridor and impacting more residents is unjustified. Few incursions, historically, even occur on the north. Only during construction of the South Airfield Improvement Project (SAIP) in 2008, when most air traffic was redirected to the north airfield complex, did the number of incursions increase. When runway safety was raised as an issue, LAX commissioned a multimillion dollar Northside Safety Review. LAX selected a panel of top academic experts and funded NASA simulations. The experts concluded that runway safety is not a justification for spending billions of dollars.

Sound mitigation and other actions were taken in the past to reduce airport impacts. Hundreds of thousands of people along the flight path would be affected by runway movements, not only those adjacent to LAX. Even those not "impacted" by legal terms will be subjected to sleepless nights and pollution by any changes.

Expansion proponents used incursion experience as their basis to call for increasing runway spacing and a center line taxiway to accommodate the newer, larger aircraft. The small number of newer, larger aircraft (projected to be 12-14 per day within the next seven years) is but a small fraction of far less than one percent of the total daily aircraft operations. This is poor justification to spend billions of dollars when these aircraft are already being handled safely.

Runway safety can always be better even if already "extremely safe." ARSAC has been calling for implementation of economically justifiable safety improvements for LAX. We were the driving force encouraging Mayor Villaraigosa to implement the decades long "FAA experiment" conducted at other airports to include runway status lights (RSL) at LAX. RSL are traffic signals at runway/taxiway intersections to alert pilots of impending danger. The initial RSL installation three years ago did not include all critical intersections. We look forward to the promised completion this year of the system to cover all intersections.

*Page 2 of 6 LAX Specific Plan Amendment Draft Environmental Impact Report Release Statement*

SPAS-PC00130

**ARSAC Alliance for a Regional Solution to Airport Congestion***Attachment to July 26 News Release*

Many billion dollars of capital projects are necessary for maintenance and improvements to the landside, passenger experience at LAX.

The action/project priorities listed below will cost billions of dollars to accomplish and must precede any runway movements. Each enhances LAX safety, efficiency and/or passenger service:

- Visibility from the tower is critical to safety. Non-visible areas remain a serious issue. The 1991 north runway air disaster occurred at a blind runway intersection when one controller gave take off instructions to a small aircraft at a midfield runway intersection while a second controller authorized a larger aircraft to land on that same runway at the same time. Increased runway separation has no impact on this kind of incident. The disaster was addressed by building the existing tower to replace the old tower (which is now the administration building) so that the full runway became visible. New Tom Bradley International Terminal construction and other new projects have created new "non-visibility" locations on the airfield. A new tower is in order but it is not even on LAX's list. SFO is adding a new tower to support FAA NextGen satellite based control and better ground aircraft tracking. LAX is silent on this issue.
- The upper roadway in the CTA is a cantilevered bridge, built for the 1984 Olympics. It is defective and a safety risk. CalTrans inspectors have repeatedly reported since 2003 to LAX that the expansion joints are failed and issues of creeping rust have existed for the last decade. This should have been already addressed, but is finally gaining LAX attention.
- The passenger bridges from the parking lots to the terminals have severe rust and are in need of structural reconstruction. The parking lots also have signs of water seepage that needs resolution.
- Terminal restrooms are frequently flooding from numerous plumbing problems.
- Terminal roofs should not be leaking after a rain storm.
- Passenger gate bridges to access aircraft have collapsed while passengers were boarding.
- The parking structures also need to be rebuilt to eliminate water issues and improve access.
- The 2004 RAND Study and subsequent security consultants recommended blast glass for terminal windows, but LAX has failed to install them.
- Improve the staffing of the control tower with additional, highly experienced controllers.
- Three years ago LAX suggested changing north complex taxiway configurations to improve runway safety. ARSAC went further and suggested numerous other field taxiway improvements. All these should be done immediately to improve ground efficiency and safety.
- Implement better field signage and marking, pilot training, and ground radar improvements to improve safety.
- Rescheduling flights to other than peak hours is another safety improvement endorsed by ARSAC. Safe spacing between aircraft has become difficult to maintain during peak hours as the number of operations per hour increases. This change would reduce overcrowding of the skies over adjacent airport communities and lower the risks of air collisions.

*Page 3 of 6 LAX Specific Plan Amendment Draft Environmental Impact Report Release Statement*

SPAS-PC00130

**ARSAC Alliance for a Regional Solution to Airport Congestion***Attachment to July 26 News Release*

- LAX is taking good designs and, in an effort to reduce construction costs, "scaling back" or eliminating critical design project elements. In the Central Utilities Plant, for instance, the design initially called for easy access trenches for wiring and pipe guide ways. They were never built in an effort to reduce current costs and to meet the construction time schedules. When a problem occurs full lengths of pipes or wires must be unearthed to discover where the problem has occurred before repairs are made. This should be readressed and done before moving runways.
- Traffic accessibility into and around the airport is currently at level F during major parts of the day. The current 62 Million of Annual Passengers (MAP) is nowhere near the already approved 78.9 MAP or the much greater MAP levels desired by LAX. Major changes in traffic access must be made before moving any runway.
- Getting mass transit into LAX remains a mystery to LAX. Their prime solution is a bus! Adding more buses to the already congested horse shoe Central Terminal Area will make it nearly impossible to get close to the terminal curbs.
- The 2004 approved consolidated rental car facility for which LAX has collected fees from every vehicle rental contract since 2008 remains unplanned. LAX is now opposing construction indefinitely leaving tourists and business visitors to experience the current extreme delays and confusion.
- The difficulty getting to connecting flights from terminal to terminal with luggage, wheel chairs, strollers, or children continues to remain unresolved by LAX Plans.
- Security check in and baggage handling must also be improved before runway movements are considered.

The LAX alternatives prioritize international (25%) passenger experience over the domestic (75%) passengers. Improvements for all passengers must be addressed.

**2. LAX MUST SUPPORT ALL OF ITS AIRPORTS TO ENSURE FUTURE REGIONAL CAPACITY INSTEAD OF PUSHING TRAVELLERS TO LAX.**

LAX understood regionalization in the past. In the 1988 LAX Master Plan EIR LAX highlighted reasons for procuring Palmdale and Ontario airports. They knew LAX could never meet total future regional demand and that a backup set of airports was necessary. LAX percentages of the total regional MAP continues to increase. LAX has not even prepared a valid master plan for either Ontario airport or Palmdale airport. Ontario has become an underutilized, abused step child of LAX with emptied terminals, while Palmdale airport has zero commercial flights. LAX demonstrated its Palmdale commitment by returning its operating license to the federal government.

"Regionalization" no longer exists. LAX now handles over 75% of all air commerce and traffic in the Southern California region. The FAA has projected up to a million operations at LAX by 2030 with virtually no growth of any other Southern California airport.

*Page 4 of 6 LAX Specific Plan Amendment Draft Environmental Impact Report Release Statement*

SPAS-PC00130

**ARSAC Alliance for a Regional Solution to Airport Congestion***Attachment to July 26 News Release*

LAX is withholding marketing and other support from their other operated airports to further a claim that further LAX expansion is needed. We expect that regionalization is not included in the DEIR as a way to improve traffic and other current LAX passenger bottlenecks.

LAX is severely delinquent in meeting their "regionalization" responsibilities restated in the 2006 Stipulated Settlement. LAX is located in an area where the 405 freeway is gridlocked daily.

Ontario wants local control, but LAX continues to resist. ARSAC supports local control because LAX has done so little in support of ONT and regionalization. The Ontario proponents who want local control have estimated that 1.6 million vehicles are unnecessarily being forced into the 405 freeway gridlock because flights are unavailable in Ontario. This will only get worse as time goes on if corrective action is not taken. This hurts all Angelenos by making movements along the freeways much longer—a direct cost to all businesses relying on goods movement or employees who must visit other facilities.

In the year 2000 LAX handled 67.3 MAP and ONT 6.7 MAP for a total of 74 MAP. In 2011 with less total air traffic of 66.4 MAP, LAX handled a greater percentage (61.9 vs 4.5 MAP) of total traffic at the expense of ONT. LAX recently changed their marketing contract with LA Inc. to exclude ONT. This year passenger traffic is projected to be even more greatly concentrated at LAX.

**3. LAX IS EXERCISING FISCAL INSANITY BY PRIORITIZING EXPENDING \$BILLIONS TO EXPAND RUNWAYS WITH LITTLE BENEFIT LEAVING INSUFFICIENT FUNDS TO REPAIR, MODERNIZE, AND MAINTAIN CRITICAL LAX FACILITIES.**

Air gridlock occurred in 2001 when LAX handled 800,000 operations in the year. In 2011 there was about 600,000 operations. Increased runway separation will be of little benefit for a very long time. The Northside Safety Study estimated only nominal improvements. The costs and risks of moving runways north is unjustified. This effort can become Los Angeles' equivalent of the Boston "Big Dig" because risks of construction have been understated by LAX to make them look more palatable.

We have heard that the estimated costs for the 2004 LAX Master Plan Alternative D have projected increases of ten fold since approval. We suspect equivalent optimism has permeated LAX's cost estimates for the current alternatives.

Runway expansion is greatly complicated by LAX proximity to developments and the major infrastructure going under the airport. Moving the runways will be outrageously expensive:

- Runway movement north will necessitate redesigning Lincoln Boulevard to below grade (into a tunnel) and fully revising the intersection at Sepulveda Boulevard. This impacts major traffic flow as it is one of the few north-south corridors to supplement the gridlocked 405 freeway.
- Runway movement north will necessitate mitigating unstable substrata surrounding the decommissioned six-lane, 740' long, "Manchester Tunnel" built in the 1960s. The original CalTrans plan was to build a

*Page 5 of 6 LAX Specific Plan Amendment Draft Environmental Impact Report Release Statement*

SPAS-PC00130



**ARSAC Alliance for a Regional Solution to Airport Congestion****Attachment to July 26 New Release**

north-south freeway corridor tunnel entirely under LAX to link Westchester with El Segundo and the South Bay. The tunnel project, however, had to be abandoned because it was destabilizing the one north runway. Sink holes were problematic. The remainder of the decommissioned tunnel extends under the current north runway, 24R, from Lincoln Boulevard to 50' of the interior north runway, 24L. Any runway movement north will require reevaluation and mitigation of an unknown water source which caused flooding and subsequent abandonment of the tunnel project. We do know that construction of the tunnel required an artesian well to reduce the water table level. When LAWA inspected the tunnel about two years ago standing water was inside despite six years of drought. Construction can cause water movements and cause destabilization in new, surrounding areas. LAWA has refused to reenter the tunnel subsequent to the high rain seasons. The unknown water source must be found and re-evaluated to determine if it can be redirected and/or if this presents a new fresh water source for LA City. Once opened for construction, the tunnel will be destabilized. This would possibly necessitate closure of both north runways until mitigations are completed over an indeterminate time period.

- Currently beneath the north runways are three major sewer lines connecting the entire City and Valley Regions to the Hyperion Sewage Treatment Plant just southwest of LAX. One of these sewers is located near the intersection where Lincoln and Sepulveda are to be reconnected. The LAWA proposed below grade roadway will necessitate moving this sewer at a major cost.
- Additional underground utilities and crude oil pipes linking active oil fields to refineries in El Segundo may require movement as well.
- Any runway movement north will cause major demise of the commercial corridor north of LAX eliminating hundreds of businesses and thousands of jobs when the economy is already fragile. The previous business destruction required more than twenty years of revitalization efforts. This will deprive Los Angeles of much needed tax revenue.

Finally, ARSAC has raised numerous issues over the past six years and in our Notice of Preparation comments. LAWA has conducted numerous outreach meetings, but has generally failed to act or cure any of the issues raised.

Aside from the destruction of a viable business corridor which pays taxes to the City. The number one LAWA failure is to address gridlocked airport access and needed Central Terminal improvements which could jeopardize tourism. Airport construction costs are financed by LAWA and ultimate the airlines and travelers, but money for infrastructure projects such as expanded roadways around LAX which are not exclusively used by LAX traffic, must come from the City general fund. General fund money consumed reduces projects throughout the rest of L.A. and the region. Similarly, some CalTrans, LADWP, LA Sanitation and other required work will not be covered by LAWA and be cause for rate increases and more "fees."

Page 6 of 6 LAX Specific Plan Amendment Draft Environmental Impact Report Release Statement

SPAS-PC00130

**ARSAC Alliance for a Regional Solution to Airport Congestion****Attachment to July 26 New Release**

Attachments: MVCC-121009-POLICY MOTION LAX SPAS DEIR.pdf

**From:** Sharon Commins [scommins@marv.com]  
**Sent:** Wednesday, October 10, 2012 10:21 AM  
**To:** SPASEIR Comments  
**Cc:** Bill Rosendahl; Mike Bonin; chuck RAY; Ken Algen; Denny Schneider  
**Subject:** MVCC Official Comment, LAX SPAS DEIR

Dear Mr Alvarez:

At its regular monthly meeting October 9, 2012, the Mar Vista Community Council unanimously passed the following motion regarding alternatives presented in the LAX SPAS DEIR:

The Mar Vista Community Council encourages the Los Angeles World Airport (LAWA) to adopt the plan in their LAX SPAS DEIR which ensures the most rapid completion of LAX modernization. Alternative 2 which requires no relocation of the North Runway and Alternative 9 which is a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into the Westchester business district should be the preferred alternatives. Such a plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns, presents the least intrusive impacts on local communities, and, at the same time, provides the lowest construction cost and construction risks.

The letter is attached.

Kind regards,

Sharon Commins, Chair  
 Mar Vista Community Council  
 scommins@marvista.org  
 310-650-5119 mobile

SPAS-PC00131

SPAS-PC00130





**Mar Vista  
Community Council**  
P.O. Box 66871  
Mar Vista, CA 90066

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2011-2012**

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**Zone 63**

**Zone 64**

October 10, 2012

**Via Email to:** Los Angeles World Airports, Facilities Planning Division,  
ATTN: Diego Alvarez (spas@lawa.com)

Cc Councilmember Bill Rosendahl  
Cc CD 11 Chief of Staff Mike Bonin

Dear Mr. Alvarez:

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Kind regards,  
Sharon Commins, Chair  
Mar Vista Community Council

SPAS-PC00131

## Los Angeles International Airport Area Advisory Committee

Committee Members: Residents of El Segundo, Inglewood, Lemmo, Hawthorne, Culver City,  
Marina del Rey and Westchester/Playa del Rey

October 9, 2012

Mr. Diego Alvarez  
Facilities Planning Division  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

**Re: Comments on the Draft EIR for the LAX SPAS study**

Dear Mr. Alvarez:

The Los Angeles International Airport Area Advisory Committee (LAXAAC), a committee of residents of the communities surrounding Los Angeles International Airport (LAX), is writing with comments relating to the recent Draft Environmental Impact Report (DEIR) or the proposed Specific Plan Amendment Study at LAX (the SPAS).

Our initial concern with the DEIR is its massive size and complexity with the number of proposed alternatives discussed, coupled with the failure of LAWA to designate a preferred alternative, particularly in light of the extremely limited time allowed for the public to review these documents. You have indicated that LAWA may yet select a preferred alternative, which would be unfair in that it effectively would give the public even less time to evaluate that alternative thoroughly. We ask that when LAWA decides upon a proposed alternative, that the public be given additional time to address that proposal.

### Preferred Alternatives 7 and 9:

Our committee favors a combination of Alternatives 7 and 9, which we believe would modernize the airport and improve both airfield operations and ground transportation without unduly impacting the surrounding communities.

Alternative 7 proposes a 100 foot southward movement for Runway 6R/24L, increasing runway separation from 700 to 800 feet, and adding a center-line taxiway. We believe that the center-line taxiway would enhance safety on the North Airfield, because recent experience on the South Airfield and at other airports with added center-line taxiways suggests that incursions will be reduced.

Data available on a Federal Aviation Administration (FAA) website confirm that there was a significant reduction in the number of incursions on the South Airfield after the addition of the center-line taxiway. A comparison between the five-year periods between 2003-2007 and 2008-August 2012 before and after the south center-line taxiway shows that the incursion average on the South Airfield was reduced significantly while the incursions on the North Airfield stayed about the same. (See [http://www.asias.faa.gov/portal/page/portal/asias\\_pages/usius\\_home/detainfo](http://www.asias.faa.gov/portal/page/portal/asias_pages/usius_home/detainfo)). Other data on the FAA website show that incursion severity has diminished since the center-line taxiway was installed. These data are consistent with that from other major airports in the country. The incursions on the North Airfield generally have been somewhat more severe than on the South Airfield after the center-line taxiway but less severe than they were on the South Airfield prior to the taxiway. Accordingly, we

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## Los Angeles International Airport Area Advisory Committee

Committee Members: Residents of El Segundo, Inglewood, Lemmo, Hawthorne, Culver City,  
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believe that the inclusion of a center-line taxiway on the North Airfield could significantly reduce the frequency of incursions.

We believe that less than optimal taxiway positions may have played a role in the incursions that have occurred on the North Airfield. We support the lengthening of Runway 24-L towards the east to a minimum length of 11,500 feet from the current 10,286 feet included in Alternative 7 because it would measurably improve North and South Airfield safety. The 2010 North Runway Safety Study (NASS) conducted by an academic panel under the auspices of the North Airfield Safety Advisory Committee noted on page 143 that incursion or collision risk could be minimized by balancing operations between the North and South Airfield complexes. The imbalance occurs because the heavy Groups IV and V aircraft that depart from the North terminals currently must taxi counter-flow on the North all the way around to the South complex to depart, and vice versa for landing. The NASS recognized that the net result of this imbalance is a quadrupling of the incursion risk with this traffic. This means more opportunities for incidents on the North and South complexes, additional fuel cost and time for the departing aircraft and additional pollution for the local environment from aircraft exhaust.

In addition, we note that the DEIR fails to explore all other safety measures that could be taken to reduce incursions. Therefore, please address the following items in the final EIR to determine whether they would be adequate to address any remaining perceived safety issues:

- Improved communications between tower and cockpit,
- Fully staffed tower and TRACON offices,
- Most modern and efficient equipment installed in the tower,
- GPS ground-tracking system installed,
- More space between aircraft, and
- Adherence to the LAX preferential runway noise abatement plan.

We propose the combination of Alternative 7 with Alternative 9 because we believe that the Consolidated Rental Car Center (CONRAC) project in Alternative 7 combined with the Automated People Mover (APM) from Alternative 9, would take rental car shuttles off the road, improve traffic, and provide a great convenience to the traveling public.

We favor the Alternative 9 proposal of an Intermodal Transportation Facility (ITF) to be constructed between 96<sup>th</sup> and 98<sup>th</sup> Streets and between Vicksburg Avenue and Airport Boulevard. The ITF would include space for passenger parking and a remote passenger pick-up drop off to provide drivers the option of not entering the CTA.

The construction of a CONRAC with an APM to transport rental car passengers between it and the CTA would significantly improve passenger convenience and reduce traffic congestion in the vicinity of the airport as well as in the CTA. Instead of congesting several streets around the airport with rental vehicles, passengers would go to one facility to obtain or return their rental cars, where there would be more than 8200 spaces for vehicles. Departing passengers could drop off rental cars and take the APM.

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## Los Angeles International Airport Area Advisory Committee

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directly from the CONRAC into the airport, while arriving passengers who need a rental vehicle could take the APM directly to the CONRAC. Combined with the CONRAC and the ITF, the APM likely would significantly reduce the number of private vehicles accessing the CTA.

The APM, which would be located on a new elevated tramway, would be superior to the bus system proposed in Alternative 8. Under Alternative 8, rental car shuttles would arrive in the CTA from the CONRAC via the elevated bus way (4.12.1 at p. 4-1093). This system has the potential to severely impact traffic between Manchester Square and the CTA, along the 98<sup>th</sup> Street corridor, as well as in the CTA, where it would merge with mixed-flow traffic on the upper level roadway.

We expect that the APM in Alternative 9 would prove to be less cumbersome for travelers than would the elevated bus way proposed in Alternative 8, for the simple reason that stepping onto an APM with luggage is easier than getting onto a bus with luggage. Passengers with baggage and children would find the APM more convenient also because they would have fewer steps to walk when they arrived at their terminal than they would have with the bus system. The elevated tramway also would be far more passenger friendly in other respects, as it would be faster and more efficient, with less complicated routing and higher capacity. Train systems have been effectively used in other cities such as New York, San Francisco, and Atlanta, but no major airport currently uses a dedicated bus way.

We are concerned, however, about the numerous details missing from the DEIR regarding the APM in Alternative 9. For example, we think it imperative that the APM move around the CTA in a continuous loop, and not dead-end at Terminal 7, as it appears to do in Figure 2.9 (2.3.1.9.4 at p. 2-43). If it were to dead-end at Terminal 7, arriving passengers at any terminal would have to travel back through all the other terminals on the APM to go to the CONRAC. This would be especially inconvenient for passengers who are arriving at Terminals 5 through 7, and would defeat the purposes of saving time and improving convenience for passengers. Given that the APM would not be the exclusive means to access the CTA, it will need to be more convenient than private vehicles or the traveling public will not use it. Please explain how it would operate.

We also are concerned about the apparent lack of participation in this process by the Los Angeles Metropolitan Transportation Authority (Metro). Collaboration between Metro and LAWA on any link between a new light-rail extension and the CTA is essential. Currently, Metro is considering several options for extending the Green Line into LAX, in addition to Alternatives 8 and 9, such as extending an elevated Green Line into the CTA or bringing the Green Line into the CTA underground. Why are these proposals, which might offer significant advantages in terms of the volume of passengers carried to the airport, not addressed in the DEIR? Further, LAWA has made only vague references in the SPAS public hearings to the Metro processes on the Green Line and Crenshaw Line. Because Metro would need to use public funds unrelated to the airport for any construction of a light rail line outside airport boundaries, cooperation between LAWA and Metro is mandatory. Please explain how LAWA would work with Metro in this regard.

Alternatives 2 and 4:

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## Los Angeles International Airport Area Advisory Committee

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We prefer Alternative 7 over Alternative 2 because Alternative 7 allows for the inclusion of a center-line taxiway, as discussed above. We would not otherwise oppose Alternative 2, which has been designated the "environmentally superior alternative" (1.5 at p. 1-103), if it were to be combined with Alternative 9. We support the airfield improvements in Alternative 2, which does not relocate Runway 6L/24R or Runway 6R/24L, but lengthens Runway 6R/24L, and modifies and improves taxiways. The DEIR shows that larger aircraft (Groups V and VI) can be acceptably handled by these modifications to the airfield with no additional runway spacing (see Table 4.7.2-8, at p. 4-514-515). The NASS unanimously concluded that the North Runway Complex is extremely safe, even at projected fleet mix and traffic levels (4.7.2, at p. 4-505). Alternative 2 would also be an affordable option, in that, among other things, it would have the least impact on road traffic noise (4.10.2.6.1 at p. 4-942) and would not require modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under other options.

Alternative 4 would accomplish less than Alternative 2, and for that reason is less desirable. Alternative 4, the option that represents what would happen if all non-yellow light improvements identified in the Alt. D Master Plan were implemented, proposes the same extension of Runway 6R/24L and Taxiway E as Alternative 2, coupled with a CONRAC and new parking lot. However, it would not meet design standards for ADG V and VI aircraft or reduce the need for FAA waivers, and thus does not accomplish as many of LAWA's goals as either Alternatives 7 or 2.

### Alternatives 1, 5 and 6 (moving the runway north):

We oppose these alternatives because of their proposals to move Runway 6L/24R north (Alternative 1: 260 feet north, Alternative 5: 350 feet north, Alternative 6: 100 feet north). It already has been demonstrated that further runway separation is unnecessary for safety (see the NASS, 4.7.2, at p. 4-505). In negating the safety rationale for revisiting the separation distance of Runways 24-L and 24-R, the academic panel also negated any legitimate argument that the communities surrounding LAX must suffer the adverse impacts of runway movement due to safety concerns.

Given that the DEIR predicts an increase in the size of the noise contour over surrounding communities from these runway movements (4.10.1.6.1 at p. 4-829 (Alt. 1); 4.10.1.6.5, at p. 4-881-2 (Alt. 5); 4.10.1.6.6 at p. 4-897 (Alt. 6)), we oppose them because it appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport.

Please explain how the impacts associated with the change of uses within the Runway Protection Zones (RPZ) can be considered "less than significant" (1, p. 1-77) when it is clear that Westchester businesses not currently located within an RPZ would be located within it and may need to be destroyed (see, for example, 4.7.2, p. 4-516). This includes much of the Westchester Central Business District along Sepulveda Boulevard south of La Tijera Boulevard. LAWA appears to assume that the airport would have to purchase very little of the existing Westchester business district even through much of it would fall into the RPZ because it assumes that pilots will land mid-runway on Runway 24R. However, there is no guarantee that pilots will land mid-runway or that the FAA will agree that

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telling them to do so is an adequate protection for the businesses that will be within the RPZ. It is our understanding that the FAA will no longer "grandfather" existing structures, but instead will insist that they be cleared not only from the Runway Safety Area (RSA) but also from the RPZ. The DEIR recognizes these as incompatible uses under FAA design recommendations (4.7.2, at p. 4-522), and recognizes that FAA may require that these structures be removed.

In addition, LAWA and the City of Los Angeles also are likely to incur a substantial financial burden under any of these three alternatives. We expect that the cost estimates in the DEIR are vastly understated. Do the cost estimates included in the DEIR for this alternative include the cost of purchasing the very profitable properties that likely would need to be purchased at great expense to LAWA and Los Angeles? How was the market value determined for this analysis?

In addition, moving the runway north would require very expensive modifications to the Argo Drainage Channel, the Manchester Tunnel and Lincoln Boulevard. In addition, sewer lines may have to be moved. Where does the DEIR analyze these impacts of each of these alternatives?

We do not see an adequate discussion in the DEIR of the following questions:

- What businesses in the Westchester Business District would need to be relocated, and what buildings demolished?
- What would be the cost of such demolition/relocation? Realistic costs for all proposals should be included that take into account negotiations and potential litigation and include realistic time schedules to accommodate these procedures.
- What would be the loss to the City of Los Angeles from the loss of this tax base and purchasing capability of displaced businesses and residences?
- What would it cost to soundproof the homes, schools, and businesses impacted by the new noise contour?
- Under each alternative, what would be the cost of filling in the tunnels under the North Airfield and addressing the seepage problems that cause sink holes due to the natural aquifer, and what would be a reasonably determined time schedule to accomplish these tasks?
- Under each alternative, what would be the costs for relocating/realigning/reinforcing Lincoln and Sepulveda Boulevards, including the Sepulveda Tunnel? Because these endeavors would involve other agencies (e.g., the California Department of Transportation) what would be a realistic time schedule to achieve them?
- What would be the scheduling of the implementation of each proposal and how could the costs be expected to increase during the implementation?
- Who would pay for the costs associated with the various proposals for reconfiguration?

### Alternative 3 (moving the runway south 340 feet):

We oppose Alternative 3 because it unnecessarily proposes to move Run 6R/24L 340 feet south, at significant expense, including demolition of three terminals and extensive central terminal

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construction, because, as discussed above, the separation of the North runways by this amount of distance is simply unnecessary for either airfield safety or efficiency. The DEIR states that Alternative 3 will increase runway separation from 700 to 1040 feet. These changes would not affect the existing abilities relative to simultaneous arrivals and departures (4.7.2.6.7 at p. 4-563), and in fact, this runway movement may adversely impact operations on the south runway (p. 4-533 fn 406).

Just as with the three Alternatives proposing to move the runway north, the DEIR does not have an adequate cost analysis for the displacement of the newly included businesses that would be located within the Alternative 3 RPZ.

\*\*\*\*\*

The DEIR's discussion of each of the alternative proposals is incomplete because the DEIR does not calculate the unavoidable environmental impacts for each of the alternatives from construction activities, which it attributes to the conceptual nature of the projects (see 4.2.2.1 at p. 4-466). This is another reason why we should be given an additional opportunity to comment upon the environmental impacts of whatever becomes the LAWA staff's preferred alternative. In addition, we expect LAWA would take all precautions with the selected alternative for some offset of such construction impacts by requiring the operating directives mandated for other recent construction projects to mitigate air pollution, noise, dust and disturbance for neighboring communities. Methods and procedures to ensure strict enforcement with these directives must be included in the final EIR.

We also are very concerned that the expressed Project Objectives for the SPAS (Exes. Summary Section 1.2.1) do not include the goal of regionalization of Southern California air traffic, which we had understood to be a goal of the current mayor of Los Angeles. Please explain why regionalization was not included as a Project Objective. We firmly believe that only an aggressive regional approach to air transportation will mitigate the safety concerns, noise, congestion and air pollution currently impacting the communities surrounding LAX. Only if the air traffic burden can be spread throughout the Southern California region, will we continue to see the economic benefits of a vibrant transportation system without unduly impacting one portion of the Southern California community. Accordingly, we believe that regionalization should have been included in the list of Project Objectives, and the DEIR should have included a discussion of how each alternative will help to accomplish that objective.

Finally, we understand the need to modernize LAX. Given that funding sources are limited, it makes sense for LAWA to invest in infrastructure that will enhance the travel experience, such as improving the upper roadway, the signage, the elevators, and restrooms. And, to the extent that creating jobs is an objective of any of these projects, such modernization projects will accomplish that.

Because we believe that the airport should be modernized, but not expanded, we do not think that LAWA should undertake any alternative that would be prohibitively expensive. We believe it would make more sense to devote funds to developing facilities elsewhere that can relieve some of the burden of regional air transportation from this portion of Southern California. Given the possibilities of a

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## Los Angeles International Airport Area Advisory Committee

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major earthquake near LAX or a terrorist attack on what is admittedly Southern California's prime target, the economy of this region needs to have other airport facilities.

We hope that LAWA, the Board of Airport Commissioners and the City Council all recognize that these Alternatives are in fact all piecemeal or "Band-aid" solutions that in the long term will result in Los Angeles having the magnificent airport that we all desire. If Los Angeles is truly to have a world-class airport, the city must realize that LAX is not the location for it, because LAX is so constrained geographically. Los Angeles must start to develop an airport where there is space for such an airport, and also build mass transit from downtown directly to that site.

Please let us know if you have any questions regarding our position on these matters.

Very truly yours,



Sergio Paz, LAXAAC Chair  
Los Angeles International Airport Area Advisory Committee (LAXAAC)  
1 World Way, P.O. Box 92216  
Los Angeles, CA 90009-2216

Enclosure (one-page description of our committee's role)

cc: Board of Airport Commissioners  
Los Angeles Mayor Antonio Villaraigosa  
Culver City Mayor Andrew Weissman  
Inglewood Mayor James T. Butts, Jr.  
El Segundo Mayor Carl Jacobson  
Hawthorne Mayor Daniel Juarez  
Councilman Bill Rosendahl  
Supervisor Don Kuabe  
Supervisor Mark Ridley-Thomas  
Gina Marie Lindsey, LAWA Executive Director

SPAS-PC00132



From: Audrey Melton [amelton@janeiredale.com]  
 Sent: Wednesday, October 10, 2012 9:22 AM  
 To: SPASEIR Comments  
 Subject: LAX EIR

To Whom it May Concern:

As a long time resident of Westchester, I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation.

We all want a world class airport, but we object to moving any runway that would grossly impact our community with noise, pollution, and the loss of any more of our business district.

Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Audrey Melton, Business Consultant - Los Angeles/Hawaii Regions  
 Iredale Mineral Cosmetics, Ltd.  
 t: 310-902-8035 f: (866) 397-0107 orders: 800-817-5665  
[janeiredale.com](mailto:janeiredale.com) [amelton@janeiredale.com](mailto:amelton@janeiredale.com) [order@janeiredale.com](mailto:order@janeiredale.com)

*Simply Magical*. The bewitching beauty collection from *Jane Iredale*.  
 Check yourself and kick up your heels! *Jane Iredale* donates 100% of profits of *Chirish Up* fragrance sales to *Living Beyond Breast Cancer*.

SPAS-PC00133

From: Greg Melton [greg.melton@ca.rr.com]  
 Sent: Wednesday, October 10, 2012 9:14 AM  
 To: SPASEIR Comments  
 Subject: LAX EIR Comments

As a long time resident of Westchester, I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation.

We all want a world class airport, but we object to moving any runway that would grossly impact our community with noise, pollution, and the loss of any more of our business district.

Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Greg Melton  
 Westchester

SPAS-PC00134

From: Citrin Judy gmail [jpcitrin@gmail.com]  
 Sent: Wednesday, October 10, 2012 12:42 PM  
 To: SPASEIR Comments  
 Subject: additional questions about DEIR & North Runway

I sent in some comments a few days ago, and I have some specific questions to add. I also neglected to complete my address which is written below.

1. What is the reason that LAWA wants to move the North runway? If it is safety, exactly what difference will it make?
2. What is the advantage of having a taxiway between the runways?
3. Are the number of A380s limited because of current north runway configuration, and how are south runways used for A380s?
4. Exactly what will be the difference in noise to residents on the approach for landings and takeoffs if the North Runway is moved 100, 200 or 350 ft? I live in the Usage area--what difference will it make to me?

Thanks,

Judy Citrin  
 5422 W. 82nd St  
 LA, CA 90045

SPAS-PC00135

From: <scainbcar@aol.com>  
 Date: Tue, Oct 9, 2012 at 12:36 AM  
 Subject: CD11 Transportation Advisory Committee Motion--Support of Alternatives 2 and 9 (LAX Reconfiguration)  
 To: [spasecomments@lawa.org](mailto:spasecomments@lawa.org), [DAI.VAREZ@lawa.org](mailto:DAI.VAREZ@lawa.org), [councilman.rosendahl@lacity.org](mailto:councilman.rosendahl@lacity.org),  
[Mike.Bonin@lacity.org](mailto:Mike.Bonin@lacity.org), [Paul.Backstrom@lacity.org](mailto:Paul.Backstrom@lacity.org), [Jay.Greenstein@lacity.org](mailto:Jay.Greenstein@lacity.org)

To Diego Alvarez, the LA World Airports Facilities Planning Division, and the LAX SPAS Planners:

I endorse the motion was passed at the monthly meeting of the CD11 Transportation Advisory Committee on 10/9/2012 by a vote of 7-0-0.

#### MOTION—Support of LAX SPAS DEIR Alternatives 2 and 9

The CD11 Transportation Advisory Committee encourages the Los Angeles World Airport (LAWA) to adopt the plan in their LAX SPAS DEIR which ensures the most rapid completion of LAX modernization. Alternative 2 which requires no relocation of the North Runway and Alternative 9 which is a Consolidated Rental Car Facility in Manchester Square supported by some form of rail mass transit which allows for connection into the Westchester business district should be the preferred alternatives. Such a plan, according to DEIR evaluations, addresses the necessary airfield operational efficiency and safety concerns, presents the least intrusive impacts on local communities, and, at the same time, provides the lowest construction cost and construction risks.

Sincerely,

Gordon Bergelson  
 11947 Beatrice Street  
 Culver City, CA 90230

SPAS-PC00136



**From:** Candace Mayeron [cmayeron@ca.rr.com]  
**Sent:** Tuesday, October 09, 2012 5:07 PM  
**To:** SPASEIR Comments  
**Subject:** moving runway north

Please add my name to those protesting moving or adding runways on the north side.

Thank you.

*Candace Mayeron*  
 310-422-1646

[cmayeron@ca.rr.com](mailto:cmayeron@ca.rr.com)

SPAS-PC00137

#### SUPPORT OF THE COALITION TO FIX LAX NOW.....

October 09, 2012

There is no question that Los Angeles International Airport (LAX) is one of the top two or three economic drivers for the City, the County, and the Southern California region. But that position continues to be undermined by a small, short-sighted, vocal group of airport neighbors who have managed to hold hostage the airport's plans to upgrade the facility's operational efficiency, safety, and competitiveness.

Simply, it is time to put an end to these roadblocks--hurdles that hub airports across the U.S. have either not experienced or solved to essentially eclipse LAX in constructing state-of-the-art airports for the 21<sup>st</sup> century. Seattle, San Francisco, Denver, Dallas/Ft. Worth, Phoenix, Las Vegas, and Vancouver, B.C. are cases in point and are overshadowing LAX.

While the modernization of the Bradley International Terminal is a long overdue move to begin the comeback of LAX, much more must be done. Reconfiguring the 1960s era out-of-date north airfield complex to effectively and safely handle the next generation of large aircraft (A380, Boeing 787, Boeing 747-800), addressing the aging domestic terminal (circa 1961) where some 80 per cent of the traffic is handled, improving ground access, and passenger processing, and constructing a single car rental facility are uppermost.

I retired in late 2006 as Regional Director of Governmental and Public Affairs for United Airlines after some 27 years based at LAX, and I should point out that these submitted comments only reflect my personal viewpoint as an interested observer. I am not privy to United's position on the LAX Specific Plan Study (SPAS) Draft Environmental Impact Report (EIR) or the other carriers and am not involved with any of them and have not discussed it with them. However, I have continued to follow industry developments and serve as a member of the Board of Directors of the Aero Club of Southern California and the Flight Path Learning Center and Museum at LAX.

But I can offer a historical perspective. In the 2003/2004 timeframe United and many international carriers supported the Alternative D Master Plan advanced by then Mayor Jim Hahn. As the largest carrier at LAX, United recognized the benefits of the plan that had many forward-thinking elements aimed at modernizing LAX, including a remote passenger check-in facility and a central terminal processing facility. The City Council passed the plan, 12-3 in December 2004, thanks to a coalition composed of business, labor, airlines and related vendors and led by the Los Angeles Chamber of Commerce and the L. A. County Federation of Labor.

Six months later Councilman Antonio Villaraigosa, one of the three "noe" votes, defeated Mayor Hahn in the mayoral race. In subsequent months key elements of the plan were shelved and various accommodations were reached with the neighborhood

SPAS-PC00138

dissidents. But the important elements approved by the Council in Alternative D remain on the table, ripening if you will, and dealing with surface transportation improvements, new terminal construction, and the separation of the north runways...and awaiting approval. That process is underway as the alternative actions are reviewed to solve the problems at LAX against the backdrop of not only making it competitive, but also responding to the tremendous need for quality jobs to be injected into the local economy.

As L.A. Chamber president Gary Toeppen has stated, enough is enough. This process has gone on for some 20 years and LAX has fallen behind and the constraints have resulted in an airport that trails other hub facilities, particularly those in the West.

It is time to fix LAX.

Alan B. Wayne  
 80351 Oak Tree  
 La Quinta, California 92253

SPAS-PC00138

**From:** James Redner [jimredner@therednergroupp.com]  
**Sent:** Tuesday, October 09, 2012 5:10 PM  
**To:** SPASEIR Comments  
**Subject:** LAX SPA Draft EIR

To Whom It May Concern,

We have reviewed the nine alternatives currently being suggested for LAX. Based on where we live (85<sup>th</sup> Place, between Georgetown and McConnell), across Manchester from the golf course.

As it is, the flights coming in and out are fairly loud and depending on the direction of the wind, we can smell jet fuel. The idea that runways may move up to 350/300 ft closer to where we live is very troubling. The movement will negatively impact our lives with unwanted and potentially harmful pollution (noise and air). If this movement were to occur, it will have undesired repercussions.

With that in mind, we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help alleviate current congestion. Alternative 9 would improve the airport, helping to make it a top destination which it is current not.

Jim Redner  
 therednergroupp  
 (323) 217-4314  
[www.theRednerGroup.com](http://www.theRednerGroup.com)  
 PSM: therednergroupp  
 XBLA: therednergroupp

SPAS-PC00139



**From:** Mary Austin [memmesh17@hotmail.com]  
**Sent:** Tuesday, October 09, 2012 5:14 PM  
**To:** SPASEIR Comments  
**Subject:** LAX Expansion

October 9, 2012

HELLO,

I'm a resident living in Playa Del Rey, for the past 18 years, I am totally against any plans calling for a move of the runway NORTH BY 300ft. I waited 10 years for the LAX project to "sound proof" our homes. A total rip off of taxpayers money, the sound of airplanes taking off has not improved our quality of life the noise is constant, our skylights leak, due to poor workmanship, which the LAX authorities continue to ignore.

I park my vehicle on the street, Tuscany Ave, after 7 days exposed to the pollution in the air coming from LAX, I can write my name on the vehicle body work!!!

JUST WHAT ARE WE BREATHING IN!!!!

Richard Austin  
 8512 Tuscany Ave U416

SPAS-PC00140

**From:** Mary Austin [memmesh2001@yahoo.com]  
**Sent:** Tuesday, October 09, 2012 5:21 PM  
**To:** SPASEIR Comments  
**Subject:** LAX Expansion

10/9/2012

HELLO,

I'm a resident living in Playa Del Rey, for the past 19 years, I am totally against any plans calling for a move of the runway NORTH BY 300ft.

I waited more than 12 Years for the LAX project to "Sound Proof" our home. A total rip off of taxpayers money, the sound of airplanes taking off has not improved our quality of life the noise is constant, our skylights leak, due to poor workmanship, which the LAX authorities continue to ignore. One of our so called Sound Proofing Window facing the Airport has cracked fantastic workmanship.

Moving the runway closer by 300 ft. will this result in all my window to crack.....

I park my vehicle on the street, Tuscany Ave, after 7 days exposed to the pollution in the air coming from LAX, I can write my name on the vehicle body work!!!

JUST WHAT ARE WE BREATHING IN!!!!

Maria Austin  
 8512 Tuscany Avenue  
 Playa del Rey, CA 90293

SPAS-PC00141

**From:** JoyceCurra@aol.com [JoyceCurra@aol.com]  
**Sent:** Tuesday, October 09, 2012 6:21 PM  
**To:** SPASEIR Comments  
**Subject:** Comments on LAX SPAS Draft EIR

I have attended one of the public meetings and will be greatly impacted by which Alternative is chosen. I fully support Alternatives 2 and 9.

Joyce Curran  
 8150 Manitoba St., Unit 242  
 Playa del Rey, CA 90293

SPAS-PC00142

**From:** Mike Davison [sfredge@gmail.com]  
**Sent:** Tuesday, October 09, 2012 9:24 PM  
**To:** SPASEIR Comments  
**Subject:** Comments on SPAS Draft EIR

Los Angeles World Airports, Facilities Planning Division

Attention: Diego Alvarez

One World Way

Los Angeles, CA 90045-5803

Dear Mr. Alvarez:

I support SPAS Alternatives 2 and 9, although with some reservations. I am very much opposed to moving runway 24R north. The 2010 NASA study affirmed that the north airfield is already safe. Taxiway improvements and runway status lights will further improve safety and efficiency.

Proponents of moving the runway say the north airfield must "shut down" when an A380 lands. Since it is never said for how long, I must conclude that "shut down" is an exaggeration. In any case, because only five A380s are landing at LAX today, and because Gina Maria Lindsey said (at last month's World Route Development Strategy Summit in Abu Dhabi) that "few airlines are using the A380 for its full capacity," it seems ill-advised to spend billions to move a runway to accommodate five below-capacity planes a day.

In addition, moving runway 24R north would require rerouting and burying Lincoln Boulevard, covering the Argo trench, and likely major rerouting of sewer lines and other infrastructure. Besides being prohibitively expensive – certainly not worth it for five planes a day out of what, 800 or so? – this work would snarl traffic for years. Traffic around LAX is already bad due in part to the lack of north-south streets in the area; it's also bad because Ontario Airport is underutilized, forcing passengers and freight originating closer to Ontario to travel across town to LAX.

I also firmly believe that either the Metro Green Line or an automated people mover must be brought into the CTA. NOT A BUSWAY! Rail transportation into the CTA is an absolute, non-negotiable requirement to make LAX a world-class airport. The current proliferation of buses in the CTA is bad enough; having the largest buses terminate instead at the proposed Intermodal Transportation Facility would make the CTA more drivable.

SPAS-PC00143



One aspect of Alternative 2 that I am opposed to is the construction of Terminal 0 east of Terminal 1. SPAS section 4.12.01, page 57, states, "While it is presently assumed that all Terminal 0 passengers will be processed at Terminal 1 or 1.5, changes in security processing or other processing requirements may necessitate those functions be incorporated into Terminal 0." Entering Terminal 1.5 and then walking all the way back to Terminal 0 is not my idea of a world-class airport! If passenger processing is subsequently moved – or shoehorned – into Terminal 0, then I foresee major traffic backups on the modified Sky Way entrance.

I am opposed to expanding LAX, already the sixth busiest in the world, especially moving runway 24R north. Rather, LAX needs to be modernized with new taxiways and runway lights, rail transportation into the CTA, a consolidated rental car facility at Manchester Square, and renovation of terminals and other facilities that are, as Gina Marie Lindsey was quoted in the 8/14/12 *New York Times*, "falling apart." In addition, better use needs to be made of Ontario Airport, which will reduce congestion and pollution not only near LAX but across the Los Angeles Basin.

Thank you for your time.

Mike Davison

8033 Denrock Avenue

Los Angeles, CA 90045

SPAS-PC00143

Attachments: DIER.docx

**From:** Garrett Smith (garrettsmith@ga.a7.com)  
**Sent:** Tuesday, October 09, 2012 10:28 PM  
**To:** SPASER Comments  
**Cc:** 'Garrett Smith'  
**Subject:** SPAS public response

Attention: Diego Alvarez  
One World Way  
Los Angeles, CA 90045-5803

Dear Mr. Alvarez,

Please find attached DIER response and forward to Ms Lindsey for her consideration.

Thank you,

Garrett Smith  
6857 West 85<sup>th</sup> place  
Los Angeles, CA 90045

310 592-3680

SPAS-PC00144

October 10, 2012

Ms. Gina Marie Lindsey, Executive Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

RE: Draft Environmental Impact Report

Dear Ms. Lindsey,

Our family and our community has always worked to be understanding good neighbors of LAX and expected the same respect in return. We support your efforts to make our airport a world class gateway for our guests. Without objection we supported the new Tom Bradley terminal. We are very proud of the progress and look forward to its grand opening.

While it's impossible for me to have reviewed and comprehend the 11,000 plus pages of the draft EIR especially with the limited review and comment period, I will make my best effort to comment on a few observations and concerns.

A world class airport starts with getting passengers in and out. A transportation system designed to connect passengers with terminals, Metro facilities, consolidated Rental Car Facility, hotels and trains. Transportation is step one. Affordability of a transportation solution is not even a question, it must be done first. This is why I encourage LAX to adapt Alternative 9 as the first phase of modernization of LAX.

I support the modernization of terminals 1, 2 and 3 even building terminal zero at Park One if necessary. What has taken LAX so long to remodel these terminals? This is a no brainer. These projects would create more jobs, permanent jobs with living wages and would not have a negative impact on our community. Without question I am in favor of any CTA improvement. Let's get started immediately.

We are 100% in support of safety especially when it comes to our airport. Nothing in this EIR will make us any safer. Out of 11,000 pages I could not find the NASA study, although I was told it was there. The NASA study, which we spent millions of dollars to conduct, clearly said NO MEASURABLE improvement of safety would be increased by moving the runway north. Runway safety lights should be adequate for pilots to avoid intrusions and near misses.

Moving the north runway even one foot north is unacceptable. How can moving the noise, pollution, vibration, air traffic, light and glare of airport operations be beneficial to our community. The community of Westchester/Playa del Rey cannot give up any more of our business district to LAX, it is unacceptable and unnecessary. Moving the north runway to accommodate any Airbus or other large plane is completely intolerable and to expensive especially since the south runways are perfectly capable to handle these landings and takeoffs. There is only one acceptable Alternative and that is number 2.

If any northerly movement of the runway is approved, then any negative impacts must be mitigated including traffic, sound proofing, pollution, vibration, light and glare for our Westchester, Playa del Rey, Inglewood, south Los Angeles communities. There should be NO additional negative impact on our neighbors and business district. No loss of income to individuals and small businesses like myself who's customer base is in

SPAS-PC00144

the Downtown Westchester Business District. Not one more decibel, not one more molecule of pollution and not one more inch of our community.

I strongly encourage you to get busy modernizing our airport, get busy connecting LAX with a great transportation system and leave the north runway alone.

Sincerely,

Garrett Smith  
6857 West 85<sup>th</sup> place

Westchester, CA 90045

310 592-3680

SPAS-PC00144



10/12/2012

To: LAWA  
c/o: Diego Alvarez  
Los Angeles World Airports  
Facilities Planning Division  
1 World Way  
Los Angeles, CA 90045-5803

Re: DEIR

Dear Mr. Alvarez,

I was in attendance at the Westchester High School auditorium townhall meeting. I and my wife Janis live at 8829 Stanmoor Dr., L.A. 90045 and we totally support Alternative 2 (no runway move but improve taxiways and terminal) combined with Alternative 9 (include a ConRAC and mass transit access to LAX - no bus). We believe that ARSAC's solutions totally reflect our community's position and aspirations. The mayor's office, Councilman Rosendahl, Maxine Waters and many business organizations support Alternatives 2 & 9 as well. We strongly implore LAWA and the FAA to work with us in implementing the two aforementioned alternatives in the DEIR. Thank you for your cooperation and understanding.

Sincerely,



Steven Matilla &amp; Janis Matilla

SPAS-PC00145

From: Demetra L. Edwards [dedwards@wahblaw.com]  
Sent: Tuesday, October 09, 2012 11:14 PM  
To: 'spaseircomments@lawa.org'  
Cc: Demetra L. Edwards  
Subject: LAX SPA Draft EIR

To Whom It May Concern,

We have reviewed the nine alternatives currently being suggested for LAX. Based on where we live (8851 W. 85<sup>th</sup> Place, between Georgetown and McConnell and approximately one block from Manchester), we are extremely concerned with the alternatives suggested for expansion of LAX toward our neighborhood.

Specifically, as it is, the flights coming in and out are quite loud and depending on the direction of the wind, we can smell jet fuel. The idea that runways may move up to 350/300 feet closer to where we live is very troubling both from an environmental standpoint and health standpoint. The movement will negatively impact our lives with a nuisance, particularly unwanted and potentially harmful pollution (noise and air). If this movement were to occur, it will have undesired repercussions and ramifications for the citizens of Westchester.

With that in mind, we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help alleviate current congestion. In particular, Alternative 9 would improve the airport, helping to make it a top destination which it is currently not.

Thank you for your consideration. Please feel free to contact me should you have any questions or wish to further discuss the concerns of the community.

Sincerely,

Demetra Edwards

Demetra L. Edwards, Esq.

Senior Counsel | Wood, Smith, Henning & Borkman LLP  
10650 Wilshire Boulevard, 18th Floor | Los Angeles 90024  
dedwards@wahblaw.com | TEL 310.481.7517 | FAX 310.481.4650

WSH&amp;B

Los Angeles • Las Vegas • Phoenix • Northern California • Fresno • Orange County • Rancho Cucamonga • Glendale •  
Riverside • San Diego • Denver

1

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## Attachments:

ARC\_SPAS\_DEIR\_Letter90412.pdf; AllVAI2Costs.pdf; OEAnalysisConclusions.pdf;  
OEAnalysisTotals.pdf; EnvironmentallySuperior.pdf; SafetyStudyConclusions.pdf;  
280NVAISCost.pdf; Summary of the LAX Specific Plan Amendment Alternatives in the 2012  
DEIR (1).pdf; LAX has competitive advantage (1).pdf; Injury\_Facts\_37.pdf

From: Craig Eggers [roadrider90293@gmail.com]  
Sent: Wednesday, October 10, 2012 9:42 AM  
To: SPASEIR Comments  
Subject: Fwd: NCWP ARC SPAS EIR letter

FYI

----- Forwarded message -----

From: **Craig Eggers** <roadrider90293@gmail.com>  
Date: Tue, Oct 9, 2012 at 5:39 PM  
Subject: NCWP ARC SPAS EIR letter  
To: Diego Alvarez <dvalvarez@lawa.org>

Hi Diego,

Attached is the NCWP ARC SPAS EIR letter and associated attachments...I am fairly certain you already have a copy, but I would rather be a bit redundant...

Please acknowledge receipt of this e-mail.

Thanks,

Craig Eggers  
Chair, Airport Relations Committee  
Neighborhood Council Westchester/Playa  
310-704-4696

SPAS-PC00147



## Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045  
313.473.7023 • 310.361.3344 fax  
email: ncwest@ncwpdrc.org • www.ncwpdrc.org



September 4, 2012

Ms. Gina Marie Lindsey  
Executive Director  
Los Angeles World Airports  
Post Office Box 92216  
Los Angeles, California 90009-2216

The Neighborhood Council of Westchester/Playa supports a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring \$10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history. Knowing that funding sources are limited, we encourage LAWA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX.

As the first line of welcome to travelers to Los Angeles, the Neighborhood Council of Westchester/Playa is excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in the

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## Appendix F-2 – North Runway Alternatives Simulation Analysis

Table 17  
Average All-Weather Delays, Unimpeded Taxi Times and Variations from 2009 Baseline

Alternative	Average All Weather (Minutes per Operation)			Variation from Baseline (Minutes per Operation)		
	Delay	Unimpeded Taxi Time	Totals	Delay Variation	Unimpeded Taxi Time Variation	Totals
Baseline	2.38	7.80	10.18	-	-	-
Alternative 1	5.20	6.10	13.29	2.82	0.30	3.12
Alternative 2	5.38	7.88	13.24	3.00	0.08	3.08
Alternative 3	6.14	8.64	14.78	3.76	0.84	4.60
Alternative 4	5.90	7.88	13.88	3.52	0.08	3.60

Note: Totals may not add due to rounding.

Source: Roundtrip Associates, Inc., May 2012, based on SIMMOD simulation results (average all weather delay and unimpeded taxi times).

Los Angeles International Airport 106 LAX Specific Plan Amendment Study  
Report  
July 2012

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## 1. Introduction and Executive Summary

### Evaluation of Amendments to the LAX Specific Plan

In conjunction with the physical and operational improvements proposed under each of the nine SPAS alternatives, Chapter 7, *LAX Specific Plan Amendments*, of the SPAS Report identifies administrative amendments to the LAX Specific Plan that might be needed depending on the SPAS Alternative. These administrative amendments would not have any environmental impacts beyond those resulting from the physical improvements that would occur as a result of the SPAS alternatives analyzed in Chapters 4 and 5 of this Draft EIR. Chapter 7, *LAX Specific Plan Amendments*, of the SPAS Report also identifies an amendment to Section 7.H of the LAX Specific Plan that would require LAVIA to conduct passenger and airline surveys and studies when LAX reaches 75 MAP, the results of which would help inform LAVIA as to potential actions that could be taken to encourage airlines to provide increased domestic passenger service at other airports in the region, particularly those owned or operated by LAVIA. The actualization of those actions could result in environmental impacts in the form of reduced operational impacts at LAX and increased impacts at the other affected airports if, and to the extent, there is a shift in aircraft and passenger activity from LAX to other airports. Such operational impacts would include air pollutant emissions, including greenhouse gas emissions, from aircraft and motor vehicles, noise from aircraft and vehicles, surface traffic, and demands on public services and utilities. Detailed evaluation of the exact nature and extent of these shifts in impacts, as well as other environmental impacts, would be speculative at this time, but Chapter 8, *Evaluation of Amendments to the LAX Specific Plan*, provides a programmatic description of the types of impacts that would occur.

### 1.5 Environmentally Superior Alternative

Section 15125.8(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. Based on the analyses in Chapter 4, *Environmental Impact Analysis*, and Chapter 5, *Cumulative Impacts*, of this EIR, Alternative 2 is considered to be the Environmentally Superior Alternative of the nine alternatives evaluated in detail throughout this document.<sup>21</sup>

As described in more detail in Chapter 2, *Project Description*, Alternative 2 proposes very limited airfield improvements that do not involve any runway relocation or development of a centerfield taxiway. As such, Alternative 2 would require less construction than all of the other alternatives, except for Alternative 4, and would result in reduced/fewer significant construction-related impacts. This would include construction-related air quality impacts (see Table 1-7 above), construction-related GHG emissions (see Table 4.6-6 in Section 4.6, *Greenhouse Gases*), and construction equipment noise impacts (see Table 1-23 above). Although the temporary construction-related air quality impacts, GHG emissions, and construction equipment noise impacts of Alternative 4 would be less than those of Alternative 2, the longer-term operations-related air quality, GHG emissions, and noise impacts of Alternative 4 would be greater than those of Alternative 2, as further described below.

Operations-related air quality impacts, particularly from aircraft emissions, which generally constitute the majority of gaseous air pollutants at the airport, would be the lowest under Alternative 2, compared to the other alternatives including Alternative 4, for Visual Flight Rules (VFR) conditions that occur approximately 96 percent of the year (see Table 4.2-13 in Section 4.2, *Air Quality*). This is also the case

<sup>21</sup> As further described in Chapter 2, *Project Description*, nine alternatives are addressed throughout the EIR, four of which are "fully integrated alternatives" (Alternatives 1 through 4), each of which includes a combination of airfield, terminal, and ground access improvements, and five of which are "focused alternatives," including three alternatives that focus on airfield and associated terminal improvements (Alternatives 5 through 7) and two alternatives that focus on ground access improvements (Alternatives 8 and 9). Selection and implementation of any one of the focused alternatives is assumed to be "paired" with complementary elements of another alternative in order to effectively be an integrated alternative. For example, the airfield/terminal improvements of Alternatives 5 through 7 could be paired with the ground access improvements proposed in Alternatives 1, 2, 8, and 9, and the ground access improvements in Alternatives 8 and 9 could be paired with the airfield/terminal improvements proposed in Alternatives 1, 2, 5, 6, and 7. The comparison of environmental impacts between the nine alternatives and selection of the environmentally superior alternative assumes each of the nine alternatives includes a full complement of airfield, terminal, and ground access improvements.

Los Angeles International Airport 1-103 LAX Specific Plan Amendment Study  
Draft EIR  
July 2012

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Runway 24R in 340-N would often have a better view of departing traffic on Runway 24L before crossing that runway.

The capacity results for the three-runway configuration were less encouraging: the reduction in arrivals and departures observed at FFC could have adverse direct and indirect consequences. Given that mixed operations would occur on the North Airfield (i.e., landings and takeoffs on the same runway), arranging for departures in the face of frequent arrivals would be challenging. It is also true that unexpected conditions – such as the temporary shutdown of a runway – can cause considerably more disruption when there are only three runways rather than four. The AP fears, therefore, that the capacity limitations in the three-runway case would be unduly constraining in peak conditions, which would prevail for nine hours of the day under the 2020 forecast.

#### 17.6. Caveats

The various estimates summarized above and presented in more detail elsewhere in this report should be interpreted as plausible approximations, rather than exact results. Among the reasons for caution are:

- The 2020 forecasts about traffic levels at LAX, and about the fraction of traffic involving Group VI aircraft, are subject to considerable uncertainty.
- The experiments at FFC were sophisticated and well conducted, but they can only provide an approximate indication of what might happen under various configurations of the North Airfield.
- Data about historical experience are valuable, but there are issues in generalizing from other airports to LAX, and from past patterns to those that might prevail in the future under new arrangements; moreover, many of the data are subject to the high random variability associated with rare events, a circumstance that poses real challenges for statistical estimation.

#### 17.7. Main Conclusions

The AP is unanimous on all of the following points:

*For projected 2020 traffic levels and traffic mix, the LAX North Airfield is extremely safe under the current configuration.*

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The AP estimates that, at 2020 traffic levels, fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers. That level of risk is low even relative to the exceptional safety of US passenger aviation.

All the proposals to create new configurations on the North Airfield would reduce by a substantial percentage the risk of a runway collision.

More specifically, the evidence from the NASA-Ames simulation and numerous kinds of historical data suggest that:

*Moving Runway 24R 100 feet North and creating a centerline taxiway could reduce collision risk on the North by about 40% relative to the baseline.*

*Moving Runway 24R 340 feet North and creating a centerline taxiway could reduce collision risk on the North by about 33% relative to the baseline.*

*Moving Runway 24L 340 feet South and creating a centerline taxiway could reduce collision risk on the North by about 50% relative to the baseline.*

*Creating a single Runway 24 to replace 24L and 24R could reduce collision risk by about 50% relative to the baseline.*

However, because the baseline level of collision risk is so low, reducing that risk by a substantial percentage will have a limited practical effect.

Aviation at LAX is exceedingly safe. Of the 750 million passengers who would use the LAX North Airfield per decade at 2020 traffic levels, only about 80 might be expected to perish in air disasters from all causes in the Baseline case. Of these 80 deaths, five might occur in runway collisions on the North Airfield. Reconfiguration of the North runways might be expected to reduce total deaths to about 78.

In terms of capacity, changes in the configuration could have major effects.

*Moving to a three-runway configuration could cause major difficulties, in terms of flight schedule reliability and congestion, even under visual flight conditions.*

*Moving to the 340-N configuration, on the other hand, might significantly reduce airport congestion during peak hours and could provide appreciable capacity benefits.*

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Indeed, a serious case could be made for building 340-N based on its capacity benefits. This would also improve safety. But these safety benefits would essentially be a "side benefit", not the principal one.

However, the North Airfield Safety Study was, as the name implies, primarily about safety. All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone.

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TABLE A-5 Length-Weighted Temperature Estimates - 1960-1990 (continued)														
Station	1960-1969		1970-1979		1980-1989		1990-1999		1960-1999		1960-1999		1960-1999	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD	Mean	SD	Mean	SD	Mean	SD
1	15.2	1.2	15.5	1.3	15.8	1.4	16.1	1.5	15.7	1.3	15.9	1.4	16.2	1.6
2	15.5	1.3	15.8	1.4	16.1	1.5	16.4	1.6	16.0	1.4	16.2	1.5	16.5	1.7
3	15.8	1.4	16.1	1.5	16.4	1.6	16.7	1.7	16.3	1.5	16.5	1.6	16.8	1.8
4	16.1	1.5	16.4	1.6	16.7	1.7	17.0	1.8	16.6	1.6	16.8	1.7	17.1	1.9
5	16.4	1.6	16.7	1.7	17.0	1.8	17.3	1.9	16.9	1.7	17.1	1.8	17.4	2.0
6	16.7	1.7	17.0	1.8	17.3	1.9	17.6	2.0	17.2	1.8	17.4	1.9	17.7	2.1
7	17.0	1.8	17.3	1.9	17.6	2.0	17.9	2.1	17.5	1.9	17.7	2.0	18.0	2.2
8	17.3	1.9	17.6	2.0	17.9	2.1	18.2	2.2	17.8	2.0	18.0	2.1	18.3	2.3
9	17.6	2.0	17.9	2.1	18.2	2.2	18.5	2.3	18.1	2.1	18.3	2.2	18.6	2.4
10	17.9	2.1	18.2	2.2	18.5	2.3	18.8	2.4	18.4	2.2	18.6	2.3	18.9	2.5
11	18.2	2.2	18.5	2.3	18.8	2.4	19.1	2.5	18.7	2.3	18.9	2.4	19.2	2.6
12	18.5	2.3	18.8	2.4	19.1	2.5	19.4	2.6	19.0	2.4	19.2	2.5	19.5	2.7
13	18.8	2.4	19.1	2.5	19.4	2.6	19.7	2.7	19.3	2.5	19.5	2.6	19.8	2.8
14	19.1	2.5	19.4	2.6	19.7	2.7	20.0	2.8	19.6	2.6	19.8	2.7	20.1	2.9
15	19.4	2.6	19.7	2.7	20.0	2.8	20.3	2.9	19.9	2.7	20.1	2.8	20.4	3.0
16	19.7	2.7	20.0	2.8	20.3	2.9	20.6	3.0	20.2					

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Summary of the LAX Specific Plan Amendment Alternatives in the 8-2012 DEIR  
(ARSAC Generated [www.RegionalSolution.org](http://www.RegionalSolution.org))

Alt #	Alternative Name/Comments	Characteristics
1	<p><b>LAWA Maint Preferred</b></p> <ul style="list-style-type: none"> <li>"Fully Integrated" Alternative</li> <li>-Displaces businesses and homes</li> <li>-Risky construction factors; could be very costly in time and delays</li> <li>-Flies little traffic or CTA access</li> <li>-Major underground utilities, sewer, and tunnel impacts</li> </ul>	<p>Moves Runway 24R (outboard)—240° N and 500° W (width to 200', Moves Runway 24L (inboard)—1250' E</p> <p>Adds Centerfield Taxiway</p> <p>Reconfigures taxiways and taxiangles to accommodate bigger aircraft</p> <p>Moves Terminal 3 40° W, Adds Terminal Q and extends T01 and Mid Concourse Terminals N</p> <p>Argo Flood Channel Enlarged</p> <p>Eliminated ConTAC</p> <p>Lincoln Blvd repositioned to sub terrain or tunnel and new Sepulveda interchange</p> <p>Implies business district and homes</p> <p>Redesigned 95° S; Entrance into Park One</p>
2	<p><b>No Runway Movement</b></p> <ul style="list-style-type: none"> <li>"Fully Integrated" Alternative</li> <li>-Most affordable</li> <li>-Does little for traffic and CTA access</li> </ul>	<p>Leaves Runways in current location</p> <p>Reconfigures taxiways and taxiangles to accommodate bigger aircraft</p> <p>Adds Terminal Q and extends T01 and Mid Concourse Terminals N</p> <p>Redesigns 95° S</p> <p>Redesigns 95° S; Entrance into Park One</p> <p>Lincoln Blvd/Sepulveda Blvd interface intact</p>
3	<p><b>City Approved All D</b></p> <ul style="list-style-type: none"> <li>"Fully Integrated" Alternative</li> <li>-NOT AFFORDABLE. Cost has risen from \$12B 2004 approval time estimate at to over \$100 B in eight years</li> </ul>	<p>Extends Runway 24R (outboard) 1,495 feet west</p> <p>Moves Runway 24L (inboard) 340° S and adds Center-field taxiway</p> <p>Reconfigures taxiways and taxiangles to accommodate bigger aircraft</p> <p>ConTAC in Use C</p> <p>Ground Transportation Center in Manchester Square with baggage tunnel to Central Terminal Area</p> <p>Central Terminal Area closed to traffic</p> <p>Integrated Transportation Center in Continental City</p> <p>Lincoln Blvd/Sepulveda Blvd interface intact</p>
4	<p><b>All D Green light projects w/ mile projects; No yellow projects; No yellow</b></p> <ul style="list-style-type: none"> <li>"Fully Integrated" Alternative</li> <li>-Limited runway movement</li> <li>-No runway movement North</li> <li>-Least impacts or cost</li> <li>-Does little for traffic and CTA access</li> </ul>	<p>Moves Runway 24R in current location</p> <p>Moves Runway 24L (inboard)—835' E</p> <p>No Center-field taxiway</p> <p>Argo Flood Channel partially enclosed</p> <p>Lincoln Blvd/Sepulveda Blvd interface left intact</p> <p>ConTAC in Manchester Square</p> <p>No Taxiways or taxiangles reconfigured</p> <p>No Terminal Changes</p> <p>No Terminal Changes</p> <p>Lincoln Blvd/Sepulveda Blvd interface intact</p>

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5	<p><b>Airfield Mod 350' N</b></p> <p>"Airfield Change Alternative" -Greater impacts north businesses and residents/major move of flight path north -Relay construction factors could be very costly in time and delays -Does little for traffic and CTA access</p>	<p>Move Runway 24R (outboard)—350' N and 604' W (increase to 200' width) Move Runway 24L (inboard)—1250' E Adds Centerfield Taxiway Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N Argo Flood Channel enclosed (985') Unclassified sub terrain and moved/new Spaulveda connect Impacts business districts and homes All west remote gates eliminated Compatible with ground access in A11s 1,2,8, &amp; 9</p>
6	<p><b>Airfield Mod 100' N</b></p> <p>"Airfield Change Alternative" -Impacts north businesses and residents/major move of flight path north -Relay construction factors could be very costly in time and delays -Does little for traffic and CTA access</p>	<p>Move Runway 24R (outboard)—100' N (no extension or widening) Move Runway 24L (inboard)—1250' E Adds Centerfield Taxiway Reconfigures taxiways and taxielines to accommodate bigger aircraft Argo Flood Channel partially enclosed (1400') Unclassified sub terrain and moved/new Spaulveda connect Impacts business districts and homes Adds road to gate 10, TB IT and Mid Concourse Terminals N All west remote gates eliminated Compatible with ground access in A11s 1,2,8, &amp; 9</p>
7	<p><b>Airfield Mod 100' S</b></p> <p>"Airfield Change Alternative" -Avoids construction risks of tunnel, roadway moves, severs</p>	<p>Move Runway 24R (outboard)—no extension or widening Move Runway 24L (inboard)—100' S and extend 1350' E (widened to 300') Adds Centerfield Taxiway Reconfigures taxiways and taxielines to accommodate bigger aircraft All west remote gates eliminated No Business district or home impact Adds Terminal 0 and extends TB IT and Mid Concourse Terminals N Compatible with ground access in A11s 1,2,8, &amp; 9 Removes Concourse West/Easter Square Removes Concourse West/Easter Square (must be combined with others to establish full Master Plan)</p>
8	<p><b>No Consolidated Rental Car</b></p> <p>"Ground Alternative" -No Rental Car traffic -Eliminates \$5 million and 4'd</p>	
9	<p><b>Consolidated Rental Car</b></p> <p>"Ground Alternative" -Ground Rental Car traffic</p>	<p>Moves Concourse to Manchester Square from Lot C (as indicated in Alt 0) (must be combined with others to establish full Master Plan)</p>

SPAS-PC00147



[latimes.com/news/la-me-lax-restoration-20110703,0,7352614.story](http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7352614.story)

## latimes.com

## LAX hopes to dominate the Western skies once again

**At least \$4 billion is being spent on additions to the Bradley International Terminal, improvements to several domestic terminals and upgraded utilities and taxiways to handle the latest generation of super-sized jumbo jets.**

By Dan Weikel, Los Angeles Times

4:24 PM PDT, July 2, 2011

Barring another terrorist attack or recession that disrupts air travel, Los Angeles International Airport — long ranked among the nation's worst aviation hubs — is on a path that could restore its reputation as the West Coast's dominant international gateway.

Modernization projects now underway mark the first major expansion of passenger facilities since the Tom Bradley International Terminal was built for the Summer Olympics 27 years ago.

Since then, LAX has steadily fallen behind the modernization efforts of other big-city airports. Aging terminals and a lack of amenities have undercut passenger satisfaction and the airport's share of overseas travelers, some of whom fly into San Francisco, which opened a stunning international terminal in 2000.

New airport officials, including those beyond Los Angeles, say LAX's stature is on the rise. At least \$4 billion is being spent on additions to the Bradley terminal, improvements to several domestic terminals and upgraded utilities and taxiways to handle the latest generation of super-sized jumbo jets.

"We want to do in three years what other airports have done in seven or eight," said Los Angeles airport chief Gina Marie Lindsey, who was hired four years ago to get languishing modernization efforts moving.

John L. Marin, the veteran airport director hailed for remodeling San Francisco's airport, says that "any competitive advantage we had in terms of facilities on the international side will be going away" with the Bradley West project, now being built. It is to house a grand hall filled with upscale restaurants, posh lounges and luxury boutiques.

The addition's massive steel skeleton is visible and will include new concourses, gates, 1 million additional square feet of floor space and an expanded customs area. It will eliminate the hassle that international travelers encounter when flights stop short of the Bradley terminal and passengers are bused to the immigration processing area.

Other pending projects include a giant passenger processing center and a new concourse west of the Bradley terminal that would add more gates. It would be linked to the main terminal area by a steel-and-glass sky bridge, and an elevated tram would whisk passengers to other remodeled terminals. A new station would link the entire airport to the growing regional rail network.

Lindsey acknowledged that the ambitious modernization schedule will rely on meeting upbeat passenger

<http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7244765.print.story>

SPAS-PC00147

projections and avoiding another economic downturn, a terrorist attack on the nation or hikes in fuel costs and ticket prices.

"The other projects will depend on how much the airport grows," she said, "and how much we can pay down our debt."

Half a century ago, LAX was conceived as a futuristic, cutting-edge reflection of the jet age, a vision still projected at the airport by the historic Theme Building, which looks like a flying saucer suspended on curved concrete legs.

For decades, the airport that ushered in its first jetliner in 1959 prided itself on operating a no-frills facility that stressed low costs for airlines and the efficient movement of passengers.

In the terminals, travelers could buy little more than the basics: a newspaper, a cup of coffee, cafeteria fare and a preflight libation. The mantra was: "We are an airport, not a shopping mall."

The utilitarian philosophy served the airport well. Attracted by low costs and the emergence of Los Angeles as a huge market for air travel, foreign and domestic carriers steadily added service, fueling the region's economy.

But by the 1990s, the terminals were dated and falling into disrepair. Modernization schemes were proposed by Mayors Richard Riordan and James K. Hahn to greatly expand the airport's footprint and add new terminals.

Both plans met stiff opposition from residents and neighboring cities worried about traffic congestion, noise, pollution and the likelihood that homes and businesses would be demolished to make way for improvements.

As politicians and airport neighbors fought over how best to revitalize LAX, the terminals deteriorated further. Water mains broke, escalators failed, concrete fell from the legs of the Theme Building and passenger areas grew more crowded.

Officials realized too that the old gates could not accommodate the latest wide-bodied aircraft, including the giant Airbus A380 now in service.

Research showed that the worsening conditions contributed to passenger declines even before air travel was slammed by the terrorist attacks of Sept. 11, 2001. LAX lost about 12% of the airline seats on its weekly international departures from 2000 to 2006, while many other U.S. gateways posted gains.

The stakes were particularly high for the local economy. A 2006 study found that a single international flight traveling roundtrip daily from LAX generated \$623 million a year in business activity for the region and supported 3,120 jobs.

The threat of a downward spiral sparked a new commitment — and a new approach — to reviving LAX under Mayor Antonio Villaraigosa.

Within months of his election, Villaraigosa settled a major lawsuit and compromised with neighbors so certain airport projects could proceed, as long as some projected passenger growth was pushed to other airports in the region. The deal limited the capacity to 78 million passengers a year, about 11 million fewer than Riordan had sought.

<http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7244765.print.story>

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Aviation officials say LAX's development also has been hampered by a high turnover of airport directors. Over a 30-year period, eight leaders came and went, including interim chiefs and one who served twice. San Francisco by contrast, had just two in that time.

Villaraigosa put Lindsey in the top job, where she has remained for four years, longer than the combined tenure of the two directors who preceded her.

Lindsey got the Bradley West project moving, cleared the way for improvements to domestic terminals and helped to bring a more passenger-centric view to LAX planning. "We are looking at the most innovative things at sports venues, shopping malls and convention centers," she said. "We want to create an environment that is soothing, welcoming and alive."

To help finance the current renovations, the airport sold \$2 billion in bonds. The debt will be paid with fees charged to airlines, revenue from concessions and charges added to the cost of tickets.

Officials hope passenger volumes will grow so the debt can be paid down and more money can be borrowed to keep improvements coming.

The latest five-year forecasts from a top industry analyst and the Federal Aviation Administration indicate that the number of passengers at LAX will increase from 59.1 million to between 62 million and 68 million by 2014.

But some FAA and LAX forecasts have been unreliable — wildly so — partly because of unforeseen events. LAX had been expected to grow over the last decade, but the number of passengers actually declined by 8.2 million.

Contributing to the downward pressure were the Sept. 11 attacks, the outbreak of a highly contagious illness in Asia, dramatically higher fuel prices in 2008 and the recession.

In 2010, LAX handled 15.9 million international passengers, a 5.5% increase over 2009, but 1.6 million below the peak in 2005. The growth rate was slower than San Francisco's.

In addition to uncertainties about future revenue related to passenger growth, LAX has to balance the pace of improvements with the rising costs it is imposing on airlines, industry analysts say.

If fees become too high, carriers, particularly discount airlines, might be discouraged from operating at LAX or adding flights there.

"At about \$11 per enplaned passenger, LAX has had some of the lowest rates for years. Now they are talking about \$20 per passenger or more," said Jack Keady, an airline industry consultant based in Playa del Rey. LAX officials had "better pay attention to their costs."

Despite the new modernization efforts, local business leaders remain concerned that LAX still lags behind its competitors, which also are looking to upgrade and compete for lucrative international travelers.

"There has been some progress, but we still have a 1984 airport competing in a 2011 world," said Russell Goldsmith, chief executive of City National Bank and chairman of a business coalition that views the improvement of LAX as vital to boosting local commerce.

Goldsmith says airport officials must move faster to remake domestic terminals, connect LAX to transit

<http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7244765.print.story>

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lines and further separate the two northern runways, a proposal that might improve the safety and efficiency of flight operations.

But the runway proposal is rekindling the political fires surrounding airport improvements. One watchdog group that helped sink earlier master plans, the Alliance for a Regional Solution to Airport Congestion, contends the proposal is unnecessary and will harm communities to the north of LAX.

The alliance recently made the north runways an issue in the race to represent the 36th Congressional District, which includes LAX. It obtained a pledge not to expand the airport from one of the two primary election winners, Los Angeles City Councilwoman Janice Hahn.

[dan.weikel@latimes.com](mailto:dan.weikel@latimes.com)

Times staff writer Maria L. LaGanga in San Francisco contributed to this report.

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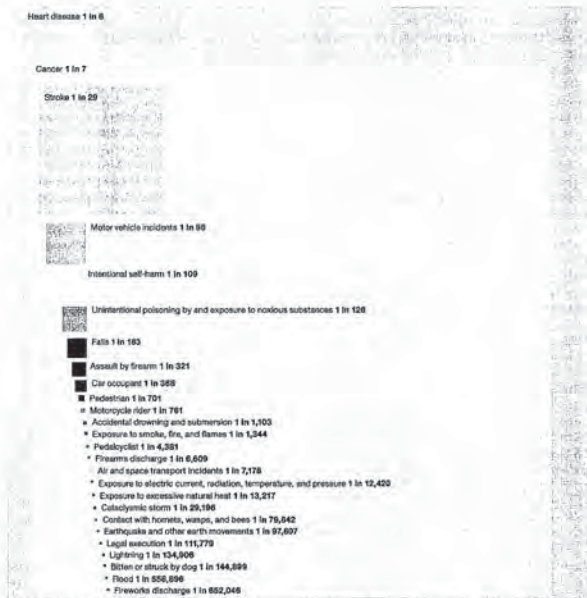
<http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7244765.print.story>

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## The Odds of Dying from...(cont.)

Lifetime odds of death for selected causes, United States, 2008\*

Total, any cause  
1 in 1

Source: National Safety Council estimates based on data from National Center for Health Statistics-Mortality Data for 2008 as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Population and life expectancy data are from the U.S. Census Bureau. For mortality figures, estimated one-year and lifetime odds, and external cause classification codes based on the Tenth Revision of the World Health Organization's "The International Classification of Diseases" (ICD) for the causes illustrated, see table on pages 47-52.

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Attachments: commentsLAXDEIROd2012

From: Nangee Morrison [Nangee@aol.com]  
 Sent: Wednesday, October 10, 2012 8:39 AM  
 To: SPASEIR Comments  
 Subject: Comments on LAX SPAS Draft EIR

SPAS-PC00148

Nancy-Gene Warner Morrison

6350 W. 81<sup>st</sup> Street  
 Westchester, CA 90045  
 310 410-4430  
[Nangee@aol.com](mailto:Nangee@aol.com)

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way, Room 218  
 Los Angeles, CA 90045

Re: Comments on the LAX SPAS Draft EIR

Email: [spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

Dear Mr. Alvarez:

## Safety

My major concerns are safety issues.

How will LAX/LAWA maintain safety for the community surrounding and using LAX?

How will agencies communicate safety information and be notified of malfunctions?

How will the public be informed of malfunctions and safety of using the Sepulveda Tunnel when the sign reads, "Danger fire in tunnel Do not enter"?

Who is responsible for inaccurate information and protecting public safety?

On Monday, August 27, 2012 at approximately 1:30 PM, due to a malfunctioning sign on the Sepulveda Tunnel south bound, the sign on the tunnel read "Danger fire in tunnel Do not enter". I phoned 911 as traffic roared through the tunnel and was connected in the following order to:

Los Angeles Police Department  
 Los Angeles Fire Department  
 LAX Fire Department-who wanted to know where the Fire was in the Tunnel  
 LAX Police Department- who were aware of the malfunctioning sign.

LAX Fire Department was never notified of the malfunctioning sign, the agency to be the first responder to any fire at LAX. LAX PD, told me the sign was malfunctioning and that no agency involved was able to turn the sign off. There was no presence of LAX PD, that it was all right to go through the tunnel in spite of the sign.

What will you do to improve communication between your own airport agencies and protect the public by giving accurate information out?

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LAX is located in an active geological area on the Pacific "Rim of Fire" on and close to known earthquake faults.

How will LAX/LAWA respond to an earthquake effecting use and safety at LAX?

What are the plans for switching operations to Ontario and Palmdale, both of which are operated by LAWLA?

It is unwise to "put all your eggs in one basket", i.e. only using LAX for this densely populated large metropolitan area. A regional plan is need for emergencies.

Why is there NO earthquake preparedness information readily seen by travelers at LAX?

Where are travelers to go if an earthquake occurs while at LAX?

What if any earthquake preparedness do you have for the traveling public?

In the new Denver Colorado airport, tornado shelter information signs are readily seen frequently through out the airport. I believe earthquakes are more frequent, often very small, at LAX than tornados in Denver Colorado.

There is excellent train service, well marked within the airports at Washington Dulles, Denver and San Francisco. Train service is needed to LAX and between terminals within LAX.

I join with the Neighborhood Council of Westchester/Playa in urging the adoption of

Alternative 2, plus Alternative 9 with a realistic train service plan that includes all the terminals, No centerline taxiway.

Sincerely,

Nancy-Gene Warner Morrison  
 6350 W. 81<sup>st</sup> Street, Westchester, CA 90045

[Nangee@aol.com](mailto:Nangee@aol.com)  
 phone: 310 410-4430

SPAS-PC00148



Attachments: LAX Coastal Area Chamber 2012 LAX DEIR Comments with Exhibits.pdf

From: David Voss [David@vsbilo.com]  
Sent: Wednesday, October 10, 2012 12:47 PM  
To: SPASEIR Comments; ALVAREZ, DIEGO  
Cc: Christina Davis  
Subject: Comments from the LAX Coastal Area Chamber of Commerce to July 2012 DEIR

Dear Mr. Alvarez:

Attached please find the comments of the LAX Coastal Area Chamber of Commerce on the July 2012 Specific Plan Amendment Study Draft EIR.

Best regards,  
David Voss  
Chair, Public Policy  
LAX Coastal Area Chamber of Commerce

SPAS-PC00149



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October 10, 2012

Los Angeles World Airports  
Facilities Planning Division  
One World Way  
Los Angeles, CA 90045-5803  
ATTN: Diego Alvarez

VIA EMAIL TO [spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

Re: Comments to July 2012 LAX Specific Plan Amendment Study Draft EIR

Dear Mr. Alvarez:

The LAX Coastal Area Chamber of Commerce has completed its review of the Draft Environmental Impact Report ("DEIR") for the Specific Plan Amendment Study ("SPAS") process and finds that it supports the vast majority of the referenced projects including the completion of the Bradley West Project, the Midfield Satellite Concourse, the new Airport Response Coordination Center, the "New Face" of the Central Terminal Area Improvements/Enhancements, the Network Power Station Upgrade, a new centralized Public Safety Facility, the Consolidated Rental Car Facility (CONRAC), Automated People Mover, parking lot rehabilitation and more. Cumulatively these "landside" projects are the ones that address the aging infrastructure of LAX and give us a facility that will compete for travelers over the next thirty years. These projects are also the most labor intensive and will create the most immediate jobs to jumpstart our economy.

In the past, the LAX Coastal Area Chamber of Commerce actively supported Alternative D, which was adopted by the Los Angeles City Council subject to the "SPAS" process. "Alt D" would have brought us three new terminals and reduced environmental impacts on the community. We strongly supported the new West Satellite Concourse to ensure that the new Group VI aircraft including the A380 and newest 747 would not fly over Los Angeles in preference for competing destinations. We believe strongly in all aspects of the proposals to renovate our terminals and improve the passenger experience at LAX which J.D. Power found "falls way short of meeting customer expectations ranking 68 of 76 global airports in overall airport satisfaction." We were next to last in major US airports in 2010. Indeed, we applaud LAWA's recent focus where it counts: \$4 Billion spent on modernization of the passenger experience at the renovated Bradley International Terminal to treat our overseas visitors to a world class experience when they arrive.



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SPAS-PC00149

However, there is one single project we cannot support - the reconfiguration and relocation of the north airfield runways both because the proposals having nothing to do with economic competitiveness and there is no factual basis for moving the north runways on the basis of safety either today or at any time between now and 2028.

The question must be where and when is it best to invest finite airport dollars to most effectively ensure that LAX is competitive in the 21<sup>st</sup> century? As business people we must prioritize our spending on capital improvements and so must our airport. It no more makes sense to focus our time and resources on runway configuration than it does to put a cast on your arm when it was your leg that was broken. The "landside" projects which the Chamber supports directly address LAX deficiencies as identified by J.D. Power. But, not once in the sixty plus page report by J.D. Power did it ever even mention runway configuration as a factor in improving LAX' position at the bottom of airports worldwide.

#### Why are Runways Even on the Drawing Board?

At the outset of these comments we feel compelled to put into perspective how we have come to be here today. The general public and policy makers alike were both told that there was a compelling safety reason that necessitated reconfiguring the North runways at LAX. Dissatisfied with the "highly suspect"<sup>1</sup> peer reviews that were produced many in the same weekend, the LA City Council took the unprecedented step of delaying this DEIR for two years so that we could get a true unbiased and thorough study done to determine whether safety was truly an issue. Without a safety need, runways would not move. The NASA Study definitively concluded there was simply no safety reason for moving the runways.

It is a universally accepted fact that it is impossible to move these runways further North and make them longer without having an unavoidable environmental impact on the communities to the North - most significantly in the form of increased noise and as a consequence of growth, traffic.

Yet, a Coalition has been formed to ignore the facts and press forward anyway. But without safety as a reason for moving the runway, no policy maker can reasonably conclude that it makes good public policy to subject its population to severe environmental impacts.

Amazingly, of the 1800+ pages of the DEIR only 6 pages are given to summarizing what are described as seven independent assessments. Of these, the only actual comprehensive study done over a period of two years and at an expense of two million dollars and at the express behest of the Los Angeles City Council is given nothing more than a summary (inaccurate at that) and a total of two paragraphs and 16 lines of text.

For the policy maker reviewing this document, this should be a giant red flag as it

<sup>1</sup> Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007 (attached as Exhibit C).

SPAS-PC00149

amounts to a massive and intentional failure to disclose relevant information critical to the core reason that the policy maker is being asked to consider alternative with substantial impacts many of which cannot be mitigated. And to the extent the policy maker reading this is a member of the Los Angeles City Council, the DEIR flies right in the face of what the City Council asked for in demanding the NASA Study take place; to wit, the complete NASA Study and it's Addendum are nowhere to be found in the DEIR.

Ironically, scant days before the findings of the NASA Study were released, most of the key players now pushing for the runways to move North (including the Los Angeles Area Chamber of Commerce, Los Angeles Economic Development Corporation (LAEDC), Central City Association (CCA) and Valley Industry and Commerce Association (VICA)) released a joint communique to the press<sup>2</sup> insisting that this study was the one we should all accept as the dispositive final word on the subject. We call on all the signatories to the February 17, 2010 communique to honor their word. They said that the NASA Study "should be the final study that LAWA and the City of Los Angeles conducts to ascertain how to maximize passenger safety at the LAX North Airfield" and that we should all "embrace the results of the study." We agree.

We also call on Mayor Villaraigosa to stand by the statements in his letter dated February 19, 2010 after the NASA Study came out.<sup>3</sup> He wrote that:

**"Barring other findings that would indicate safety issues, we are not moving the runway."**

There have been no "other findings." As the Coalition members above suggested, the NASA Study was the final study. There has been NO STUDY which has contradicted the NASA Study findings that the North runways are safe since its completion in February 2010 - in fact there have been no further safety studies at all. As Mayor Villaraigosa added:

**"the report concludes definitively that the north runways are 'extremely safe under the current configuration' and that is very good news for the millions of travelers who use LAX every year."**

Since there is no present safety rationale, the LAX Coastal Area Chamber of Commerce logically declines to support any runway reconfiguration proposal until such time as there is a simple proven need to move the runways. That day has not yet arrived.

Very truly yours,

Christina Davis,  
President

<sup>2</sup> See attached Exhibit "A".

<sup>3</sup> See attached Exhibit "B".

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### CRITICAL PROBLEMS WITH THE DEIR

- I) The Proposals in the DEIR Violate the Settlement Agreement
- II) There is No Justification for Moving Any Runway Before 2028 at the Earliest
- III) NASA Study Addendum Not Even Referenced
- IV) NASA Study is the Only Comprehensive Safety Study
- V) Failure to Comply with City Council Motion
- VI) Other DEIR Deficiencies (Traffic Mitigation/ARGO Ditch/Scoping relocation of Lincoln/
- VII) Support for the Consolidated Rental Car Facility (CONRAC)

#### I. The Proposals in the DEIR Violate the Settlement Agreement

We share the view of Los Angeles County Supervisor Don Knabe who observed that the proposals for study " ... goes against the spirit of the settlement agreement."

Likewise, the Los Angeles City Council has stated that expanding LAX for reasons other than safety

"...would be a clear violation of the 2005 Stipulated Settlement Agreement between LAWA and its neighbors."<sup>4</sup>

More specifically, we note that the SPAS Study was supposed to provide that Alternative Projects "...provide a comparable level of mitigation to that described for the Yellow Light Projects..."<sup>5</sup> Indeed, the Stipulated Settlement also expressly requires "minimizing environmental impacts on the surrounding communities"<sup>6</sup> as part of its terms.

During the public outreach process, LAWA itself told the public that the LAX Specific Plan Amendment Study called for by the Settlement Agreement *requires* that:

"Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR."<sup>7</sup>

<sup>4</sup> Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007. Attached hereto as Exhibit "C".

<sup>5</sup> Stipulated Settlement Section V.D.3. @ p.9

<sup>6</sup> Stipulated Settlement Section V.C. @ p.9

<sup>7</sup> See [http://www.laxmasterplan.org/pdf/N\\_Airfield\\_-\\_Land\\_Use\\_112206.pdf](http://www.laxmasterplan.org/pdf/N_Airfield_-_Land_Use_112206.pdf) p.6 PowerPoint slide attached as Exhibit "D". (Emphasis in original)

LAX COASTAL CHAMBER COMMENTS TO LAX DEIR - PAGE 1

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In summary, LAWA has said one thing while doing another. LAWA has represented to the public that the only allowable alternatives which can even be considered are those which would have no more impact than the Yellow Light Projects. By contrast, LAWA has treated the SPAS process as though it calls for an completely unconstrained blank sheet or *de novo* review. Most egregiously this now includes the addition of a proposal for runway separation far in excess of the south movement and extension of 24L approved by the Master Plan. We submit that the all of the proposals to move Runway 24R both north and west violate these express provisions of the Stipulated Settlement and therefore exceed the scope of what should properly be considered by the NOP and the DEIR. Their inclusion renders the document fatally flawed.

#### II. There is no Safety<sup>8</sup> Justification for Moving any Runway Before 2028 at the Earliest

The NASA safety study<sup>9</sup> concludes with this sentence:

*"All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone."* P .164

"After much analysis, the AP [Academic Panel] unanimously concluded that the existing North Airfield will be extremely safe even under traffic levels projected for 2020, estimating that:

*...at 2020 traffic levels, fatal runway collisions on the existing North Airfield would occur on average approximately once every 200 years."* Study P157

*...according to the current FAA Terminal Area Forecast (TAF) projections*

<sup>8</sup> As a side note, as business organizations it would be unfair to ignore the data provided in the study showing that there is a \$5.7 million dollar annual projected savings to the airlines stemming from a 17 second average reduction in taxi times. (Final Report, p.122) But of course at \$500 million and up it would take a hundred years to recoup the investment.

This isn't to say that the day will not come when we need to improve the operational efficiency of LAX, but based on the addendum to the NASA Study, we will not even reach the number of flights they assumed until 2028! And, looking at capacity, the study noted that:

"It is noteworthy that, in 2000, when daily operations at LAX were only about 5% below the level projected for 2020, the airport fared quite well."

Furthermore, the DEIR unequivocally states that "Based on the activity level selected for the analysis, none of the alternatives is expected to result in significant operating efficiency gains." Appendix F-2, p.107

<sup>9</sup> The entire NASA Study and its Addendum answering and rebutting questions raised by the FAA letter dated April 2, 2010 are attached hereto as Exhibits "E" and "F".

LAX COASTAL CHAMBER COMMENTS TO LAX DEIR - PAGE 2

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*LAX will not reach the level of daily operations projected in the LAWA year 2020 demand scenario until the year 2028.*<sup>10</sup>

It is important to note that these findings were based on the projected flight mix at LAX which will be reached in 2028. There is no study which addresses runway safety at a date later than this or at any increased utilization of LAX in the future. Therefore, the conclusion that the north runways need not be reconfigured can only be said to apply up to that date.

Despite these clear and unequivocal findings, the DEIR misleads the reader with respect to both the relative significance of the "independent assessments" completed to date and the conclusions of the most important one of these - the NASA Study. It purports to summarize the findings of the two years of research, simulations and innumerable meetings with stakeholders as directed by the City Council Resolution to a grand total of five bullet points. As a result there are those who have either failed to actually review the source materials or who choose to recklessly cherry pick facts out of context to say moving the runway makes us 55% safer<sup>11</sup> and that if we don't do something "there will be blood on our hands." What the 55% advocates didn't tell you when using this percentage number is that the chances are so small to begin with that the number is statistically irrelevant!<sup>12</sup>

The NASA Study Addendum directly addressed the notion of percentage improvements by saying that:

*"As noted earlier, we believe that this "fact" is not informative, and neither does FAA. We never suggested that a centerline taxiway would have no safety benefits: we assume that the 40% reduction in relevant incursions observed at LAX-South would also occur on LAX-North. The issue is: what is the baseline level of risk that would be reduced by 40%?"<sup>13</sup>*

<sup>10</sup> Addendum to Final Report, May 15, 2010, p.13.

<sup>11</sup> The study uses alternately refers to the risk reduction as 50% and 55% in its findings. The NASA Study concluded that "Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 50% if the existing North Airfield were replaced by the 340' North configuration with a centerline taxiway." p.110.

<sup>12</sup> We note also that according to the NASA Study, 40% improvement comes from moving only 100 feet - and that creates just as many jobs. Comparing a runway movement of only 100 feet to 340 feet, the NASA Study found a statistical reduction of 0.5 lives per decade: "Thus, instead of five lives lost per decade, the estimated number would drop to an average of 2.5. (Compared to 100' North, deaths per decade would drop from three to 2.5.)" p.110.

<sup>13</sup> Addendum to Final Report, May 15, 2010, Paragraph 7, p.19.

LAX COASTAL CHAMBER COMMENTS TO LAX DEIR - PAGE 3

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"The AP [academic panel] estimates that, at 2020 traffic levels, **fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers.**"

Cutting in half the risk means simply that the chances of a fatal runway collision drop from once every 200 years to once every 300 years. Odds are we may not even be using planes at all 200 or 300 years from now! **"That number [1/150,000,000] is small compared to the risks that citizens face every day."**

**"We would summarize our conclusions about mortality risk in the baseline case [i.e. no change in runway configuration] as follows:**

- The runway-collision risk to LAX air travelers would be extremely low in absolute terms, even at 2020 traffic levels.
- The risk would be very low relative to the other mortality risks that face residents of Los Angeles."

What are the other mortality risks we face every day? The risk of dying on the north runways at LAX is so small it wouldn't even make a dot on the attached chart prepared by the National Safety Council.<sup>14</sup> By comparison, it is already 700 times more likely you'll die from being stuck by lightning than because of an accident at LAX. And the odds are 150,000 times more likely someone will die by committing suicide than to die in a runway accident at LAX.

By comparison, the odds are:

- 1 in 126 of dying by poisoning.
- 1 in 6609 of being shot to death
- 1 in 29,196 of dying from a cataclysmic storm
- 1 in 79,842 of dying from a bee sting!
- 1 in 97,807 of dying in an earthquake
- 1 in 111,779 of being executed
- 1 in 134,000 of being struck by lightning
- 1 in 150,000,000 chance of dying on the runway at LAX even if we don't move the runways at all.**

As the NASA Study concludes:

**"The statistic "one in 150 million" is obviously small in absolute terms. It is also extremely small relative to other accident risks that Los Angeles residents and others face: for example, an American baby born today has approximately a 1 in 100 chance of eventually dying in an automobile accident."**

<sup>14</sup> Attached as Exhibit "G".

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### III. NASA Study Addendum Not Even Referenced

The DEIR also presents an FAA letter written without any simulation or empirical study but then completely omitted reference to the Addendum to the NASA Study that addressed and completely debunked the FAA and other comments. This again misleads the reader of the DEIR by omitting information which impacts the ability of the policy maker to evaluate the choices presented.

In addition to directly refuting claims raised, new and important information presented in the Addendum focused also on the myth that the centerline taxiway built for the south runways at LAX was inherently safer than not having one as on the north. The Addendum noted the following:

- Air Traffic Controllers "judged the existing north configuration without a centerline taxiway as *about equally safe* as the south airfield with such a taxiway."<sup>15</sup>
- The south airfield still has more incursions than the north even with the centerline taxiway and additional runway separation! "Indeed, since the centerline taxiway was opened on June 24, 2008, the LAX incursion pattern [was 12 south and 6 north]."

In fact since the Addendum came out, the statistics taken from the DEIR itself show that since the south airfield was reconfigured, for calendar years 2009, 2010 and 2011 combined there have been 25 incursions on the south runways and 11 on the north. **In the last three years of data there has been not one single incursion on runway 24R - which is the very runway it is proposed be moved and lengthened.** And none of the north runway incursions have been graded as categories A or B meaning that they were all minor incidents that did not rise to a significant safety risk.<sup>16</sup>

The Addendum put it this way:

**"We do not mean to be critical, but the critique suffers an inconsistency. It cannot depict the new LAX South airfield as a paragon of safety and yet claim that the North—which appears just as safe as the South now—poses an unacceptable risk to LAX passengers. If LAX North is really "not good enough," then it follows that neither is LAX South." p.9**

<sup>15</sup> "It is also instructive to consider the responses of air traffic controllers who took part in the NASA-Ames simulation. The controllers were asked to compare the LAX-North baseline configuration with the new South Airfield *with its centerline taxiway*. On a scale from 1 to 7, in which 1 meant "LAX North much safer" and 7 meant "LAX South much safer," the controllers gave an average response of 4.2. In short, they judged the existing north configuration without a centerline taxiway as *about equally safe* as the south airfield with such a taxiway." Addendum p.9.

<sup>16</sup> Appendix G2 Safety c p.19.

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It went on to the following conclusions:

"...we would suggest that it is time to stop describing LAX as a high-risk airport. Both the North and South airfields more than "hold their own" against other major US airports."  
**"If the FAA critique had presented valid criticisms of our analysis, then we would have hastened to make full corrections: never would concerns about "saving face" have meant anything to us compared to the imperative of saving lives. But we were charged with the task of estimating the absolute level of risk for the LAX North Airfield, and were encouraged by all parties to do nothing but tell the truth. This we have done, and this we will continue to do."**

### IV. NASA Study is the Only Comprehensive Safety Study

The NASA Study was so important in comparison to all the other "independent assessments" that preceded it that the Los Angeles City Council voted unanimously to halt the EIR process in its tracks for two entire years so that we would have the benefit of its findings before choosing to move forward with any north runway reconfiguration.

But, the DEIR misleads the reader by suggesting that there were "seven independent assessments" and presents them in merely six pages with the clear implication that they should all be given equal weight by the policy maker assessing the risks affecting the alternatives presented. Of these seven, only one - the NASA Study - was an actual complete study worthy of use to evaluate the alternatives. Mayor Villaraigosa who wrote that:

"I would like to thank the academic panel and NASA-Ames for conducting the most comprehensive airfield safety study ever done for Los Angeles International Airport (LAX). By dedicating approximately 21 months to extensive computer simulation and analysis, these experts have carefully considered all aspects of runway safety on the north Airfield in an unprecedented level of detail." 2/19/10 Statement on Release of North Airfield Safety Study.

Historical perspective is in order to understand that the NASA Study came to fruition because the prior five "independent assessments" as they are referred to by the DEIR were considered,

"highly suspect peer review studies. The studies, conducted in a cursory manner by airline insiders, came to no clear conclusions, and strayed from safety issues to focus on "operational efficiency," which many consider to be code for 'expansion.' LAWA's efforts have convinced practically none of the airport neighbors, who consider the studies to be biased, skewed, focused on the wrong issues, and therefore inconclusive. Additionally, it is concluded in

LAX COASTAL CHAMBER COMMENTS TO LAX DEIR - PAGE 6

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the Motion that objective and thorough analysis, conducted by an independent agency that has credibility with airport neighbors and their elected officials, is imperative."

That language is taken from the Los Angeles City Council's own resolution calling for an "objective and thorough analysis, conducted by an independent agency."

In 2008, the Board of Airport Commissioners voted to move forward with a DEIR for the North Runways. In an unprecedented act, the City Council put the EIR on hold requesting that: "...BOAC direct that the study be conducted, completed and reviewed before the release of the Notice of Preparation (NOP) for the LAX Master Plan Restudy; **and that the study's findings be incorporated into the NOP and environmental documents.**"<sup>17</sup>

By comparison, of the first five "independent assessments" preceding the NASA Study most of them were done on the same weekend in May of 2007 when industry insiders gathered to produce a few quickly slapped together papers without any simulation or oversight whatever. These papers were so completely discredited that the City Council directed BOAC to do a real study of the same type done before deciding on configuration of LAX' South Runways - run by NASA and involving real pilots, air traffic controllers and using the state of the art NASA Ames FutureFlight simulation facility to evaluate each proposed design.

The bottom line is the NASA Study represents the gold standard and the DEIR fails to either adequately disclose its findings or provide accurate context for the reader to understand its relative significance to the other "independent assessments" which it is lumped in with even though it is the only actual study completed by any group on the subject.

### V. Failure to Comply with City Council Motion

We object to the NOP on the grounds that LAWA has failed to comply with the mandate of the Los Angeles City Council when it created the North Runway Safety Advisory Committee; to wit, "the study's findings be incorporated into the NOP and environmental documents." The conclusions of that study are critical to the policy makers having a true understanding of the need or lack thereof of reconfiguring the north airfield. Put simply, failure to include this critical document as explicitly required by the Los Angeles City Council resolution renders the document defective on its face.

<sup>17</sup> Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007.

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### VI) Other DEIR Deficiencies

Scoping/Timing: The DEIR fails to adequately disclose the timing and sequencing of the various construction projects anticipated at LAX.<sup>18</sup> Admitting that the proposal simply lacks sufficient specificity is not an excuse under CEQA. As such environmental impacts during construction cannot be adequately reviewed and may materially understate the cumulative impact of multiple projects proceeding concurrently. **We also disagree with the premise that it would require a doubling or tripling of traffic to constitute a "threshold of significance."**<sup>19</sup> Additionally, the timing of projects designed to increase passenger capacity of LAX (runway movement) are not provided relative to the construction of those projects that would by design handle the anticipated extra passengers commensurate with the increased capacity. Put simply, any project increasing capacity should be delayed until all mitigation projects are first completed. Landside projects must be finished first.

Property Condemnation: The DEIR is silent on this issue. It is our understanding that without certain waivers by the FAA relating to the Runway Protection Zone (RPZ) and other property setbacks, that there may be a substantial impact on the Westchester business district including the potential for inverse condemnation proceedings.

<sup>18</sup> The DEIR admits to the deficiency; to wit: "There is not sufficient information at this conceptual level of planning to estimate the construction schedules, construction traffic trip generation, or trip distribution associated with the various development projects, including the SPAS alternatives. Notwithstanding, it is considered unlikely that the nature, location, and timing of the various construction projects would coincide such that traffic volumes on the nearby arterial roadways and highways would double or triple, thereby resulting in significant construction traffic noise impacts. Even using very conservative assumptions regarding construction-related traffic generation and distribution for a recent major development project at LAX (i.e., the Bradley West Project), the traffic volumes on nearby arterial roadways and freeways did not double or triple. It would be speculative at this conceptual level of planning to estimate the nature, timing, and construction traffic characteristics of major improvements projects particular to each of the SPAS alternatives along with the nature, timing, and construction traffic characteristics of other development projects that may occur between now and 2025, such that a specific combination of projects would result in a doubling or tripling of traffic on specific roadways in the airport vicinity. Regarding increases in road traffic noise associated with regional growth anticipated to occur by 2025, please see the discussion under the heading of Road Traffic Noise above. As described in detail in Section 5.5.10.3 in Chapter 5, *Cumulative Impacts*, significant cumulative construction noise impacts from cumulative projects combined with SPAS improvements could occur under all of the SPAS alternatives and the contribution of the SPAS alternatives to the significant cumulative impacts would be cumulatively considerable." DEIR p.1-94.

<sup>19</sup> "...construction-related traffic would not result in a doubling or tripling of traffic volumes on nearby roadways, as would be needed to occur in order to exceed the threshold of significance; therefore, these impacts would be less than significant." DEIR p.4-964.

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Aircraft Noise: "Significant and unavoidable." Every single proposal has this label and no wonder given that more than 14,000 individuals and over 4000 homes will be directly impacted by noise in excess of 65 CNEL - reducing property values for their owners and quality of life for those who live in the community.<sup>20</sup>

Traffic Mitigation: The entire DEIR is deficient in failing to provide alternatives for mitigation of substantial traffic impacts described in the report. It is no surprise that traffic on the West side of Los Angeles is generally speaking a disaster. Many of the major intersections in a radius of several miles surrounding LAX are already significantly degraded. While the DEIR discloses that no matter which proposal is adopted, more than 40 major intersections will suffer significant impact relative to future conditions "with no feasible mitigation available."<sup>21</sup>

ARGO Drainage Channel: The DEIR fundamentally fails to address or analyze the impact of relocating runway 24R northward on this significant storm water collector system. Plans currently call for the community to have the benefit of soccer fields and a recreation park as part of the Northside sanitation project which is directly fed by this system. No analysis is presented nor contact made with the United States Corps of Engineers who have oversight of this project.<sup>22</sup>

Relocation of Lincoln Boulevard: Again the DEIR provides inadequate information for the evaluation of the impact of the runway on the location of Lincoln Blvd. and also for the environmental impacts caused during construction of this heavily used north/south commuter artery in forcing the relocation of traffic onto alternative routes in the local community.

<sup>20</sup> DEIR p.1-84.

<sup>21</sup> DEIR p.1-49.

<sup>22</sup> DEIR pp.44 and 98.

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## CONCLUSION

We would remind the reader that it was the FAA itself who in 2005 proclaimed that it "considers the airport safe to use today."<sup>23</sup> Since then two million dollars and two years were spent on a comprehensive study looking out into the future on 2028 and finding that: *"All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone."*

As such, the LAX Coastal Area Chamber of Commerce cannot endorse any proposed plan for the realignment or extension of runways on the north airfield at LAX and expresses its substantial concern that the Draft Environmental Impact Report presented in compliance with CEQA requirements fails to meet the standards set forth therein as a matter of law.

<sup>23</sup> FAA Record of Decision for LAX Master Plan Improvements, May 20, 2005, p.41

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PLEASE USE ADOBE "BOOKMARKS" TO GO DIRECTLY TO EXHIBITS

EXHIBIT A



February 17, 2010

Mr. Alan Rothenberg  
Chairman  
Board of Airport Commissioners  
Los Angeles International Airport  
1 World Way  
Los Angeles, CA 90045

Dear Chairman Rothenberg and Members of the Airport Commission,

As business organizations that have supported plans to modernize our terminals and improve passenger safety at LAX for many years, we look forward to the results of the NORSAC study to be presented this Friday. The purpose of this letter is to emphasize that this should be the final study that LAWA and the City of Los Angeles conducts to ascertain how to maximize passenger safety at the LAX North Airfield. We also want to encourage the commission to take action quickly to improve safety and efficiency at the North Airfield.

While the results of the NASA study will not be released until this Friday, we are stating for the record to the Board of Airport Commissioners, Los Angeles City Elected Officials, and the neighborhoods adjacent to the North Airfield that we will embrace the results of the study and support immediate action by the Board of Airport Commissioners.

As Councilmember Bill Rosenhahl said at the beginning of the NASA study, "This is a breakthrough moment. For the first time, all sides of this contentious debate have agreed on how to fairly look at the safety issue on the North Airfield."

That sentiment was followed by a quote by Denny Schneider of the Alliance for a Regional Solution to Airport Congestion (ARSAC) saying, "NASA has the expertise and integrity necessary to conduct a thorough and unbiased study that community and business alike will support."

And later, NORSAC member David Voss emphasized at a packed NCWPDR meeting, "The North Airfield safety study was as impartial a process as we could have asked for and the professors who conducted the study were by no means puppets of the airport. The chips will fall where they may and this study should decide what action to take on the North Airfield."

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During this process, the votes by the NORSAC members were nearly all unanimous. As a result, we are optimistic that all parties who are stakeholders in this decision will be ready to move forward after the results of the study are released on Friday.

This has been a long process and we urge the Board of Airport Commissioners to proceed rapidly with a solution that ensures passenger safety on the North Airfield at LAX.

Sincerely,

Gary Toebben  
Los Angeles Area Chamber of Commerce

Bill Allen  
Los Angeles Economic Development Corp

Carol Schatz  
Central City Association

Stuart Waldman  
Valley Industry and Commerce Association

cc: Mayor Antonio Villaraigosa  
Members of the Los Angeles City Council  
Gina Marie Lindsey  
Board of Airport Commissioners

SPAS-PC00149





Office of the Mayor  
City of Los Angeles

**ANTONIO R. VILLARAIGOSA**

FOR IMMEDIATE RELEASE  
February 19, 2010

Contact: Lisa Hansen  
213-978-0658  
or 213-978-0741

## MAYOR VILLARAIGOSA ISSUES STATEMENT ON RELEASE OF LAX NORTH AIRFIELD SAFETY STUDY

*Configuration of North runways deemed "extremely safe" by expert panel.*

**LOS ANGELES** – Mayor Antonio Villaraigosa today issued the following statement regarding the release of the "Los Angeles International Airport North Airfield Safety Study" performed by the LAX Academic Panel in conjunction with NASA-Ames.

"I would like to thank the academic panel and NASA-Ames for conducting the most comprehensive airfield safety study ever done for Los Angeles International Airport (LAX). By dedicating approximately 21 months to extensive computer simulation and analysis, these experts have carefully considered all aspects of runway safety on the North Airfield in an unprecedented level of detail.

I have always said that I oppose a reconfiguration of the north airfield at LAX absent a clear demonstration that such a change is necessary to ensure the safety of passengers, workers, and the surrounding community.

Although my office has not yet received the full report, we will be carefully reviewing its findings and methodology. Barring other findings that would indicate safety issues, we are not moving the runway.

The executive summary of the report concludes definitively that the north runways are 'extremely safe under the current configuration' and that is very good news for the millions of travelers who use LAX every year.

-MORE-

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Airfield safety has always been my top priority at LAX and I am grateful to the academic panel and NASA-Ames for confirming that the North Airfield is safe. We will continue to make safety at LAX a focus. We have already installed runway status lights and will be expanding their use at LAX through a continuing partnership with the Federal Aviation Administration."

LAX has a total of four runways, with two on the North Airfield and two on the South Airfield. The LAX Academic Panel/NASA-Ames study exclusively focused on the safety of the North Airfield. Mayor Villaraigosa previously reconfigured the South Airfield in 2006-2008 based on safety concerns, and dangerous runway incursions there have been reduced significantly (from 8 in 2006 and 17 in 2007; to 4 in 2008 and 6 in 2009).

###

SPAS-PC00149

FRANK T. MARTINEZ  
City Clerk

KAREN E. KALFAYAN  
Executive Officer

When making inquiries  
relative to this matter  
refer to File No.

07-1781

CD 11

June 26, 2007

Office of the Mayor  
Councilmember Rosendahl  
City Administrative Officer  
Chief Legislative Analyst  
City Attorney  
Los Angeles World Airports  
Board of Airport Commissioners

RE: REQUEST THAT THE BOARD OF AIRPORT COMMISSIONERS HIRE AN INDEPENDENT FIRM OR ORGANIZATION TO CONDUCT A COMPREHENSIVE AND OBJECTIVE STUDY AND ANALYSIS OF NORTH AIRFIELD SAFETY ISSUES AND RELATED MATTERS

At the meeting of the Council held June 20, 2007, the following action was taken:

Attached report adopted	.....	X
Attached motion (-) adopted	.....	
Attached resolution adopted	.....	
FORTHWITH	.....	
Mayor concurred	.....	
To the Mayor FORTHWITH	.....	
Mayor approved	.....	
Mayor failed to act - deemed approved	.....	
Findings adopted	.....	
Negative Declaration adopted	.....	
Categorically exempt	.....	
Generally exempt	.....	

*Frank T. Martinez*

City Clerk  
or



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## TO THE COUNCIL OF THE CITY OF LOS ANGELES

Your TRADE, COMMERCE, AND TOURISM COMMITTEE

reports as follows:

TRADE, COMMERCE, AND TOURISM COMMITTEE REPORT relative to a request that the Board of Airport Commissioners (BOAC) hire an independent firm or organization to conduct a comprehensive and objective study and analysis of north airfield safety issues, and related matters.

Recommendations for Council action, pursuant to Motion (Rosendahl - Parks - Garcetti):

1. REQUEST that the BOAC hire an independent firm or organization to conduct a comprehensive and objective study and analysis of north airfield safety issues.
2. REQUEST that the BOAC direct the study to be conducted, completed and reviewed before the release of the Notice of Preparation (NOP) for the LAX Master Plan Restudy; and that the study's findings be incorporated into the NOP and environmental documents.
3. REQUEST that the BOAC direct the study to:
  - a. Be limited to safety issues, and not consider issues such as operational efficiency or capacity enhancement, which are not genuine safety concerns.
  - b. Quantify all north airfield safety issues and their causes, and specifically examine and recommend a range of alternative solutions for any identified safety problems.
  - c. Specifically examine the feasibility of an end-around taxiway system as a potential solution to any purported safety problems.
4. REQUEST that the BOAC form a North Runway Safety Advisory Committee consisting of representatives from the following entities: Council District 11; Council District 8; Los Angeles County; the City of Inglewood; the Alliance for a Regional Solution to Airport Congestion; the Neighborhood Council of Westchester-Playa del Rey; airport-area congressional representatives; the greater Los Angeles business community; and the Airline Airport Affairs Committee.
5. REQUEST that the BOAC choose a firm or organization to conduct the safety study only after any and all potential firms or organizations have been reviewed and ranked by the North Airfield Safety Advisory Committee.
6. REQUEST that the BOAC invite the North Runway Safety Advisory Committee to further craft and refine the scope of the safety study, shape the questions posed therein, and comment on its findings.

**Fiscal Impact Statement:** Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.



Summary:

At its June 13, 2007 meeting, your Committee considered Motion (Rosendahl - Parks - Garcetti) relative to a request that the BOAC hire an independent firm or organization to conduct a comprehensive and objective study and analysis of north airfield safety issues, and related matters. The Motion states that over the past several months, representatives of Los Angeles World Airports (LAWA) have been making public arguments on behalf of moving LAX runways north, into the residential communities of Westchester and Playa del Rey. In doing so, LAWA officials have begun to insist that public safety is at risk with the current north airfield configuration – a new and unfamiliar argument which has been largely absent from previous discussions of LAX modernization.

The Motion also states that airport neighbors and their elected officials at the local, county, state and national level have reacted to LAWA's runway safety claims with considerable skepticism and suspicion, noting that the Federal Aviation Administration has not identified a safety problem, the overwhelming majority of runway incursions occur on the south airfield, and most north airfield incursions are due to pilot error and not runway configuration. While remaining open to evidence of genuine safety concerns, most objective observers consider LAWA's safety claims to be a smokescreen for LAWA's true objective: expanding LAX. Such an effort would be a clear violation of the 2005 Stipulated Settlement Agreement between LAWA and its neighbors.

The Motion further states that LAWA has fed into this suspicion by commissioning highly suspect peer review studies. The studies, conducted in a cursory manner by airline insiders, came to no clear conclusions, and strayed from safety issues to focus on "operational efficiency," which many consider to be code for "expansion." LAWA's efforts have convinced practically none of the airport neighbors, who consider the studies to be biased, skewed, focused on the wrong issues, and therefore inconclusive. Additionally, it is concluded in the Motion that objective and thorough analysis, conducted by an independent agency that has credibility with airport neighbors and their elected officials, is imperative.

During the discussion of this item, the LAWA representative responded to various related questions by the Committee members, which included, among other questions, one on the process to move a project from "yellow-lighted" to "green-lighted" status. There was also a discussion on mitigation measures that merit additional study/analysis, and several recommendations were made by the Committee members in this regard. The Committee then heard testimony from numerous members of the public who spoke in favor of the Motion and against airport expansion.

After additional discussion, the Committee recommended that Council adopt the recommendations contained in the Motion as reflected above. This matter is now forwarded to the Council for its consideration.

SPAS-PC00149

Respectfully submitted,

TRADE, COMMERCE, AND TOURISM COMMITTEE

*James Hahn*  
*Barry Weiss*

MEMBER	VOTE
HAHN:	YES
ROSENDAHL:	YES
WEISS:	YES

MLE  
6-14-07  
#07#071781

*Rpt*  
**ADOPTED**  
JUN 20 2007  
LOS ANGELES CITY COUNCIL

SPAS-PC00149

EXHIBIT D

## Settlement Study Requirements (cont)

The LAX Specific Plan Amendment Study requires:

3. "Potential environmental impacts that could result from replacement of the Yellow Light projects with the Alternative Projects, and potential mitigation measures that could provide a comparable level of mitigation to that described for the Yellow Light Projects in the LAX Master Plan Program EIR."



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EXHIBIT E

## Los Angeles International Airport North Airfield Safety Study

### Final Report

Prepared by:

Dr. Arnold Barnett (Chairman)  
Dr. Michael Ball  
Dr. George Donohue  
Dr. Mark Hansen  
Dr. Amedeo Odoni  
Dr. Antonio Trani



May 11, 2010

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**Acknowledgments**

Many people helped us substantially in this endeavor. At NASA, Betty Silva, Nancy Dorighi, Terry Rager, Mike Madson, Richard Lanier and Boris Rabin were among many individuals who assisted us with great skill in a complex simulation, which differed in many ways from previous ones at NASA-Ames. Kurt Rammelsberg and Elliot Brann of LAX Tower worked hard to achieve realism in the simulated control tower, and taught us a great deal about airport operations. Ken Christensen did a masterful job at arranging for the "anomalies" in the simulation that offered a unique perspective on airport operations at 2020 traffic levels. The pilots, "pseudo-pilots," and controllers who took part in the NASA simulation were serious, skilled, and generous with their insights. Gary Paull provided extremely helpful information about the collision-avoidance potential of new runway technologies. At LAWA, Jay Vaswani, Rick Wells, Tim Ihle, Jacob Adams, Victoria Remington, and others were consistently helpful, and Gina Marie Lindsey set the tone for a rigorous study in which getting at the truth was the only objective. At HNTB, we thank Evan Pfahler, Jean-Christophe Dick and Justin Bycheck for their work on LAX computer drawings. We also thank Nick Johnson for providing LAX runway data from a previous study. The people of NORSAC offered stimulating and candid comments on many occasions, and never attempted to put pressure on us to reach particular conclusions. We are deeply grateful to everyone.

**Executive Summary**

The North Airfield Safety Study was undertaken by an Academic Panel comprised of the six professors listed above, with very substantial participation by colleagues at NASA-Ames. The primary aim of the study was to *estimate as specifically as possible the level of future safety of several alternate configurations of the LAX North Airfield*. An auxiliary goal was to *provide useful information about the capacity implications of the various configurations*, in light of projections about LAX traffic levels in 2020.

A central component of the study was a human-in-the-loop simulation exercise, conducted during August 2009 at the NASA-Ames FutureFlight Central facility in Mountain View, California. But the study also relied heavily on empirical evidence about runway safety and capacity, based on historical experience at LAX and elsewhere. The Panel took careful note of the changes completed in 2008 on the LAX South Airfield, which moved the two parallel runways 100 feet further apart and created a centerline taxiway between the runways.

As is explained in the report, the Panel concluded that the North Airfield of LAX is extremely safe under the current configuration. Changes to the configuration could create even greater safety, but they would be expected to reduce only slightly the overall risk that LAX air travelers face in the journeys. (That overall risk level is itself minuscule because air travel is exceedingly safe.) Considerations of *capacity* appear to make some alterations to the North Airfield less attractive, and others—particularly the option of moving Runway 24R 340 feet North—significantly more so. But the Panel believes that it would be difficult to argue for reconfiguring the North Airfield on *safety grounds alone*.

**The Alternative Configurations**

The study focused on five possible configurations of the North Airfield, including two variants of the existing layout:



- (1A) *The existing configuration*, in which runways 24L and 24R are separated by 700 feet, with no centerline taxiway between them.
- (1B) *The existing configuration*, but with changes to the taxiways leading from runway 24R so that planes landing on 24R would cross runway 24L closer to its west end.
- (2) *The 100-North Option*, which would create on the North Airfield essentially a mirror image of the new arrangement on the South Airfield. Runway 24R would be moved North by 100 feet, and a centerline taxiway placed between runways 24L and 24R.
- (3) *The 340-North Option*, which would move runway 24R 340 feet to the North and create a centerline taxiway between runways 24L and 24R.
- (4) *The 340-South Option*, which would move runway 24L 340 feet to the South and create a centerline taxiway between runways 24L and 24R. This option would entail the demolition of existing terminals 1-3 and the construction of a new “linear” terminal.
- (5) *The Three-Runway Option*, which would replace runways 24L and 24R with a single runway 24 and would handle most of the airport’s Group V aircraft (e.g. 777class) and Group VI aircraft (e.g. Airbus 380 class), with other flight operations concentrated on the South Airfield.

### ***The Available Data***

The Panel was fortunate to have a wealth of information generated by the simulations at NASA-Ames. Experienced controllers worked simulated traffic at LAX--on both the North and South Airfields--expected during busy hours based on 2020 forecasts prepared by Ricondo Associates with modifications by the Panel. Three visibility conditions were simulated: Daytime Visual, Daytime Instrument, and Night Visual. Across the simulation hours, the number of operations by Group VI aircraft—the grouping with the largest planes, namely, the Airbus 380-800 and the Boeing 747-8—varied from two to six. Some of the landings were performed by actual pilots in a

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Boeing 747-400 flight simulator, while other aircraft were landed by “pseudo-pilots” using a computer-based interface.

Several types of information and data were collected in the simulations. After the sessions, intensive oral and written interviews were conducted with both pilots and controllers. Moreover, some “anomalies” were introduced into the simulation to provide an alternate perspective on how well the controllers were coping with heavy and diverse traffic. For example, some pseudo-pilots were asked deliberately to read back controller instructions incorrectly, to see whether the controller noticed and corrected the error. In addition, data were available about the number and duration of transmitted messages between pilots and controllers. This information offers some insight about controller workload.

The Panel also thought it important to scrutinize information from several other sources, including:

- FAA projections about the national risk of fatal runway collisions in 2020
- FAA assessments about the accident-reduction potential of new technologies, such as the ASDE-X radar and Runway Status Lights
- The history of runway incursions on both the South and North Airfields of LAX
- The runway incursion history at other US airports besides LAX
- Worldwide historical data about casualty patterns in fatal runway collisions
- Worldwide historical data about runway *excursions*, in which a single aircraft deviates sharply and suddenly from its intended path
- Data about easterly arrivals at LAX, which were not included in the NASA simulation

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### ***Findings about Safety***

#### ***The Baseline Case***

After much analysis, the Panel unanimously concluded that the existing North Airfield will be *extremely safe* even under traffic levels projected for 2020. More specifically:

**The Panel estimates that, at 2020 traffic levels, fatal runway collisions on the existing North Airfield would occur on average approximately once every 200 years.**

The Panel’s reasoning is explained in detail in the report, but a quick synopsis would be:

- Various FAA studies imply that, at 2020 traffic levels, *fatal runway collisions* would occur at *some* towered US airport once every eight years.
- This estimate assumes high effectiveness for new technologies like AMASS (Airport Movement Area Safety System) ASDE-X radar and Runway Status Lights. (LAX South is one of the very few US airports that have all three technologies.) Thus far, the FAA’s prediction has been justified by events: major runway incursions in the US dropped 80% between Fiscal 2000 and Fiscal 2009 (from 67 to 12). Furthermore, there have been no fatal runway collisions anywhere in the US since March 2000, and the accident on 2/2/91 at the LAX North Airfield—nineteen years ago – was the *last* collision at a towered US airport that caused deaths to scheduled airline passengers.
- To be conservative, the Panel estimated that fatal runway collisions would occur at 2020 traffic levels once every four years rather than every eight. In effect, the Panel was assuming twice the level of collision risk estimated by FAA.
- But if a fatal runway collision occurred at 2020 traffic levels at one of the US towered airports, what is the chance it would take place on the LAX North

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Airfield rather than elsewhere? The Panel made eight different estimates of this probability, based on:

- The runway incursion history at LAX-North relative to that for the entire US
- The LAX-North share of squared traffic levels in the US, a key metric because FAA airport surface risk models assume that risk varies in proportion to the square of traffic levels.
- Safety levels at other US airports that pilots in the NASA-Ames simulation considered equally safe with LAX-North (the “peer airports”). These peer airports included Atlanta, San Francisco, Miami, and New York-JFK.
- The eight estimates of the chance that a fatal runway collision that took place in the US would occur at LAX-North ranged from a low of 1 in 140 to a high of 1 in 60. To be conservative, however, the Panel estimated to be 1 in 50 (2%) the probability that the venue would be LAX-North. In other words, the Panel used a risk estimate for LAX-North that was *higher* than any that arose under its diverse estimation methods.
- The Panel explored whether the growing frequency of Group VI aircraft on the North Airfield might pose incremental collision risk, and concluded that it would not. A major reason for this conclusion is that Group V aircraft (the largest planes for which there is historical data) have not been involved in incursions at LAX to a disproportionate extent.
- The Panel then combined its numerical risk estimates. If:
  - fatal runway collisions occurred once every four years at some towered US airport and
  - 1 in 50 of these collisions took place at LAX-North

Then it follows that fatal runway collisions at LAX-North collisions would occur every  $4 \times 50 = 200$  years.

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Using the “one in every 200 years estimate,” plus estimates about the casualties in a fatal runway collision at LAX North, and data about LAX passenger traffic around 2020, the Panel reached a further approximation:

**At 2020 traffic levels, the Panel estimates that fatal runway collisions at LAX-North would claim approximately five lives per decade.** Because of the margin of error associated with this estimate, a range estimate for the actual rate extends from a low of one death per decade to a high of eight deaths per decade. **Given that roughly 750 million passengers would use LAX each decade at 2020 traffic levels, the figure “five death per decade” works out to one death per 150 million passengers.**

The statistic “one in 150 million” is obviously small in absolute terms. It is also extremely small relative to other accident risks that US residents face: an American baby born today, for example, has approximately a 1 in 100 chance of eventually dying in an auto accident. Moreover, the risk is small even relative to the exceedingly low risks of passenger air travel: the death risk per flight for US air travelers is approximately 1 in 10 million, which is *fifteen times* the risk that the LAX-North runways would present in the baseline case.

***The Interim Improvements to the North Airfield (IRSIP)***

The Panel explored evidence about whether IRSIP would improve North Airfield safety by requiring planes landing on Runway 24R heading towards terminals to cross Runway 24L further down the runway. The Panel estimates that the plan could increase from 33% to 51% the chance that a departing aircraft on 24L would already be airborne at the point where a landing plane blundered onto the takeoff runway. But the probability that a landing plane blunders onto 24L might not decrease significantly if the new runway exits proposed in IRSIP induce the high runway incursion rates associated with taxiways Zulu and AA. Indeed, for planes that now use Taxiway Yankee, the data suggest that the risk of incursion might well go up. Thus, it is possible that closing Taxiway Yankee would do more harm than good, and the matter warrants further study.

***Moving Runway 24R 100 Feet North***

Because such a proposal would essentially replicate on the North Airfield what has already been done on the South Airfield, the Panel put considerable weight on evidence about whether incursions have dropped on the South since its reconfiguration. While only about 18 months of data are at hand about safety under the new arrangements, they suggest that the changes have reduced incursion risk on the South by about **40%**. The apparent reason for the improvement is the new centerline taxiway, which causes landing planes to slow down before crossing the takeoff runway and which gives controllers greater flexibility in deciding when planes landing on Runway 25L should cross Runway 25R.

The Panel also considered a good deal of other evidence about the effectiveness of a 100-North configuration. From the NASA-Ames simulation, there were data about anomalies and radio communications between tower and pilot, as well as survey reactions from pilots and controllers. There were incursions data from airports other than LAX that have configurations similar to 100-North, and there were indications that Runway Status Lights might be especially effective when accompanied by a centerline taxiway. Some of this evidence suggested that the benefits of 100-North would exceed the 40% suggested by South Airfield data, while other evidence suggested a benefit less than 40%. The Panel concluded that, on balance:

**40% is a reasonable estimate of the reduction in the risk of a fatal runway collision on the North Airfield if the existing runways were replaced by a 100-North configuration.**

***Moving Runway 24R 340 Feet North***

The Panel considered various data about this option, which has the distinguishing feature that its centerline taxiway is far enough from the active runways that Group VI aircraft need not require special treatment. The reconfiguration would also allow landing pilots crossing Runway 24L to get a better view than otherwise of departing traffic.

After various analyses, the Panel concluded that 340-North reduces collision risk relative to 100-North, but not by an enormous factor (perhaps 25%). Much of the benefit of introducing a centerline taxiway would already be achieved with the 100-North configuration. The Panel estimates that:

**55% is a reasonable estimate of the reduction in the risk of a fatal runway collision on the North Airfield if the existing runways were replaced by a 340-North configuration.**

***Moving Runway 24L 340 Feet South***

Operationally, this arrangement is similar to 340-North. But the Panel concluded that the safety benefits would be slightly smaller, largely because the NASA simulations suggest that ground arrangements associated with revamping the terminals could get more complex and demanding for controllers. The Panel estimates that:

**50% is a reasonable estimate of the reduction in the risk of a fatal runway collision on the North Airfield if the existing runways were replaced by a 340’ South configuration.**

***Moving to a Three-Runway Airport***

If there were only one runway on the North Airfield, then planes landing there would have no takeoff runways to cross en route to terminals. On the other hand, the North Airfield would be perpetually involved in *mixed operations*, in which landings and takeoffs occur on the same runway. (Mixed operations on the North Airfield would occur even under other configurations, but to a much lesser extent.) Results from the NASA simulations and data about other US airports that extensively conduct mixed operations suggest that a three-runway configuration would largely achieve the safety benefits for which its proponents hope. The Panel estimates that:

**50% is a reasonable estimate of the reduction in the risk of a fatal runway collision if the existing North Airfield were replaced by a single Runway 24 under a three-runway configuration for LAX.**

***Capacity Assessment***

The Panel was asked whether the limitations of airport capacity under individual configurations of the North Airfield would “unduly impact” the ability of LAX to handle the volume and mix of air traffic projected for 2020. Here the experiments at NASA-Ames provided quantitative data about how many departures that could be achieved under peak traffic conditions, as well as taxi-in and taxi-out times. Across the simulation hours, there were variations in weather and visibility conditions and in the number of Group VI aircraft, allowing a clearer picture of the sensitivity of capacity findings to the background assumptions.

The Panel concluded that the baseline, 100-North, and 340’ South configurations could handle even peak traffic without “unduly” suffering stress and delay.

In the 340-North configuration, however, there was conspicuous improvement in capacity over the baseline and 100-North cases. The Panel estimates an annual cost savings of \$15 million because of the reduction in taxiing times and runway blocking operations. The gain in departure capacity would be modest (perhaps four additional operations per hour), but it would open the door to reduced arrival delays. (The study did not estimate this size of this benefit.) Besides a capacity gain, having a centerline taxiway allows greater flexibility in handling aircraft and, in particular, Group VI aircraft.

The capacity results for the three-runway configuration were less encouraging: the reduction in departures observed at NASA could have adverse direct and indirect consequences. Given that mixed operations would occur on the North Airfield (i.e., landings and takeoffs on the same runway), arranging for departures in the face of frequent arrivals would be challenging. It is also true that the temporary shutdown of a runway can cause considerably more disruption when there are only three runways rather than four. The Panel fears, therefore, that the capacity limitations in the three-runway case *would* be unduly constraining in peak conditions, which would prevail for nine hours of the day under the 2020 forecast.



### Caveats

The Panel has never been under any illusion that it could provide exact results rather than plausible approximations. Among the reasons for caution are:

- The 2020 forecasts about traffic levels at LAX, and about the fraction of traffic involving Group VI aircraft, are subject to considerable uncertainty.
- The experiments at NASA-Ames were extremely sophisticated and well conducted, but they can only approximate what might happen under various configurations of the North Airfield.
- Data about historical experience are valuable, but there are issues in generalizing from other airports to LAX, and from past patterns to those that might prevail in the future under new arrangements. Moreover, many of the data are subject to the high random variability associated with rare events, a circumstance that poses real challenges for statistical estimation.

One might remember, however, the adage that the perfect is the enemy of the good. The Panel believes that the thrust of its conclusions is accurate, and that the experiment at NASA-Ames and the review of historical and other data serve to point in the right general direction if not at the exact angle.

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### Main Conclusions

The Panel is unanimous on all of the following points:

- *For projected 2020 traffic levels and traffic mix, the LAX North Airfield is extremely safe under the current configuration.*  
The Panel estimates that, at 2020 traffic levels, fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers. That level of risk is low even relative to the exceptional safety of US passenger aviation.
- *All the proposals to create new configurations on the North Airfield would reduce by a substantial percentage the risk of a runway collision.*

More specifically, the evidence from the NASA-Ames simulation and numerous kinds of historical data suggest that:

- Moving Runway 24R 100 feet North and creating a centerline taxiway could reduce collision risk on the North by about 40% relative to the baseline.
- Moving Runway 24R 340 feet North and creating a centerline taxiway could reduce collision risk on the North by about 55% relative to the baseline.
- Moving Runway 24L 340 feet South and creating a centerline taxiway could reduce collision risk on the North by about 50% relative to the baseline.
- Creating a single Runway 24 to replace 24L and 24R could reduce collision risk by about 50% relative to the baseline.
- *However, because the baseline level of collision risk is so low, reducing that risk by a substantial percentage is of limited practical importance.*

Aviation at LAX is exceedingly safe. Of the 750 million passengers who would use LAX per decade at 2020 traffic levels, only about 80 might be expected to

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perish in air disasters in the baseline case. Of these 80 deaths, five might occur in runway collisions. Reconfiguration of the North runways might be expected to reduce total deaths to about 78.

- *In terms of capacity, changes in the configuration could have major effects.*
  - Moving to a three-runway configuration could cause huge difficulties, even under visual flight conditions.
  - Moving to the 340'-North configuration, on the other hand, might significantly reduce airport congestion during peak hours and could provide appreciable capacity benefits.
- *A serious case could be made for building 340'-North based on its capacity benefits, and it **would** improve safety.*  
But it would be more useful to consider the safety benefits the "icing on the cake" rather than the cake itself.
- *However, the North Airfield Safety Study was, as the name implies, primarily about safety. All things considered, the Panel cannot construct a compelling argument on safety grounds alone for reconfiguring the North Airfield.*

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### 1. INTRODUCTION

In April, 2008, Los Angeles World Airports (LAWA) and the North Airfield Safety Advisory Committee (NORSAC) agreed to create an Academic Panel, which would conduct the North Airfield Safety Study with very substantial assistance from colleagues at NASA-Ames. The panel consists of six professors from various universities and various disciplines in Science and Engineering, but who have in common a longstanding interest in issues about aviation safety and efficiency. The Panel members are:

<b>Arnold Barnett (Chair)</b>	MIT Sloan School of Management PhD in Mathematics
<b>Michael Ball</b>	University of Maryland Smith School of Business PhD in Operations Research
<b>George Donohue</b>	George Mason University Department of Systems Engineering and Operations Research PhD in Mechanical and Aerospace Engineering
<b>Mark Hansen</b>	University of California, Berkeley, Department of Civil and Environmental Engineering PhD in Civil Engineering
<b>Amedeo Odoni</b>	MIT Department of Aeronautics and Astronautics Department of Civil and Environmental Engineering PhD in Operations Research
<b>Antonio Trani</b>	Virginia Polytechnic Institute and State University Department of Civil and Environmental Engineering PhD in Civil Engineering

Over the past eighteen months, the Panel has considered a host of issues related to safety and capacity of the LAX North Airfield, under a variety of configurations that could be adopted in the future. A central aspect of its work was an experiment at NASA-Ames in August 2009, in which pilots and controllers took part in sophisticated simulations of what might happen on the North Airfield in a busy hour in 2020, assuming several different geometries for the runways and taxiways. The Panel also considered information about past runway incursions and accidents at LAX and elsewhere, about the effectiveness of new technologies meant to enhance runway safety, and about the characteristics of LAX operations now and in the past. The Panel recognized

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from the beginning that it was engaged in an exercise in approximation, which might advance the discussion beyond a clash of conjectures about safety and capacity but fall short of exact predictions on either topic.

The main findings of the investigation are discussed in detail in this report. As we will describe, the Panel believes that:

- Even at projected 2020 traffic levels, the North Airfield would be extremely safe under the existing runway configuration.
- Nearly all the changes to the configuration that the Panel considered would be expected to improve safety, and to reduce runway collision risk by an appreciable proportion.
- However, because the baseline level of risk is so low, even reducing it by a significant fraction is of limited practical importance.
- Capacity might increase and congestion substantially diminish on the North Airfield under certain changes of runway layout.

In consequence of these assessments, the Panel believes that a case for changing the North Airfield might arise from capacity considerations, but that the case for doing so for safety reasons *alone* is not compelling. A modest improvement in safety might be “the icing on the cake” of a reconfiguration undertaken for other reasons, but it would probably not be the cake itself.

We begin our work in the next chapter, where we summarize what the Panel was and was not asked to do. Then in Chapter 3 we specify the six configurations of the North Airfield that were studied (including two variants of the baseline). In Chapter 4, we offer an overview of the experiment at NASA-Ames; in the following section, we list the other kinds of information that the Panel studied. Estimates about the safety of operations at 2020 traffic levels start in Chapter 6 and continue through Chapter 12, while Chapter 13 offers a detailed overview of findings about capacity. Finally, Chapters 14 through 17 offer caveats, answers to some specific questions posed to the Panel, some general observations and suggestions about North Airfield safety, and an overview, summary, and conclusions. An Addendum presents nine commentaries about the preliminary draft of this study, along with the Panel’s responses to them. Many specific details about the investigation and much background information are presented in the appendices.

2. THE CHARGE TO THE PANEL

The Panel proceeded with certain understandings about what was expected of it. Here we articulate those understandings.

2.1. Safety First

The very fact that the endeavor was called the North Airfield Safety Study (as opposed to (say) the North Airfield Safety and Capacity Study) seemed to us to say a great deal about its priorities. We inferred that, above all, LAWA/NORSAC wanted to know whether certain configurations of the North Airfield could not guarantee at 2020 traffic levels an acceptably-high level of passenger safety. LAWA/NORSAC also wanted to know whether other configurations could do better at meeting high safety standards.

But we also understood that we were not being asked for vague or platitudinous assessments. It would not be enough to say that “X seems safer than Y”; we were asked to quantify “how much safer is X than Y?” as well as to specify “how safe was Y in the first place?” We therefore strived for – and obtained – quantitative estimates of passenger mortality risk in various LAX-North runway configurations. We also brought supplementary information to bear to offer perspective on the risk estimates and make clearer what the statistics meant

- About absolute risk to LAX passengers
- About relative risk compared to other safety hazards that face Los Angeles residents
- About runway risk relative to other mortality risks that air travelers face

2.2. Capacity Too

But we were also asked to consider capacity issues about the North Airfield. We were charged with investigating whether the constraints associated with individual runway configurations might “unduly impact” the ability of LAX to handle the levels of traffic that were projected for 2020. We considered two aspects of capacity that are related but not identical:

- (i) Will the airport be able to accommodate the number of landings and takeoffs that would be sought at a peak hour, under various plausible assumptions about the fleet mix (e.g., about the fraction of operations involving aircraft design group VI aircraft)?

- (ii) Will the operations that do occur take place expeditiously, or might there be a high degree of queuing and other forms of congestion? (For example, even if flight Z takes off as desired in the peak hour, did it do so rapidly or did it spend twenty minutes in taxi-out time before takeoff?)

Using information from the NASA Ames simulation and from other sources, we strived for specific answers to these questions for every configuration that we considered.

2.3. The Nine Questions

At the outset, we were given a set of nine questions that it was hoped we would answer the study:

- (1) What are the causes of past and ongoing runway incursions and surface incidents on the LAX North Airfield?
- (2) Are these incursions indicative of a current unacceptable level of risk by the FAA safety standards?
- (3) What role does the existing airline fleet of aircraft serving LAX play in the risk of runway incursions?
- (4) What roles do airfield marking, lighting, and signage play in the risk of runway incursions at LAX?
- (5) What role does human error play in the risk of runway incursions? What role does air traffic control staffing play in the risk of runway incursions?
- (6) What other factors play a role in the risk of runway incursions?
- (7) Why has the South Airfield historically been subject to substantially more runway incursions than the North Airfield?
- (8) Is there a relationship between the LAX North Airfield and South Airfield operations and the risk of incursions at the airport in general? If so, is this relationship a safety issue or problem?
- (9) Will the planned airline fleet of aircraft have an impact on the LAX North Airfield operations? If so, is this a safety issue or problem?

In the body of our report, we address most of these questions directly or indirectly. But we devote a section (Section 15) to offering succinct summaries of our responses to the nine questions.

What the Panel Was Not Asked

We understood from the beginning that our assignment was not open-ended. We were not asked to consider the environmental implications of operating the North Airfield under different configurations, or the potential consequences on communities that border LAX. Nor were we asked to discuss how desires for a “balanced airfield” between North and South affect the attractiveness of particular configurations. And we were not expected to estimate the dollar cost of reconfiguring the North Airfield in various ways.



### 3. ALTERNATE CONFIGURATIONS FOR THE NORTH AIRFIELD

This section presents a brief overview of alternative configurations considered in this study. Overall, six alternatives or configurations were studied and modeled using the NASA Ames Research Center FutureFlight Central (FFC) and a series of external computer models and analyses performed by the Academic Panel. NORSAC provided four configurations for analysis: 1) Baseline, 2) moving runway 24L 340 South (340-South) with a center taxiway and a linear terminal configuration in the North airfield, 3) moving runway 24R 100 feet North (100-North) with a center taxiway, and 4) moving runway 24R North (340-North) with a center taxiway. Further description from NORSAC indicated the desirability to study all Group VI aircraft (ADG VI) operations in the South (called Baseline-S in this report). This effectively produced five alternatives. The Academic Panel also considered other options early on, including an End-Around Taxiway design (EAT) with a 52-foot depressed end-around taxiway for runway 24R. This would have allowed ADG VI operations around the depressed taxiway without affecting departure operations on runway 24L. The idea was not investigated further. The Academic Panel considered a sixth alternative for the airport, which was suggested at one of the earlier meetings with NORSAC. This alternative replaces the North Airfield's two runways with a single runway with well-designed supporting infrastructure, such as high-speed runway exits and parallel taxiways allowing expeditious service on the single runway for both departures and arrivals.

#### 3.1. Baseline

The baseline configuration is the existing configuration of the North Airfield with minor upgrades in terms of runway status lights. The Baseline alternative is shown graphically in Figure 3-1. Runway 24R is the primary arrival runway with a runway length of 8,925 feet and 150 feet in width. The runway has 50 foot stabilized shoulders to accommodate ADG VI aircraft for both landings and departures. Due to its length, Runway 24R would not be expected to support ADG VI departure operations. Runway 24L would remain at 10,285 feet long and 150 feet wide. Shoulders are 50 feet wide allowing unrestricted ADG VI operations according to a modification of standards approved by the Federal Aviation Administration (FAA). Figure 3-1 shows the locations of runway status lights in the North Airfield. Taxiways Echo-8 (E8) and Victor (V) leading to runway 24L would be protected with runway-entrance lights (RELs) if runway 24L is unsafe for entry or crossing. The Runway 24L threshold has Takeoff-Hold Lights (THLs) as indicated by the long red line starting at Runway 24L threshold in Figure 3-1. Runway exits Yankee (Y), Zulu (Z) and Alpha-Alpha (AA) have runway-entrance lights (RELs) to signal

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aircraft if runway 24L is unsafe for entry or crossing. On the South airfield runways 25R and 25L remain unmodified at 12,091 x 150 feet and 11,095 x 200 feet, respectively. Runway 25L is compliant with ADG VI criteria in terms of the runway width and length. The South airfield has a 75-foot center taxiway located 400 feet from both runways 25L and 25R. The separation of the center taxiway is compliant with ADG V only under visibility conditions at or above 3/4 mile according to FAA design standards (FAA, 2010). The center taxiway separation does not meet FAA design standards to handle ADG VI independently. The current FAA criteria for ADG VI requires 500 feet separation between runway centerline and parallel taxiways for runways with approaches down to 1/2 mile plus adjustment to clear the runway Obstacle Free Zone (OFZ) surface. If the approach minima are lower than 1/2 mile, the FAA requires 550 feet plus correction for OFZ surface clearance.

ADG VI landings in the South require special attention by the ATC local controllers. Once an ADG VI aircraft is on the center taxiway, it blocks departures on 25R until the aircraft has crossed runway 25R and cleared the runway Obstacle Free Area (OFA). The South offers an extra challenge for ATC ground controllers because the distance between taxiway Bravo (B) and runway 25R does not allow simultaneous taxiing of ADG VI on Bravo and a departure on 25R. The distance between runway 25L and taxiway Bravo is 350 feet. Current work by LAWA on taxiway Charlie (C) should address some of these operational limitations. During the FFC simulations the Academic Panel asked NASA to locate runway-entrance lights (RELs) on the South at taxiway locations Mike (M), Papa (P), Tango (T), and Uniform (U) leading from center taxiway Hotel (H) to runway 25R. Similarly, FFC simulations had runway-entrance lights (RELs) located at taxiways Foxtrot (F) and Bravo (B) leading to runway 25R from the North. Finally, the Baseline scenario has Takeoff-Hold Lights (THLs) on runway 25R.

The Baseline configuration has a total 153 gates in ten different terminal complexes. Figure 3-2 illustrates the gate configuration provided by LAWA simulating the gate configuration expected in the year 2020. The appendix lists the gate compatibility with various aircraft and provides the gate naming nomenclature used in the study. Terminals 1-8 exist today. The West-side of the Tom Bradley International Terminal (TBIT) and the Midfield Terminal (MID) are new additions to the airport assumed to be in place in year 2020.

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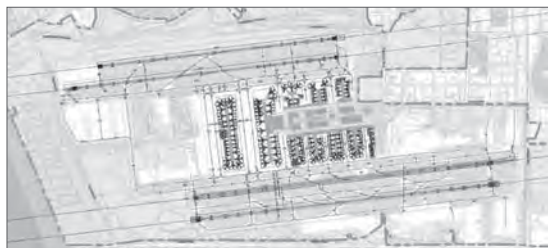


Figure 3-1: Los Angeles International Airport Baseline Alternative. Source: LAWA and HNTB (2009).

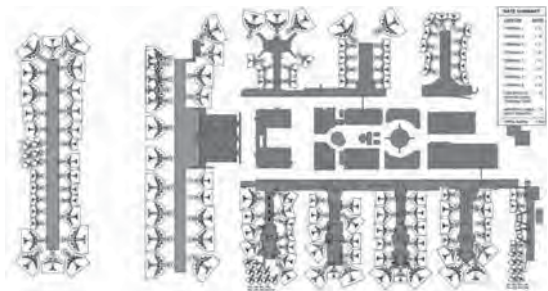


Figure 3-2: Los Angeles International Airport Gate Layout for Alternatives Baseline, 340-North, 100-North, and 3R (source: LAWA, 2009).

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#### 3.2. Baseline with Interim Runway Safety Improvement Project (IRSIP)

This configuration is an adaptation of the Baseline alternative. The Academic Panel was asked to look at this alternative late in July 2009 when the FFC experiments were ready to start. This configuration was not modeled in NASA's FutureFlight Central due to time constraints. The analysis presented in Section 7 of the report uses analytical techniques to examine the potential safety benefit of this alternative.

The basic idea of IRSIP is to move taxiway Zulu further downstream on runway 24R and create a new high-speed exit called AA1. The old Zulu and Yankee runway exits will be closed creating three similar high-speed runway exits on runway 24R. The change attempts to move possible runway incursions further downstream to the last one-third of runway 24L. Figure 3-3 illustrates the new layout of IRSIP.



Figure 3-3: Proposed Interim Runway Safety Improvements in the North Airfield. Source: LAWA and HNTB (2009).

#### 3.3. Runway 24R Moved 100 feet North with Centerline Taxiway (100-North)

This configuration duplicates the current conditions of the South airfield in the North. Runway 24R is moved 100 feet to the North allowing a placement of a new center taxiway between runways 24R and 24L as shown in Figure 3-4. The layout shown in the figure predates the time when NASA and the Academic Panel became involved in this study. As originally proposed, runway 06L-24R would have a total of five runway exit locations for landings to the West. Runway exits Kilo-3 (K3) and Kilo-4 (K4) are high-speed exit locations leading to center taxiway Kilo (K). Runway exits Bravo-Bravo (BB), Charlie-Charlie (CC) and Delta-Delta (DD) are three right-angle runway exits further downstream on runway 24R. Runway 24R would be extended to 10,286 feet to protect landings from the East. A displaced threshold is provided for landings to the East on runway 06L. The length of the displaced threshold on 06L is

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approximately 850 feet long. Three runway exits are provided for East arrivals to runway 06L-24R. The study did not simulate East flow arrivals as they represent only 5% of the total operations at LAX.

Runway 24L is extended to a total of 11,563 feet long (see Figure 3-4). The first 1,250 feet of threshold 24L constitute a displaced threshold but are usable for departures. A new taxiway (Echo-7) is built as an extension to existing taxiway Echo. Echo-7 provides access to threshold 24L for departures. Both North runways retain their 150-foot width and 50-foot shoulders allowing ADG VI operations. Runway 24L has an 850-foot displaced threshold on runway end 06R. This provides protection for approaches from the East. A full center taxiway Kilo is present in this scenario. Kilo has a total of eight perpendicular taxiways to cross runway 24L. For the purpose of the FFC simulation, the location and placement of runway status lights in the 100-North configuration at crossing taxiways W, Y, Z, AA, and BB. These locations were selected based on our prediction models for runway exit use with landings on runway 24R. In FFC simulations runway exits CC and DD were never used. The South airfield follows the same configuration described in Section 3.1 for the Baseline alternative.

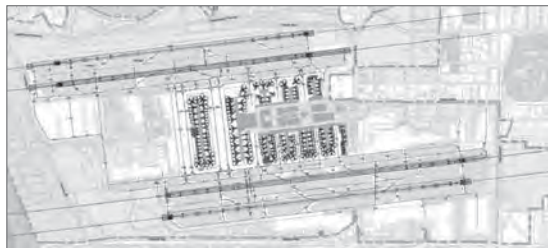


Figure 3-4: Los Angeles International Airport Alternative 100-North. Source: LAWA and HNTB (2009).

Operationally, 100-North would mirror operations of the South airfield today with a few exceptions. Three operational issues in the 100-North are: 1) the staggered thresholds 24L and 24R require ATC wake vortex separations between arrivals and departures; 2) the distance between inboard runway 24L and parallel taxiway Echo (i.e., 400 feet) provides more flexibility to ATC ground controllers compared to the South airfield; and 3) a restriction on the number of

ADG VI aircraft in the first 3,000 feet of taxiway Echo if an inboard arrival is to be processed. The handling of ADG-VI on the centerline taxiway has similar restrictions as those described for the South in Section 13.1.

The 100-North configuration has a total of 153 gates in ten different terminal complexes. Figure 3-2 illustrates the gate configuration provided by LAWA for operations in the year 2020. The gate configuration is similar to that of the Baseline alternatives described in Section 3.1.

3.4. Runway 24R Moved 340 feet North with Centerline Taxiway (340-North)

This configuration moves Runway 24R 340 feet to the North allowing a placement of a new center taxiway between runways 24R and 24L 520 feet from either runway. The layout of 340-North is shown in Figure 3-5. The layout shown in the figure predates the time when NASA and the Academic Panel became involved in this study. As originally proposed by the HNTB and LAWA, runway 06L-24R would have a total of five runway exit locations for landings to the West. Runway exits Kilo-3 (K3) and Kilo-4 (K4) are high-speed exit locations leading to center taxiway Kilo (K). Runway exits Bravo-Bravo (BB), Charlie-Charlie (CC) and Delta-Delta (DD) are three right-angle runway exits further downstream on runway 24R. Runway 24R would be extended to 10,286 feet to protect landings from the East. A displaced threshold is provided for landings to the East on runway 06L. The length of the displaced threshold on 06L is approximately 850 feet long. Strangely for this configuration, only two runway exits are provided for East arrivals to runway 06L-24R. The study did not simulate East flow arrivals as they represent only 5% of the total operations at LAX.

Runway 24L is extended to a total of 11,563 feet long (see Figure 3-5). Similar to 100-North, the first 1,250 feet of runway 24L constitute a displaced threshold but are usable for departures. A new taxiway (Echo-7) is built as an extension to existing taxiway Echo. Echo-7 provides access to threshold 24L for departures. Both North runways have 150-foot widths and 50-foot shoulders allowing ADG VI operations. Runway 24L has an 850-foot displaced threshold on runway end 06R. This provides protection for approaches from the East. A partial center taxiway Kilo is present in this scenario. This inconsistency compared to 100-North has no effect on the outcome of FFC simulations because only West-flow arrivals were modeled. Kilo has a total of nine perpendicular taxiways to cross runway 24L. For the purpose of the FFC simulation, the locations and placements of runway status lights in the 100-North configuration are crossing taxiways W, Y, Z, AA, and BB. These locations were selected based on our prediction models

for runway exit use with landings on runway 24R. The South airfield follows the same configuration described in Section 3.1 for the Baseline alternative.

Operationally, 340-North allows ADG VI aircraft to taxi on the center taxiway (Kilo) without affecting departure operations on the inboard runway (24L) 99.55% of the time at LAX (FAA ASPM records, 2009). According to the current FAA airport design criteria, ADG VI aircraft require 500-foot separation between runway centerline and parallel taxiways for runways with approaches of no less than ½ mile plus adjustment to clear the runway Obstacle Free Zone (OFZ) surface (FAA, 2010). The OFZ adjustment for an Airbus A380-800 with a critical tail height of 80 feet is around 20 extra feet beyond the 500 feet minimum thus requiring a total of 520 feet between runway and parallel taxiway centerline to satisfy the FAA design criteria. This alternative and 340-South (see Section 3.5) are the only alternatives that meet the FAA standard for ADG VI aircraft.

The 340-North configuration has a total of 153 gates in ten different terminal complexes. Figure 3-2 illustrates the gate configuration provided by LAWA for operations in the year 2020. The gate configuration is similar to that of the Baseline alternatives described in Section 3.1.

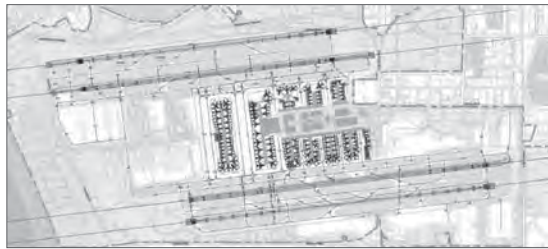


Figure 3-5: Los Angeles International Airport Alternative 340-North. Source: LAWA and HNTB (2009).

3.5. Runway 24L Moved 340 feet South with Centerline Taxiway (340-South)

This configuration moves Runway 24L 340 feet to the South and adds a new center taxiway between runways 24R and 24L that is 520 feet equidistant from both runways. The layout of 340-South shown in Figure 3-6, predates the time when NASA and the Academic Panel became involved in this study. As originally proposed by the HNTB and LAWA, runway 06L-

24R would have a total five runway exit locations for landings to the West. Runway exits Kilo-3 (K3) and Kilo-4 (K4) are high-speed exit locations leading to center taxiway Kilo (K). Runway exits Bravo-Bravo (BB), Charlie-Charlie (CC) and Delta-Delta (DD) are three right-angle runway exits further downstream on runway 24R. Runway 24R would be extended to 10,286 feet to protect landings from the East. A displaced threshold is provided for landings to the East on runway 06L. The length of the displaced threshold on 06L is approximately 850 feet long. In this configuration, only two runway exits are provided for East arrivals to runway 06L-24R. The study did not simulate East flow arrivals as they represent only 5% of the total operations at LAX.

Runway 24L is extended to a total of 11,563 feet (see Figure 3-6) similar to 100-North and 340-North. The first 1,250 feet of runway 24L constitute a displaced threshold usable for departures only. A new taxiway (Echo-7) is built as an extension to existing taxiway Echo. Echo-7 provides access to threshold 24L for departures. Both North runways have 150-foot widths and 50-foot shoulders allowing ADG VI operations. Runway 24L has an 850-foot displaced threshold on runway end 06R. This provides protection for approaches from the East. A partial center taxiway Kilo is present in this scenario. This inconsistency compared with 100-North has no effect on the outcome of FFC simulations because only West-flow arrivals were studied. Kilo has a total of eight perpendicular taxiways to cross runway 24L. For the purpose of the FFC simulation, the location and placement of runway status lights in the 100-North configuration are crossing taxiways W, Y, Z, AA, and BB. These locations were selected based on our prediction models for runway exit use with landings on runway 24R. The South airfield follows the same configuration described in Section 3.1 for the Baseline alternative.

Operationally, 340-South has similar advantages with 340-North. This alternative allows ADG VI aircraft to taxi on the center taxiway (Kilo) without affecting departure operations on the inboard runway (24L) 99.55% of the time at LAX (FAA ASPM records, 2009). This alternative and 340-North (see Section 3.4) are the only alternatives that meet the FAA standard for ADG VI aircraft.

The 340-South configuration has a total of 153 gates in eight different terminal complexes. Terminals T1, T2 and T3 are replaced by a new linear terminal with 14 gates capable of handling ADG VI and ADG VI aircraft. Figure 3-7 shows the airport configuration for 340-South. This is the only configuration studied with the linear terminal (LIN) in the North.



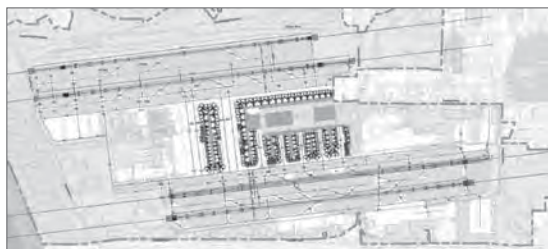


Figure 3-6: Los Angeles International Airport Alternative D (340' South). Source: LAWA and HNTB (2009).

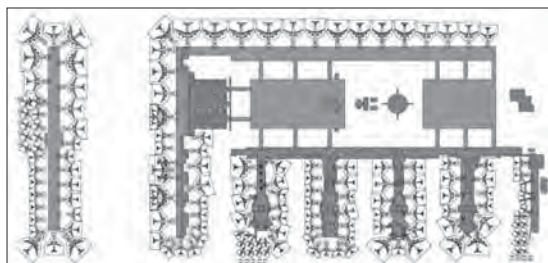


Figure 3-7: Los Angeles International Gate Layout for Alternative Baseline, 340-South (source: LAWA, 2009).

### 3.6. Single Runway 24 on the North Airfield

This configuration keeps Runway 24R at its present location in the North. Runway 24L is converted to a parallel taxiway (700 feet separation from centerline of runway 24R to taxiway Kilo). Echo is retained as an additional parallel taxiway and is located 450 feet from taxiway Kilo. The layout of 3R is shown in Figure 3-8. The design of a single runway is optimized for the aircraft fleet mix expected at LAX in the year 2020. The Academic Panel used the Runway Exit Design Interactive Model (REDIM 3.0) (Trani et al, 2001) to locate three 30-degree, high-speed

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runway exits that will minimize runway occupancy time for arrivals. The design is to reduce Runway Occupancy Time (ROT) and thus maximize the gaps between arrivals allowing a maximum number of departures from a single runway. These runway exits are labeled Yankee, Zulu and AA but they bear little resemblance to their predecessors. These are high-speed runway exits with a 1,400-foot spiral to accommodate ADG VI aircraft up to 60-knot exit speeds. A detailed design of the high-speed runway exits is shown in Figure 3-9. Three right-angle runway exits are retained from the previous configurations at the end of runway 24R (taxiways BB, CC and DD). High-speed runway exits are 100 feet wide to improve their utilization at higher speeds.

Taxiways Kilo and Echo are ADG VI compliant with 100-foot width. Ten crossing taxiways provide quick access to the gates from Kilo or Echo. In this alternative, Runway 24R would be extended to 10,286 feet to protect landings from the East. A displaced threshold is provided for landings to the East on runway 06L. The length of the displaced threshold on 06L is approximately 850 feet long. In this configuration, four runway exits (2 high-speed and 2 right-angle) are provided for East arrivals to runway 06L-24R. Runway 24R is 200 feet wide and is fully compliant with ADG VI design criteria. Shoulders are 40 feet wide on each side.

The 3R configuration has a total of 153 gates in ten different terminal complexes. Figure 3-2 illustrates the gate configuration provided by LAWA for operations in the year 2020. The gate configuration is similar to that of the Baseline alternatives described in Section 3.1 of this report.

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Figure 3-8: Los Angeles International Airport Alternative 3R. Source: Academic Panel Design, Drawing by HNTB (2009).

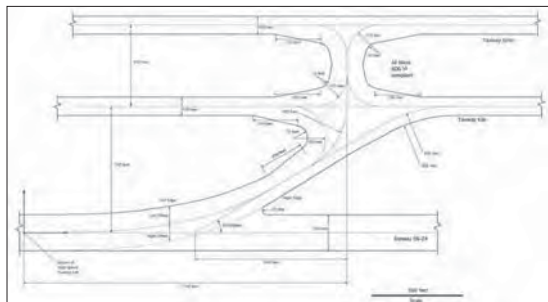


Figure 3-9: Detail Design for High-Speed Runway Exits for Alternative 3R. Source: Academic Panel.

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## 4. EXPERIMENTS AT NASA AMES RESEARCH CENTER

### 4.1. Introduction

An important component of the North Airfield study consisted of a series of experiments conducted at FutureFlight Central (FFC), a simulation facility located at NASA Ames Research Center. This chapter describes the FFC facility and the experimental design methodology used by the Academic Panel and NASA to carry out the experiments. Section 4.2 provides background on FFC its capabilities. This sets the stage for the description of the design and conduct of the experiments undertaken for the present study.

### 4.2. NASA Ames Simulation Facility

The FutureFlight Central is a complex tower simulator housed at NASA's Ames Research Center. FutureFlight Central consists of a full 360-degree out-of-window view simulation facility that can simulate a control tower cab of any large airport in the U.S. (see Figure 4-1). The facility allows controllers and pilots to experience new airfield layouts, operating procedures, and technologies in order to assess their impacts on the safety and efficiency of airfield operations, as well as workload. The simulations employ a detailed and highly realistic 3-D airport visual model displayed on twelve projection screens, simulated radar displays similar to those used in the actual tower, 3-D models that closely replicate the appearance and performance of a wide range of aircraft types, and human pseudo-pilots who control these aircraft. Pseudo-pilots control several aircraft at once, using a plan view display. For this study the FFC was integrated with a NASA Ames Boeing 747-400 full motion simulator. The Boeing 747-400 simulator replicates all the functionality of a real aircraft (including a full motion based providing 3-degrees of freedom). The Boeing 747-400 simulator is certified at the highest level of realism (level D) and is housed at the nearby Crew-Vehicle Systems Research Facility, so that the same scenario can be experienced from the cockpit as well as the control tower.

As in a real control tower, the pilot and pseudo-pilot are given instructions by tower controllers, using a voice communication system that includes channels equivalent to the tower radio frequencies.

An extensive set of data is recorded throughout a simulation run. Detailed recordings of aircraft movements, radio communications and non-transmitted voice communication between controllers are made. In addition, simulation participants are typically debriefed at the end of each simulation run using a written questionnaire and an oral discussion. The Academic Panel

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designed both pilot and air traffic control surveys in consultation with NASA to evaluate various safety aspects of each simulation run.

#### 4.3. Past LAX Studies performed at FutureFlight Central

Three previous studies concerning LAX were performed at FFC. The studies are termed Phase I, II, and III, and were performed between 2001 and 2003. The Phase I study (NASA, 2001a) was conducted in February, 2001. Its purpose was to evaluate possible remedies for runway incursions, from changes in airfield geometry to new control techniques and pilot procedures. Phase I was specifically aimed at assessing “whether the FFC simulation was sufficiently representative of LAX operations, such that FFC could be used to study the impact of the alternatives proposed in Phase II on operations at LAX.” It was concluded that the FFC simulations were sufficiently realistic, based upon controllers’ direct assessments of the degree of realism, their assessments of workload relative to that at LAX, and comparisons of throughput, taxi times, runway occupancy times, and communications activity between LAX and FFC.

Phase II (NASA, 2001b) was the first of the LAX studies that, like the current one, evaluated possible measures to improve safety. Alternatives included swapping arrival and departure runways, having two local controllers on the south side, and several variants that involved extending a taxiway (B16) to allow some or all departures on 25L to avoid crossing 25R. Assessment was based on controller subjective ratings of workload, efficiency, and runway incursion risk, as well as measured departure rates, taxi times, and frequency utilization. The simulations yielded two clear “winners,” both involving the taxiway extension. These alternatives had the most favorable ratings with regard to efficiency and incursion risk, as well as the highest peak departure rates. The taxiway extension idea was not implemented, because FAA declined to grant permission for departures on 25R to proceed while aircraft crossed in front of it on B16.

Phase III, conducted in 2003, evaluated a new centerline taxiway on the South Airfield (NASA, 2003). The aim of this study, like several others conducted at FutureFlight Central, was to confirm the acceptability of a planned airfield change, in this case the centerline taxiway. Controller surveys revealed that the reconfiguration increased workload and reduced rated efficiency for the ground controller, while having the opposite effects for the local controller. Controller assessments of the impact of the center taxiway on the potential for runway incursions were also mixed, with ground controllers perceiving a slight increase in potential and local controllers a slight decrease. Departure throughput was unaffected except under IFR, where it decreased by 8%, while taxi times generally increased.

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It is important to appreciate that these prior studies had different purposes than the one presented here. Phase I was a validation exercise. Phase II was intended to give preliminary assessments to several concepts, some of which would then be subject to extensive further review. Phase III was designed to confirm that a particular course of action that had already been virtually decided upon was acceptable. It is interesting to note that if the Phase III study had been the sole basis for deciding whether to build the centerline taxiway on the south, that option might well have been rejected. Given this background, it is understandable that, valuable as the FutureFlight Simulations were to the Academic Panel’s work, it was also necessary to tap other sources of information to fulfill the aims of the study. This is the subject of Chapter 5.



Figure 4-1: NASA Ames Research Center FutureFlight Central. Source: A. A. Trani (2009).

#### 4.4. FFC Experiments Performed for this Study

##### Description of ATC Controller Positions

A group of six LAX controllers each worked fourteen one-hour scenarios over a seven-day period. The complete schedule of the scenarios scheduled in FFC is shown in Appendix G of the report. The FFC simulations required staff on both North and South Airfields similar to the actual LAX tower. The following five positions were staffed by controllers during the simulation:

LC-1: Local Controller, South side (South Local)

LC-2: Local Controller, North side (North Local)

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GC-1: Ground Controller, South side (South Ground)

GC-2: Ground Controller, North side (North Ground)

GC-3: Ground Controller, Mid-field (Mid-field Ground)

Due to the complexity of the future airport midfield terminal and the added gate positions behind the Tom Bradley International terminal, a dedicated ground control position was created in each simulation (GC-3). A local assistant controller was also present on the North side of the field. A tower supervisor was also present during all runs. The tower supervisor and the local assistant controller acted as a neutral party in the simulation and their performance was not evaluated in this study. The supervisor position was staffed by two experienced LAX air traffic controllers with many years of experience. The frequencies assigned to each position are shown in Table 4-1.

Table 4-1: LAX Tower Frequencies and ATC Control Positions Assigned in the FFC Experiment.

Position	Name	Frequency (Mhz)	Airfield Side
Ground Control	GC-1	121.75	South
Local Control	LC-1	120.95	South
Ground Control	GC-2	121.65	North
Local Control	LC-2	133.95	North
Ground Control	GC-3	126.25	Midfield

The FFC tower simulator setup showing the staffed air traffic positions is shown in Figure 4-2. A total of three sets of air traffic controllers participated in the study. All North controller positions involved former LAX tower controllers. Most of the South controllers were also former LAX although some had experience at other large hub airports in the country (Phoenix and San Francisco). The investigation focuses on the North controllers. In general, as it will be shown in Section 13.3 of the report, the North controllers performed better in terms of handling more traffic more efficiently than South controllers.

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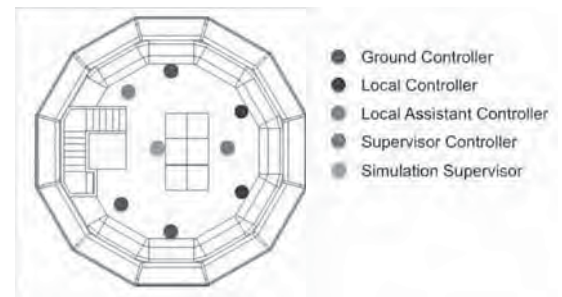


Figure 4-2: NASA Ames FutureFlight Central: Tower Cab Layout Used in the Experiments. Source: NASA Ames Research Center.

##### Description of the Boeing 747-400 Flight Simulator

The Boeing 747-400 flight simulator used in this study represents a state-of-the-art training simulator certified at the highest level of realism (level D). The simulator has a full-motion base allowing realistic replication of aircraft acceleration onset rates. The simulator has a Vital Multiview visual display system capable of displaying 180 degrees laterally and 40 degrees vertically (see Figure 4-3). The Boeing 747-400 simulator is housed at the nearby Crew-Vehicle Systems Research Facility at NASA Ames Research Center. For this experiment, a total of ten Boeing 747-400 or Boeing 777-200 test pilots participated in the evaluation of various airport configurations. The Boeing 747-400 requires a crew of two. In each flight a “neutral” pilot would accompany the test pilot to manage systems similar to a revenue flight. Pilots were asked to fly approaches to LAX airport joining the final approach sequence at 5,000 feet and 17 miles out of runway 24R and then fly a standard final approach procedure, land and taxi to a prescribed gate on the Midfield terminal.

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Figure 4-3: NASA Ames Boeing 747-400 Flight Simulator. Source: NASA Ames Research Center Web Site.

#### 4.5. Experimental Design

The Academic Panel, in extensive consultation with their NASA colleagues, designed a set of simulation runs that addressed the questions it was charged to answer. The design attempted to balance the various factors that had to be addressed with the limited number of runs that could be performed. Factors incorporated into the design included:

- *North airfield alternative.* All the alternatives were simulated except for the baseline with relocated exits, which was not originally a part of the study;
- *Visibility.* Three visibility conditions, Daytime Visual, Daytime Instrument, and Nighttime Visual, were included. Experiments with all three conditions were run for five of the six alternatives. The exception was Baseline with Design Group VI aircraft operations restricted to the South Airfield, which was not simulated in Nighttime conditions;
- *Design Group VI Operations.* Experiments with 2, 4, and 6 Design Group VI Operations were run;

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- *Controller Team.* To obtain reliable results, it was necessary to have more than one controller team participate in the experiments. We had three teams. Team members were retired tower controllers with experience at major airports, including LAX, SFO, and DFW.

Given the number of factors and factor levels involved, it was not possible to simulate every combination. To do so for a *single* alternative would require 3 (visibility conditions) x 3 (design group VI traffic levels) x 3 (controller teams) = 27 runs, while fewer than 60 total runs were available. To economize on runs, combinations were selected so as to avoid systematic correlation between any two factors. In practice, this meant that every team saw every alternative three times, under every visibility condition (with the exception for the Baseline South alternative already noted), and under every level of design group VI operations, but that for a given team and alternative the visibility condition was correlated with the number of group VI aircraft. These correlations varied across teams and alternatives so that across the entire set of runs they were eliminated. Table 4-2 identifies the specific runs conducted.

Table 4-2: Experimental Design Table.

Team	Alternative	Group VI Aircraft	Visibility
1	B	2	VMC
1	B	6	IMC
1	B	4	Night-VMC
1	B-South	6	VMC
1	B-South	4	IMC
1	D	4	VMC
1	D	2	IMC
1	D	6	Night-VMC
1	M	2	VMC
1	M	6	IMC
1	M	4	Night-VMC
1	N	6	VMC
1	N	4	IMC
1	N	2	Night-VMC
1	3R	4	VMC
1	3R	2	IMC
1	3R	6	Night-VMC
2	B	4	VMC
2	B	2	IMC

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2	B	6	Night-VMC
2	B-South	2	VMC
2	B-South	6	IMC
2	D	6	VMC
2	D	4	IMC
2	D	2	Night-VMC
2	M	4	VMC
2	M	2	IMC
2	M	6	Night-VMC
2	N	2	VMC
2	N	6	IMC
2	N	4	Night-VMC
2	3R	6	VMC
2	3R	4	IMC
2	3R	2	Night-VMC
3	B	6	VMC
3	B	4	IMC
3	B	2	Night-VMC
3	B-South	4	VMC
3	B-South	2	IMC
3	D	2	VMC
3	D	6	IMC
3	D	4	Night-VMC
3	M	6	VMC
3	M	4	IMC
3	M	2	Night-VMC
3	N	4	VMC
3	N	2	IMC
3	N	6	Night-VMC
3	3R	2	VMC
3	3R	6	IMC
3	3R	4	Night-VMC

Anomalies were also included in the experiments. These were scripted “mistakes” by the pseudo pilots requiring an appropriate response from the controllers. The mistakes included failure to call in by a pilot on approach, incorrect read-backs of controller instructions, and busted hold lines. It was important that these anomalies, while scripted, be unpredictable to the controllers. To accomplish this, randomization was employed to, first, determine the numbers of

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different anomalies that would be scripted into each run, and, second, decide which specific flights would commit the mistakes. For busted hold-lines and some read-back errors, improvisation on the part of the pseudo-pilots was required, since the mistake could only be made in certain circumstances. (For example, a hold-line could not be busted if there were no instruction to hold.) The pseudo-pilots fulfilled this responsibility—an additional burden for a job that is quite difficult to begin with—admirably.

#### 4.6. Demand Scenarios for FFC Experiments

The Academic Panel designed each one of the 54 detailed scenarios ran in the FFC simulation. These scenarios involve a full description of the following items: 1) aircraft assigned to each arrival stream, 2) aircraft injection times into the simulation (both arrivals and departures), 3) aircraft types and company liveries to reproduce a projected demand scenario, 4) gate assignment for both arrivals and departures and 5) Standard Instrument Departures (SIDs) for every flight departing LAX. The Academic Panel worked with LAX controllers Kurt Rammelsberg and Elliot Brand as well as with NASA Ames personnel, Betty Silva, Mike Madson, and Boris Rabin, to understand many technical aspects of the simulation and the LAX airport procedures before embarking in the demand generation task. The Academic Panel relied on Performance Data Analysis and Reporting System (PDARS) radar data to understand aircraft operational procedures in and out of the LAX airport. A sample departure track analysis performed by the Academic Panel for the South airfield is shown in Figure 4-4. The demand scenarios created by the Panel attempted to replicate current procedures flown at LAX with higher demand loads expected in the year 2020. The Academic Panel also examined the LAWA/Ricondo demand scenarios proposed for year 2020 at the airport (see Figure 4-5).

In creating demand sets for FFC simulations we struck a balance between arrival and departures for every scenario. For example, during a typical one-hour FFC simulation run, between 77 and 80 arrivals are scheduled for the one-hour period. According to Figure 4-5, LAWA expects 147 operations in the peak hour in the year 2020. Note that there are 9 hours during the design day with more than 127 operations per hour. Note that during the highest loads of the design day, the 2020 demand schedule calls for an almost equal number of arrivals and departures. This fact was maintained in the FFC simulations. The LAWA/Ricondo design day has a fleet mix fraction shown in Figure 4-6.

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Figure 4-4: Typical South Airfield Departure Tracks. PDARS Data (2007).

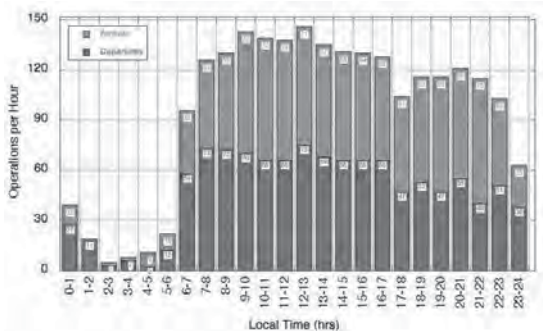


Figure 4-5: LAWA/Ricordo LAX Baseline Demand Scenario (2009).

The Panel used the baseline demand as an initial guideline. However, we deviated from the baseline demand to account for recent trends in fleet mix at both the National and local levels. For example, the LAWA/Ricondo demand included numerous flights by small aircraft prominently with Embraer 120 aircraft in 2020 (i.e., 11% of aircraft in the small wake class). The Panel judged that such aircraft will be mostly retired from the fleet and we substitute for larger turboprop aircraft (Aerospatiale ATR 72). The result of such substitution is an increase in the size of aircraft to larger wake classes with a corresponding reduction in arrival capacity at the airport. Similarly, we reason that many Boeing 757-200 aircraft will be retired in 2020 (a verifiable trend today in the US fleet) and thus substituted some Boeing 757-200 operations for Boeing 737-800 and Boeing 787-8 “Dreamliners”.

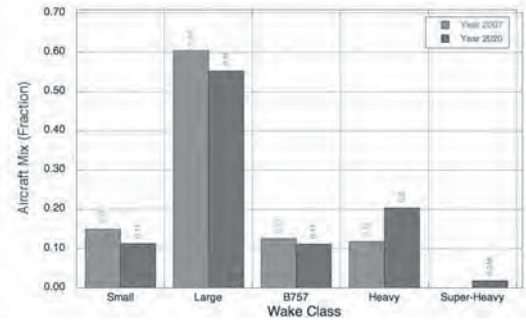


Figure 4-6: LAWA/Ricondo 2007 and 2020 Aircraft Wake Class Distribution.

### Aircraft Performance Data

Whenever possible, the Academic Panel scrutinized FFC flight profile data to verify the realism of the simulator for aircraft arrivals. Using PDARS radar data the Panel determined average approach speed profiles in the sections of airspace where aircraft were “injected” 17 miles from runways 24R and 25L at 5,200 feet. Using such data, the Panel asked NASA to update the aircraft performance parameters for all aircraft modeled in the simulation. This provided added realism as every aircraft flew a unique approach profile similar to those observed in the field.

### Air Traffic Separations Analysis to Generate FFC Arrival Data

The PDARS radar data was also used by the Panel to derive realistic aircraft in-trail separations. Using a full day of radar data, the Academic Panel derived cumulative density functions similar to that shown in Figure 4-7 to set aircraft-aircraft arrival separations at LAX during high-demand periods. These arrival separations were used to create arrival times for each aircraft arrival at the airspace injection points in the FFC simulation. We also developed a Monte Carlo simulation model to derive optimal procedures for the 3R configuration. This configuration is described in Sections 3 and 10 of the report.

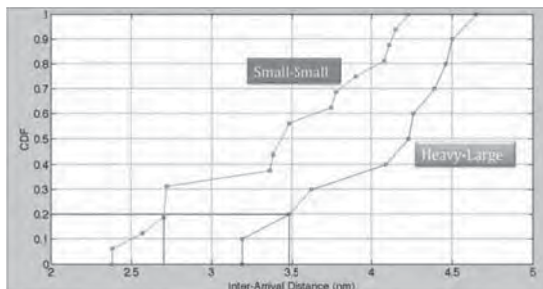


Figure 4-7: Cumulative Density Functions of Distance Between Successive Arrivals.  
PDARS Data. Academic Panel Analysis.

### Methodology to Generate FFC Traffic Data

Using the information gathered in the field and from various sources as described above, we created 54 detailed scenarios representing 54 operational hours for the LAX airport in the year 2020. Section 4-5 explained the experimental design process used to set control variables in the simulation process. Control variables in the experiment were weather conditions (VMC, Night and IMC), number of design group VI aircraft (2,4 and 6), and 6 North airfield configurations. Figure 4-8 illustrates a flowchart to show the steps needed to generate each one of the 54 scenarios. First we extracted the baseline demand data from fast-time simulation studies done by Ricondo for LAWA. The demand follows the same profile as that shown in Figure 4-5. Since FFC simulations lasted one hour, we selected individual peak hour periods to emulate in the FFC

simulation. Aircraft substitutions are made to this baseline demand based on fleet mix trend analysis performed by the Academic Panel. We then assign the number of ADG VI aircraft to the modified hourly schedule and calculate arrival times to the runway threshold. Using the observed separation criteria at the airport, we back track the runway arrival times to create injection times in the airspace for arrivals and gate push back times for departures. This process requires some heuristics to balance the use of gates across all terminal complexes. Random events are introduced according to probabilities sampled from real events as described in section 4-5. A few more checks are done after the steps in Figure 4-8 are completed to assign departure routes and still balance the use of gates at LAX.

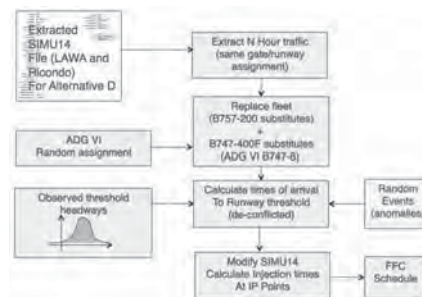


Figure 4-8: Methodology to Derive FFC Demand Schedule.



## 5. OTHER EVIDENCE CONSIDERED BY THE PANEL

The Panel supplemented the valuable information from the NASA simulations with other evidence that allows a fuller picture. The additional information utilized is described briefly in the following sections.

### 5.1. The Runway Incursion History at LAX

We studied incursions in recent years on both the North and South Airfields. We noted in particular:

- what happened
- where on the runways or taxiways the incursions occurred
- what kinds of aircraft (and other vehicles) were involved
- whether operations were in Easterly or Westerly flow
- the severity of the incursion (under the A, B, C, D classification scheme used by FAA, which we describe in Section 7).

### 5.2. The Runway Collision on the LAX North Airfield on 2/2/91

The collision on Runway 24-L between a landing US Air jet and a SkyWest commuter plane killed 34 people in the worst runway accident in US aviation history. We considered the circumstances of the event, and the effectiveness of measures taken to prevent a recurrence.

### 5.3. LAX Operations Data

We considered data on such subjects as:

- how traffic was distributed between the North and South Airfield
- how far down the runway departing aircraft of various kinds travelled before they became airborne
- which taxiways landing aircraft took to exit the arrival runway
- what proportion of operations took place in Easterly and Westerly flow
- what fractions of operations occurred under IMC and VMC

### 5.4. Runway Incursions at Other Towered US Airports

We considered US incursion records in detail, paying particular attention to other airports that offer information of special relevance to the LAX North Airfield. These airports included:

- Airports deemed similar to LAX by pilots who took part in the NASA simulation

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- Airports that have centerline taxiways between parallel runways, with spacing similar to those proposed under some LAX-North reconfiguration scenarios
- Airports that participate frequently in mixed operations (i.e., involving landings and takeoffs on the same runway).

### 5.5. Worldwide Data about Fatal Runway Collisions

We considered the circumstances of such collisions, and the proportions of passengers killed on the various aircraft involved.

### 5.6. Worldwide Historical Data about Runway Excursions

Runway excursions are events in which planes deviate suddenly and sharply from their intended paths, for reasons unrelated to other aircraft or land vehicles. Such events could potentially lead to collisions with other aircraft. We explored data about the frequency and nature of such events, and considered whether they could appreciably affect the relative safety of different runway configurations.

### 5.7. Previous Studies about North Airfield Runway Safety

The information described above falls into the general category of data that the Panel gathered for the North Airfield Safety Study. But we also studied data collected and analyses performed by others in prior work.

### 5.8. Prior Collision-Risk Research

We understood that peer-reviewed research might offer data and analyses that could benefit the present work, and reviewed such research.

### 5.9. FAA Effectiveness Assessments for Relevant New Technologies

In recent years, the FAA has undertaken extensive analyses about the potential effectiveness of AMASS, ASDE-X radar, and Runway Status Lights. All three of these technologies are now in place on the LAX South Airfield, and they should soon be in place on the North Airfield. We sought and gained access to the FAA analyses, and carefully considered them in the present study.

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## 5.10. Studies about the Interim Runway Safety Improvement Program for the North Airfield

We considered proposals to change/move exit taxiways from Runway 24R so that landing planes crossing Runway 24L en route to terminals would do so further west.

### 5.11. Prior Studies about Safety on the LAX North Airfield

Organizations such as the Washington Consulting Group have conducted safety studies about some possible configurations of the North Airfield, and we reviewed such studies.

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## 6. SAFETY ANALYSIS: THE BASELINE CASE

Of fundamental importance to the Study is the question: assuming 2020 traffic levels and the associated traffic mix, what level of risk would prevail if the LAX North Airfield remained as it is now? This section offers an approximate answer to the question. The focus is on *fatal* runway collisions, and on two subsidiary questions:

- If 2020 traffic levels prevailed over a long period, what would be the baseline *frequency* of fatal runway collisions on the LAX North Airfield?
- When fatal accidents occur, what would be their expected *consequences* in lives lost?

### 6.1. Some Background Data

A starting point for the analysis is the article "Fatal US Runway Collisions over the Next Two Decades," which was commissioned by FAA and published in the peer-reviewed *Air Traffic Control Quarterly* (Barnett, Paull, and Iadaluca (2000); the paper appears as an Appendix to this report). The two decades in question were the years 2003-2022. Using US and worldwide data about runway incursions and accidents, and official projections of US traffic growth, the authors concluded that, for the two decades 2003-2022, *fifteen* was a mid-range estimate of the number of fatal runway collisions that would occur at the approximately 500 towered US airports. (A high estimate was 33 fatal collisions, while a low estimate was four.) Analysis of survival and casualty patterns in historical data led to the approximation that an average of 48 lives would be lost in each one. Fifteen events over twenty years works out to an average of one event every sixteen months. But under the assumption of steady traffic growth, the rate in 2020 would be higher than the average for 2003-2022, and would average approximately *one fatal runway collision per year*, at some towered US airport.

However, these estimates were based on technology and procedures in place in the 1990's at towered US airports. They did *not* consider the safety benefits of three major technologies that have since been introduced:

The **Airport Movement Area Safety System (AMASS)**, which offers visual and aural warnings to tower controllers about many situations that potentially compromise safety.

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**Airport Surface Detection Equipment, Model X (ASDE-X)**, which detects potential runway conflicts using surface movement radar, multilateration sensors, aircraft transponders, and other indicators of the positions of both aircraft and ground vehicles.

**Runway Status Lights (RWSL)** , which turn red at the centerline of a runway or taxiway when it is unsafe to proceed because of other traffic movements. These lights use information from airport surveillance and surface detector radars, as well as multilateration information from the ASDE-X system.

All three of these technologies are now available on the LAX South Airfield, and all should be available on the North by 2020.

After intensive investigations, FAA has subsequently made estimates of the effectiveness of these three technologies in preventing a runway collision:

- **63.0%** for AMASS accompanied by ASDE-3 radar, a predecessor of ASDE-X radar
- **72.6%** for AMASS and ASDE-X
- **87.6%** for AMASS, ASDE-X, and RWSL

Source: *FAA Surface Benefits Model, 2008*

In other words, FAA believes that the combination of AMASS, ASDE-X, and runway status lights can cut by approximately **7/8** (87.6%) the risk of runway collisions that prevailed prior to their introduction.

**6.2. A Two-Part Procedure for Estimating the Baseline Frequency of Runway Collisions at the LAX North Airfield**

We consider two questions in sequence:

- (i) Assuming 2020 traffic levels in the US as well as the use of AMASS, ASDE-X, and RWSL, what would be the expected frequency of fatal runway collisions at towered US airports as a group?
- (ii) Given that a fatal runway collision occurred, what is the probability that it would happen at the LAX North Airfield rather than elsewhere?

The first of these questions is fairly easy to answer if we use the background data arising from FAA studies. One could say that the *original* frequency of fatal collisions for 2020 traffic levels would be approximately one per year, but the introduction of AMASS, ASDE-X, and

RWSL would reduce that risk by a factor of roughly eight. Thus, the revised frequency would be approximately *one in eight years*.

However, the Panel thought it important to assess whether the FAA effectiveness assessments for the new technologies have been borne out by actual airport experience. That review is the subject of the next section.

**6.3. Some Trends in US Runway Incursions, 1999-2009**

The International Civil Aviation Organization (ICAO) and the FAA define a runway incursion as:

“any occurrence at an aerodrome involving the incorrect presence of an aircraft, vehicle, or person on the protected area of a surface designated for the landing and take-off of aircraft.”

In the late 1990’s, FAA developed a classification system that created four categories of runway incursions at US airports:

- Category A:** “Separation decreases and participants take extreme action to narrowly avoid a collision, or the event results in a collision.”
  - Category B:** “Separation decreases and there is a significant potential for collision.”
  - Category C:** “Separation decreases but there is ample time and distance to avoid a potential collision.”
  - Category D:** “Little or no chance of collision but meets the definition of a runway incursion.”
- Source: *FAA Runway Safety Report, June 2008*

The Panel examined trends in US runway incursions over the period 1999-2009 to see whether the substantial drops in incursions that FAA expected because of new technologies had actually materialized. While ASDE-X and RWSL have only recently been introduced at US airports, AMASS was installed at 32 of the largest US airports over 2001-03. A FAA data analysis estimated that, subsequent to installation, Category A and B runway incursions at those airports declined by 59%, from an expected 24.3 to an actual 10 (Surface Benefits Model, 2008). That statistic is close to the 63% reduction that FAA projected prior to the installation. It is not clear that AMASS deserves full credit for the improvement: other airports that did not receive AMASS also showed a drop in incursions, perhaps because of better airport signage, training, and other measures. Whatever the exact reasons, the observed drop was large and statistically significant.

Indeed, an FAA fact sheet issued on 10/9/09 about *all* towered US airports stated that

“The number of serious runway incursions — classified as Categories A and B — dropped by more than 63 percent from fiscal year (FY) 2000 through fiscal year 2008.” And in FY 2009, A and B incursions dropped by factor of two compared to 2008, from 24 to 12. In all, A and B incursions fell from 67 in FY 2000 to 12 in FY 2009, a decline of **80%**. This last statistic includes the benefits of ASDE-X at roughly 15 US airports, which include several but not all of the very largest. Very few airports had RWSL by 2009; LAX has them on its South Airfield but not on the North. In other words, the observed decline was *greater* than that which FAA envisioned before RWSL’s and with only a partial implementation of ASDE-X.

These incursion statistics are encouraging. If the number of A and B incursions is a reasonable proxy for collision risk over a given year, then the data suggest that the combination of AMASS, ASDE-X and other measures has improved safety on the runways by roughly 80%. But the Panel considered a question: is it possible that “grade deflation” meant that some events that might have been classified as (say) Category B incursions towards the start of the 21<sup>st</sup> century were being classified as (say) Category C incursions several years later? The Panel does not take this possibility seriously because of another statistic, which is not subject to variations in judgment. The number of fatal runway collisions at towered US airports has been *zero* in recent years.

*Zero.* The Barnett, Paull, Iadecula analysis for FAA (2000) anticipated approximately four fatal runway collisions at towered US airports over 2003-09. Traffic was lower during those years than had been projected before 9/11 but, even accounting for that shortfall, the absence of any fatal accidents reflects a statistically significant improvement in runway safety that cannot plausibly be dismissed as a coincidence. (There have been no fatal runway collisions at towered US airports since March 2000, when two GA planes collided at Sarasota, Florida. The runway collision at LAX in February 1991—*nineteen years ago*—was the last runway collision at a towered US airport which caused deaths to passengers on scheduled flights.) In short, the empirical evidence about both major incursions and fatal accidents strongly indicates that US runways were far safer around 2009 than they were in the 1990’s.

Developments in aviation beyond airport runways further increase the Panel’s confidence in the ability of technology and new procedures to achieve huge improvements in safety. For a long time, midair collisions involving scheduled aircraft occurred in the US on average every other year. (Southern Californians will recall the PSA collision at San Diego and the Aeromexico collision south of Los Angeles.) But *not one* scheduled flight in the US has been involved in a fatal midair collision in *more than twenty years*, in substantial part because of on-board collision

avoidance systems. Similarly, thunderstorm-induced wind shear caused frequent disasters near airports in the 1970’s and 1980’s, including Pan Am at New Orleans and Pago-Pago, Eastern at JFK, Delta at Dallas/Fort Worth, and Ozark at St. Louis. Yet, with the advent of Doppler radar, on-board wind-shear detectors and wind-shear avoidance training, there have been no wind-shear related crashes on US scheduled flights in more than fifteen years (and the last event, in 1994, occurred at an airport that had not yet received Doppler radar). Aviation safety is a continuing story of mortal hazards that have been rendered harmless by a combination of new equipment and improved training, and the recent sharp reductions in dangerous runway incursions seem consistent with that history.

**6.4. The Panel’s Estimate of National Risk of Fatal Runway Collisions, 2020**

Under these circumstances, the Panel estimated that US fatal runway collisions at towered airports in 2020 will not occur at a rate on one per year (per Barnett, Paull, Iadecula), but rather at a substantially lower rate. We have noted that, if we use FAA benefit statistics about AMASS, ASDE-X, and RWSL—statistics that are consistent with actual experience so far—we would cut the risk by a factor of eight, to one fatal collision every eight years. To be conservative, however, we estimated a reduction by a factor of four rather than eight, meaning that we assume a national frequency of fatal runway collisions of *one every four years* at towered US airports. The upshot is that we are assuming roughly *twice* the level of risk in 2020 than the FAA projections would imply.

Why this conservatism? Because RWSL have not been widely deployed, we do not have field experience to validate FAA assessments about their benefits. FAA estimated that AMASS/ASDE-X/RWSL would cut risk by about 88%, as compared to 73% for AMASS/ASDE-X alone. In other words, of the 27% of potential collisions that AMASS/ASDE-X would not in themselves avert (namely, 100% - 73%), roughly 15% would be prevented if RWSL were added to the mix (88% - 73%). RWSL would therefore cut collisions by roughly *half* from the level that would prevail in its absence (i.e. by 15% out of 27%). The Panel is effectively assuming for now that, while AMASS/ASDE-X and other measures have achieved the major gains that were anticipated, it is possible that RWSL may not fully do so. *Let us be clear:* we have no reason to be skeptical of the benefits assessment about RWSL. But, to reduce the danger of overstating the safety of US runways in 2020, we use 75% rather than 88% as the estimated improvement in runway safety in 2020, as compared to a projection based on the 1990’s.

In summary:



*The Panel assumes an expected frequency of fatal runway collisions in 2020 at the 504 towered US airports of one every four years. That statistic assumes that AMASS/ASDE-X/RWSL are present at the major airports at which risk is concentrated, and that traffic grows between now and 2020 in accordance with forecasts. (If the traffic forecasts prove too optimistic—as was certainly the case about growth over 2000-09—then risk in 2020 would be lower.)*

#### 6.5. Baseline Runway Collision Risk at LAX-North as a Share of National Risk

To move from a national risk estimate to one for LAX-North, we considered the question: if a fatal runway collision does occur in 2020 at a towered US airport, what is the probability that it would do so on the LAX North Airfield? While there are 504 towered US airports (505 if LAX South is treated as distinct from LAX North), the chance would not be 1 in 505. Simply because LAX-North has far more than 1/505 of national air traffic, one would expect a higher probability than 1 in 505. But how much higher?

Because no estimation procedure in this context is manifestly correct, we made eight separate estimates of the risk to LAX-North, assuming that the runway configuration in 2020 is the same as the one in place now. The first two are based on the runway incursion history of LAX-North, as it relates to national history. Over the period 1999-2009<sup>a</sup>, LAX-North experienced:

**1.1%** of the 181 Category-A incursions at towered US airports (2/181).

**2.2%** of the 231 Category-B incursions (5/231)

**0.4%** of the 942 Category-C incursions<sup>b</sup> (4/942)

Notes:

(a) We used the period 1999-2009 because the FAA classification system was not introduced until 1997, and we assumed a short start-up period before national consistency was fully established.

(b) The category-C data are from 1999-2007, because a shift to ICAO classification rules as of FY 2008 raised problems in aggregating data from 1999-2007 with those from 2008-09.

One could argue that, because LAX-North suffered 1.1% of the Category A incursions in recent years—1 in 90—it would have approximately a 1 in 90 chance under baseline conditions of suffering a fatal accident in 2020. That argument tacitly assumes that the level and mix of air traffic at LAX-North would bear the same relation in 2020 to the national level and mix as prevailed in the recent past. We discuss the “fleet mix” assumption in Section 6.7; to put it briefly, we are comfortable using 1 in 90 as one plausible estimate of LAX-North’s share of national risk.

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Another estimation rule acknowledges that Category B and C incursions—though not as dire as those in Category A—represent lapses that pose real collision risk. A second estimate of LAX-North’s risk share is the *average* of its share of national Category A, Category B, and Category C incursions (i.e., of 1.1%, 2.2%, and 0.4%). That process yields a risk estimate of **1.2%**, very close to the number that arose for Category A incursions alone.

Two other estimates of LAX-North’s risk share arise from its level of traffic rather than its share of incursions. Barnett, Paull, and Idaeluca (2000) offered both conceptual and empirical arguments that collision risk at an airport varied not with its level of operations but rather with the *square* of the level of operations (*the quadratic model*). The FAA continues to use the quadratic model in its risk assessments about airport surface safety. LAX-North’s share of national risk based on the quadratic model<sup>c</sup> would be:

**1.7%** based on actual levels of operations in 2000<sup>b</sup>

**1.3%** based on projected levels in 2020<sup>c</sup>

Notes:

(a) We used the quadratic model to get the risk share for LAX as a whole, and then allocated risk between LAX-North and LAX-South based on their own squared traffic levels.

(b) We use 2000 data because 2000 was the year when operations at LAX reached their peak, so it yields a high estimate of the LAX traffic share.

(c) For 2020, we used Ricondo estimates of traffic levels at LAX, and TAF estimates for traffic at other airports.

These two traffic-based estimates—1.7% and 1.3%—join the two incursion-based risk estimates (1.1% and 1.2%) of the LAX-North risk share, yielding a total of four estimates. But more estimates can be obtained.

#### The Peer Airports

Other estimates of the risk share arose from the August experiment at NASA-Ames. Pilots in the Boeing 747 cockpit simulator who landed at LAX-North were asked about their perceptions, and in particular answered the following question in their post-flight surveys:

“How did the overall safety of this configuration compare to that at the other airports into which you fly?”

The pilots answered on a scale from 1 to 7, in which 1 meant “LAX much safer” and 7 meant “other airports much safer.”

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**1.7%** (based on squared operations in 2000 at peer airports)

**1.7%** (based on projected squared operations in 2020)

It is striking that these estimates—which were not rooted in data from LAX-North—were nonetheless very close to those previously offered that were based on LAX data. Taken together, the different estimates are *mutually corroboratory*: the pilots considered baseline LAX-North about as safe as the airports they deemed its peers, and incursion histories and traffic level risk-estimates implied essentially the same conclusion.

#### 6.6. An Estimate of the LAX-North Risk Share

In summary, we have come up with eight estimates of the chance that, if a fatal runway collision occurred in 2020 at a US towered airport, it would do so at LAX-North (assuming continuation of the present layout). These estimates were:

- 1.1% (Category A incursions, LAX-North)
- 1.2% (Category A, B, C incursions, LAX-North)
- 1.7% (Squared traffic share, 2000)
- 1.3% (Squared traffic share, 2020)
- 0.8% (Category A incursions, peer airports)
- 0.7% (Category A, B, and C incursions, peer airports)
- 1.7% (squared traffic per operation, 2000, peer airports)
- 1.7% (squared traffic per operation, 2020, peer airports)

The average of these eight numbers is 1.3%. However, to be conservative, we estimate as **2%**—1 in 50—the chance that a fatal runway incursion in 2020—if it occurs in the US would occur at LAX-North. This estimate is *higher* than all eight estimates we reached, and, once again, reflects our desire not to underestimate risk at LAX-North under baseline conditions.

To repeat:

We estimate as 2% the chance that, if a fatal runway collision occurs at a towered US airport at 2020 traffic levels, it would do so at LAX-North (assuming it retains its current layout).

#### 6.7. Aircraft Design Group VI Aircraft

It could be objected that none of these estimates takes account of the fact that Group VI aircraft—initially the Airbus 380 and the Boeing 747-800—will serve LAX to a highly disproportionate extent among US airports. If Group VI operations are less safe than those for smaller aircraft, then calculations that ignore their role could be too optimistic.

We have considered this possibility, and reject it on three grounds:

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Those pilots who landed in the existing layout for LAX North (i.e., in the baseline case) gave an average rating of 3.65 on the 1-7 scale. This outcome implies that LAX-North was *about average* in risk in comparison with the other airports (actually, slightly better than average), and was highly consistent with what they said in interviews. This assessment offers another way of estimating the risk share of LAX-North, based not on LAX data but rather on safety information about other US airports. The basic idea is that, if LAX-North is deemed as safe as Atlanta and the risk level at Atlanta is estimated as X, then X is also an estimate of the risk at LAX-North.

We designate the airports that the pilots considered about as safe as LAX-North baseline the *peer airports*. All the pilots at NASA-Ames were 747-qualified, and conducted international flights. They came from the airlines American, United, Northwest/Delta, and Cathay Pacific. When asked what other airports they had in mind when the answered questions about LAX-North, they (collectively) responded:

Airport	Airport
Atlanta	Miami
Chicago-O'Hare	New York (JFK)
Dallas-Fort Worth	San Francisco
Denver	Washington (Dulles)
Detroit	

We worked out the risk level *per operation* for these nine airports taken together, and used that to approximate the risk level per operation at LAX-North. To estimate risk per operation at the peer airports, we used the same four statistics we used earlier with LAX-North data:

- (i) rate of Category A incursions per operation
- (ii) average rate of Category A, B, and C incursions per operation
- (iii) squared traffic per operation in 2000
- (iv) squared traffic per operation in 2020 (using TAF data)

Using these four metrics and the peer-airport data, we reached the following estimates for the LAX-North risk share:

**0.8%** (based on Category A incursions at peer airports)

**0.7%** (based on A, B, and C incursions)

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- (i) *LAX has always been served disproportionately by the largest aircraft.*  
Thus, if large aircraft did pose excess risk of serious incursions, that circumstance would already be reflected in the incursions statistics about LAX.
- (ii) *While LAX has more large aircraft than the average US airport, its fleet mix does not diverge sharply from that at other major US airports.*
- The following table offers a synopsis of the situation:

Table 6-1: Peer Airports Considered in the Study.

Airport	Passengers per Aircraft Movement (Year 2007)
Atlanta (ATL)	90
Charlotte (CLT)	64
Chicago O'Hare (ORD)	82
Dallas Forth-Worth (DFW)	87
Denver (DEN)	81
Detroit (DTW)	77
Houston (IAH)	71
Los Angeles (LAX)	91
Miami (MIA)	87
Minneapolis/St. Paul (MSA)	78
New York (JFK)	108
New York / Newark (EWR)	82
Orlando	101
Phoenix (PHX)	78
San Francisco (SFO)	85
15-City Average	85

Source: A. Odoni, Table 12.1 in *The Global Airline Industry* (2009)

At 91, the average number of passengers per operation is only slightly higher than that at the 15 largest US airports (85), which handle a sizable fraction of US air traffic.

But perhaps most persuasive argument is the third:

- (iii) *There is no evidence that Group VI aircraft will be more "incursion prone" than other planes.*

By that statement we mean that Group VI planes will be no more likely to suffer incursions than other aircraft. If an incursion does occur and leads to a collision, the consequences could well be greater with Group VI aircraft, as we discuss in Section 6.6

There is little experience as of now with Group VI aircraft at LAX or elsewhere, though nothing to date indicates higher incursion rates for these planes. But LAX has a long history of handling large numbers of both "heavy" planes and Group V aircraft. The table below reflects LAX runway incursion data, and shows that large planes have been involved in incursions in proportions very close to their share of LAX traffic:

Table 6-2: Large-Aircraft Involvement in LAX Runway Incursions, 2002-2008.

Type of Plane	Percentage Share of Aircraft Involved in Incursions	Percentage of LAX Flight Operations
Heavy	19%	18%
Group V	7%	9%

Notes: By "percentage share of aircraft involved in incursions," we mean the fraction of those aircraft involved in incursions that were of the type listed. We do not distinguish between the plane that was the "intruder" in the incursion and the other aircraft.

Heavy aircraft include the Boeing 747, Boeing 767, Boeing 777, Airbus 330, Airbus 340, and McDonnell Douglas MD-11.

Group V aircraft include the Boeing 747, Boeing 777, and Airbus 340. Group V is a subset of "heavy." In short, we see no reason to expect that Group VI aircraft will pose a higher level of incursion risk than other planes operating at LAX.

6.8. A Baseline Frequency Estimate for Fatal Collisions at LAX-North

At this stage, the overall risk estimate for LAX-North baseline follows quickly from what was said earlier.

- (i) We estimated that, at 2020 traffic levels, a fatal runway collision would occur at a towered US airport approximately once every four years.
- (ii) We estimated that 2% of such runway collisions—I in 50--would occur at LAX-North under baseline conditions.

Taken together, these estimates imply that:

*At 2020 traffic levels, fatal runway collisions at LAX-North under the current airport layout would occur approximately once every 4 x 50 = 200 years.*

Of course, this statistic "once every 200 years" is an average, mid-range estimate. We are not asserting that such a collision could not occur on 1/1/2020; we are suggesting that the daily probabilities are so low that the average time until the first fatal collision would be 200 years.

We understand that this estimate might strike some readers as unreasonably low. We can only respond that it follows inexorably from the calculations that preceded it. And we stress that at two key points—in estimating the effectiveness of AMASS/ASDE-X/RWSL and in estimating the risk-share for LAX-North baseline--we used *higher risk estimates* than were suggested by the underlying data. Had we used the FAA estimate of 88% effectiveness for AMASS/ASDE-X/RWSL (rather than 75%), and had we assumed that LAX-North baseline had a 1.3% chance of being the venue of a fatal US runway collision (rather than 2%), we would have reached a risk estimate of once every 600 years.

We would also reiterate that there has not been a fatal runway collision at a towered US airport since early 2000. During the decade since that time, there have approximately 500 million safe operations at these airports. It is projected that LAX-North will have approximately 400,000 operations per year in 2020. Thus, towered US airports have collectively performed over *1000-years worth of LAX-North operations* since early 2000, and all in perfect safety. Against that backdrop, it is not outlandish to suggest that LAX-North can average as few as one fatal collision every 200 years, especially with technologies like ASDE-X and RWSL that were not widely available in the last decade.

6.9. The Consequences of a Fatal Runway Collision on LAX-North

While the frequency of fatal collisions is of great interest, it is necessary to estimate how many lives would be lost should a collision occur. Barnett, Paull, and Idealuca (2000) studied casualty patterns in worldwide fatal collisions, and estimated after extensive calculations that a fatal runway collision at a towered U.S. airport would on average cost 48 lives. The actual number killed could vary widely around that average: many fatal collisions involve only one or two deaths; at the other extreme, the 1977 collision at Tenerife in the Canary Islands cost 583 lives. The estimate of 48 deaths took account of a consistent pattern: when two planes of unequal size collided, the percentage killed is generally far higher on the smaller plane than on the larger one. In the 1991 collision at LAX, for example, the death rate was 100% on the small commuter plane but was 25% on the 737 jet that crashed into it.

It is certainly the case that planes at LAX on average carry more passengers and crew than those at a randomly-chosen US airport (though, as we have seen, only slightly more than at a busy US commercial airport). Group VI aircraft are projected to perform only a small percentage of LAX flights in 2020 (perhaps 3%), but they could carry up to 500 passengers apiece. Taking various factors into account, the Panel approximately *doubled* the overall casualty estimate in the 2000 study: roughly speaking, the assumption was that two planes that collided at LAX would on average hold 200 passengers in total, and that half of them would survive the fatal crash. The Panel estimated that:

*A fatal runway collision on the LAX North Airfield in 2020 would on average entail a death toll of 100.*

6.10. Mortality Risk on the LAX North Airfield in 2020, Baseline Case

As described, the Panel reached the approximations that:

- On average, fatal runway collisions at LAX-North would occur on average once every 200 years, under 2020 traffic levels and the current runway layout.
- When fatal runway collisions occurred at LAX, they would on average take 100 lives.

Taken together, these assumptions imply an average loss of 100 lives every 200 years. That works out to *five lives lost per decade*. Because of random variability in the actual frequency of fatal collisions and in the death toll in each one, there is a statistical *margin of error* in this projection. Over a long period, the confidence interval for lives lost extends from a low of *one* death per decade and a high of *eight*. Outcomes near five are more likely to arise than outcomes at the edges of the confidence interval. The actual toll could obviously fall outside these limits, but the Panel believes that the probability that would happen is low.

To summarize:

*The Panel estimates that, if the current layout at LAX-North remains in place, runway collisions at 2020 traffic levels would cause an average toll of five deaths per decade there. This average arises because fatal collisions would occur on average once every 200 years, but would cause an average of 100 deaths when they do occur. The Panel assigns a margin of error to this estimate, and projects that the average death toll per decade could be as low as one and as high as eight. It believes, however, that five is a more likely outcome than these lower or upper bounds.*



### 6.11. Some Perspective on the Mortality Risk Estimate

Like everyone at LAWA or NORSAC, the Panel would prefer that the risk level be zero. But how might one interpret a statistic like “five deaths per decade in runway collisions?” We will discuss the issue further in the chapter on Summary and Conclusions, but offer a few thoughts now.

At 2020 traffic levels, LAX would handle approximately 75 million passengers per year. That works out to 750 million passengers per decade, meaning that the risk per passenger assuming five deaths per decade would be approximately *one per 150 million* ( $750 \text{ million} \div 5$ ). That number is small compared to the risks that citizens face every day. Based on recent statistics, for example, an American baby born now would have roughly a 1 in 100 chance of eventually dying in an auto accident. And Southern Californians know of the menace posed by the San Andreas Fault.

It is true that aviation is held to an extraordinarily high safety standard. Even by that standard, however, the risk associated with runway collisions is small. Accidents beyond the runways and terrorist acts are statistically more dangerous to passengers than runway collisions, as is illustrated by recent LAX experience. During the first decade of the 21<sup>st</sup> century, Alaska Air 261 crashed into the Pacific while attempting an emergency landing at LAX, while, on 9/11/01, American #11, United #175, and American #77 never reached their destination of Los Angeles. There were no survivors on any of these flights. Overall, the death risk per flight on a US aircraft was *one in ten million* over 2000-09 (Barnett, 2009). At that rate, about 75 of the 750 million passengers who landed at or took-off from LAX would perish for reasons unrelated to runway hazards. Runway collisions on the North Airfield in baseline conditions, in other words, would account for approximately 1/16 of the extremely low level of mortality risk that US air travelers face (5 deaths out of  $75 \div 5 = 80$  deaths).

To summarize, aviation hazards would cause approximately 80 deaths *per decade* at 2020 traffic levels among the 750 million passengers served each decade by the LAX runways. Five of these deaths would arise in runway collisions. (We emphasize that *this calculation assumes continuation of the present layout of the North Airfield.*) Even if changes to the North Airfield runway configuration reduced the number of deaths in runway collisions by (say) half, the expected number of deaths would only fall from 80 to approximately 78. We would summarize our conclusions about mortality risk in the baseline case as follows:

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- The runway-collision risk to LAX air travelers would be extremely low in absolute terms, even at 2020 traffic levels.
- The risk would be very low relative to the other mortality risks that face residents of Los Angeles.
- The risk would be low even relative to overall mortality risk of passenger aviation, which is itself exceedingly low.

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## 7. COLLISION-RISK ASSESSMENT: BASELINE WITH IRSIP

At the request of NORSAC the Academic Panel reviewed the Los Angeles Interim Runway Safety Improvement Project (IRSIP) (Feldman 2009a; Feldman 2009b). This program is a pro-active effort by LAWA to enhance the safety of the existing airport while maintaining operational efficiency pending the long-term decisions of the North Airfield configuration (LAWA, 2009a). The IRSIP improvements discussed here are rooted in the FAA Engineering Brief 75 (FAA, 2007) that states:

“... The preference is for aircraft to cross in the last third of the runway whenever possible, since within the middle third of the runway the arriving/ departing aircraft is usually on the ground and traveling at a high rate of speed.”

The application of this guiding design principle to the North airfield has been studied by LAWA and its contractor HNTB in the last two quarters of 2009. The goal is to move runway exit Zulu further downrange from its present location, eliminate Yankee for West landings, and create a new high-speed runway exit called AA1 further downrange of the present AA. This new configuration for the North Airfield is shown in Figure 7-1. The idea is to locate runway exits on runway 24R so that all the junctions of these runway exits with runway 24L fall in the last third segment of the runway as stipulated in the FAA Engineering Briefing 75.



Figure 7-1: Proposed Interim Runway Safety Improvements in the North Airfield.  
Source: LAWA and HNTB (2009).

The analysis presented in this Section is a simple analytical effort to estimate some of the safety implications of the new Baseline airport with changes stated in the IRSIP document. The Academic Panel and NASA were made aware of this idea in the third quarter of 2009. At the time, all FFC visuals had been prepared and the long lead-time of the simulation did not allow this scenario to be tested. Nevertheless, we gathered data about the airport operations that could be the starting point of a more detail analysis later on.

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The WCG LAX study (2007) describes a matrix of 10 hazards identified for LAX. Feldman (2009a) describes hazards LAX001 and LAX002 as runway incursions caused by a blundering landing aircraft that crosses the hold bars on Yankee and Zulu while a departure takes place on runway 24L. The differentiation of the two hazards is related to the wake class of the departing aircraft on runway 24L. Two more runway incursion hazards are identified when the blunder occurs on taxiway AA or BB (called LAX003 and LAX004). Again, the wake class makes the difference between hazards LAX003 and LAX004. The WCG matrix is shown for completeness in Figure 7-2. Note that both LAX001 and LAX002 fall into the medium risk zone since the severity (or consequence) of a collision for a departing aircraft on 24L with another crossing Zulu or Yankee would occur at relatively high speeds thus causing a “hazardous” condition in the severity category. It is interesting to observe that hazards LAX003 and LAX004 are placed in the “minor” severity category and are as improbable to occur as LAX001 and LAX002 with probability of happening once every 1-100 years. One immediate question from the previous evaluations is whether or not the severity classification for these cases is objective, considering the historical trends observed at the airport.

Severity	No Safety Effect	Minor	Major	Hazardous	Catastrophic
5	4	3	2	1	
Frequent - A More than once per year					
Probable - B Once every month					
Rare - C Once every year			LAX 005 LAX 006 LAX 009		
Extremely Rare - D Once every 10- 100 years		LAX 003 LAX 004 LAX 010	LAX 008	LAX 001 LAX 002 LAX 007	
Extremely Improbable - E Less than once every 100 years					*

Figure 7-2: LAX North Airfield Risk Matrix. Source: LAX WCF Safety Risk Management Panel (2007). Red = High Risk, Yellow = Medium Risk and Green = Low Risk.

For example, taxiways with historically distinct runway incursion rates are bundled together in the likelihood category (i.e., Yankee and Zulu). Figure 7-3 demonstrates that various

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runway exits in the North airfield have very distinct Runway Incursion Rates (RIR). The figure has been created using FAA runway incursion data for years 1999-2007 (ASIAS, 2010) and using the FAA Terminal Area Forecast (TAF) to account for operations at LAX over the time period of analysis. Following historical patterns at LAX, 42% of the landings at LAX are assigned to runway 24R. The number of operations at individual runway exits on runway 24R have been estimated using the Academic Panel's field observations (time-stamp method) and studying four hours of ASDE-X radar data. Table 7-1 summarizes the runway exit data collected by the Academic Panel. Figure 7-3 suggests that perhaps the hazard analysis suggested in Figure 7-2 should distinguish between exit locations that are more prone to runway incursions. Obviously Zulu is very prone to runway incursions, whereas Yankee is not. AA falls in-between but still displays a high runway incursion incidence compared to Yankee (one of the exits to be eliminated in the IRSIP program).

The IRSIP document states that if the relocation of the runway exits is carried out the overall risk level will be reduced for the North airfield so as to move LAX001 to the “major” severity category and LAX002 to the extremely improbable category (i.e., less than once in 100 years). The analysis presented in the WCG seems to be based on “qualitative” assessments and does not offer the analysis to justify moving some of the hazards from the medium risk to the low risk area. For example, the reduction of risk for LAX002 would require that most heavy aircraft departing runway 24L would be airborne at the junction of 24L and the new Zulu (located 7,000 feet down the runway).

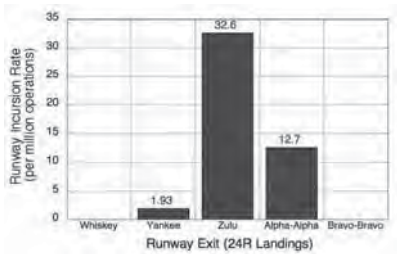


Figure 7-3: LAX North Airfield Runway Exit Incursion Rates.

Table 7-2 summarizes the mean and standard deviation of takeoff distances for two groups of aircraft defined in the IRSIP study (i.e., non-heavy and heavy). The heavy group has a mean takeoff distance of 8,080 feet. Large and small aircraft (all in one category) have average takeoff distances of 7,024 feet. The sample size is small but generally shows a trend that seems realistic. Today, most of the aircraft operating out of Los Angeles employ “flex” thrust settings at takeoff to reduce engine wear and prolong engine life. This effect lengthens the takeoff runway distances. The AP Panel observations using actual video of operations corroborates the takeoff distance numbers. For example, Figure 7-5 shows a Boeing 737-700 (non-heavy) departing runway 24L while an Airbus A380-800 holds on taxiway AA. The Boeing 737-700 rotates slightly ahead of the 7,000 feet mark but, according to our definition of takeoff distance the ASDE-X system will not “detect” the aircraft in the airborne phase until 50-100 feet above the ground. This is the distance reported in this study. Notice that the same distance is not likely to clear a tall tail of an ADG VI aircraft as shown in the picture. Nevertheless, for this analytical study, our definition of takeoff distance would probably equate to the ability to clear an imaginary 35-foot obstacle as stipulated by FAA takeoff distance requirements (FAR 25, 2010).

Table 7-2: Summary of Takeoff Distances Observed at LAX Using ASDE-X Radar Video Data.

Parameter	Large and Small (non-heavy)	Heavy and B757 (report as heavy)
Mean Takeoff Roll Distance (feet)	7,024	8,080
Standard Deviation Takeoff Toll Distance (feet)	1,485	1,235
Number of Data Points (takeoffs)	86	29

7.2. Estimation of Runway Exit Use Under IRSIP Scenario

To further understand the safety benefit of the relocations proposed in IRSIP we estimate the utilization of the new exits (new Zulu, AA and AA1). This is accomplished using the Runway Exit Design Interactive Model (REDIM 3.0) – a computer model developed at Virginia Tech for the FAA and NASA to that estimates the runway exit utilization considering individual aircraft kinematics (Trani et al., 1999). The input to the model to estimate the utilization of new exits is

Table 7-1: Summary of Runway Exit Utilization in the North Airfield. Numbers in the Table Represent the Percent of Aircraft Landing on Runway 24R Taking a Specific Runway Exit. Academic Panel Observations and Analysis.

	Runway Exit				
	W	Y	Z	AA	BB
All Operations (ASDE-X)	0	36	14	50	0
All Operations (Time-Stamp)	1	40	4	54	1
Final Values in Risk Analysis	0	38	9	52	1

7.1. Empirical Observations at LAX

Our empirical observations using video and ASDE-X suggest that 20% of the heavy fleet operating at LAX will be barely airborne at such distance. Figure 7-4 illustrates the cumulative density function of the airborne distance versus distance from departing threshold of runway 24L. Figure 7-4 also suggests that 53% of the non-heavy aircraft operating at LAX today would likely be just airborne at a point 7,000 feet down the runway. The distance x corresponds to the first instance in the ASDE-X video data when an aircraft transitions from the ground to the air mode.

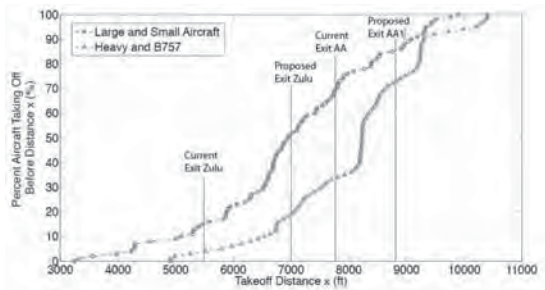


Figure 7-4: Cumulative Density Function of Aircraft Takeoff Distance x from Runway 24L Departing Threshold at LAX. Data Applies to all Runways at LAX.

shown in Table 7-3. The aircraft fleet is representative of today’s operations at LAX in the North airfield. The model predicts an expected value of runway occupancy time (ROT) of 56 seconds for all operations. ROT in the model is defined as the time span from threshold crossing to the clearance of the imaginary plane of the runway with either a wingtip or a tail-tip (if taking a right-angle turnoff).



Figure 7-5: Example of Operations in the North Airfield with Potential Runway Incursion Interactions (A.A. Trani).



Table 7-3: Aircraft Mix Used to Estimate Runway Exit Utilization for Landings of Runway 24R Under IRSIP Scenario.

Wake Class	Percent Fleet Mix (%)	Representative Aircraft (% of Fleet)
<b>Small</b>	5	EMB120 (5)
<b>Large</b>	77	Boeing 737-300 (27) Boeing 737-700 (20) Airbus A320 (20) EMB135 (10)
<b>B757</b>	6	Boeing 757-200 (6)
<b>Heavy</b>	11	Boeing 747-400 (6) Boeing 777-200 (5)
<b>Super-heavy</b>	1	Airbus A380 (1)

Table 7-4 summarizes the exit utilization with the Interim Improvements. The table shows that 71% of the Airbus A320 will use the New Zulu exit, 23% will use AA and the remaining 6% are likely to use AA1. The values shown in the table assumed 75% dry runway conditions and 25% wet to account for annual use with varying pavement conditions.

Table 7-4: Estimated Runway Exit Utilization for Landings on Runway 24R. Academic Panel Analysis Using the REDIM 3.0 Model. Numbers in Each Cell Represent the Percent of Aircraft Taking Each Runway Exit.

Runway Exit	New Zulu	AA	AA1	BB	Total
<i>Aircraft</i>					
A320	71	23	6	0	100
A380	0	56	41	3	100
B733	75	24	1	0	100
B738	73	26	1	0	100
B744	0	56	40	4	100
B757	65	34	2	0	100
B772	31	58	10	1	100
E120	100	0	0	0	100
E135	92	8	0	0	100

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Table 7-5: Los Angeles International Airport Breakdown of Annual Runway Operations (source: LAWA EIS, 2008).

Runway	Arrivals	Departures
<b>24R</b>	134,111	7,206
<b>24L</b>	7,597	136,142
<b>Total North</b>	141,708	143,348
<b>25R</b>	20,908	143,533
<b>25L</b>	158,179	31,855
<b>Total South</b>	179,087	175,388
<b>Total Airfield</b>	320,795	318,736

Table 7-5 contains the typical breakdown of landings per runway for LAX (EIS, 2008). Using Tables 7-4 and 7-5 we estimate the expected number of operations at every new runway exit proposed by the Interim Improvement plan. Table 7-6 shows the results of this analysis. A few observations are important.

- 1) The new taxiway Zulu takes most of the landing traffic from Yankee, old Zulu and about 47% of the operations assigned to AA in the Baseline case.
- 2) The move from old Zulu to new Zulu is good news since this will improve the chance that an aircraft departing runway 24L would avoid a collision with a blundering aircraft entering 24L accidentally.
- 3) However, the traffic that moves from AA to new Zulu actually would increase the conditional probability of a collision given a blunder because more traffic will be crossing closer to the departure end 24L.

Table 7-6: Estimated Annual Runway Exit Use for Landings on Runway 24R. Numbers in Each Cell Represent the Number of Aircraft Landings Expected in Each Runway Exit.

Runway Exit
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	Yankee	Zulu	New Zulu	AA	AA1	BB
<i>Exit Location (ft) From 24R threshold</i>	4,560	4,600	6,200	7,000	7,800	8,670
<i>Percent Use (%) Baseline</i>	38	9	N/A	52	N/A	1
<i>Annual Landings Baseline</i>	50,962	12,070	N/A	69,738	N/A	1,341
<i>Percent Use (%) IRSIP Scenario</i>	N/A	N/A	68	27	5	0
<i>Annual Landings IRSIP Scenario</i>	N/A	N/A	90,632	36,155	6,893	429

N/A means runway exit is not available in that scenario.

Using the CDF distribution presented in Figure 4-7 we estimate the probability that an aircraft taking off on runway 24L will lift-off in various runway segments between runway exits. Table 7-7 presents the results of this calculation and we introduce labels 1-6 for all runway segments. The utilization of each runway exit is presented in Table 7-8. We introduce labels A through F to facilitate further calculations.

Table 7-7: Probability that the Aircraft Taking off on Runway 24L will Lift-off in a Runway Segment.

	1	2	3	4	5	6
	0-Yankee	Yankee – Zulu	Zulu – New Zulu	New Zulu – AA	AA – AA1	AA1 – BB
<b>Non-Heavy</b>	0	0.16	0.36	0.14	0.20	0.14
<b>Heavy</b>	0	0.04	0.14	0.15	0.40	0.27

Table 7-8: Probability that an Aircraft Landing on Runway 24L will use a given Exit.

A	B	C	D	E	F
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	Yankee	Zulu	New Zulu	AA	AA1	BB
<b>Baseline</b>	0.38	0.09	0	0.52	0	0.01
<b>IRSIP</b>	0	0	0.68	0.27	0.05	0

The next step is to perform a simple convolution calculation to estimate the percent of aircraft that taking off from runway 24L that would clear a blundering aircraft using a given exit. To illustrate the problem consider non-heavy aircraft taking off from runway 24L in the Baseline configuration. The percent of aircraft departing 24L and lifting off between Yankee and Zulu is known to be 16% (0.16 in column 2 of Table 7-7). According to Table 7-8, 38% of the arrivals on runway 24R use runway exit Yankee in the Baseline case. The contribution of these landing aircraft to the overall probability of aircraft departing on 24L and lifting off in segment Yankee-Zulu is then the product  $(0.16)(0.38) = 0.0608$ . This is shown in Table 7-9. This process is repeated for all combinations of values contained in Tables 7-7 and 7-8. The results are shown in Tables 7-9 through 7-12. Tables 7-9 and 7-10 show the results for the Baseline airfield. Tables 7-11 and 7-12 show the results for the IRSIP configuration. The numbers in red indicate the percentages of aircraft taking off that will be airborne and thus avoid a collision if the blundering aircraft enters runway 24L accidentally. Table 7-13 summarizes the percent of aircraft of each type that will be able to overfly a runway incursion. The table indicates that under Baseline case 33% of the aircraft departing runway 24L will be able to overfly an incursion.

Table 7-9: Convolution of Tables 7-7 and 7-8. **Baseline Scenario: Non-Heavy Takeoff.** Numbers in Red Indicate Percentages of Aircraft Airborne.

	A	B	C	D	E	F
<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>2</b>	0.0608	<b>0.0144</b>	<b>0</b>	<b>0.0832</b>	<b>0</b>	<b>0.0016</b>
<b>3</b>	0.1368	0.0324	<b>0</b>	<b>0.1872</b>	<b>0</b>	<b>0.0036</b>
<b>4</b>	0.0532	0.0126	<b>0</b>	<b>0.0728</b>	<b>0</b>	<b>0.0014</b>
<b>5</b>	0.076	0.018	<b>0</b>	0.104	<b>0</b>	<b>0.0020</b>
<b>6</b>	0.0532	0.0126	<b>0</b>	0.0728	<b>0</b>	<b>0.0014</b>

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Table 7-10: Convolution of Tables 7-7 and 7-8. **Baseline Scenario: Heavy Takeoff.** Numbers in Red Indicate Percentages of Aircraft Airborne.

	A	B	C	D	E	F
1	0	0	0	0	0	0
2	0.0152	0.0036	0	0.0208	0	0.0004
3	0.0532	0.0126	0	0.0728	0	0.0014
4	0.057	0.0135	0	0.078	0	0.0015
5	0.152	0.036	0	0.208	0	0.004
6	0.1026	0.0243	0	0.1404	0	0.0027

Table 7-11: Convolution of Tables 7-7 and 7-8. **IRSIP Scenario: Non-Heavy Takeoff.** Numbers in Red Indicate Percentages of Aircraft Airborne.

	A	B	C	D	E	F
1	0	0	0	0	0	0
2	0	0	0.1088	0.0432	0.008	0
3	0	0	0.2448	0.0972	0.018	0
4	0	0	0.0952	0.0378	0.007	0
5	0	0	0.136	0.054	0.01	0
6	0	0	0.0952	0.0378	0.007	0

Table 7-12: Convolution of Tables 7-7 and 7-8. **IRSIP Scenario: Heavy Takeoff.** Numbers in Red Indicate Percentages of Aircraft Airborne.

	A	B	C	D	E	F
1	0	0	0	0	0	0
2	0	0	0.0272	0.0108	0.002	0

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suggests that it is not certain that closing Taxiway Yankee will reduce collision risk but could rather increase it if historical trends are to be believed.

Consider the analysis presented in Table 7-7. The table illustrates the total risk calculation of Baseline vs. IRSIP if we assume the RIR metric for the new exits is half that of AA (i.e., 6.34 incursions per million landings). The table shows that cumulatively, the total risk of incursions per year for the Baseline is 1.38 incursions per year. The table also shows that the total risk for IRSIP would be 1.08 runway incursions per year. This produces a net gain for the IRSIP alternative of 22% in risk reduction compared to the Baseline. However, if the new exits Zulu and AA1 are as risk prone as AA (with RIR at 12.68 incursions per million landings), the analysis produces 1.38 runway incursions per year for the Baseline and 1.70 runway incursions per year for IRSIP. This means the probability of incursion for IRSIP would be higher than the Baseline case. Factoring in the probability of collision given an incursion for the IRSIP case, this would produce a net gain for IRSIP of 18.9%. This is the most likely scenario given the apparent relationship between runway exit angle and runway incursion rate.

*This suggests that careful attention should be paid to the geometric design aspect of the new runway exits suggested for IRSIP to avoid high RIR rates as in the current Zulu.* At the time of our report writing, the detailed geometric design standards for AA1 and New Zulu were not known.

This last point brings us to the paradox of high-speed runway exit design with two close parallel runways (e.g., LAX). This paradox applies to both Baseline and IRSIP. In general we would like to:

- Design high-speed runway exits to reduce Runway Occupancy Time (ROT) – good for arrival acceptance rate or good for mixed runway operations, and
- Design high-speed runway exits that promote safety at the crossing junction with 24L.

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3	0	0	0.0952	0.0378	0.007	0
4	0	0	0.102	0.0405	0.0075	0
5	0	0	0.272	0.108	0.02	0
6	0	0	0.1836	0.0729	0.0135	0

Table 7-13: Probability of Overflying Incursion Aircraft. North Airfield Operations.

	Baseline	IRSIP
Non-heavy take-off	0.37	0.57
Heavy take-off	0.19	0.25
80% Non-heavy, 20% Heavy	0.33	0.51

The IRSIP scenario indicates that 51% percent of the aircraft will overfly the blundering aircraft. This result implies that, “all other conditions being equal”, the IRSIP scenario reduces the probability of collision given a runway incursion by 27% ((67-49)/67). However, this analysis assumes that the exposure to runway incursions will be the same in the Baseline and IRSIP. There is evidence that the risk of runway incursion is higher for certain types of runway exits in the North. For example, Figure 7-3 shows the large variability of runway incursion rates among runway exits in the North airfield. More careful analysis is needed to understand the causal link between runway exit geometry and runway incursion rates. For LAX North, common elements of runway exits Zulu and AA (with the highest RIR metric) are: 1) both are high-speed exits and 2) both have acute exit angles (albeit different geometries).

Figure 7-6 presents the RIR metric vs. runway exit angle for all four exits in the North airfield. The plot clearly indicates that while high-speed runway geometries are good to reduce ROT and thus improve saturation arrival capacity on Runway 24R, they also pose a problem in terms of runway incursions in the specific case of close-parallel runways (a well known problem for airports like Los Angeles). If the new exit types in the IRSIP study are similar to AA and, and if the runway incursion rate of AA is an indication of the things to come (6 times higher risk than Yankee), then having two new “good” runway exits further downrange with higher individual RIR risks, could erode the gains achieved by displacing the runway exits further downrange. This

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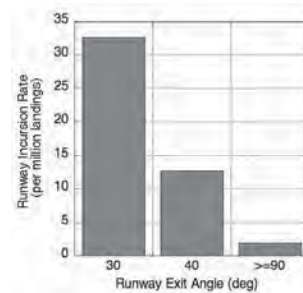


Figure 7-6: Runway Incursion Rate vs. Runway Exit Angle. Runway 24R Exits.

*These two design criteria are difficult to reconcile without an invisible “barrier” that precludes pilots from blundering.* The barrier could be a center taxiway or a combination of technologies (ground-based lights like RWSL, flight deck or ATC tower-based systems like ASDE-X) that prevents pilots from crossing hold bars accidentally. Both techniques are investigated in Section 8 of this report. Any airport designer will agree that building high-speed exits between two closely-spaced runways is not a good idea. Our analysis of taxiways Zulu and AA is that they do have slightly more than 1,150 feet of path length (at the centerline) to decelerate an aircraft between the point of curvature (entry point to the turnoff on the runway centerline) and the hold bars. If an aircraft enters either Zulu or AA at 60 knots (considered a very high speed for these exits), a very modest deceleration rate of  $-4.4 \text{ ft/s}^2$  would be needed to bring the aircraft to a full stop at the hold bar position. This assumes the pilot is attentive and willing to brake in the turn at a modest rate.

Table 7-14: Estimated Yearly Incursions and Risk of Baseline vs. IRSIP. Assume RIR for New Exits is Half the Historical Value of Runway Exit AA.

Runway Exit							Total RI
	Yankee	Zulu	New Zulu	AA	AA1	BB	

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Annual Landings Baseline	50,962	12,070	N/A	69,738	N/A	1,341	
Annual Landings IRSIP Scenario	N/A	N/A	90,632	36,155	6,893	429	
Runway Incursion Rate (per million) Baseline	1.98	32.56		12.68		0.00	
Incursions per Year	0.0983	0.3931		0.8843		0	1.3757
Runway Incursion Rate (per million) IRSIP			6.34	12.68	6.34		
Incursions per Year			0.5747	0.4584	0.0437	0	1.0769

N/A means runway exit is not available in that scenario.

The analysis so far does not consider the benefit IRSIP could have by providing pilots and controllers with more time to recognize and react to a runway incursion because the runway exits are located further downrange. This requires an estimation of the probability that the takeoff will be aborted and that the aborting aircraft stops short of a collision. This was not calculated in this study. The Academic Panel recommends more analysis for this configuration.

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## 8. COLLISION-RISK ASSESSMENT: 100' NORTH

The significant change brought by the 100-North alternative is a centerline taxiway between runways 24L and 24R. We begin our analysis of the 100-North alternative with a general comparison between a runway complex with two closely-spaced parallel runways and a centerline taxiway (CeT case) and a complex having two closely-spaced parallel runways without such a taxiway (NCT case). There are a number of operational capabilities and performance changes provided by centerline taxiways. Some of these mainly impact the efficiency of airport operations and others mainly impact safety. Our focus here is safety. Probably the most prominent collision risk of an NCT runway complex, like the Baseline, involves an aircraft arriving on the outboard runway, taking a high-speed exit and then crossing the inboard runway, or breaching the hold bar, without clearance from the controller. Such an incident can involve a very high degree of risk, as the arriving aircraft could encounter an aircraft departing on the inboard runway. A number of such runway incursions have been observed on both the LAX North runway complex and the LAX South runway complex (prior to the construction of a centerline taxiway on the South). These runway incursions play an important role in our analysis and so we specifically identify them as Exit-No-Stop (ENS) incursions. It seems clear that an ENS incursion generally would be caused by a distracted or disoriented pilot or by a pilot exiting at too high a speed. Usually there is some degree of mis-communication between the pilot and controller as well.

Figure 8-1 illustrates the exit path of an aircraft arriving on the outboard runway with and without a centerline taxiway. One can see that, in the CeT case, the aircraft is forced to perform a combination of two rather sharp turns. This both reduces the likelihood of a pilot being distracted by requiring greater attentiveness, forces a greater degree situational awareness and, of course, forces a greater speed reduction. Thus, it seems evident that:

***A centerline taxiway should reduce the risk of ENS incursions and moreover this is an objective of their design.***

Of course, there are other operational advantages of a centerline taxiway. While these most directly would seem to provide efficiency advantages, they also can potentially improve safety. A major challenge in managing aircraft operations for airports with closely spaced parallel runways involves maintaining a high level of departure throughput in light of the need to allow arriving aircraft to cross the inboard (departure) runway. A further challenge can be posed by congestion in the terminal area, e.g. on a taxiway parallel to the runways. Such congestion might prevent the

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ability to cross aircraft at certain times and/or locations. As illustrated in Figure 8-2, the crossing of aircraft is facilitated by the ability to buffer aircraft. In the NCT case, the taxiway-exits between the two runways provide some buffering capability, while in the CeT case, the entire centerline taxiway provides a (much larger) buffer. Further, the centerline taxiway also provides the capability to move aircraft to different crossing locations, while in the NCT case, the arriving aircraft can only cross the inboard runway at the location of the taxiway-exit it used upon arrival. Thus,

***A centerline taxiway:***

- gives controllers the ability to move aircraft to the most appropriate crossing point,*
- improves the controller ability to time crossings and*
- offers more opportunity to cross multiple aircraft simultaneously.*

These capabilities can be used to improve the efficiency of ground operations. Moreover, by reducing the cases where a controller is forced to carry out a particular crossing operation, they have the potential to improve safety.

NCT (Baseline) Case:



CeT (100-North) Case:

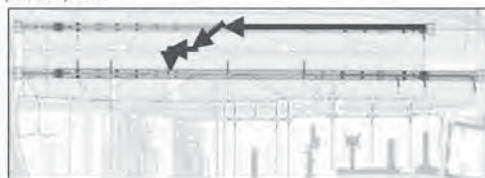


Figure 8-1: Comparison of Exit Path with and without Centerline Taxiway

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Another related safety issue for the NCT case involves holding aircraft on the exit-taxiways. For larger aircraft, it can be the case that, if an aircraft holding on an exit-taxiway is incorrectly positioned, its tail could protrude into outboard runway safety zone. This obviously would pose a safety hazard. It can also be the case, that two aircraft could occupy the same exit-taxiway. Such an occurrence would result in an even greater risk that the protrusion of an aircraft tail into the outboard runway. Thus,

***The centerline taxiway should nearly eliminate hazards involving aircraft tails protruding onto the outboard runway.***

With this background we now proceed to assess the relative risk of the Baseline and 100-North cases. We start with an analysis of the results from the Sim (Section 8.1) and then proceed with an analysis of historical LAX incursion data (Section 8.2). Section 8.3. provides overall conclusions for the 100-North case.

NCT (Baseline) Case:



CeT (100-North) Case:



Figure 8-2: Comparison of Buffers with and without Centerline Taxiway.

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8.1. Analysis of Simulation Results

We now review the Simulation results and present the insights they provide and the conclusions they support. First, it is very important to point out that the Simulation allowed the AP, the subject pilots, the subject controllers and other experts to observe the “actual” operation of the LAX North Runway complex after the 100-North modifications. This has been invaluable in providing the AP with insights into the basic functionality 100-North provides and how it differs from the Baseline and the other alternatives. In fact, the discussion provided at the beginning of this section was largely based on our own observations and discussion with experts while watching 100-North operations.

8.1.1 Controller Interviews

We start with an analysis of the controller interviews. A very prominent theme in the interviews was the near universal opinion that a centerline taxiway provides a significant positive impact on airport operations. Below we provide some specific excerpts from the interview notes that support this conclusion:

Group 1:

*South easier to manage than North – tremendous improvement with center taxiway; Center taxiway is the only way to go: more flexibility in timing runway crossing (don’t miss departure “holes”); can better respond to congestion on other taxiways.*

Group 2:

*Centerline taxiway helps ground controllers and local controllers alike; today’s operation is surgical (requires a lot of planning and limited holding capacity between runways in the North); the presence of a centerline taxiway allows more flexibility in handling traffic; a centerline taxiway is a “must” to improve the operation at this airport; any of the 100’ or 340’ is a vast improvement over today’s configuration.*

Group 3:

*Centerline taxiway is a tough mindset to change, i.e. it makes things much easier to operate; it makes lots of strategies “work”; don’t have to be super-precise; generally things are not as efficient or safe without center taxiway; reduces risk of incursion.*

The 2<sup>nd</sup> and 3<sup>rd</sup> groups of controllers both rated 100-North and 340-N significantly above all other alternatives indicating that 340-N was noticeably better than 100N; the 1st group of

controllers was not quite as explicit but implicitly seemed to have a similar opinion. The 3<sup>rd</sup> group of controllers explicitly used the analogy that if 340-N represented 100% improvement then 100-North attained 80% of that objective. Certain controllers indicated that the relative degree of incremental improvement of 340-N over 100-North depended on the number of Group VI aircraft in the fleet composition. Here it seemed clear that the criterion for rating one alternative better than another depended on a combination of improved safety, improved efficiency and better ability for the controllers to carry out their job function well.

8.1.2 Controller Surveys

We now consider the controller surveys. Questions 1 through 13 deal with effects generally related to operational efficiency and improvement in the controller job function. Question 15 explicitly deals with the risk of a runway incursion. To quantify the degree of difference in the risk level between 100-North and the Baseline as expressed by the subject controllers, we mapped the responses on Question 15 to a relative risk scale as follows. We assume that answers at the extreme ends of the scale—1 and 7 in the surveys conducted for our study—are associated with a large difference in relative risk, say 95% for 7 and 5% for 1. Relative risk values for intermediate points can then be calculated by interpolation. Two forms of interpolation may plausibly be employed. The first is linear. Assuming 95% and 5% for the endpoints, then a 1-point move along the scale is associated with a  $(95\%-5\%)/(7-1)=15\%$  change in relative risk. The second form of interpolation is logarithmic. In this case, each 1-point movement has a constant multiplicative effect. Again assuming 95% and 5% for the endpoints, a 1-point increase multiplies the risk by  $(95\%/5\%)^{1/(7-1)}=1.63$ . There is a body of research on risk perception supporting the use of a logarithmic scale, e.g. see [Longo and Lurenco, 2007]

Table 8-1 gives the results of our analysis. We see that in the controllers’ perception, 100-North provides an incursion risk reduction in the range of 19 to 29 per cent.

Table 8-1: Results of Controller Surveys for Incursion Risk.

Incursion Risk	Linear Scale	Logarithmic Scale
Baseline	0.57	0.27
100-N	0.46	0.19
100-N improvement %	19%	29%

Viewing the other relevant survey results (Questions 1 through 13), the results generally support the perceptions gained from the interviews. Overall the surveys indicated that the 100-North provided an improvement in operational performance when compared to the Baseline. The average percent improvement indicated by the surveys were in the mid-20% range.

8.1.3 Pilot Interviews

The pilot interviews were constructed so as to gain insight into the relative merits of the various alternatives. However, we also tried to use them to gain insight into the safety of LAX compared to other airports. A summary of the information provided is given below.

- *Pilots generally expressed the opinion that LAX (today) was about in the middle of other major airports from a safety perspective; in particular, there did not appear to be a reason to call it an unsafe airport (relatively speaking).*
- *There did seem to be almost universal agreement that a center taxiway would improve safety. At the same time, some pilots expressed a dislike for the centerline taxiway due to the requirement for additional aircraft maneuvering. At least in one case, we felt this was associated with a poor design of the taxiway exit system.*
- *Certain pilots pointed out that, under the Baseline alternative, the fact that some heavies (and, of course, super heavies) cannot hold between the runways (their tail would protrude into 24L) is a safety hazard. This is especially problematic since controllers must remember to give these aircraft special treatment.*

Multiple pilots pointed out the safety advantage of the ability of a pilot to look down the inbound runway prior to crossing it. One can build on this comment to view the decision to cross the inbound runway from a systems reliability standpoint. Specifically, the following three processes serve to provide redundancy in making this decision: i) controller clearance, ii) runway status lights, iii) pilot visual check of runway status. It was noted that the ability to see down the runway depends on the angle at which the aircraft approaches the runway. For larger aircraft, in the case of the Baseline and in the case of 100-North, the aircraft must approach the inbound runway at an acute angle that eliminates (or reduces) a clear line-of-sight down the runway. This issue will be analyzed later and, in fact, is the driver of a potential safety difference between 100-North and 340-North.

The pilots also provided useful feedback on the effectiveness of runway status lights (RWSL). Insights gained from these comments will be employed in the quantitative analysis performed in Section 1.2.

8.1.4 Pilot Surveys

A general review of the raw data resulting from the pilot surveys can at times seem to give counter-intuitive and even contradictory results. This in part may be due to the relatively small number of pilots involved and also to the fact that individual pilots did not see all of the alternatives. For these reasons we feel less weight should be placed on these surveys. We conducted tests to determine the statistical validity of the hypothesis that the pilot answers indicated a significant difference in the area covered by the question. Comparing 100-North to the Baseline, there was one safety-related question that passed the test: Question 3, which dealt with the safety of the runway-cross phase. That is, the hypothesis that the runway crossing phase is safer under 100-North than under the Baseline, as perceived by the pilots, can be supported by the data. We also calculated the metric described in the previous section for question 23 that asked pilots to compare the North runway alternative under consideration to other airports from a safety perspective. The results are given in Table 8-2.

Table 8-2: Summary of Pilot Survey Results.

	Basic Safety	Crossing Safety	General Operations Performance	Comparative Confusion	Comparative Safety
Baseline	0.070	0.208	0.426	0.335	0.621
100-North	0.101	0.127	0.414	0.330	0.582
% Improve	-46%	39%	3%	1%	6%

These results may seem a bit inconsistent and somewhat contradictory. We performed statistical tests and found that, of the questions referred to above, the only one that displayed a statistical significance in the responses was the Crossing Safety question. It should be pointed out that the Basic Safety questions largely treated issues not affected by the centerline taxiway. For this reason and since our statistical tests did not support the hypothesis that there was a difference between the Baseline and 100-North based on the responses, we do not place a great deal of significance in the seemingly large advantage for the Baseline indicated by the responses. Overall, we feel the surveys support the hypothesis that the centerline taxiway provides a



significant safety advantage relative to runway crossing. Otherwise, they generally indicate little difference in performance.

### 8.1.5 FutureFlight Simulation Data

We consider three types of Simulation data: anomalies statistics, radio frequency usage and capacity and delay information. For all types of anomalies, 100-North was indistinguishable from the Baseline. Thus, two conclusions can be supported: i) that the 100-North alternative does not significantly affect controller error rates or ii) that this particular experiment was not able to identify such difference (for many possible reasons). A similar situation exists relative to the frequency usage data. Specifically, there were no significant differences between 100-North and the Baseline and, thus, the same two conclusions could be supported. Section 13 analyzes the capacity and delay data in detail so we will just touch on it here. The data indicated a slight advantage of 100-North over the Baseline. Specifically, given the same level of operations, under 100-North there should be slightly less surface delays and slightly shorter taxi times. To the degree that such a reduction in congestion would reduce workload and stress, it should have a positive impact on safety.

### 8.1.5 General Conclusions

There was certainly a near universal conclusion among controllers and pilots that a centerline taxiway improved airport operations, when compared to the Baseline. "Improved" in this case could be interpreted along multiple dimensions, one of which is safety. This conclusion came out both in the interviews and in the surveys. Using a method to convert the survey responses to improvement factors, the controllers' collective opinion indicated a 21% reduction in collision risk and a 23% increase in a combined measure of operational performance. Applying these methods to pilot survey results, the pilots indicated a 35% increase in runway crossing safety, a 6% increase in comparative (to other airports) safety, a 46% decrease in general (landing and taxi-to-gate) safety and minimal change in operation performance. We must use these results with care as they are based on the subjective judgment of the subjects and the scales used are difficult to convert to actual risk values. Particular care must be applied to the pilot results due to the very small sample sizes. We will discuss this later when developing our overall conclusions. The Simulation data did not show a significant difference between 100-North and the Baseline except in the area of capacity and delay, which it indicated a slight advantage for 100-North.

## 8.2 Analysis of Historical Incursion Data

While the Simulation results provide strong evidence that a centerline taxiway improves airport operations and airport safety, it can be challenging to explicitly estimate changes in collision risk from the Simulation results. In this section we turn to analysis of historical incursion data. This analysis will allow us to both validate the Simulation results and also to generate quantitative estimates of the risk impact. The similarities between the current LAX North runway complex and the LAX South runway complex, before the new centerline taxiway was built, and also the similarity between the current South runway complex and the 100-North alternative allow for the very effective use of historical incursion data. The incursion data used in this Chapter was obtained by merging data from the LAX Incursion "Maps" provided on the LAWA web site with data downloaded from the FAA's **Aviation Safety Information Analysis and Sharing (ASIAS) System**. The ASIAS database included all incursions that appeared on the LAWA web site plus a few additional ones. These additional incursions were minor and did not even receive the standard A, B, C or D classification. Generally, we ignored these in our analysis although for reasons related to computational convenience we used this larger set in our analysis of the frequency of appearance of large aircraft in incursions. Incursion statistics are calculated on a calendar year basis. Please note that FAA reports general provide incursion statistics on a fiscal year basis. Some of this (fiscal year) data is used elsewhere in this report (when this is done the basis year assumed is noted).

The principal risk that we focus on in evaluating runway alternatives is the risk of a collision due to a runway incursion. The runway geometry also impacts the risk of a collision resulting from an excursion. This risk is dealt with in Section 6. Runway geometry may also impact the risk of accident in the general vicinity of the airport. Such accidents are generally a second order effect of runway geometry and they will be discussed as appropriate after the main analysis.

We start by considering the relationship between the risk of a collision due to a runway incursion and the risk of a runway incursion.

$$\begin{aligned} \text{Risk of fatal runway collision} &= \\ \text{Prob}[\text{fatal collision resulting from runway incursion}] &= \\ \text{Prob}[\text{fatal collision} \mid \text{runway incursion}] * \text{Prob}[\text{runway incursion}] & \quad (8.1) \end{aligned}$$

The final term involves the product of the probability that a runway incursion occurs and the probability that a particular runway incursion results in a fatal collision. The importance of this equation is that the risk of a fatal runway collision can be reduced by either reducing the chance that a runway incursion occurs (equivalently the annual rate of runway incursions) or by reducing the chance that a runway incursion results in a fatal collision. When we consider the impact of various alternatives, these may impact one or both of the terms in the product.

The starting point for our incursion analysis is the identification of the ENS incursion as defined earlier. We estimate the risk reduction impact of a centerline taxiway by estimating the ability of a centerline taxiway to reduce the rate of ENS incursions. To do this, we employ historical data from the South to estimate the ENS incursion risk reduction of the centerline taxiway under 100-North. The justification for this approach is the similarity discussed earlier between the pre-centerline taxiway South airfield and the current North airfield and the post-centerline taxiway South airfield and the 100-North alternative. We are well aware that, in spite of these similarities, there are significant differences between the North and South airfields (and historically there have been significant differences in the incursions rates). However, we do not attempt to estimate absolute incursion rates on the North from the South but rather we apply *an estimate of the rate reduction* experienced on the South to the North under the 100-North option.

Based on an examination of the descriptions of all runway incursions that occurred at LAX between 1998 and 2007, we classified each incursion as being an ENS incursion or not. We note that some subjective judgment was required in some cases; however, the number of such cases was relatively small. The result of this analysis was:

Average number ENS incursions / yr on S: 3.6 (55%)

Average number ENS incursions / yr on N: 1.1 (55%)

Note that, somewhat remarkably, the percent of ENS incursions on the North and South were virtually identical. This analysis considered incursions of all severity levels (A through D). Since some estimates and analyses performed by us and others restrict attention to more severe incursions we did an additional analysis to estimate the incursion breakdown restricted to only A and B incursions and to only A, B and C incursions. These did not differ significantly from the above breakdown so we feel this estimate is quite reliable.

The key estimate that will drive our analysis is the reduction factor for ENS incursions on the South attributed to the centerline taxiway. We first consider estimating the pre-centerline ENS incursion rate. This taxiway was opened in June of 2008, with the early part of 2008 largely

devoted to construction. Thus, we use as a cutoff point the end of 2007. While our analysis has generally employed data starting in 1998 or 1999, two significant changes occurred during the year 2001. The first was the introduction of ASDE-3 and AMASS and the second is a decrease in traffic. Since we wish to estimate the incremental impact of a centerline taxiway over and above ASDE-3 and AMASS and also, we wish to do so in roughly equivalent traffic conditions, a reasonable time frame would seem to be 2002 to 2007. Table 8-3 provides both the 1999-2007 rates and the 2002-2007 rates for AB, ABC and ABCD incursions.

Table 8-3: Pre-Centerline ENS Incursion Rates on LAX South.

Rate/year	1999-2007	2002-2007
AB	1	0.5
ABC	3	1
ABCD	3.6	3.2

We note that 02-07 rates do show a substantial drop from the 99-07 rates in all cases except ABCD. The relatively small change in the ABCD rate can perhaps be attributed to changes in the criteria for C and D incursions. The next major challenge is to estimate a post-centerline taxiway rate. From July of 2008 through December of 2009, there was a single incursion on the South that could be classified as an ENS incursion: the 10/25/2009 incident, which was classified as a category C incursion. One incursion over an 18-month period represents a .67 rate. Even though the data collection period (18 months) is short and the number of observations very small (1), the change in the ABCD rate from 3.2 or 3.6 to .67 is highly statistically significant. Thus, we can conclude with confidence that the centerline taxiway has significantly reduced the ENS incursion rate on the South. On the other hand, the specific estimate of the rate, .67, represents a point in a fairly wide confidence interval. Thus, we must use judgment and intuition in arriving at a reasonable ENS incursion rate reduction factor. For reasons discussed earlier we will restrict use for the pre-centerline rate, the 2002-2007 data. One could argue that the default should be to employ the ABCD rate since generally our analysis has focused on all incursions. On the other hand, FAA studies have tended to focus on serious incursions, e.g. AB, or possibly ABC. In our case, focusing only on AB would not produce meaningful results as such incursions are simply too infrequent. Focusing on ABC starts to alleviate this issue to a degree. At the same time, it seems clear that data concerning D incursions is certainly meaningful and one certainly should not ignore the very significant drop in ENS D incursions after the centerline taxiway introduction.



Table 8-4 lists the 2002-2007 pre-centerline taxiway rates, the post-centerline taxiway rates and the corresponding reduction factor.

As discussed above the “default” would be to use the ABCD analysis and the reduction factor of 79%. To acknowledge the much more modest reduction factor for ABC incursions one could take the approach of weighting the three categories (and reduction factors) evenly and taking the average reduction factor:  $(100 + 33 + 79)/3 = 71\%$ . We should note that this approach implicitly gives higher weight to the more serious incursions. These two estimates are relatively close and for our analysis we take a compromise and use a reduction factor of 75%.

Table 8-4: ENS Incursion Rate Reduction on South Airfield.

Rate/Year	Before Center Taxiway	After Center Taxiway	Reduction Factor
AB	0.5	0	100%
ABC	1	0.67	33%
ABCD	3.2	0.67	79%

### 8.2.1 Risk Reduction without RWSL

We now proceed to calculate the risk reduction provided for the 100-North alternative. Because of certain subtleties in our analysis we use as a starting point the level of risk for a modified Baseline that assumes the 2020 traffic levels, ASDE-X and AMASS but no RWSL. We define this starting risk level as R:

$$\text{starting risk} = R$$

Allocating based on incursion distribution yields:

$$\begin{aligned} &= \text{non-ENS collision risk} + \text{ENS collision risk} = \\ &.45 * R + .55 * R \end{aligned}$$

Applying a risk reduction (75% → factor of 4 reduction) for ENS incursion risk:

$$\begin{aligned} &.45 * R + .55/4 * R = \\ &.45 * R + .14 * R = \\ &.59 * R \rightarrow \text{a risk reduction of } \sim 40\% \end{aligned}$$

### 8.2.2 Analysis of Runway Status Lights

RWSL play an important and somewhat subtle role in our analysis. In the previous section we compute the incremental impact of 100-North relative to the Baseline without RWSL. From there, we will compute the impact of RWSL on the Baseline, the impact of RWSL on 100-North and then compare the two results. The reason for this approach is that our analysis shows that the incremental improvement provided by RWSL applied to 100-North is actually greater than the incremental improvement provided by RWSL applied to the Baseline.

FAA studies have estimated that runway status lights (RWSL) would decrease the collision risk by an additional factor of 50% over and above the impact of ASDE-X and AMASS. However, insights gained from the Simulation led us to examine this conclusion carefully and not to apply it in a uniform manner. Consider the following scenarios.

**A:** A pilot has stopped at the hold bar of the inboard runway and has observed a red runway entrance light (REL). The pilot then proceeds to cross runway (or “bust” the hold bar) even though REL is still red.

**B:** A pilot is distracted or has exited the outboard runway at a high speed and failed to slow down; the pilot then proceeds to cross the inboard runway or bust hold bar even though REL is red.

In case B, the fact that the pilot is distracted would seem to increase the likelihood that he/she would fail to take notice of the REL’s; also, in case B, if the aircraft was exiting at an excessive speed, it is possible that the pilot would not have enough time to stop the plane short of the hold bar having observed the REL. **Both of these explanations suggest that the effectiveness of REL’s should be greater in scenario A than in scenario B.** It is also the case, that, in the FAA analysis of ASDE-X, AMASS and RWSL, the experts were told to assume that the relevant technology “worked as it was supposed to” – this apparently was interpreted by the experts to mean that the pilot was alerted by the RWSL’s and took whatever action he or she thought was most appropriate. **This provides further justification to a more careful application of the FAA results.**

Consider now the comments from several Simulation pilots.

**Pilot 3:** “RWSL’s are counter intuitive because they run along side the runway; not being able to stop is not the issue; it is saturation of tasks.”

**Pilot 4:** “[RWSL] Lights are easy to be missed; they don’t stand out:

- have to train oneself to see them;
- it would be better if they were a bigger indicator.”

**Pilot 5:** “In the Simulation the RWSL don’t appear to be a high intensity system; they really should be brighter; they need to be a distraction.”

**Pilot 6:** “With rain or low visibility it would be easy to accidentally cross both runways;

- RWSL may or may not stop pilots from crossing runways;
- [need] some sort of stop sign.”

Other comments provide a similar sentiment. On the other hand, it is certainly the case that pilots also had many positive things to say about RWSL’s. Also, it seems clear (based on comments and our experience in the flight simulator cockpit) that the RWSL’s were not as bright in the Simulation as they would be in real life. On balance, we feel the pilot feedback from the Simulation supports the hypothesis that the RWSL’s are less effective at preventing the ENS incursions than at preventing other incursions. We do not have an analytic basis on which to derive a quantitative estimate so we “split the difference” and assume RWSL’s are twice as effective once an aircraft has stopped:

$$\begin{aligned} &\text{RWSL risk reduction for ENS incursion: } 33\% \\ &\text{RWSL risk reduction if aircraft has stopped: } 67\% \\ &\text{RWSL general risk reduction: } 50\% \text{ (FAA estimate)} \end{aligned}$$

### 8.2.3 Risk Reduction with Runway Status Lights

We now continue with our prior analysis and include the impact of RWSL:

$$\text{Starting risk} = .45 * R + .14 * R$$

Apply risk reduction of 50% (factor of 2) for non-ENS incursion risk and risk reduction of 33% (factor of 2/3) for ENS incursion risk:

$$\begin{aligned} &.45 / 2 * R + .14 * 2/3 * R = \\ &.23 * R + .09 * R = \\ &.32 * R \rightarrow \text{total risk reduction for 100-North with RWSL } \sim 70\% \end{aligned}$$

We now consider the impact of RWSL on the modified Baseline.

$$\text{starting risk for modified Baseline} = R =$$

Allocating based on incursion distribution yields:

$$.45 * R + .55 * R$$

Apply RWSL risk reduction factor of 50% to non-ENS incursion risk (multiply by 1/2) and RWSL risk reduction factor of 33% for ENS incursion risk (multiply by 2/3):

$$\begin{aligned} &.45 / 2 * R + .55 * 2/3 * R = \\ &.23 * R + .37 * R = \\ &.6 * R \rightarrow \text{a risk reduction of } \sim 40\% \end{aligned}$$

To find the risk reduction of 100-North over the Baseline (with RWSL), we compare the 100-North Risk:  $(.32 * R)$  with the Baseline Risk  $(.6 * R)$  and reach the following conclusion.

**Thus, the 100-North option reduces risk over the baseline by a factor of**

$$(.60 - .32) R / (.6 R) = .47 \rightarrow 47\%$$

It is instructive to compare the incremental impact of RWSL in the two cases. RWSL reduces the risk of the modified Baseline by 40%. On the other hand, RWSL reduces the risk of 100-North (without RWSL) by a factor of  $(.59 - .32) * R / (.59 * R) = .46$  or 46 %. Does it make sense that the impact of RWSL on 100-North should be greater than its impact on the (modified) Baseline? In fact, the reason for this difference is that the centerline taxiway is very effective at reducing the risk of ENS incursions, whereas, RWSL are less effective with ENS incursions and more effective with others. Thus, in a sense the combination of RWSL and a centerline taxiway is a pairing of two measures that are most effective in complementary areas leading to a more pronounced effect.

It is certainly true that we had to apply some judgment in carrying out this analysis. However, this rather significant risk reduction is certainly consistent with the controller and pilot input provided during the Sim. Further, it should be noted that this analysis only considered the impact of RWSL on the risk of ENS incursions. As discussed earlier there are other positive benefits to the centerline taxiway that should further reduce risk.

### 8.2.4 Impact of Fleet Mix Changes Including Group VI Aircraft

The Baseline risk estimate served as the starting point for our analysis. Since it has taken into account a growth in traffic (and the implied quadratic growth in risk) our analysis has allowed for a growth in traffic predicted by the year 2020. However, by relying on historical data, the analysis described in Section 8.2 implicitly assumed the current fleet mix. Of particular



concern is an increase in the percentage of larger aircraft, most notably Group VI aircraft. We now investigate the degree to which fleet mix changes might impact our conclusions.

Recalling again equation (8.1), we can view this question in terms of whether larger aircraft might have a higher (or lower) risk of either being involved in a runway incursion or of having an incursion result in a collision. As data-driven starting point we examine the question of whether larger aircraft are more likely to be involved in runway incursions. Tables 8-5, 8-6 and 8-7 give relevant statistics.

Table 8-5: Fraction of Incursions Involving Heavy Aircraft.

Year	2002	2003	2004	2005	2006	2007	2008	Average
<b>Heavy Incursion %</b>								
<b>North</b>	0.67	0.20	0.25	0.14	0.00	0.08	0.17	0.17
<b>Total Aircraft Involved in Incursions (North Airfield)</b>	3	5	4	7	4	13	6	
<b>Heavy Incursion %</b>								
<b>South</b>	0.40	0.33	0.00	0.13	0.13	0.19	0.00	0.18
<b>Total Aircraft Involved in Incursions (South Airfield)</b>	15	21	12	15	15	27	4	

Table 8-6: Fraction of Incursion Involving Group V Aircraft.

Year	2002	2003	2004	2005	2006	2007	2008	Average
<b>Group V Incursion (%)</b>								
<b>North Airfield</b>	0.33	0.00	0.25	0.00	0.00	0.08	0.17	0.10
<b>Total Aircraft Involved in Incursions (North Airfield)</b>	3	5	4	7	4	13	6	
<b>Group V Incursion (%)</b>								
<b>South Airfield</b>	0.13	0.05	0.00	0.13	0.00	0.04	0.00	0.06
<b>Total Aircraft Involved in Incursions (South Airfield)</b>	15	21	12	15	15	27	4	

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The first two tables provide the relative frequency with which heavies and Group V aircraft appear in runway incursions. We note that a typical runway incursion involves two aircraft, although some involve only one. We count an “appearance” as either being one of the two aircraft in a two-aircraft incursion or the single aircraft in a one-aircraft incursion (Thus, the totals given in these two tables are the total number of aircraft that were involved in incursions not the total number of incursions. We also note the set of incursions considered in this analysis was the larger set that appears in the ASIAs database). Table 8.7 provides statistics on the representation of heavies and Group VI aircraft in the LAX fleet. A comparison of the data in the first two tables with the data in the third reveals that the representation of these aircraft types in runway incursions is very close to representation in the general fleet mix. Thus, we conclude that it is neither more nor less likely that these very large aircraft will appear in a runway incursion.

Table 8-7: LAX Fleet Mix Characteristics.

Year	2002	2003	2004	2005	2006	2007	2008	AVE
<b>Fleet % Heavy</b>	0.21	0.19	0.19	0.18	0.17	0.17	0.17	0.18
<b>Fleet % Group V</b>	0.09	0.08	0.08	0.09	0.09	0.09	0.09	0.09

We now move on to the question of whether the larger aircraft have a higher (or lower) risk of collision given that they are involved in an incursion. Two effects seem to be worth considering in detail:

1. *Larger aircraft have longer takeoff rolls, i.e. they become airborne further down the runway; as a result it is less likely that they would overfly an aircraft that breaches the runway downfield.*
2. *Larger aircraft, simply due to their size, are more likely to collide with another aircraft when the two get in close proximity.*

Both of these effects are potentially significant. Effect 1) is analyzed in some detail for the IRSIP case (Section 7). It seems likely that increases in the per cent of very large aircraft in the fleet mix (including Group VI) will increase the collision risk estimate we have calculated.

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However, we argue that this effect will apply equally to all alternatives assuming similar exit locations. Further the degree to which exits can be relocated (as is done with IRSIP) in such a way to influence the risk change, such changes can be applied to any of the options. We do not view the 100-North design used in the Sim as final and in fact we have proposed various recommendations some of which involve changes in exit placement (see Section 16).

*Thus, we conclude that while effect 1) may increase risk it will change risk in a similar way for the Baseline. Further, exit changes that mitigate this risk under the Baseline, e.g. IRSIP, could equally be applied under 100-North.*

One could argue that effect 2) is in fact the reason that FAA standards for runway displacement changes with aircraft size. Thus, it is certainly a very important consideration. However, it can also be argued that FAA requirements on both runway displacement and operational restrictions address this effect. In particular, under the 100-North alternative, Group VI aircraft cannot remain on the centerline taxiway while a departure takes place on the inbound runway (while under 340-North they can). There is, of course, a similar requirement for the Baseline. Thus, we conclude that effect 2) will most likely increase the collision risk under 100-North. However, it would induce a similar increase under the Baseline. Thus, we conclude that this effect does not change our relative risk reduction calculation.

### 8.3. Overall conclusion for 100-North Case

The analysis of the LAX incursion data has indicated risk reduction of close to 50% due to the substantial reduction in the frequency of ENS incursions. Viewing this part of the analysis in isolation, this reduction factor can be viewed as lower bound on the magnitude of the reduction since other positive impacts of the centerline taxiway were not considered. Considering the Sim results, interviews with the subject controllers and pilots as well as the results of surveys also indicate a significant positive impact of the centerline taxiway and the 100-North changes. Sim data was less conclusive showing only a small positive impact in the area of capacity and delays. Further, our conversion of the controller survey data into a collision risk reduction factors indicated a smaller impact than the historical data (e.g. between 19 and 29% vs 47 % for the controller data). The pilot data, considered less reliable showed an even lower reduction factor.

Balancing these various perspectives, we feel that the numerical estimates based on the historical analysis are more reliable than the numerical estimates from the surveys since the surveys themselves relied on human judgment. Further the Simulation results certainly do not contradict the historical analysis in any way. In fact, the Simulation results strongly support the

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essential conclusions, if not the exact numerical value. A second reason to support the higher risk reduction estimate based on historical data is that our analysis did not take into account the positive effects of the centerline taxiway over and above its impact on ENS incursions. At the same time, the numerical results from the Simulation suggest a slight lower risk reduction. Thus, we feel it prudent to reduce the estimate based on historical data slightly. Therefore,

*We conclude that the 100-North alternative significantly reduces the risk of a fatal runway collision over the Baseline case and we estimate the magnitude of the risk reduction to be 40%*

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9. COLLISION-RISK ASSESSMENT: 340' NORTH

This section examines the collision risk associated with the alternative of moving runway 24R/6L 340' north and placing a center taxiway between it and the neighboring 24L/6R. Hereafter we will refer to this as 340-North.

From an operational point of view 340-North has certain clear cut advantages over all others considered, including 100-North, which moves 24R/6L 100' north. The major difference is that under 340-North design group VI aircraft can—with a few exceptions when visibility is low—occupy the center taxiway without disrupting operations on the north runways. This increases the capacity of the airport when there are group VI operations, as discussed in Chapter 13. It is also apparent that, from the viewpoint of residents and businesses in the areas north of LAX, 340-North has clear-cut disadvantages. LAWA and NORSAC have agreed that such concerns are outside the scope of this particular report.

The focus of this chapter is exclusively on collision risk. Should 340-North be built, how will this affect the probability of a collision between two aircraft? To get a handle on this question, the AP examined evidence from a variety of sources. First, we reviewed previous studies concerning the North Airfield in order to better understand the safety case for 340-North. Second, we considered results from the FFC simulations. Third, we examined the empirical record both at LAX and at other airports in order to ascertain whether the incidence of runway incursions is affected by the amount of separation between runways.

We first review the evidence from each of these sources as it pertains to the collision risk for 340-North. Then, in consideration of this evidence, we offer our summary estimate of the collision risk of 340-North relative to 100-North and the Baseline.

9.1. Prior Studies

The safety impacts of 340-North are addressed in three previous studies. In 2007, LAWA sponsored a safety risk assessment of this alternative. The work, performed by the Washington Consulting Group, employed a panel of six individuals with extensive knowledge of LAX operations, the existing and proposed airfield layouts, and safety risk management procedures. The panel identified a total of 10 hazards associated with operations on the North Airfield, and qualitatively assessed how the risks from the hazards would be affected by replacing the Baseline with the 340-North configuration. The panel concluded that the 340-North would greatly reduce or eliminate risks from 24R arrivals crossing 24L without a clearance, reduce the risk from “go-

arounds” forced by conflicts between arrivals and departures, and reduce the risk from heavy and super-heavy aircraft occupying taxiways that restrict operations of nearby runways. Of the six highest specific hazards judged by the panel to carry the highest risks, three are entirely eliminated, one is made less probable and much less severe, and two are made less probable. These findings are, in the words of the report, based on “the analysis of qualitative data obtained from subject matter experts,” not historical data from LAX.

The WCG study considers only the Baseline and 340-North, and does not attempt to quantify the reduction in collision risk that results from the latter. The results may, however, be used to make such an estimate, and also to assess how it might differ for 100-North.

To convert the WCG findings into an estimate of collision risk reduction, consider Figure 9-1 below, which reproduces Figure 8 of the WCG study. Figure x.1 is a risk matrix, a widely used construct in safety analysis. The rows correspond to the likelihood of occurrence of some hazard, while the columns correspond to the severity of the hazard. The entries in the table correspond to different hazards. For example, LAX 001 is the hazard of an arrival on 24R crossing 24L without a clearance on taxiway Yankee or Zulu, when there is a non-heavy aircraft departing. The likelihood of this hazard is viewed by the panel to be “Extremely Remote,” but the event is viewed as quite serious—“Hazardous” in the terminology of the matrix—should it occur.

It is common practice to quantify the degree of hazard as the product of two numbers, one associated with its row and the other with its column. For example, if Likelihood Category D is associated with the value 1/100 and Severity Category 2 is assigned the value 1/10, then the hazard score for LAX 001 is  $\frac{1}{100} \times \frac{1}{10} = \frac{1}{1000}$ . Assuming that all collision hazards are included in Figure 8, the total collision hazard is the sum of the hazard scores of each.

Figure 9-2, also taken from the WCG report, depicts how the risk matrix would change, in the judgment of the WCG panel, if 340-North were implemented. Some hazards are eliminated entirely, others made less likely, and others less severe. Using the same procedure as before, a total collision hazard could be calculated for this scenario. The ratio of the two scores is a measure of the degree of risk reduction if the Baseline configuration were replaced with 340-North.

Unfortunately, the WCG report does not specify the numerical values associated with the Likelihood and Severity categories. Normally, the variation is logarithmic, with adjacent categories differing by a constant multiplicative factor on the order to 10. For example, the

Likelihood Category A might be 100 times a year, B 10 times a year, C once a year, etcetera. If we assume this is the case, then it is possible to calculate the ratio of the two risk scores, even if we don't know the exact numerical values for the categories. If the multiplicative factor is indeed 10, the result obtained is about 0.06, implying that 340-North would reduce the risk of a collision by about 94%. The ratio is 0.03 if the multiplicative factor is 20, and 0.11 if it is 5. In sum, the WCG risk analysis suggests a reduction in collision risk of between 90 and 97 percent if 340-North is constructed.

While the WCG panel did not explicitly consider 100-North, it appears that most of their findings would apply to this option as well. The major exception is that 100-North would not address Hazard LAX 009—“increase in complexity associated with new mix of Design Group V/VI aircraft.” Thus, referring to Figure 9.2, under 100-North the LAX 009 would remain in the Likelihood Category C cell instead of moving to the Likelihood Category D cell. Repeating the above calculation with this one change, and again, assuming a multiplicative factor of 10, we obtain a risk score ratio of 0.23, suggesting that 100-North would yield a risk reduction of 77% compared to the Baseline. Similarly, the ratio of the 100-North and 340-North risk scores is 0.25. In other words, by moving 24R 340' north instead of 100' north, we reduce collision risk 75%, according to these calculations.

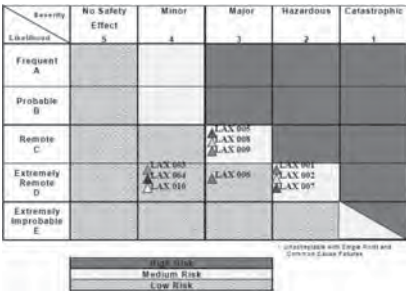


Figure 9-1: Risk Matrix for LAX North Airfield Baseline, According to WCG Panel.

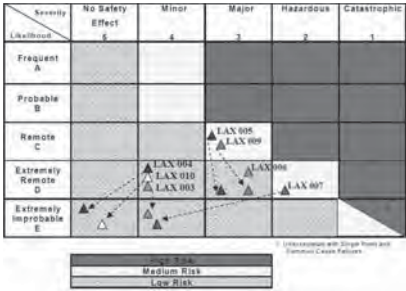


Figure 9-2: Change in Risk Matrix from Going from Baseline to 340-North, According to WCG Panel.

Two other studies from the same period also support the 340-North alternative. The “Special Peer Review” of the LAX North Airfield concluded that this was “the North Airfield alternative offering maximum safety, balance, and efficiency.” This conclusion was based on a 3-day visit by the Peer Review Group, which included briefings from LAWA staff, a tour of the airfield and tower, and a review of historical background information and data. The group also had a favorable view of the 100-North alternative, preferring 340-North mainly because of its compatibility with group VI aircraft. Alternatives involving building a runway to the south were considered undesirable because of their impact on the terminal area, while the “present North Airfield configuration is prone to runway incursions.” The second study, entitled, “Analysis of LAX North Airfield Alternatives” and prepared by the International Aviation Management Group concluded that 340-North has a “High” potential to mitigate runway incursions, while 100-North has a “Medium” potential. The basis for this difference is not clear, although it is stated that, in contrast to 340-North, 100-North “provides minimal increased separation between runways.”

9.2. Results from FFC Simulations

Controller and Pilot Feedback

As elaborated in Chapter 8, controllers and pilots participating in the FFC simulations considered the center taxiway featured in 340-North—as well as 340-South and 100-North—to be a significant safety improvement. The taxiway would virtually eliminate runway incursions onto



24L of aircraft exiting 24R, either because of excessive aircraft speed or pilot inattentiveness (ENS incursions as defined in Chapter 8). The taxiway forces pilots to maneuver a longer, more complicated, path to from the 24R exit to the 24L crossing, so that the crossing is made in a more deliberate and controlled manner. Controllers also cited the greater holding capacity of the center taxiway as compared to the exits in the Baseline configuration. This reduces pressure to cross arriving aircraft in order to clear the exits for subsequent arrivals. It also eliminates the risk of an aircraft on the exit intruding into the obstacle free zone 24R.

While above advantages hold for Alternatives 340-South and 100-North as well as 340-North, controllers and pilots also perceived certain advantages of 340-North over the other two. Controllers noted that with 340-North, in contrast to 100-North, they did not have to remember special rules for super-heavy aircraft, or face the pressure to immediately cross them in order to allow a subsequent departure. Controllers also placed some value on the extra exit traversal time resulting from the additional separation between the runway and the center taxiway, which could be used for braking, tower-cockpit communication, and more deliberate decision making on how to route the aircraft to the gate. Some pilots believed that 340-North enabled them to orient their planes to be perpendicular with 24L at the crossing, affording them the ability to see down the runway for approaching aircraft.

Controller's quantitative survey responses suggested that 340-North reduced the difficulty of their tasks compared to the Baseline. On a seven-point scale, the overall difficulty of runs involving 340-North was rated 0.6 points easier than either Baseline alternative. Tasks with the greatest reduction in difficulty included "deciding how to best manage traffic" and "gathering or applying the information needed to control aircraft." There were also sizable improvement in controller ratings of "potential for confusion" and controller assessment of "the relative likelihood of a runway incursion on North versus South."

The survey responses revealed considerable less difference in controller ratings for 340-North and 100-North. On most questions, the ratings were not significantly different, although 100-North came out slightly better. On the all-important question of the relative likelihood of runway incursion compared to the South, however, 340-North was judged to have the lower risk, by a margin of 0.6 points on a seven-point scale. Considering these results together, it appears that controllers saw little difference between 340-North and 100-North in terms of the overall difficulty and complexity of controlling traffic, but a significant difference in the ability to prevent incursions.

As described in Chapter 8, one approach to assessing collision risk is to assume that the numerical survey responses reflect controllers' perception of relative risk. Using the same assumptions and methods described in Chapter 8, we converted controllers' ratings of runway incursion risk into estimates of relative risk, using both linear and logarithmic interpolation. The results appear in Table 9-1. Based on the incursion risk question, the reduction in risk relative to the Baseline is estimated to be 34% using linear interpolation and 46% using logarithmic interpolation.

Table 9-1: Estimation of Relative Risk from Controller Rating of Incursion Risk.

	<i>Risk Relative to Highest Risk Rating, Linear Interpolation</i>	<i>Risk Relative to Highest Risk Rating, Logarithmic Interpolation</i>
<b>Baseline</b>	0.57	0.27
<b>100-North</b>	0.46	0.19
<b>340-North</b>	0.34	0.15
<b>340-North improvement over Baseline%</b>	34%	46%
<b>340-North improvement over 100-North %</b>	26%	21%

A similar analysis was performed on the pilot survey responses regarding airport safety. Following the logic described in Chapter 8, we extracted estimates of perceived risk from answers to the question in which pilots rate the safety at LAX compared to other major airports they have experienced. The results, shown in Table 9-2, suggest that pilots see less difference in safety among the alternatives than controllers do, but still favor 340-North over the Baseline and 100-North.

#### Anomalies

As explained in Chapter 4, the FutureFlight simulations included scripted "anomalies"—mistakes by pseudo-pilots. By observing how controllers responded to these anomalies, we hoped to gain additional insight about the complexity and safety of the different airfield alternatives. If controllers are very busy with other tasks, they may be less likely to notice an anomaly. This has

a direct safety implication, since a correct controller response to a pilot error can prevent a mistake from turning into a catastrophe.

Table 9-2: Estimation of Relative Risk from Pilot Rating of Airport Safety.

	<i>Risk Relative to Lowest Safety Rating, Linear Interpolation</i>	<i>Risk Relative to Lowest Safety Rating, Logarithmic Interpolation</i>
<b>Baseline</b>	0.62	0.33
<b>100-North</b>	0.58	0.28
<b>340-North</b>	0.55	0.25
<b>340-North improvement over Baseline %</b>	12%	22%
<b>340-North improvement over 100-North %</b>	6%	10%

Table 9-3 compares the percentage of incorrect controller responses for the three types of anomalies included in the simulations under the Baseline, 100-North, and 340-North alternatives. These results are based on small samples, since care had to be taken to avoid making a simulation into a "chamber of horrors." As a result, none of the differences are statistically significant. They do, however, suggest that under 340-North controllers respond better to pilot errors. In particular, the average of the incorrect response rates for 340-North is about 25% lower than for the Baseline or 100-North, while the latter alternatives score about the same on this metric. This evidence conflicts somewhat with the slightly higher ratings controllers give to 100-North in the survey.

Let us assume that virtually every accident involves a pilot error and a failure of the controller to correctly respond to that error. 340-North and 100-North probably have about the same effect on the likelihood of pilot error. However, the anomaly results suggest that 340-North increases the probability that the controller responds correctly to such an error. This implies that the differences between the alternatives observed in Table 9-2 translate directly to a reduction in risk of a failure of a controller to avert a collision in the face of a pilot error, and hence into a similar reduction in collision risk. On this reading, the results suggest that 340-North has a collision risk 26% less than 100-North.

Table 9-3: Percentage of Anomalies with Incorrect Controller Response, by Category and Alternative.

	<i>No Pilot Call In</i>	<i>Readback Error</i>	<i>Busted Hold Line</i>	<i>Average</i>
<b>Baseline</b>	56%	32%	76%	55%
<b>100-North</b>	62%	43%	64%	56%
<b>340-North</b>	62%	15%	47%	42%
<b>340-North improvement over Baseline %</b>	-11%	51%	39%	24%
<b>340-North improvement over 100-N %</b>	-1%	64%	27%	26%

### 9.3. Empirical Evidence

In addition to results from previous studies and the FutureFlight Central simulations, there is empirical evidence regarding the incidence of runway incursions at US airports. As noted in Chapter 6, the FAA maintains a runway incursion database that includes all such events from October 1, 2001 to the present. As of this writing, the database includes some 8248 incursions.

We used these data to compare the incidence of runway incursions at LAX, airports whose geometry is similar to 340-North, and airports whose geometry is similar to 100-North. For Alternative 340-North airports, we selected those with parallel runways separated by more than 1000' up to 1300', and with centerline taxiways. Airports in this category include ATL, DFW, PIT, CLE, and STL. 100-North airports have parallel runway separations 1000' or less, along with centerline taxiways. This category includes LAS, MIA, and MEM.

While the incursion data extend back to 2001, for analysis we considered incursions starting in 2004. By this time, ASDE-X and AMASS had been implemented at most airports. We divided the time since 2004 into two periods. The first extended through May of 2008, since in June of that year the south airfield centerline taxiway at LAX became operational. The second period runs from July 2008 to September of 2009.



We compared incursion rates for each airport category. Two different rates, a linear rate and a quadratic rate, were calculated. The linear rate is calculated as:

$$R_{l,c} = \frac{\sum_{t,a} I_{t,a}}{\sum_{t,a} O_{t,a}}$$

where  $I_{t,a}$  is the number of incursions for airport  $a$  and month  $t$ , and  $O_{t,a}$  is the total airport operations (arrivals plus departures) for airport  $a$  in month  $t$ . The quadratic rate is calculated as:

$$R_{q,c} = \frac{\sum_{t,a} I_{t,a}^2}{\sum_{t,a} O_{t,a}^2}$$

In both of these equations, the summations are over all airports in a given category and months in the analysis period. The rationale for the quadratic rate is the theory, explained in Chapter 6, that the incidence of runway incursions is proportional to the square of the airport traffic. In calculating these rates we did not consider incursions involving ground vehicles, since these are not likely to be affected by the geometric factors under consideration.

Table 9-4: Runway Incursions Rates, by Airport Category, 1/2004-5/2008.

	All Incursions		ABC Incursions		AB Incursions	
	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )
<b>LAX</b>	14.1	0.255	3.77	0.0685	1.72	0.0311
<b>Category 100-North Airports</b>	8.70	0.215	2.63	0.0651	0.164	0.00407
<b>Category 340-North Airports</b>	8.73	0.162	3.01	0.0560	0.155	0.00287

The rate calculations for the first period are shown in Table 9-4. The results support the conclusion that LAX had higher incursion rates over this period than either the Category 100-North or 340-North airports. The linear rate difference is greater than the quadratic rate difference, reflecting the fact that LAX has more operations than most of the Category 100-North and 340-North airports. The difference is particularly great for the more severe (AB) incursions,

for which even the quadratic rate differs by an order of magnitude. (It should be noted that the AB rates are based on very small numbers of events—5, 1, and 2 for LAX, Category 100-North, and Category 340-North airports respectively.)

Comparing rates for 100-North and 340-North airports, we see that the linear results are mixed, but the quadratic rate is consistently lower for 340-North. This again reflects that the Category 340-North airports are somewhat busier. Considering the quadratic results only, the 340-North rate is lower than the 100-North rate by between 14 and 30 percent, depending on the severity level. Comparing the Category 340-North quadratic rates with those for LAX, the former are lower by 37, 18, and 91 percent for all incursions, ABC incursions, and AB incursions respectively.

In Chapter 6, it was suggested that a simple average is a reasonable way to combine the reductions for different categories of incursions in order to estimate the reduction in collision risk. The average appropriately gives more weight to individual incursions that are more severe incursions, since the percentage reduction for these is based on a smaller number of events. Applying this method, and considering the quadratic results only, we estimate that 340-North airports have a collision risk 48% less than LAX without center taxiways, and 23% less than 100-North airports.

The Baseline considered in study includes a center taxiway on the south of LAX, whereas the previous analysis is based on LAX without it. Table 9-5 compares the incursion rates for LAX and other airports before and after completion of the centerline taxiway on the south. The rates are based on all severity levels; since the definitions for these levels changed in 2008 severity-specific comparisons are not available. Interestingly, the LAX rates with the center taxiway on the south are less than the other airports in the 340-North and 100-North categories.

Table 9-5: Runway Incursion Rates, by Airport Category, Before and After South Airfield Improvements at LAX.

	LAX		Alternative 100-North Airports		Alternative 340-North Airports	
	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-9</sup> )
<b>1/2004-5/2008</b>	14.1	0.255	8.70	0.215	8.73	0.162
<b>7/2008-present</b>	4.76	0.101	7.09	0.200	10.07	0.202

The dramatic reduction in runway incursions after the south centerline taxiway was built reflects that in the earlier period the majority of runway incursions occurred on the South. While based on sparse data, these results also raise some question about the potential for further improvement from adding a centerline taxiway on the north.

#### 9.4. Summary of Collision Risk Estimates for 340-North

Table 9-6 summarizes the collision risk results for 340-North, in terms of estimated risk reduction versus the Baseline and 100-North alternatives. We will focus on the risk reduction versus 100-North. With a few exceptions, there is a fairly close bunching in the range of 20-30%. There are reasons to question each of the outlier estimates, aside from their extreme values.

Table 9-6: Summary of Risk Reduction Estimates, 340-North.

Basis for Estimate	Risk Reduction Versus Baseline	Risk Reduction Versus 100-N	Comments
<b>WCG Study</b>	94%	75%	Log-scaling or risk matrices.
<b>Controller Survey Linear Interpolation</b>	34%	26%	Linear scaling of controller assessment of runway incursion risk.
<b>Controller Survey Log Interpolation</b>	46%	21%	Log scaling of controller assessment of runway incursion risk.
<b>Pilot Survey Linear Interpolation</b>	12%	6%	Linear scaling of pilot assessment of LAX comparative safety.
<b>Pilot Survey Log Interpolation</b>	22%	10%	Log scaling of pilot assessment of LAX comparative safety.
<b>Anomalies</b>		26%	Risk of failing to correct pilot error.
<b>Cross-sectional I</b>	48%	23%	Cross-sectional comparison of quadratic incursion rates, 1/2004-5/2008. Baseline assumes no centerline taxiway on north of south.
<b>Cross-sectional II</b>	0%	0%	Cross-sectional comparison of quadratic incursion rates, 7/2007-9/2009.

The WCG estimate is based on very specific assumptions about how to quantify the risk matrix, as well as a matrix that is itself very coarse. The Cross-Section II estimate is based on very little data for LAX. The pilot estimates are based on just a handful of landings, and are confounded by the fact that different pilots experienced different alternatives. All things considered,

**we estimate a 25% risk reduction for 340-North compared to 100-North.**

Given that the estimated risk reduction of 100-North compared to the Baseline is 40%, we estimate 340-North to have a risk relative to the Baseline of (1-0.25)\*(1-0.4)=.45. Thus,

**we estimate a 55% reduction in risk for 340-North compared to the Baseline.**



## 10. COLLISION-RISK ASSESSMENT: 340' SOUTH

This section examines the collision risk associated with the alternative of moving runway 24L/6R 340' south and placing a center taxiway between it and the neighboring 24R/6L.

Hereafter we will refer to this as 340-South. Those familiar with recent history at LAX will also recognize it as the North Airfield component of Alternative D, which was approved by the Los Angeles City Council as the Master Plan for LAX in late 2004 and by FAA shortly thereafter. A series of lawsuits against LAWA and the City of Los Angeles led to a settlement in which it was agreed that they would re-evaluate North Airfield improvements called for in Alternative D. Indeed, this report is part of the re-evaluation.

From a collision risk point of view, 340-South has a great deal in common with 340-North. The processes of landing on 24R/6L, exiting, traversing the centerline taxiway, and finally crossing the 24L/6R will be essentially the same wherever these elements are located relative to the Central Terminal Area. The advantages of the centerline taxiway, greater separation between the runways, and compatibility with ADG VI aircraft will be realized under either 340-South or 340-North.

With this as the starting point, the aim of this chapter is to identify differences between 340-South and 340-North that may influence collision risk, and to estimate the change in risk that may result from them. We begin by reviewing past studies that qualitatively compare 340-South and 340-North. We then discuss results from the FutureFlight Central simulations, which for the alternative provide the major basis for risk quantification.

### 10.1. Prior Studies

340-South was not part of the original LAX Master Plan, released in 2001, which identified as a preferred alternative a plan similar to 340-North known at Alternative C. Called the "Enhanced Safety and Security Plan", it was shaped by public comments on the original plan and the 9/11 terrorist attacks. This description primarily reflected changes in the terminal designed to increase protection against terrorist attacks, and to "provide a facility that can continue to operate under the highest security levels with minimal impacts on the passenger processing experience." However, it was also noted that Alternative D, by increasing separation between runways and adding centerline taxiways, would reduce runway incursions. To our knowledge, the original analysis of Alternative D did not mention any difference with Alternative C from a runway safety standpoint.

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The risk analysis performed by WCG does not explicitly consider 340-South. It appears that most of the hazards in the Baseline configuration found in that study to be mitigated by 340-North are mitigated by 340-South to an equal degree. The major difference is hazard LAX-008, which involves a Group V or VI aircraft on taxiway Echo impeding on the obstacle-free zone of runway 24L. While this hazard is eliminated by 340-North as a result of increased separation between the taxiway and runway, 340-South does not have this feature. Employing the method discussed in Section 1.2, the relative risk of 340-South compared to the Baseline is .26, the same as 100-N. The IAMG study concluded 340-North and 340-South both have "high" potential to mitigate runway incursions, but also noted that north airfield incursions on the east side of 24L "occur in part due to the close proximity of the ramp, taxiways, and runways in this area," and, referring to 340-South, "reducing the distance between the runway and the adjacent taxiway environment will do little to mitigate the potential of runway incursions, and may be a factor in aggravating this issue."

The Special Peer Review, in contrast to the other studies, is highly critical of 340-South, which it includes to be "clearly not feasible" because it would "require years of extensive and disruptive apron/gate and terminal demolition" while not allowing "balanced use of the airfield and terminal apron/gate complex." The Review does not, however, explicitly state that 340-South is inferior to 340-North from the standpoint of safety.

## 10.2. Results from FFC Simulations

### Controller and Pilot Feedback

In general, controllers viewed 340-South as an awkward layout because of the need to move a lot of traffic between the gates on the South side of the airport and the North runway complex. In the words of one controller, 340-South would "create more problems on the South than you solve on the North." The operation put particular stress on the Ground Controller 1 position. With the Southwest gates moved to the south terminal, GC-1's area included the gate complexes for three busy airlines. Pilots did not have much qualitative feedback on 340-South, although one reported a problem with the sequence of maneuvers involved in turning onto the centerline taxiway, traversing it for a short distance, and then exiting it.

In the survey, controllers in general rated 340-South and 340-North quite similarly. There was not a single question for which the ratings difference between these alternatives was statistically significant. In 12 of 14 questions, however, 340-North had the higher average rating. On the question of incursion risk, controllers rated 340-South above 100-N by a statistically

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significant margin, as they did 340-North. While 340-North had a slightly higher rating than 340-South on this question, the difference is so small as to be negligible. Thus, for the estimates of relative collision risk based on this question, we will use the values obtained from 340-North (9-2).

Pilots, in contrast, tended to prefer 340-South, although again the differences for individual questions were not statistically significant. Pilots, on average, favored 340-South over 340-North on nine of 10 questions. The largest difference in rating was on "potential for confusion" on which pilots rated 340-North to have greater potential by 1.5 points on a scale of 7. The advantage of 340-South over 340-North on this question and most other questions could the fact that pilots were landing on the north airfield, where the ground controller is less busy under 340-South. This advantage did not, however, carry over into overall rating of safety compared to other airports, where advantage for 340-South over 340-North was just 0.3 points.

### Anomalies

Examining controller responses to scripted anomalies, we find that, overall, the correct response rate for 340-South was higher than the Baseline and slightly lower than 340-North, as shown in Table 10-1. 340-South does is better than the Baseline and worse than 340-North on this metric. Following the logic of the analysis in 340-North, we estimate from these results that the probability of failing to avert a collision by failing to respond correctly to a pilot mistake increases by a factor of  $(1-.54)/(1-.58)$ , an increase of 11%.

### 10.3. Other Evidence

The evidence from runway incursion incidence at other airports considered for 340-North is equally applicable to 340-South. The estimates of collision risk drawn from that cross-sectional analysis are therefore equally valid for 340-North.

As shown in Chapter 13, voice communication activity for the midfield terminal ground controller is higher under 340-South than for any other alternative. This reflects the large amount of cross-field traffic that results from the 340-South gate configuration. The voice activity for the north field ground controller was concomitantly reduced. While higher workload is associated with increased collision risk, the risk implications of the workload redistribution associated with these results is not clear.

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Table 10-1: Percentage of Anomalies with Correct Controller Response, by Category and Alternative.

	No Pilot Call In	Readback Error	Busted Hold Line	Average
<b>Baseline</b>	44%	68%	24%	45%
<b>340-North</b>	38%	85%	53%	58%
<b>340-South</b>	55%	40%	67%	54%
<b>340-North improvement %</b>	-14%	24%	127%	29%
<b>340-South improvement %</b>	26%	-42%	183%	20%

## 10.4. Summary of Collision Risk Estimates for 340-South

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Table 10-2 summarizes our estimates of the difference in collision risk for 340-South versus 340-North. With the exception of the estimate based on the WCG risk analysis, they suggest little or no difference. While a case could be made that 340-South has the same collision risk as 340-North, observations from prior studied, controller interviews, as well as the estimates below suggest that there is 340-South is not quite as safe as 340-North. On the basis of these sources, our estimate is that 340-South **has a collision risk 10% greater than 340-North**. This implies that this alternative has a collision risk **50% less than the Baseline**.

Table 10-2: Summary of Estimates of Collision Risk Difference between 340-South and 340-North.

Basis for Estimate	Difference in Risk Versus 340-North	Comments
WCG Study	+75%	Log-scaling or risk matrices.
Controller Survey Linear Interpolation	No change	Linear scaling of controller assessment of runway incursion risk.
Controller Survey Log Interpolation	No change	Linear scaling of controller assessment of runway incursion risk.
Pilot Survey Linear Interpolation	No change	Linear scaling of pilot assessment of LAX comparative safety.
Pilot Survey Log Interpolation	No change	Log scaling of pilot assessment of LAX comparative safety.
Anomalies	+11%	Risk of failing to correct pilot error.
Cross-sectional 1	No change	Cross-sectional comparison of quadratic incursion rates, 1/2004-5/2008. Baseline assumes no centerline taxiway on north of south.

11. COLLISION-RISK ASSESSMENT: THREE-RUNWAY AIRFIELD

We turn next to the three-runway alternative ("3R") in which the existing two-runway system of the North Airfield is replaced by a single Runway 24 that would handle most of the airport's Group V and VI aircraft. Smaller planes would be concentrated on the South Airfield. A preliminary design of this runway and associated taxiway system was described in Section 3.6 and is shown again in Figure 11-1. The availability of plentiful space in the North Airfield to accommodate a single runway would make it possible to develop a full-fledged supporting infrastructure (two parallel longitudinal taxiways, high-speed exits, right-angle exits) for a runway and taxiway complex designed to Group VI standards, as described in Section 3.6. The design outlined in that section, although carefully prepared, should be viewed as preliminary, as there may be possibilities for further improvements. It was prepared for the purposes of the FFC Simulation and implemented in the FFC environment.

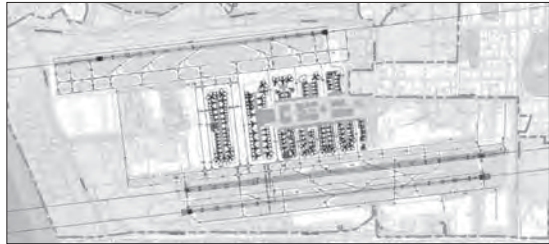


Figure 11-1: Los Angeles International Airport Alternative 3R (3 Runways). Source: LAWA and HNTB (2009).

The 3R alternative is different in a fundamental way from all others considered in this report. Whereas, in all other alternatives, one runway (24R/6L) is dedicated almost exclusively to arrivals and the other (24L/6R) to departures, in the case of 3R the single runway on the North Airfield would be used for "mixed" operations and would, in the long run, serve about as many arrivals as departures.

This chapter continues with a description of how Runway 24 would probably be operated under the 3R alternative (Section 11.2) followed by a short, qualitative discussion of the implications of this mode of operation for safety and ATC workload (Section 11.3). With this

background, we then review the assessments of the 3R alternative by the controllers and pilots who participated in the FFC Simulation (Section 11.4), as well as some empirical evidence from other airports (Section 11.5). The chapter concludes (Section 11.6) by providing an overall risk estimate for 3R that combines all the above considerations.

11.1 . Airport Operations under the 3R Alternative

There are two different modes of operating a runway which serves arrivals and departures in about equal numbers. Mode 1 is to have alternating "strings" of arrivals and departures operating on the runway. During a period of heavy demand under this approach, ATC would have departing aircraft form a queue next to the threshold of the runway while a string of consecutive arriving aircraft land on the runway. When all the arrivals in the string have landed, the runway is turned over to take-offs and (all or some of) the waiting departures are served before the runway begins serving arrivals again. If, in the above scenario, a string of arrivals proves to be so long that the departures queue grows excessively, ATC may intervene to have some departing aircraft take off by interrupting the arrivals string and having arriving aircraft wait for a while in the air. The reverse may also happen if the departures string is too long. (Serving arrivals is typically, but not always, given priority over serving departures, for obvious reasons.) In summary, under Mode 1, sequences like AAAADDDDDAAADDDDDAAAAA... will be observed on the runway, where "A" denotes an arrival and "D" a departure.

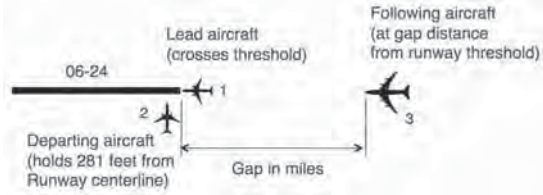


Figure 11-2: Inserting a takeoff between a pair of landings (source: Academic Panel). Numbers in the diagram show the sequence of operations on a single runway.

The second approach, Mode 2 (see Figure 11-2) is to sequence operations so that single arrivals and departures alternate, more or less, on the runway for an extended period of time. Sequences like ADADDADADAADA... might be observed under Mode 2. As far as airport



capacity is concerned, Mode 2 is often superior by a significant margin. The reason is that the required ATC separations on final approach between certain pairs of consecutive landing aircraft are, in some cases, large enough to make it possible to insert a takeoff (and sometimes two takeoffs) between the two landings without having to increase the separation between the landing aircraft. This essentially means a “free” extra movement (a takeoff) between two landings in such cases. More commonly – and more important, from the practical point of view – it is typically true that a relatively small increase in the required separation between a pair of consecutive landing aircraft will provide a gap between the landings (Figure 11-2) which is sufficiently long to insert a takeoff or possibly two takeoffs. In summary, under Mode 2, it is sometimes possible to nearly double the landing capacity of a runway by “stretching” the separations between consecutive arriving aircraft as needed to insert a departure between them: with a small “sacrifice” in the number of arrivals served, the runway can serve as many departures as arrivals during any particular period of time.

For illustration purposes, we give here typical ranges for the capacities achievable under the two modes in good weather conditions at busy U.S. commercial airports with a 50%-50% mix of arrivals and departures: 50 – 58 movements per hour (e.g., 28 arrivals and 28 departures per hour) under Mode 2; and 42 – 48 movements per hour (e.g., 24 arrivals and 24 departures per hour) under Mode 1. In other words, Mode 2 may enjoy a capacity advantage of 10 – 30% over Mode 1 depending on local circumstances. This advantage is extremely important at busy airports, as it may result in very large differences in the air traffic delays experienced under the two approaches.

### 11.3. Qualitative Characteristics of the 3R Alternative

LAX is expected to be a congested airport in 2020 or later years under the demand scenarios posited to the Academic Panel (AP). It was therefore necessary for the AP to assume that the Mode 2 approach to runway operations sequencing would be adopted in operating the single runway (Runway 24) of the North Airfield under the 3R alternative. The AP thus designed the FFC Simulation of Alternative 3R in a way that encouraged ATC controllers to utilize this second operating mode, i.e., controllers generally handled traffic by “stretching” separations between consecutive landing aircraft in order to insert one or, sometimes, two departures between them. *The reader should therefore keep in mind that the assessments of risk and operability provided by FFC pilots and controllers and described below for Alternative 3R refer to Mode 2 of operations.*

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This is important because it is reasonable to expect *a priori* that the comments and ratings concerning *safety* that were submitted by the FFC controllers and, possibly, the pilots would be influenced significantly by this mode of operating the North Airfield runway. Mode 2 requires considerable skill and concentration on the part of ATC controllers. For example, with reference to Figure 13 – 2, as soon as the leading arrival (Operation 1) touches down on the runway, the local controller must decide whether to clear the waiting departure (Operation 2) to enter the runway and take off prior to the landing of the trailing arrival (Operation 3). To make this decision the controller must answer mentally questions like: How long will the leading arrival (Operation 1) take to exit the runway, so that the take-off roll of the departing aircraft (Operation 2) may begin? How close to the runway will the airborne trailing arrival (Operation 3) be at the time when the take-off roll (Operation 2) will begin? At that point, will there be sufficient time for the departing aircraft (Operation 2) to become airborne (or, at least be more than 6000 feet away from the beginning of the take-off roll) before the trailing aircraft (Operation 3) will touch down on the runway? Note that the controller must *project* mentally that no unsafe conditions will arise throughout this process before issuing the clearance to the departing aircraft to enter the runway. And the situation must be monitored continuously, in case there is a need to advise the trailing arrival (Operation 3) to perform a go-around. Thus, the overall risk associated with operating the single runway on the North Airfield might be perceived as increasing.

Two other characteristics of operations with the 3R alternative may have a bearing on risk and on perceptions concerning risk. One is that, while Runway 24 on the North Airfield would be operated in mixed mode with a large fraction of Group IV, V, and VI aircraft in the fleet mix, the two runways on the South Airfield would continue to be operated as essentially all-departures (25R/7L) and all-arrivals (25L/7R) with a significantly “lighter” fleet mix. Thus, local controllers and TRACON controllers assigned to the North and South Airfields may require different types of training and may end up operating, in the long run, with two different mental “frameworks” regarding traffic control and sequencing. Among other consequences, this might reduce flexibility in ATC personnel assignments with, conceivably, some negative implications for safety.

Other potentially negative consequences from the safety viewpoint are that, with the 3R alternative, (i) the South Airfield would handle significantly more movements than the North and (ii) the airspace structure around LAX would have to be carefully re-designed to ensure maximum flexibility in assigning arriving and departing aircraft – irrespective of provenance or

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destination – to the appropriate airfield. For example, “Heavy” aircraft from/to the South would have to “cross-over” to/from the North Airfield.

Similarly, the ground movement of aircraft on the airport’s surface may be complicated by the fact that most Heavy aircraft will be operating on the North Airfield and most other aircraft on the South.

Finally, reliance on a single runway on the North Airfield may pose a risk in situations where the runway has to be closed temporarily (e.g., due to a disabled aircraft) and no back-up runway is available, unlike the case for all other alternatives.

Weighing against all these potential negatives is a major safety benefit: the absence of an “outboard” runway (24R/6L for all other alternatives) removes the possibility of incursions by aircraft which have just landed and attempt to cross the “inboard” runway (24L/6R for all other alternatives). In short, the study of risk on the North Airfield under 3R need not consider runway collisions due to aircraft taxiing across an active runway. This risk has been a focus of much of the analysis in this report. However, the possibility of other types of incursions still remains and must be considered.

### 11.4. Qualitative and Quantitative Assessments of the 3R Alternative

With this background, we proceed to review qualitative and quantitative assessments of 3R by controllers and pilots participating in the FFC Simulations.

In the case of *controllers*, the comments submitted were in line with what was expected (see previous section). We summarize below separately the comments from the three groups of controllers to underline the considerable uniformity of the views expressed:

#### Group 1:

- Ground control is much easier (on the North Airfield) under 3R, but overall this is a poor configuration; the local controller must constantly perform “squeeze play” (to interweave arrivals and departures); there is also potential for more go-arounds by aircraft landing on Runway 24; operations on the South Airfield would also become more difficult.

#### Group 2:

- The interweaving of arrivals and departures on Runway 24 was deemed “inherently” unsafe by LAX- trained controllers, who did not like mixed operations; go-arounds will be a problem for aircraft landing on Runway 24; good co-ordination of traffic from/to the

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South will be necessary; when it comes down to it, the Baseline alternative is preferable to 3R

#### Group 3:

- Ground control on the North Field will be easy, but local control (landings and takeoffs on runway) will be like “hitting holes” which will become tighter and tighter as traffic increases; there is potential for many go-arounds; cannot plan ahead for more than a few minutes because you always have to deal with ongoing operations; there are no runway crossing problems, but arrivals and departures on the same runway may cause bigger problems; the possibility of having to close the runway due to an unforeseen event makes this a bad option.

In interpreting the above comments, a potential consideration is that LAX controllers do not generally have much experience with mixed operations on a single runway under conditions of heavy demand. This may have shaded, to a certain extent, the opinions expressed about 3R.

The quantitative scores that the controllers assigned to the various alternatives did not quite reflect the negative tenor of the opinions they voiced during their group debriefing sessions, as outlined in the above paragraphs. Specifically, as Table 11-1 indicates, Alternative 3R was assigned the lowest “risk value” by the controllers, ranking first among alternatives with a “risk reduction” potential of 52% compared to the Baseline alternative. The method used to compute the relative risk values was described in Section 8.1.2.

The apparent inconsistency between the oral comments and the risk reduction scores assigned to 3R may have several possible explanations. For example, “group dynamics” may have played a role during the debriefing sessions with some individuals with strong views regarding the various alternatives possibly dominating the discussion. Or, it is possible that, when it came to assigning a “grade” to 3R, the safety benefits resulting from the removal of runway crossing conflicts outweighed concerns about the risks involved in interweaving arrivals and departures on Runway 24.

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Table 11-1: Relative risk values and risk reduction relative to Baseline of the various alternatives according to controllers participating in the FFC Simulations.

Alternative	Relative Risk Value	Risk Reduction Relative to "Baseline" Alternative
Baseline	0.567	0%
100-N	0.461	21%
340-N	0.377	37%
340-S	0.393	34%
3R	0.297	52%

Pilot comments seem to make no reference to risk associated with interweaving arrivals and departures during mixed operations on Runway 24. Instead, perhaps due to experience with a broad range of airport operations, pilots seemed to treat such mixed operations as routine and commonplace. In fact, there were very few comments explicitly addressing the 3R alternative.

Table 11-2: Relative risk values and risk reduction relative to Baseline of the various alternatives, according to pilots in FFC Simulation; responses corrected for potential bias (see Chapter 8).

Alternative	Relative Risk Value	Risk Reduction Relative to "Baseline" Alternative
Baseline	0.624	0%
100-N	0.581	7%
340-N	0.548	12%
340-S	0.472	24%
3R	0.489	22%

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One pilot stated that the 3R alternative on the North Airfield is "very easy" as there is no runway to cross and taxiing to/from a gate is simple. Another pilot mentioned that 3R is much safer than San Francisco, Narita, and Chicago O'Hare. (The criteria on which this comparison was based are not clear.) The same pilot indicated that he preferred 100-N (and presumably 340-N) to 3R because of the higher capacity of the former.

When it came to the quantitative assessment of the alternatives, pilots collectively rated 3R as the second best alternative, behind 340-S, with a "risk reduction" potential of 22% compared to the Baseline alternative (Table 11-2).

### 11.5. Empirical Evidence

The AP also sought empirical evidence about the safety associated with the mixed-use runway operation on the North Airfield by looking at other commercial airports operating with a single runway. Unfortunately, of the 35 busiest airports in the United States, only one, San Diego (SAN), operates with only one runway. For this reason, this investigation was extended to: (a) three other, less important airports, South West Florida International (RSW), Bangor (BGR) and Harrisburg (MDT) that operate with a single runway handling a significant number of movements annually and (b) two major airports, Charlotte (CLT) and Washington Reagan (DCA), which have multiple runways but are known to operate their principal runways in mixed mode, with arrivals and departures often interweaved in the manner described in Section 11.2.

Table 11-3: Runway Incursions Rates, for LAX and for airports with extensive use of mixed operations on the same runway, 1/1/2004-5/1/2008.

	All Incursions		ABC Incursions		AB Incursions	
	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-8</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-8</sup> )	Linear (10 <sup>-6</sup> )	Quadratic (10 <sup>-8</sup> )
LAX	14.1	0.255	3.77	0.0473	1.72	0.0311
Comparison Airports	5.3	0.176	1.43	0.0473	0.4	0.0135

We performed an analysis of incursions at these six airports (SAN, RSW, BGR, MDT, CLT, and DCA) similar to the one described in Chapter 9 (cf. Table 9.1). As in Chapter 9, the

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focus was on the period January 1, 2004 to May 1, 2008. Table 11-3 compares the rate of "all incursions", "ABC incursions" and "AB incursions" (landings and takeoffs) at the six airports combined with the corresponding rates per LAX. The comparison, as in Chapter 9, is performed for both a linear model and a quadratic model. For the linear model, it can be seen that the rates for the six comparison airports are equal to 38%, 38%, and 23%, respectively, of the rates for LAX. The average of these three estimates is 33%, implying a roughly two-thirds reduction in the rate of incursions.

For the quadratic model, the rate reductions are smaller than for the linear one, reflecting the fact that LAX has far more operations than all the comparison airports with the exception of CLT. The rates are equal to 69%, 69% and 43%, respectively, of the rates for LAX, with the average of 60% implying a roughly 40% reduction in the rate of incursions.

A review of the ASN Aviation Safety Database also indicated that there have been no fatal accidents at any of the six comparison airports during the 1990s or the 21<sup>st</sup> century (or earlier for that matter) that could be construed as related in any way to the use of their runways for mixed operations.

### 11.6. Estimation of Risk Reduction

Finally, we proceed to calculate the risk reduction provided by the 3R alternative, following the approach already described in Sections 8.2.1 and 8.2.3 of this report. Little explanation will be offered, as all the steps duplicated those in the referenced sections.

Consider as a starting point the level of risk for a modified Baseline that assumes the 2020 traffic levels, ASDE-X and AMAS but no RWSL. We define this starting risk level as RISK.

The absence of an outboard runway means that "ENS collision risk" has been removed in the case of the 3R alternative. Based on the data analysis of Chapter 8, we then have that the remaining collision risk ("non-ENS collision risk") for the 3R alternative is given by:

$$\text{non-ENS collision risk} = .45 * \text{RISK}$$

It was also argued in Section 8.2.3 that RWSL would further reduce by 50% the non-ENS incursion risk, leading to the reduced risk of:

$$.45 / 2 * \text{RISK} = .23 * \text{RISK}$$

As in the earlier analysis this must be compared to the reduced risk of the Baseline with RWSL:  $.6 * \text{RISK}$ . The risk reduction relative to this level is:

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$$(.6 - .23) \text{ RISK} / (.6 \text{ RISK}) = .62 \rightarrow 62\%.$$

Thus, the analysis produces a risk reduction estimate for 3R of 62%.

We feel it is likely that operating with a mixture of arrivals and departures should increase the likelihood of certain "non-ENS incursions". Specifically, there may be a greater likelihood of a "threshold incursion", where an aircraft goes into position and holds without clearance. Thus, while this estimate should provide some indication of risk reduction, it may overestimate the reduction.

### 11.7. Overall Assessment

In conclusion, and with the exception of the subjective opinions expressed by some of the FFC controllers, the combination of evidence from the FFC Simulations, empirical data and probabilistic analysis points to a significant reduction of risk under the 3R alternative.

- The FFC controllers' evaluations indicate a 52% reduction:
- The FFC pilots' evaluations indicate a 22% reduction:
- Empirical evidence from other airports suggests a 67% reduction according to the linear model and a 40% reduction according to the more standard quadratic model; and
- The empirically based model and analysis of Chapter 8 indicates a 62% reduction.

*On the basis of this fairly consistent information, it is reasonable to use 50% as our estimate of the risk reduction (relative to the Baseline) that can be obtained through the 3R alternative.*

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## 12. COMPARATIVE SUMMARY OF SAFETY ASSESSMENTS

Given the large and bewildering array of safety numbers about that the reader has encountered in previous sections, it is worth pausing to stress what the key statistics are and what they imply about risk to LAX air travelers. The main estimates are:

- In the Baseline case for the North Airfield, fatal runway collisions would occur at 2020 traffic levels on average once every 200 years. They would cause an average of *five deaths per decade*, which works out to approximately one death per 150 million LAX passengers.
- Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 40% if the existing North Airfield were replaced by the 100' North configuration with a centerline taxiway. Thus, instead of five lives lost per decade, the estimated number would drop to *three*.
- Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 50% if the existing North Airfield were replaced by the 340' North configuration with a centerline taxiway. Thus, instead of five lives lost per decade, the estimated number would drop to an average of 2.5. (*Compared to 100' North, deaths per decade would drop from three to 2.5.*)
- Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 40% if the existing North Airfield were replaced by the 340' South configuration with a centerline taxiway. Thus, instead of five lives lost per decade, the estimated number would drop to three.
- Compared to the Baseline case, the risk of a fatal runway collision would drop approximately 50% if the existing North Airfield were replaced by a single runway 24 in a three-runway airport. Thus, instead of five lives lost per decade, the estimated number would drop to 2.5.

But some perspective is provided if we note that, under risk levels in the first decade in the 21<sup>st</sup> century, US air travelers face a 1 in 10 million chance of perishing on each flight because of aviation crises beyond the runways (e.g., a mechanical failure that causes total loss of control, as occurred on Alaska Air 261 near LAX). Assuming that risks remain at that level in the next decade or so, the roughly 750 million passengers who pass through LAX per decade would suffer 750 million x 1 in 10 million = 75 deaths. The overall situation is suggested in Figure 12-1.

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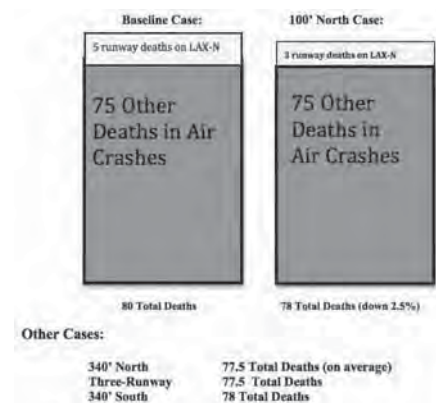


Figure 12-1: Mortality Risk Summary at 2020 LAX Traffic Levels.

These numbers imply that reconfiguring the North Airfield could save perhaps *one life every four years*, and could reduce passenger death risk per flight to about 97% of its level under the Baseline case. The question is whether the sums spent in the reconstruction might save many more lives if used in other ways.

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## 13. CAPACITY AND WORKLOAD ASSESSMENTS FOR THE VARIOUS CASES

This section describes a capacity assessment for the Los Angeles International Airport derived from FFC simulation data and complemented using analytical and simulation studies. This section is organized into five parts: 1) throughput analysis results of FFC, 2) taxi-in and taxi-out analyses for all alternatives, 3) FFC voice communication analysis, 4) runway capacity modeling and 5) conclusions of capacity analysis.

### 13.1. FFC Throughput Analysis

The experiment at the NASA Ames FutureFlight Central provided an opportunity to estimate airport system throughputs in a complex man-in-the-loop simulation. The mean arrival rate of aircraft into each one of the 6 alternatives investigated is presented in Figure 13-1. The results are presented for all three weather conditions studied in the FFC simulation facility. The results of the graph illustrate the arrival rates designed by the AP Panel and programmed in the FFC logic by NASA to present a relatively high demand condition. The aim was to present ATC local controllers with a fast pace of arrivals during each one-hour experiment.

Visual Meteorological Condition (VMC) arrival rates presented in Figure 13-1 are approximately the same for all five alternatives with 4 runways. In the design of the FFC experiments, the Academic Panel employed current ATC separation rules to schedule between 75-77 arrivals per hour during the one-hour simulation time period. The range denotes that in some FFC runs, more super-heavy aircraft were introduced and thus fewer arrivals could be scheduled in the one-hour period. The three-runway alternative (3R) could handle fewer arrivals in the North compared to the Baseline alternative. With a single runway in the North, the nominal aircraft separation between successive arrivals was set at 5.5 nautical miles for VMC conditions and 5.9 nautical miles for IMC conditions. This is typical spacing used in mixed operations (i.e., arrivals and departures on the same runway) at other airports in the United States. Nighttime arrival rates are similar to VMC rates because the same aircraft separation rules apply at night in VMC conditions. As a point of comparison, the LAWA design day for year 2020 had high-demand hourly arrival rates ranging from 73 to 77 per hour for the top three peak hours of operation.

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The Instrument Meteorological Condition (IMC) arrival rates were designed to be 21% lower than the VMC conditions using known ATC separation rules and the Academic Panel analysis of Los Angeles International Airport terminal radar data (PDARS data). 3R simulations produced a 16% reduction in arrival rates for the three-runway alternative (3R).

The arrival rates designed in the FutureFlight Simulations represent realistic upper bound values of what Southern California (SoCal) air traffic controllers could deliver to LAX under saturation conditions. According to personal communication between the Academic Panel and LAX tower controllers, the upper limit of arrival traffic per hour from SoCal controllers is around 80 aircraft per hour in two arrival streams.

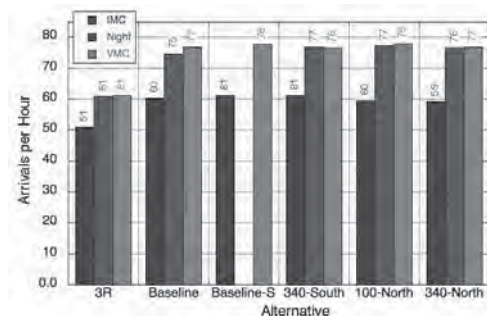


Figure 13-1: Mean Arrival Rates per Hour Observed for All Six Alternatives Studied.

A measure of the departure throughput capacity of the airport is presented in Figure 13-2. Departure rates observed in the FFC simulations were slightly higher than expected. The numbers shown in Figure 13-2 nevertheless offer a qualitative assessment of the various alternatives tested. In general, it was observed that ATC controllers used similar departure separation rules for IMC and VMC conditions. This would result in nearly similar departure rates under VMC/Night and IMC conditions. However, the departure rates for VMC and Nighttime conditions are affected by four inbound arrivals per hour per complex scheduled in the simulation under VMC/Night conditions. This fact reduces the departure rate for VMC and Nighttime conditions as shown in

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Figure 13-2. All VMC and Nighttime FFC simulations were designed with four inbound arrivals per hour per complex to balance the arrival and departure flows to the airport. The Academic Panel studied in detail the LAWA commissioned fast-time simulations for Alternative 340-South and they included 7-8 arrivals to inbound runways per hour for the complete airfield (4 per complex). No inbound arrivals were designed into the IMC runs following standard practice at LAX. The behavior of ATC in sequencing departure traffic under IMC conditions was considered aggressive by the Academic Panel but perhaps understandable given the large number of departures scheduled during each FFC simulation run. In Section 13.4 we estimate measures of runway capacity correcting for this behavior.

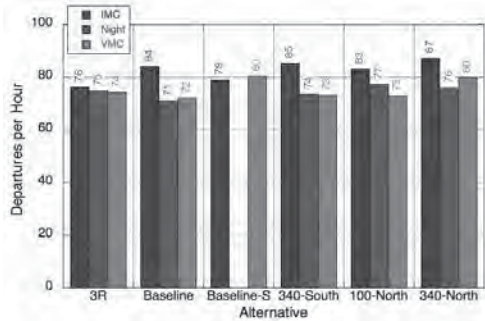


Figure 13-2: Mean Departure Rates per Hour Observed for All Six Alternatives Studied.

An assessment of the throughput arrival rates expected in the North field is presented in Figure 13-3. By design, the arrival rates to the North complex for all 5 alternatives are very similar representing saturation arrival conditions. The three-runway alternative has significantly lower arrival rates (22-23 per hour) allowing departures to occur between successive arrivals. The gap between successive arrivals for the three-runway alternative was optimized using a Monte Carlo simulation performed by the Academic Panel using several parameters observed at LAX using limited ASDE-X data collected for this study.

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Departure rates observed in the FFC simulations follow similar trends to those observed for the complete airfield. Departure rates in VMC and Nighttime conditions are affected by four inbound arrivals per hour scheduled in each simulation run. Using the numeric averages of three weather conditions simulated for five of the alternatives we observe some trends shown in Figure 13-5. Alternative 3R is in a class by itself with the lowest departure rates. This was expected since the gaps between successive arrivals were designed to accommodate one departure per gap. The FFC simulations proved that controllers could release two departures per gap in some instances making the results for 3R better than expected. In the Academic Panel's opinion, local controllers were pushing very hard to release departure operations in the North airfield and some adjustment is warranted to estimate realistic departure saturation rates for the three-runway alternative. This will be covered in Section 13.4. Alternatives 340-South, 100-North and Baseline are clustered in a second group as shown in Figure 13-5. This second group produces an average of 42 departures per hour. Alternative 340-North is in a class by itself with close to 46 departures per hour. This result was expected because in alternative 340-North all aircraft, including design Group VI aircraft, are allowed to taxi in the center taxiway without affecting the departures on the inbound runway (i.e., runway 24L).

Alternative 340-South shares similar runway separation with 340-North. However, this alternative could not achieve the same departure rates as 340-North and it proved to be challenging to air traffic controllers. The linear terminal in alternative 340-South creates a large imbalance of gates in the North airfield requiring significantly longer aircraft taxiing to the North to balance the South and North departure flows. This produced similar departure rate performance with the Baseline and alternative 100-North.

A comparison of the number of operations in the South and the North Airfields is shown Figure 13-6. The results indicate that the North airfield was more efficient in handling departures than the South. This was expected since the air traffic controllers in the North were all former LAX controllers and were more familiar with specific LAX airfield procedures. The results for Baseline-S should be interpreted with care. Our observations show that in many instances ATC controllers in the South handled aircraft design Group VI just like aircraft design Group V contributing to the high departure rates observed for the Baseline-S alternative. It is our assessment that under real world circumstances, the South airfield should experience departure saturation rates more inline with alternatives Baseline and 100-North.

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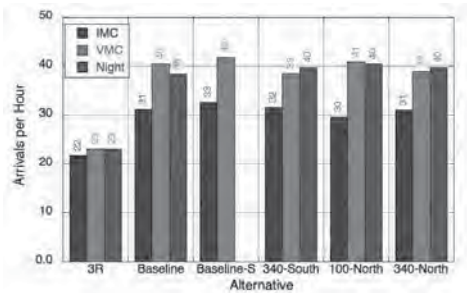


Figure 13-3: Mean Arrival Rates per Hour Observed in the North Airfield.

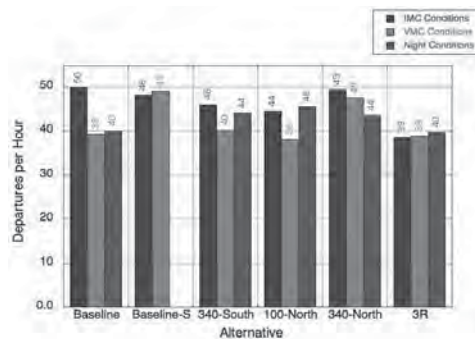


Figure 13-4: Mean Departure Rates per Hour Observed in the North Airfield.

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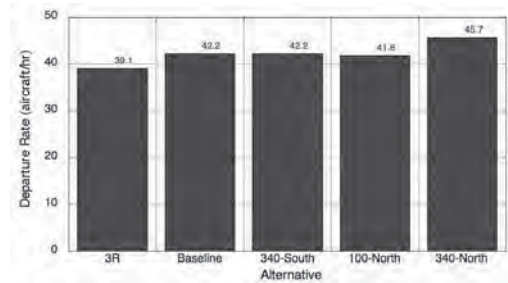


Figure 13-5: Average Departure Rates per Hour Observed in the North Airfield. Five Alternatives with all Three Weather Conditions Simulated in FFC.

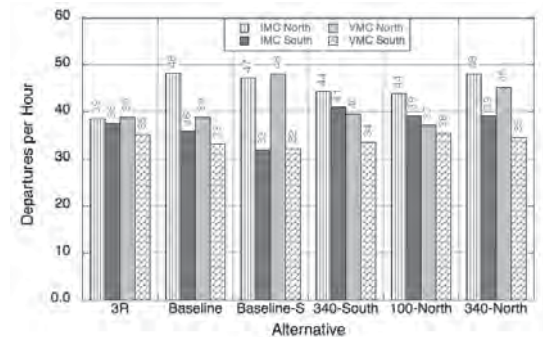


Figure 13-6: Mean Departure Rates per Hour Observed in the North Airfield Under Various Weather Scenarios.

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### 13.2. Taxi-in and Taxi-Out Analysis

While this study concentrates on safety of the Los Angeles International Airport, airport operations should be efficient to handle traffic on runway, taxiways and in apron areas near gates. This section describes the taxi-in and taxi-out results of the FutureFlight Central simulations.

#### Taxi-In Times

Taxi-in times measure the time interval between the aircraft touchdown condition and the time when the same aircraft reaches its gate. Table 13-1 presents a summary of the taxi-in time results obtained in the FFC simulations. Figure 13-7 shows the mean taxi-in times observed in the FFC simulations for six airport alternatives. The y-axis represents taxi-in time per arrival in seconds. Statistical analysis of the data for 52 FFC runs shows that there are significant differences in taxi-in times for each alternative (at 95% confidence level). 340-South performs last in terms of taxi-in times with a mean taxi-in time of 708 seconds per arrival. The best alternative in terms of taxi-in times is 340-North with a mean taxi-in time of 612 seconds per operation followed closely by 100-North (630 seconds per operation). While runway 24R in 340-North is located further from the gates, the taxiing times are better than 100-N because of improved ground flows observed in the simulations. In other words, alternative 100-North produced more frequent aircraft stops on the ground for arriving aircraft compared to alternative 340-N. The ground stops for arriving aircraft are affected by both arrival and departing traffic flows in the airfield. Since 340-North has the best departure saturation capacity of all alternatives (i.e., fewer departure queues), this produced fewer bottlenecks on the ground network thus reducing taxi times in the airfield for both arrivals and departures in 340-North compared to other alternatives. This provides evidence that 340-N is a more efficient configuration to handle ground traffic. The poor performance of 340-South is attributed to the large imbalance in the number of gates in the North (i.e., linear terminal) compared to the South complex. The results for alternative Baseline-S include two weather conditions (VMC and IMC). The five remaining alternatives include all three weather conditions (VMC, Night and IMC). Comparisons between Baseline-S and other alternatives should be done with reservations since Baseline-S had no nighttime runs. Analysis of track data from FFC simulations reveals that alternative 340-South had the longest average travel distance in the field of all alternatives tested. This comes to no surprise, since many aircraft arrivals processed on the North airfield taxied long distances to the more numerous South airfield gates.

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#### Taxi-Out Times

Taxi-out times measure the time interval between the aircraft push back condition at the gate and the time when a departure is processed on the runway (i.e., aircraft becomes airborne). Taxi-out times statistics are gathered for flights that reach the airborne phase. A summary of taxi-out times is shown in Table 13-2. Figure 13-8 shows the mean taxi-out times (i.e. taxi times for departures) observed in the FFC simulations. The y-axis represents taxi-out times per departure in seconds. Statistical analysis of the data for 52 FFC runs shows that there are significant differences in taxi-out times for some alternatives. 3R performs last in terms of taxi-out times with a mean taxi-out time of 1,309 seconds per departure. The best alternatives in terms of taxi-out times are 340-North and 340-South with mean taxi-out times of 1,198 and 1,208 seconds per departure, respectively. As would have been expected, 3R performs last with an average of 1,309 seconds of taxi-out time per operation. During the FFC runs for 3R, the North field taxiway "Echo" became very congested. Under 3R the North complex did not have the ability to handle the same amount of traffic as others.

Table 13-1: Taxi-In Time Analysis. FutureFlight Central Simulation Analysis Results.

Alternative	Mean Taxi-In Time (s) Overall	Mean Taxi-In Time (s) IMC	Mean Taxi-In Time (s) Night	Mean Taxi-In Time (s) VMC
3R	627	613	617	650
Baseline	645	606	713	633
Baseline-S	609	599	N/A <sup>1</sup>	619
340-South	708	640	697	789
100-North	630	584	624	684
340-North	612	601	636	600

<sup>1</sup> No Night condition was simulated in FFC for Baseline-S. Thus comparisons with others should be viewed with care.

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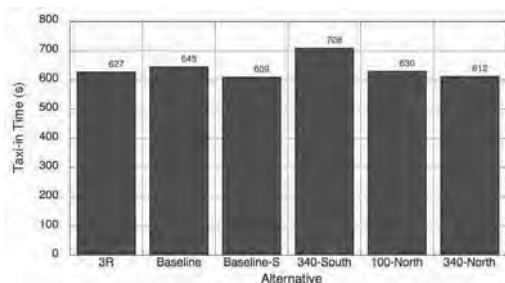


Figure 13-7: Taxi-In Times per Operation Observed for all Six Alternatives Studied.

Table 13-2: Taxi-Out Time Analysis. FutureFlight Central Simulation Results.

Alternative	Mean Taxi-Out Time (seconds) Overall	Mean Taxi-Out Time (seconds) IMC	Mean Taxi-Out Time (seconds) Night	Mean Taxi-Out Time (seconds) VMC
3R	1,309	1,356	1,306	1,266
Baseline	1,267	1,218	1,271	1,312
Baseline-S	1,236	1,255	N/A	1,217
340-South	1,208	1,132	1,195	1,292
100-North	1,257	1,239	1,259	1,272
340-North	1,198	1,201	1,197	1,198

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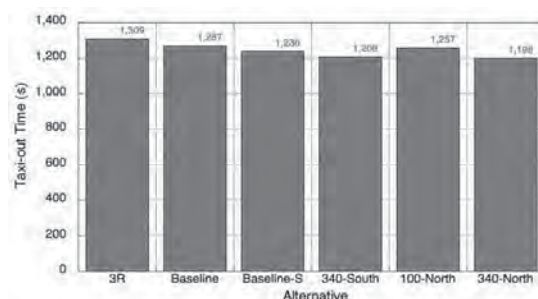


Figure 13-8: Taxi-Out Times per Operation Observed for Six Airport Alternatives.

In order to understand the implications of the FFC results, a simple economic analysis was conducted to understand the long-term impacts of added taxi-in and taxi-out times for various airport alternatives. The analysis considers periods of demand at the airport with conditions above a minimum threshold of demand to justify the use of FFC taxi-out and taxi-in results. During the FFC simulations, the range of demand values tested varied from a low 127 operations per hour (for 3R) to a high of 163 operations per hour. Examination of the expected demand function over a 24-hr period at LAX (see Figure 4-3) provides insight of the range of the operations expected at the airport in the future. Using a low threshold of 127 operations per hour, we estimate 9 one-hour periods in the year 2020 with demand values above that minimum threshold. A total of 1,220 operations are impacted and considered in the analysis of delays based on FFC taxi-in and taxi-out times. Note that this approach assumes the contribution of delays in the remaining hours of operation during the day is zero. However, this is compensated because not all 9 one-hours selected are operated at the highest demand load simulated in FFC.

The results of the first-order cost analysis are presented in Table 13-3. The table presents the estimated annual operating cost savings (\$2010) between the Baseline and all other alternatives (see column 2). The same table presents the operating cost with reference to alternative 340-North. 340-North was the alternative with the lowest operating cost per year of all six simulated in FFC. The results show that the Baseline would have an added cost of ground operations of 20.5 million dollars compared to alternative 340-North. Similarly, alternative 340-

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North could save 10.9 million dollars per year compared to alternative 100-North. It is important to realize that part of the savings account for fuel burn savings that impact emissions. The Academic Panel has not evaluated the environmental impact of these operations.

Table 13-3: First-Order Estimation of Annual Delay Savings for Six LAX Alternatives. Aircraft Operating Cost \$3,250 per hour (\$2010). 1,220 Daily Flight Operations Impacted and Considered in the Analysis.

Alternative	Total Savings vs. Baseline (\$2010) 2020 Demand	Total Savings vs. 340-North (\$2010) 2020 Demand
3R	-7,750,167	-20,482,583
Baseline	0	-12,732,417
Baseline-S	5,720,361	-7,012,056
340-South	10,887,139	-1,845,278
100-North	1,845,278	-10,887,139
340-North	12,732,417	0

### 13.3. FutureFlight Central Voice Communication Analysis

Voice communication results obtained for every FFC alternative are presented in this section. We compare four voice communication metrics for each alternative: 1) transmissions per hour, 2) average length of transmissions, 3) average airborne distributions and 4) transmission efficiency (number of transmissions per aircraft per hour). These metrics have been used in past studies (references) to estimate measures of workload that could potentially affect safety.

#### Frequency Transmissions Analysis

We first study the results for Local Controller 2 Position (i.e., North Controller). The results of ATC frequency passages per hour are shown in Figure 13-9. There were statistically significant differences observed in the number of transmissions per hour among several of the alternatives. 3R had the lowest transmission rate. This is explained due to a lower number of operations in the North airfield. A second group formed by Baseline-S, 340-North, 100-North, and Baseline had the highest transmission rates (In that order). Alternative 340-South was in the

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middle.

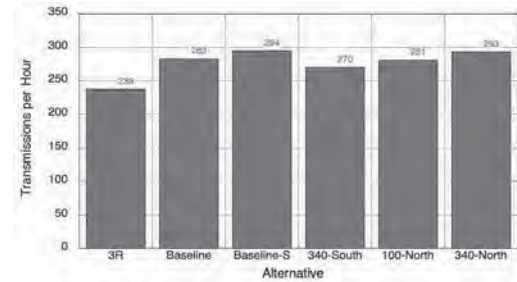


Figure 13-9: North Airfield Local Controller (LC2) Transmissions per Hour.

The transmission rates observed for 340-North and 100-North alternatives are not significantly different than the Baseline at the 95% confidence level. Transmission efficiency ratings are shown in Table 13-4. The transmission efficiency ratings (transmissions per operation) for 340-North and 100-North are comparable to those of the Baseline alternative. This would suggest that all alternatives with a center taxiway do not have a significant disadvantage with respect to workload compared to the Baseline alternative.

Table 13-4: Transmission Efficiency for LC2 Transmissions for Six Alternatives.

Alternative	North Airfield Operations per Hour	LC2 Transmissions per Hour	LC2 Transmissions per Operation
3R	61.68	238	3.86
Baseline	78.67	283	3.60
Baseline-S	84.89	294	3.46
340-South	78.42	270	3.44
100-North	79.29	281	3.54
340-North	82.26	293	3.56

The results for the North Ground Controller (GC2) are examined next. There were statistically significant differences observed in the number of transmissions per hour for the GC2 position for some of the six alternatives studied (see Figure 13-10). 340-South had the lowest transmission rate. This can be explained due to the limited number of gates on the North airfield.

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A second group formed by Baseline, 100-North, 340-North, and Baseline-S had the highest transmission rates (In that order). 3R was in the middle. The transmission efficiency observed for 340-North and 100-North alternatives are not significantly different compared to the Baseline alternative at the 95% confidence level (see Figure 13-11).

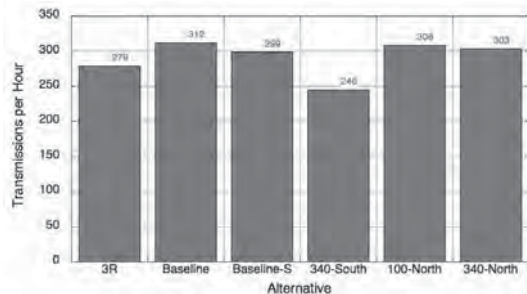


Figure 13-10: North Airfield Ground Controller (GC2) Transmissions per Hour.

Table 13-5: Transmission Efficiency for GC2 Transmissions for Six Alternatives.

Alternative	North Airfield Operations per Hour	GC2 Transmissions per Hour	GC2 Transmissions per Operation
3R	61.68	279	4.53
Baseline	78.67	312	3.97
Baseline-S	84.89	299	3.52
340-South	78.42	246	3.13
100-North	79.29	308	3.89
340-North	82.26	303	3.69

The last set of transmission results apply to a midfield ground controller position called GC3. This is a new ground control position created to deal with the added complexity of a new

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midfield terminal and additional gates on the West side of the Tom Bradley International Terminal.

Statistically significant differences were observed among several of the alternatives in terms of the number of transmissions per hour for the GC3 position (see Figure 13-11). 340-South had the highest transmission rate. This result can be attributed to the large number of crossings between North and South fields observed during the FFC simulations due to the limited number of gates on the North. This alternative created significantly more workload for GC3. A second group formed by 3R, Baseline, Baseline-S, 100-North, and 340-North had lower transmission rates (in that order).

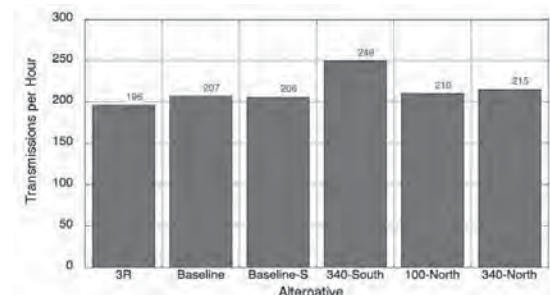


Figure 13-11: Midfield Ground Controller (GC3) Transmissions per Hour.

The transmission rates observed for 340-North and 100-North alternatives are not significantly different than the Baseline at the 95% confidence level. Transmission rates have been known to correlate with controller workload.

The results obtained in these simulations were compared to those obtained by NASA Ames in a previous FFC simulation study of the Los Angeles International Airport (NASA, 2003). The previous study analyzed the South Airfield to understand workload measures with a center taxiway in the South. In a previous NASA FFC study, the tower simulator was staffed by two controllers on each side (GC1, LC1 and GC2, LC2) with no GC3 controller (NASA, 2003).

The transmission rates for GC1 and LC1 controllers (South-side controllers) in the previous study were 300 and 309 transmissions (i.e., passages) per hour, respectively. The

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average transmissions per hour for GC2 in our study for alternatives 100-North and 340-North were 308 and 303 transmissions per hour for GC2. The average transmissions per hour for LC2 in our study for alternatives 100-North and 340-North were 291 and 293 transmissions per hour for GC2. While many variables can affect the transmission rates, the transmission rates observed in this study seem comparable with the previous center taxiway study performed by NASA. Our discussion with Air Traffic Controllers suggests that the workload for the South Field has been acceptable. Consequently, the results of the North Airfield Study suggest both ground and local controllers should be able to cope with the workloads expected in the North field with alternatives 100-North and 340-North. Alternative 340-South would probably result in higher workload for the mid-field controller (GC3) compared to today's ground controllers.

#### Airtime Frequency Analysis

Airtime frequency use is another important variable to estimate precursor measures of ATC controller workload. Starting with Ground Controller position #2 (i.e., North Controller), there are statistically significant differences in the airtime distributions for some of the alternatives at the 95% confidence level (see Figure 13-12). In the FFC simulations, 340-South had the lowest airtime frequency use. This was expected due to the small number of gates in the North airfield complex compared to the Baseline alternative. A second group formed by Baseline-S, 100-North, Baseline, and 340-North had higher airtimes (in that order) than 340-South. Based on our own analysis, none of the airtimes seemed excessive. The airtime observed for 340-North and 100-North alternatives are not significantly different than the Baseline alternative at the 95% confidence level.

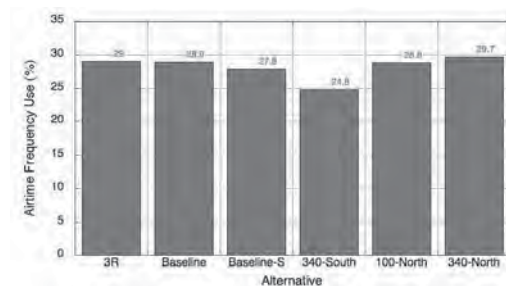


Figure 13-12: North Airfield Ground Controller (GC2) Airtime Frequency Use.

Figure 13-13 shows the percent of time of frequency use for local controller # 2 (North Controller). The results for LC2 (local controller position 2 – North Airfield) show that statistically, no appreciable differences observed in the airtime distribution at the 95% confidence level. 3R had slightly lower airtime demands. This was expected due to lower demand on the North Airtime frequency demand varied from 23.1% to 26.9% for all 6 alternatives tested.

These values are comparable to those observed in a previous NASA center taxiway study (i.e., 26.3%) for South LC1 controllers. The airtimes for LC2 seem to be within acceptable controller workload thresholds. The airtimes observed for center taxiway alternatives (340-South, 100-North and 340-North) are not significantly different than the Baseline alternative at the 95% confidence level.

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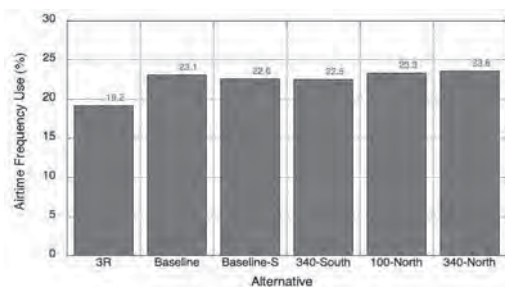


Figure 13-13: North Airfield Local Controller (LC2) Airtime Frequency Use.

The final airtime analysis corresponds to position GC3 or the ground controller in charge of midfield terminal traffic. The airtime percent use of the frequency for GC3 is shown in Figure 13-14. The results show statistically significant differences observed in the number of transmissions per hour for the GC3 position at the 95% confidence level. 340-South had the most demanding airtime requirement. This was attributed to the limited number of gates on the North creating substantially more crossover traffic and thus more workload for GC3. A second group formed by 340-North, Baseline, Baseline-S, 100-North, and 3R (in that order) had airtime distributions that were very similar.

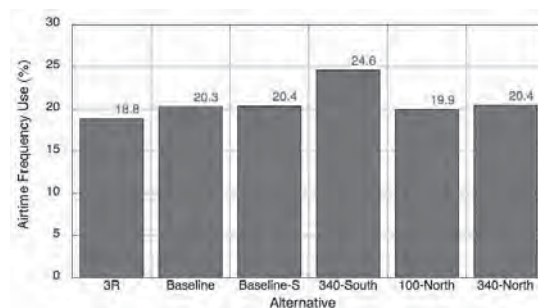


Figure 13-14: Northfield Ground Controller (GC3) Airtime Frequency Use.

The airtime results illustrated in Figure 13-14 show that 24% of the GC3 controller was busy in alternative 340-North and 26% of the time for alternative 100-North. These percentages are lower than the airtimes observed for South Airfield ground controllers (GC1) in a previous NASA study (NASA, 2003). The airtime results should provide confidence that a GC3 position can be staffed as simulated in this North Airfield FFC study. This position will be critical in future operations at Los Angeles International Airport due to the complexity of the midfield terminal and the limited visibility available from the existing ATC Control Tower as shown in Figure 13-15 and Figure 13-16.

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Figure 13-15: Visibility from LAX ATC Control Tower to Midfield Terminals. FFC Simulation (A.A. Trani).



Figure 13-16: Current Visibility from LAX ATC Control Tower to the Tom Bradley Terminal (A.A. Trani).

**Average Transmission Length Analysis**

The third voice communication metric obtained from the FFC simulations was the average transmission length. For the Local Controller position in the North Airfield (LC2) no appreciable differences were observed in the average transmission length among all alternatives. The results are shown in Figure 13-17. Transmission lengths varied from 3.17 to 3.54 seconds. The values observed in this study are comparable to those observed in a previous NASA taxiway

study (NASA, 2003) for South LC1 controllers. The transmission lengths for LC2 seem to be acceptable and in line with a previous South Airfield NASA study. The average transmission lengths observed for all center taxiway alternatives are not significantly different than the Baseline alternative at the 95% confidence level.

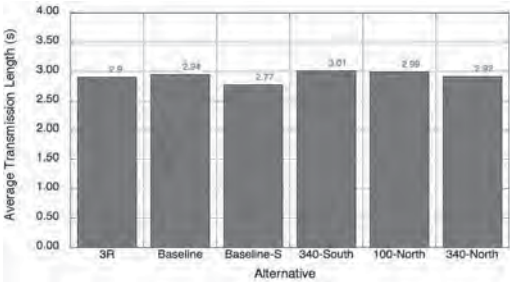


Figure 13-17: North Airfield Local Controller (LC2) Average Transmission Length.

For the Ground Controller position in the North Airfield (GC2) no appreciable differences were observed in the average transmission lengths among all alternatives. The results are shown in Figure 13-17. The average transmission lengths observed for all center taxiway alternatives are not significantly different than the Baseline alternatives (Baseline or Baseline-S) at the 95% confidence level. Transmission lengths for the GC2 position varied from 3.40 to 3.81 seconds. These values are comparable to those observed in a previous NASA center taxiway study (NASA, 2003) for South GC1 controllers.

Finally, the Ground Controller position in the Midfield (GC3) had similar average transmission lengths among all alternatives. The average transmission lengths observed for all center taxiway alternatives are not significantly different than the Baseline alternative at the 95% confidence level. The results are shown in Figure 13-18. Transmission lengths for GC3 position varied from 3.73 to 3.84 seconds.

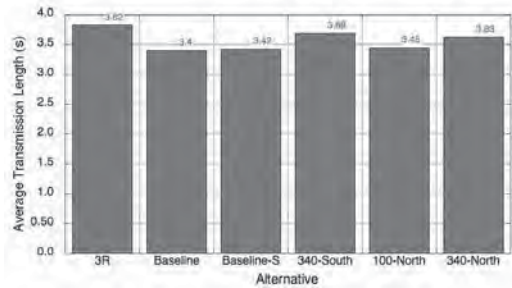


Figure 13-18: North Airfield Ground Controller (GC2) Average Transmission Length.

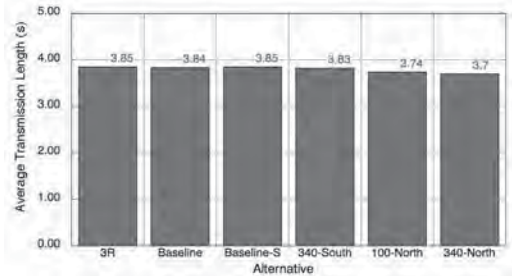


Figure 13-19: Midfield Ground Controller (GC3) Average Transmission Length.

**Summary of Voice Communication Analyses**

Three precursor workload metrics were studied using FFC output data: transmissions per hour (transmission rate), average transmission length, and airtime distribution. For all three metrics and 3 North controller positions, alternatives 340-North and 100-North demonstrated similar precursor workload parameters than the Baseline alternative. The 340-South alternative

was particularly demanding in transmission rate and airtime for the GC3 controller position. This could indicate that if alternative 340' South were to be adopted, it would likely result in the highest workload conditions for the Ground Controller in charge of the midfield. All three metrics for the North Airfield local and ground controllers were very similar in absolute terms to those measured in the previous NASA study (NASA, 2003)

**13.4. Runway Operations Analysis Model**

Section 13.1 presented the throughput analysis of the airport in terms of actual observations in the FFC simulations. As noted before, air traffic controllers were pushing very hard to service many departures from inboard runways and in some cases it was observed that, for some configurations more than others, the separation minima was either below the FAA standards or close to it. In real life, air traffic controllers would act more conservatively and thus adjustments to the throughput values obtained in Section 13.1 are warranted. This section provides an independent evaluation of runway capacity to understand the impacts of various alternatives in the future of LAX operations.

**Discrete-Event Simulation Model of North Airfield Interactions**

To evaluate in some detail the impact of ADG VI aircraft operations in the North airfield, a discrete event simulation model of the runway operations was created. The model, created in the ExtendSim modeling language, consists of blocks connected to model the interactions between arrivals on runway 24R and departures on runway 24L. The model includes an interaction block to delay departures on 24L while ADG VI aircraft are operated on the center taxiway under alternative 100-North. The diagram of the model is shown in Figure 13-20. The model runs the complete LAWA 2020 demand schedule for one day of operations with the percent of ADG VI aircraft varied parametrically between 1 to 3% simulating various futures of operations at LAX. To model 100-North operations the model blocks departure operations on 24L while a design Group VI aircraft occupies the center taxiway and performs a crossing of runway 24L in 2.8 minutes. This is the expected travel time of a super-heavy using runway exits K3, K4 and BB in 100-North. The travel time has been estimated using the Academic Panel observations at the airport for Qantas Airbus A380-800 operations and considers the FAA Modification of Standard (MOS) prescribed limit of 15 miles per hour taxiing speed on 75-foot taxiways. The analysis for 340-North includes a ½ minute blocking time for departures on 24L while the ADG VI aircraft crosses runway 24L at low speeds observed in the field. This time was added because the time gaps between successive departures will lack sufficient time to allow a super-heavy



aircraft crossing the departure runway and clear the runway Object Free Area (OFA) or Runway 24L.

To obtain stable results, we ran 100 repetitions of the model simulating 100 independent days of operation. A sample output of the model is shown in Figure 13-21. The results of the discrete-event simulation model are shown in Table 13-6 for Visual Meteorological Conditions (VMC). The table summarizes the values of incremental departure delays per operation at the airport over a 24-hour period. The values of delay in the table represent the departure delays that would be added if the runway is blocked because a Group VI aircraft maneuvers in the center taxiway. Other delays at the gate or taxiways are not factored in here because we are attempting to understand the effect of runway blocking for departures only. In general, other sources of delay on taxiways will add to the analysis presented here.

The results of the simulation show reductions of 0.20 to 0.54 minutes per departure operation for alternative 340-North compared to 100-North. These results are average numbers accumulated over a complete day of operations for every departure in the North airfield.

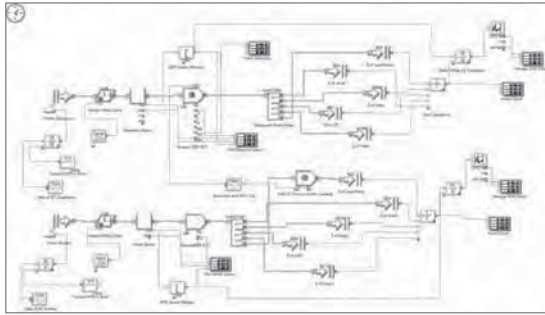


Figure 13-20: Block Diagram of Discrete-Event Simulation of the North Airfield to Measure Departure Delay Impacts in the North Airfield.

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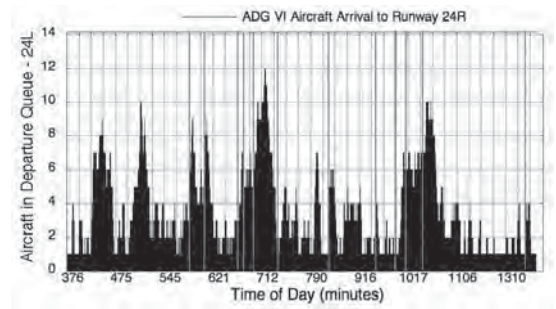


Figure 13-21: Departure Queue Output of the Discrete-Event Simulation of the North Airfield. IMC Scenario with LAWA 2020 Demand Profile. 100-North Alternative with 2% ADG VI Aircraft in the Fleet Mix.

Table 13-6: Incremental Departure Delays per Operation (LAWA 2020 Demand: 2284 operations per day). ADG VI Fleet Varies from 1-3%. VMC Operating Conditions. Tally of 100 Discrete Event Simulations Representing 100 Days of Activity at the Airport.

Alternative	% ADG VI in Fleet Mix		
	1%	2%	3%
<b>100-North</b>	1.81	2.21	2.37
<b>340-North</b>	1.61	1.74	1.83
<b>Improvement 340-North vs 100-North</b>	0.20 min/operation	0.47 min/operation	0.54 min/operation

The situation in Instrument Meteorological Conditions (IMC) is presented in Table 13-7. The table shows incremental delays ranging between 0.62 and 0.99 minutes per departure operation. To put in perspective the results shown in Tables 13-6 and 13-7, it is necessary to consider a mixed scenario that accounts for both VMC and IMC conditions. According to FAA Aviation System Performance Metric database (FAA, 2009) LAX is operated 24% of the time as

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equivalent IMC conditions. The remaining 76% of the time the airport is operated in equivalent VMC conditions.

Table 13-7: Incremental Departure Delays per Operation (LAWA 2020 Demand: 2284 operations per day). IMC Operating Conditions. ADG VI Fleet Varies from 1-3%. Tally of 100 Discrete Event Simulations Representing 100 Days of Activity at the Airport.

Alternative	% ADG VI in Fleet Mix		
	1%	2%	3%
<b>100-North</b>	3.11	3.58	4.11
<b>340-North</b>	2.49	2.90	3.12
<b>Improvement 340-North vs 100-North</b>	0.62 min/operation	0.68 min/operation	0.99 min/operation

Using this breakdown in the analysis we estimate the annual cost of departure delays due to improvements in operations with 340-North. In this analysis we use 2% of the fleet mix in the year 2020 to be ADG VI aircraft. According to the LAWA demand estimate, in 2020 there could be 525 departures per day that will be affected by any improvement in the North (assuming 46% departures in the North airfield). The cumulative added delay using a 76/24 split of VMC/IMC conditions yields 273 aircraft-minutes of added delay per day if 100-North is implemented instead of 340-North. This translates into \$5.4 million dollars per year saved using an operating cost of \$3,250 per hour using conservative numbers (\$2010). This number only considers the added delay due to runway blocking effects of runway 24L for departures due to ADG VI operations in the North airfield.

Using the taxi-in and taxi-out times presented in Section 13.2 (see Table 13-2) we make a first-order estimate of the taxi-out times for each operation discounting the stopped times at the runway departure queue. The results are summarized in

Table 13-8. The difference in taxiing times between 340-North and 100-North is 57 seconds discounting all stopped delays. This delay is due to increased taxiing distance effects of one alternative versus another one (i.e., extra routing to overcome traffic). Using this number as

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first-order cost estimation, another 499 aircraft-minutes (8.3 aircraft-hours) of delay per day would be added to the 100-North alternative compared to 340-North. This translates into \$9.9 million dollars in the year 2020. The total delay savings accounting for loss of departure capacity and taxiing effects is estimated to be \$15.3 million per year in 2020. In summary, the second cost analysis presented here provides a first-order estimate of added delay costs of 100-North versus 340-North.

Table 13-8: Estimated Taxi-Out Times without Stopped Delay.

Alternative	Average Taxi-Out Time (seconds)	Mean Taxi-Out Time Without Stopped Delay (seconds)	Average Stopped Delay per Departure (seconds)
<b>100-North</b>	1,257	1,186	71
<b>340-North</b>	1,198	1,129	69
<b>Improvement 340-North vs. 100-North</b>		57 seconds (0.95 minutes)	

Table 13-9: Estimated Delay Cost 100-North vs. 340-North. 340-North is used as the Reference Condition. \$3,250 per Hour.

Alternative	Departure Delays due to Runway Blocking Effect (\$2010 Millions)	Added Taxiing Delays (zero Stopped Delay) (\$2010 Millions)	Total Added Cost (\$2010 Millions)
<b>100-North</b>	5.4	9.9	15.3
<b>340-North</b>	0	0	0

### 13.5. Conclusions of Capacity and Operational Analysis

Comparing the two economic analyses presented in Sections 13.2 and 13.4 it is clear that alternative 340-North offers operational efficiency advantages and cost benefits over all other alternatives. If 340-North is compared with 100-North, the cost savings presented in Section 13.2 using FFC estimates alone produce \$10.9 million dollars per year. The estimation using both FFC

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data and the discrete simulation model yield \$15.3 million in cost savings per year. The conclusion of this analysis is that there are tangible advantages for 340-North from a capacity and operational efficiency viewpoint. There are other delay effects that are likely to appear if the analysis is carried in more detail. For example, arrival delays resulting from a smaller capacity in the airfield have not been factored in the FFC or in the discrete-event model. These arrival delays would likely add costs to the operation for each alternative with lower saturation capacities. This would be critical for alternatives like 3R that have the lowest acceptance rate of all. The reader should realize that once an airport is operated at the “knee” of the delay curve (like it is proposed in the year 2020) over extended periods of time during the day, small reductions in the capacity function of the airport result in large changes in delays (i.e., non-linear behavior). The following final conclusions can be made about the alternatives studied:

i) We conclude that the **340-North alternative offers superior operational efficiency and capacity of the airport over all others including the Baseline and 100-North cases**. We estimate the magnitude of the cost savings to be 15.3 million dollars per year compared to 100-North just on ground taxi and runway blocking operations. The effect of a modest gain in departure capacity for 340-North would yield operational benefits to better cope with the expected demand in the year 2020. These benefits would produce reduced arrival delays that our study has not estimated.

ii) Besides capacity, the **operational benefits** of having a centerline taxiway, **340-North provides an added benefit of holding capacity** to deal with unexpected conditions. The **Baseline configuration is limited in terms of holding capacity** for arrivals queuing at taxiways AA, Zulu and Yankee today. Our analysis of future runway operations using the IRSIP configuration will place higher demands on the new location for Zulu and under periods of heavy arrival conditions, could produce unwanted queues at new Zulu and AA.

iii) **The 340-North configuration could also improve the situational awareness of pilots crossing runway 24L by providing better viewing angles from the flight deck**. While it is difficult to state that “poor” viewing angles or runway exit angles are the main cause of high runway incursion rates in AA and Zulu, it is clear that proper geometric design of taxiway-runway junctions provides another safety net to avoid runway incursions. The 340-North configuration provides the best alternative to design good high-speed geometries and at the same time, taxiway-runway junction to the inbound runway.

iv) **The three-runway alternative (3R) would not provide adequate capacity** for conditions expected in 2020 or similar to the LAWA 2020 demand profile. For 9 hours of each

day the capacity of 3R would fall short of the capacity needed to maintain the airport delays at a reasonable level. Moreover, 3R does not offer backup ability in case a runway is closed. Runways are closed at airports for maintenance duties and for operational reasons.

v) The Baseline configuration provides reasonable capacity in the short term. However, based on two first-order cost analysis presented in this Section the **Baseline configuration is inferior to 340-North for a 2020 demand scenario**. The Baseline alternative with IRSIP offers limited queuing capacity between runways 24R and 24L. The provision of high-speed exits for the Baseline condition requires careful attention to detail to avoid inducing pilots to take runway exits at such high speeds as to cause blunders.

14. CAVEATS IN THE ANALYSIS

The North Airfield Safety Study is necessarily an exercise in approximation, an attempt to amass and work with clues rather than to reach exact truths. Some of key caveats related to our analysis are listed below.

*The 2020 forecasts about traffic levels at LAX, and the fraction of traffic involving Group VI aircraft, are subject to considerable uncertainty.*

This point needs little elaboration, given the extent to which recent demand patterns have deviated from forecasts made a decade ago. Because commercial US air traffic in 2009 was far below what was anticipated, one might wonder whether growth will resume sufficiently so that 2020 forecasts emerge as accurate. And Boeing and Airbus have long disagreed on whether Group VI planes like the Airbus 380 will be crucial to future international passenger travel, or whether instead point-to-point services on smaller aircraft will gain growing prominence. One way to interpret the forecasts is as representation of future demand levels at *some* point in the future, perhaps not 2020 but (say) 2030. Because decisions about the North Airfield concern its future over many decades, too literal a focus on 2020 might be misplaced.

*The experiments at NASA-Ames were extremely sophisticated and well conducted, but they can only approximate what might happen under various configurations of the North Airfield.*

Aviation is forever changing, and even assumptions in the simulation that were sensible when they were made might not reflect what might happen in the future. To pick but one example, aircraft are now taking off with *reduced thrust*, which means that they travel farther down the runway before becoming airborne than they did in recent years. That procedure limits wear-and-tear on the engines and is popular with airlines, but it means that the probability a plane will be in the air within a certain time and at a certain distance down the runway may be less than the simulation assumed. That circumstance affects the evaluation of the “built-in” safety of moving crossing points down the runway, and it also has implications about airport capacity. The Panel tried to make adjustments for such factors, but they arise in too many ways for such adjustments to be complete and exact.

Likewise, we gained a great deal from the oral and written surveys of both pilots and controllers in the simulation. But, sometimes, what was said in the oral sessions diverged (in tone at least) from what was written. Such differences are to be expected when people are questioned after intense simulated sessions in heavy air traffic; it is not obvious how best to

reconcile any such diversions. The Panel used judgment in synthesizing the information, but its judgments are far from infallible.

*Historical experience is valuable, but the data are subject to random variability that poses major challenges for statistical estimation.*

This point is illustrated if we consider how the changes on the South Airfield have reduced runway incursions when planes landing on runway 25-L cross runway 25-R en route to the terminals. There have been no such A and B incursions on the South since the reconfiguration was completed in 2007. That is good news but, given that such incursions were rare on the South in the several preceding years, it is too early to come up with an estimate of the incursion rate reduction with a high degree of accuracy. Many of the numbers we estimated in the analysis are subject to the volatility associated with rare events, and they are subject to margins of error that are potentially large and hard to quantify.

A Final Perspective

It should be obvious from our report that *we generally took a conservative approach to estimating risk*: if we erred, we did so on the side of overestimating risk. Further, where there was a degree of uncertainty in estimating a risk reduction parameter, *we generally took of the approach of obtaining multiple estimates using diverse techniques and then taking a “consensus” estimate*.

While the Panel admits that its estimates have degree of uncertainty associated with them, it believes that *the thrust of its conclusions is basically accurate*. Thus, it believes that the experiment at NASA-Ames and the review of historical and other data serve to point in the right direction, even if there remains considerable uncertainty about the exact angle.



## 15. ANSWERS TO THE NINE QUESTIONS

### 15.1. What are the causes of past and ongoing runway incursions and surface incidents on the LAX North Airfield? Simulate/recreate circumstances and conditions to assess and identify all primary and contributing factors.

We have reviewed and classified incursions on the North and found the following.

**55% of the incursions are of the exit-no-stop (ENS) type.** They have been discussed at other parts of the report. They involve an aircraft arriving on the outboard runway and erroneously crossing the inboard runway or breaching the hold bar at the inboard runway without stopping. They are usually caused by a distracted or disoriented pilot or a pilot that takes a runway exit at very high speed. In many cases, some form of miscommunication between the pilot and controller is a contributing factor. In a few cases, they are caused by a controller incorrectly giving a clearance.

**15% of the incursions are “threshold” incursions.** These involve an aircraft entering a runway at or near the threshold without clearance. In many cases, these incursions result in a go-around for an airborne arriving aircraft. These are caused by some miscommunication between the pilot and controller.

**15% of the incursion are “takeoff without clearance” incursions.** These involve an aircraft starting its takeoff role without clearance. These are caused by some miscommunication between the pilot and controller.

The remaining incursions could involve *i) service vehicles, ii) an aircraft arriving on the outboard runway and entering the inboard runway without clearance after a stop or iii) an aircraft entering the active inboard runway from taxiway E.*

We did not have the resources to simulate these incursions as requested.

### 15.2. Are these incursions indicative of a current unacceptable level of risk by the FAA safety standards?

As indicated in our Baseline analysis, the incursion (and collision) risk on the North Runway Complex are in line with national averages. Moreover, by objective standards, the fatality risk is extremely low so **we conclude it is not unacceptable.**

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### 15.3. What role does the existing airline fleet of aircraft serving LAX play in the risk of runway incursions?

We have found no reason to believe that the existing LAX fleet mix has a significant impact on the risk of runway incursions at LAX when compared to national averages. An analysis of historical incursion files indicated that the representation of larger aircraft (Group V, heavies) in incursions was very close to their representation within the fleet. Thus, there is no reason to believe that larger aircraft are more or less likely to be involved in an incursion. However, the risk that an incursion causes a collision may increase with aircraft size (see discussion in this report). We feel that the differential risk does not vary substantially among the alternatives considered, given the differential operational restrictions imposed by the FAA..

### 15.4. What roles do airfield marking, lighting, and signage play in the risk of runway incursions at LAX?

As discussed in the report’s Baseline risk assessment, there has been a substantial decrease in incursion risk nationally over the past eight years. Much of this decrease is most likely due to the introduction of ASDE-X and AMASS. However, in that time period, there has been a concerted effort by the FAA and airport operators to improve marking, lighting and signage and, in fact, as a group, even airports that did not receive ASDE-X and AMASS have experienced a risk reduction. This provides evidence that such measures do reduce the risk of runway incursions. The FAA has specifically estimated that RWSL should decrease runway collision risk by 50%. Thus, it certainly would appear that these mechanisms, as a group, have a noticeable positive impact on risk.

### 15.5. What role does human error play in the risk of runway incursions? What role does traffic controller staffing play in the risk of runway incursions?

A review of incursion reports reveals that human error plays the major role in virtually all runway incursions. Further, pilot error is much more frequently the cause than controller error, although controllers often have an opportunity to correct pilot errors before they lead to incursions. We observed in the FFC Simulation on multiple occasions that the Local Assist Controller (an optional position) was critical in identifying a hazardous condition and averting an operational error. Thus, if increased staffing levels increase the percent of time that a Local Assist Controller is available, staffing level increases should increase safety. We have been unable to quantify this effect, however.

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### 15.6. What other factors play a role in the risk of runway incursions?

While it is true that human error is virtually always the cause of a runway incursion, many other factors can play a role in reducing (or increasing) incursion risk.

**Weather conditions**, especially those causing poor visibility, can increase the likelihood that a pilot becomes disoriented and erroneously enters an active taxiway. As discussed earlier collision risk grows quadratically with **traffic levels**. As discussed in other parts of the report runway **exit geometry** can influence the likelihood of incursions. The IRSIP analysis shows that **exit placement** can change the likelihood that a departing aircraft is able to fly over an aircraft that has entered an active runway. **Fleet mix** may potentially influence collision risk as discussed under an earlier question and elsewhere in this report. Finally, **technology**, e.g. ASDE-X, AMASS and RWSL, **signage** and **runway complex architecture**, which are analyzed extensively elsewhere in the report, clearly impact incursion risk.

### 15.7. Why has the South Airfield historically been subject to substantially more runway incursions than the North Airfield?

Prior to the introduction of the centerline taxiway on the South, the rate of incursions on the South airfield was substantially greater than on the North. If one goes back to 1998 the difference in rates was about three to one; if one starts with 2002, the rate was closer to two to one. We have identified three factors that could contribute to this difference.

**Exit locations and relative gate locations:** The old South Complex had multiple high-speed exits (J, K, M) that led across the inboard runway directly to heavily used gate complexes. This configuration could potentially have led pilots to focus on getting to a gate quickly and possibly ignore the fact that they were crossing the (possibly active) inboard runway. By contrast the North Complex exits, with the exception of Y, tend to lead aircraft away from busy gate areas. While taxiway Y on the North does directly face a busy gate area, it has experienced a single incursion since 1998. A likely reason for this low incursion rate is that it requires an acute turn forcing aircraft to slow down and it allows pilots a clear line of vision toward the inboard runway threshold.

**Presence of facilities and a taxiway on non-terminal side of runway complex:** A very significant difference between the North and South runway complexes is that the South Complex has cargo and general aviation facilities on the South (non-terminal) side of the runway complex. In addition, there is also a parallel taxiway (A) to the South of the parallel runways. No such

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equivalent facilities exist on the North. An examination of incursion files reveals that several incursions on the South involved aircraft traveling to or from those facilities and/or taxiway A.

**Traffic differences:** The South Runway complex has historically had slightly higher traffic levels than the North. While the difference is relatively small, considering the quadratic growth in incursion risk with traffic, it could account for a noticeable (but small) difference in incursion rates.

### 15.8. Is there a relationship between the LAX North Airfield and South Airfield operations and the risk of incursions at the airport in general? If so, is this relationship a safety issue or problem?

The principle that says collision risk grows quadratically with traffic levels implies that risk is minimized by balancing traffic between the two runway complexes. It appears that the slight imbalance in traffic distribution between the North and South has caused a slight increase in collision risk. It is also certainly the case that congestion in the terminal area, and on taxiways B and E, can add challenges to the crossing of arriving aircraft over the inboard runway. This certainly can be detrimental to incursion (and collision) risk.

### 15.9. Will the planned airline fleet of aircraft have an impact on the LAX North Airfield operations? If so, is this a safety issue or problem?

It is certainly the case that a growth in the percentage of larger aircraft, especially Group VI, will impact operations on the North Airfield. Under the Baseline and 100-North alternatives, Group VI aircraft will require special handling. We investigated the extent to which larger aircraft are more likely to be involved in runway incursions and found the representation of Group V aircraft and heavy aircraft match their representation in the fleet, indicating larger aircraft do not have a higher incursion risk than others. It is also possible that incursions involving larger aircraft may be more likely to lead to collisions. While arguments for this are plausible, given the special operational procedures required for various alternatives, we feel that any risk differential among North Airfield alternatives relative to changes in the fleet mix is small.

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16. GEOMETRIC DESIGN ISSUES

This section describes relevant aspects of airport geometric design considered in the safety analyses presented in Sections 6-12. This section ends with general airport design recommendations compiled during the conduct of the study.

16.1. Geometric Design Considerations and Aircraft Maneuvering for Centerline Taxiway Alternatives

The Academic Panel studied the geometric design implications of various alternatives and their impact in aircraft maneuvering and visibility while crossing an active runway. This discussion is important in the context of the high variability observed in the runway incursion rates of the North airfield runway exits (see Chapter 7). The ability of an aircraft to maneuver efficiently in the taxiway is of paramount importance in the design of any runway-taxiway configuration. Runway exit geometry could be linked to runway incursion rates as shown in Section 7 of the report. To understand the maneuvering capabilities of large aircraft in various airport configurations we used aircraft manufacturer data (Boeing, 2010; Airbus, 2008) to verify visibility angles and critical sight distances for various configurations in the North airfield. Table 16-1 lists relevant dimensions of the critical aircraft operating at Los Angeles International Airport. The table contains data estimated by the AP Panel for a stretch version of the Airbus A380 (called A380-900). Note that some vehicles are critical than others in one dimension. For example, the Airbus A340-600 has the longest wheelbase whereas the Airbus A380-800 has the tallest tail.

Figure 16-1 contains the definitions of two critical parameters examined in this analysis: 1) turning angle at the hold line and 2) critical sight distance from the reference eye position in the flight deck. Both parameters are important to verify if a departing aircraft is taking off from a runway to be crossed. While technologies such as runway status lights and ASDE-X and AMASS at LAX warn pilots and air traffic controllers of a potential runway incursion blunder, human visual inspection becomes the last condition to avoid a runway incursion.

Table 16-1: Critical Dimensions of Aircraft Operating or Expected to Operate at Los Angeles International Airport. Sources: Boeing Commercial Co. and Airbus Documents for Airport Design.

Aircraft	Overall Length (ft)	Overall Height (ft)	Wheelbase (feet)	Wheeltrack (feet)
A340-600	228.9	58.8	112.1	35.1
A380-800	238.1	80.1	104.6	40.9
B747-400	231.8	64.0	84.0	36.1
B777-300	239.8	61.5	102.0	36.0
B747-8	250.2	71.0 <sup>2</sup>	97.4	36.1
A380-900	258.0	80.1	112.0	40.9

Figure 16-1 clearly indicates that in ideal conditions, pilots should have good visibility angles (i.e., total visual angle) to recognize a potential threat departing in an inbound runway. Similarly, distance (ds) is critical for pilots to be able to see potential traffic at long distance on the runway. The critical sight visibility distance (ds) is measured from the datum position of the pilot's seat. Pilots have limited movement in their seat (assuming their shoulder belts are unbuckled). This implies that pilots can achieve wider visual angles if unbuckled and move forward and close to the side windows. The critical sight distances represent the maximum distance (in the horizontal plane) that a pilot can see seated in the datum position of its seat (without doing any unusual movements).

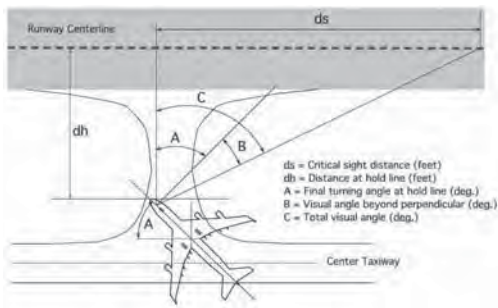


Figure 16-1: General Aircraft Maneuvering Envelope, Visibility Angles and Critical Sight Distance.

Baseline Configuration

The Baseline configuration at LAX offers a wide array of visual angles and critical sight distances at four runway exits used in West-flow operations. Table 16-2 lists the angles for each runway exit on Runway 24R. Table 16-2 indicates that visibility and critical distance (ds) are limited if an aircraft holds between Runways Runway 24L and 24R. The critical sight distances calculated by the Academic Panel are around 500 feet for Zulu and around 700 feet for Alpha-Alpha. Incidentally, Zulu and AA have the highest runway incursion rates (34.2 and 12.6 incursions per million landings, respectively) of all runway exits in the North. Figure 7-3 shows the runway incursion rates for individual runway exits.

As LAWA embarks in building new high-speed runway exits in the North airfield as part of the Interim Plan, it is important to pay special attention to the geometric design aspects (i.e., design exit speed, centerline geometry, runway exit width, etc.) of the junction between Runway 24L and the new exits. Noteworthy in Table 16-2 is taxiway Yankee. Yankee has had one incursion in 12 years. This suggests that careful attention should be paid to the geometric design aspect of the new runway exits suggested for IRSIP to avoid high RIR rates as in the current taxiway Zulu.

Table 16-2: Turning and Visibility Angle Analysis for the Baseline Alternative. Academic Panel Analysis Using Boeing Commercial Co. and Airbus Documents for Airport Design.

Runway Exit	Final Turning Angle and Hold Line (deg.) A	Visual Angle Beyond Perpendicular (deg.) B	Total Visibility Angle (deg.) C	Critical Sight Distance - ds (feet)
Yankee	135	44*	189**	Unlimited***
Zulu	30	31**	61	507
Alpha-Alpha	37	31**	68	696
Bravo-Bravo	89	35	134	Unlimited***

\* Critical aircraft is Boeing 737-700  
\*\* Critical aircraft is Airbus A380-800  
Estimated by Academic Panel using Boeing and Airbus airport design documents  
\*\*\* Unlimited in CAVU (Clear Air Visibility Unlimited) conditions

Configurations with Center Taxiways

The configurations with center taxiways provide operational advantages over the Baseline configuration in the North airfield. These advantages been stated in Sections 8, 9 and 10 of the report. Of special interest in the geometric design analysis is the estimation of turning angles at the hold line and the critical distance (ds). Table 16-3 shows a comparison of the turning angles for configurations 100-North and 340-North/340-South. The angular difference between configurations 340-North and 340-South and 100-North averages 32 degrees. The impact of this difference in terms of critical sight distance is demonstrated later in this section. A scale drawing of the turning maneuvering envelopes for the Airbus A380-800 are shown in Figures 16-2 and 16-3 for configurations 100-North and 340-North/340-South, respectively.

Figure 16-2 illustrates an Airbus A380-800 making a turn from a center taxiway located 400 feet from the runway centerline. The diagram clearly indicates that visibility is restricted because the aircraft turns 38 degrees before stopping at the hold bar. The diagram shows the hold bar to be located 281 feet from the runway centerline. The turning angles improve for Boeing 777-300ER and Boeing 747-400 but not by much (3-5 degrees).



Table 16-3: Final Turning Angles at Hold Line Locations for Two LAX Centerline Taxiway Alternatives. Academic Panel Analysis Using Boeing Commercial Co. and Airbus Documents for Airport Design.

Aircraft	100-North Turning Angle (deg.)	340-North/340-South Turning Angle (deg.)	Angular Difference (340-North/South - 100-North) (deg.)
A340-600	39	72	33
A380-800	38	68	30
B747-400	42	73	31
B777-300	40	74	34

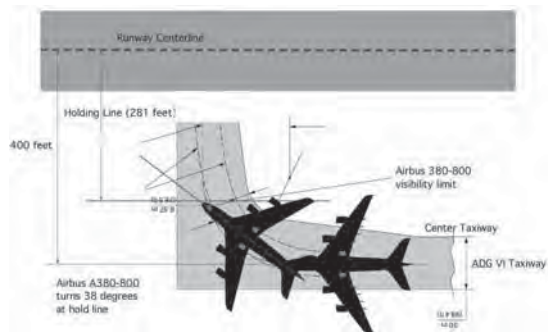


Figure 16-2: Airbus A380-800 Maneuvering Envelopes: 100-North Alternative  
Source: Airbus Document for Airport Planning with Adaptations by Academic Panel (2009).

Figure 16-3 illustrates an Airbus A380-800 making a turn from a center taxiway located 520 feet from the runway centerline for configuration 340-North. The diagram clearly indicates that visibility is greatly improved because the aircraft turns 68 degrees before stopping at the hold bar. The new visual angle should allow pilots to be more alert of the traffic on an inboard runway.

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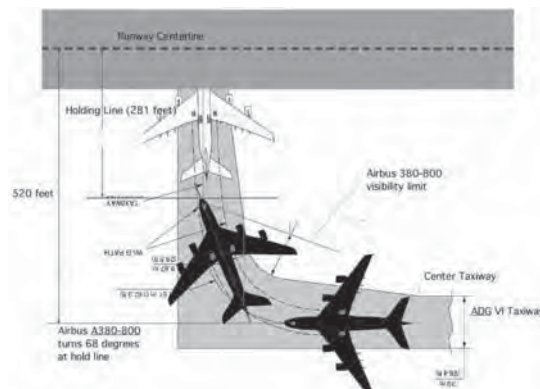


Figure 16-3: Airbus A380-800 Maneuvering Envelopes: 340-North or 340-South Alternatives. Source: Airbus Document for Airport Planning with Adaptations by Academic Panel (2009).

Alternatives 340-North and 340-South clearly offer pilots better visibility conditions to monitor runway activity and provides them with improved situational awareness to cross an active runway. The pilot's visibility from super-heavy aircraft (i.e., Airbus A380) is limited to 121 degrees (31 degrees beyond the perpendicular). The Boeing 747-400 aircraft has the highest visibility angle of all the critical aircraft studied (145 degrees). For the Boeing 747-400 aircraft, even negotiating right angle taxiways from the centerline taxiway in the 100-North alternative, the aircraft has an unlimited critical sight distance due to its large horizontal field of view.

Pilots can still achieve higher visual angles if they unbuckle and move closer to the lateral windows for all the alternatives. However, the provision of adequate visibility is of paramount importance in airport geometric design. This might well serve as the last line of defense against runway incursions – when other primary and secondary systems such as ASDE-X, AMASS, and Runway Status Lights fail to provide ample warning of the impending incursion.

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Tables 16-3 and 16-4 present the critical angles and critical sight distances estimated for all four critical aircraft flying into LAX. According to our calculations, the Airbus A380-800 has the smallest visibility angle and the shortest critical sight distance (~700 feet). Tables 16-3 and 16-4 demonstrate the critical sight distance visibility gains moving from 100-North to 340-North or 340-South. For both 340-North and 340-South, the pilot's of very large aircraft, including ADG VI aircraft, would have unrestricted view of the departures on the inboard runway (see Table 16-4). In this case, any visibility restriction would be due to environmental effects (i.e., weather) and not due to geometric design limits.

Table 16-4: Turning and Visibility Angle Analysis for 100-North Alternative.  
Academic Panel Analysis Using Boeing Commercial Co. and Airbus Documents for Airport Design.

Aircraft	Final Turning Angle at Hold Line (deg.) A	Visual Angle Beyond Perpendicular (deg.) B	Total Visibility Angle (deg.) C	Critical Sight Distance (feet) ds
A340-600	39	45	84*	2677
A380-800	38	31	69	732
B747-400	42	55	97	Unlimited**
B777-300	40	35	75	1049

\* Estimated by Academic Panel

\*\* Unlimited in CAVU (Clear Air Visibility Unlimited) conditions.

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Table 16-5: Turning and Visibility Angle Analysis for 340-North Alternative.  
Analysis by Academic Panel.

Aircraft	Final Turning Angle at Hold Line (deg.) A	Visual Angle Beyond Perpendicular (deg.) B	Total Visibility Angle (deg.) C	Critical Sight Distance (feet) ds
A340-600	72	45	117*	Unlimited**
A380-800	68	31	99	Unlimited
B747-400	73	55	128	Unlimited
B777-300	74	35	109	Unlimited

\* Estimated by Academic Panel

\*\* Unlimited in CAVU (Clear Air Visibility Unlimited) conditions.

## 16.2. General Design Issues Identified for the North Field

During this study several recommendations emerged from comments made by air traffic controllers, pilots and the Academic Panel's own observations. The following list is a series of recommendations that will be expanded in the final version of the report:

- For all center taxiway configurations, provide a full parallel taxiway Kilo to Runways 24R and 24L.
- The single-lane design of Taxiway Echo-7 should be revised allowing air traffic controllers more flexibility in departure sequencing.
- The stagger of thresholds 24R and 24L in the center taxiway configurations requires air traffic controller's careful management of wake vortex, separations. This adds workload and reduced departure separation capacity.
- The runway exits for airfield configurations with a center taxiway should be optimized in the same way as 3R.
- Three high speed runway exits are recommended for all center taxiway configurations and West-flow arrivals.

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- 6) Two optimal high-speed runway exits should be provided for East-flow arrivals
- 7) Runway safety areas need to be protected for all runway ends,
- 8) Careful design work is needed for crossing taxiways in all center taxiway configurations. The crossing taxiways were placeholders and not optimized in relation with the high-speed runway exits provided on Runway 24R, and
- 9) Careful attention should be paid to the geometric design aspect of the new runway exits suggested for IRSIP to avoid high RIR rates as in the current taxiway Zulu.

17. SUMMARY AND CONCLUSIONS

The primary aim of the North Airfield Safety Study was to estimate, as specifically as possible, the level of future safety of several alternate configurations of the LAX North Airfield. An auxiliary goal was to provide useful information about the capacity implications of the various configurations, in light of projections about LAX traffic levels in 2020.

A central component of the study was a human-in-the-loop simulation exercise, conducted during August 2009 at the NASA-Ames FutureFlight Central (FFC) facility in Mountain View, California. But the study also relied heavily on empirical evidence about runway safety and capacity, based on historical experience at LAX and elsewhere. The Academic Panel (AP) took careful note of the changes completed in 2008 on the LAX South Airfield, which moved the two parallel runways 100 feet further apart and created a centerline taxiway between the runways.

The principal conclusions of the study can be summarized as follows:

*The North Airfield of LAX is extremely safe under the current configuration. Changes to the configuration could create even greater safety, but they would be expected to reduce only slightly the overall risk that LAX air travelers face in their journeys. (That overall risk level is itself minuscule because air travel is exceedingly safe.) Considerations of capacity appear to make some alterations to the North Airfield less attractive, and others – particularly the option of moving Runway 24-R 340 feet North – significantly more so. But the AP believes that it would be difficult to argue for reconfiguring the North Airfield on safety grounds alone.*

17.2. The Alternative Configurations

The study focused on five possible configurations of the North Airfield, including two variants of the existing layout:

- (1A) Baseline: The existing configuration, in which runways 24L and 24R are separated by 700 feet, with no centerline taxiway between them.
- (1B) Baseline with Interim Runway Safety Improvement Project (IRSIP): The existing configuration, but with changes to the taxiways leading from runway 24R so that planes landing on 24R would cross runway 24L closer to its west end.
- (2) 100-North: The “100-North” alternative would create on the North Airfield essentially a mirror image of the new arrangement on the South Airfield. Runway 24R would be

moved North by 100 feet, and a centerline taxiway placed between runways 24L and 24R.

- (3) 340-North: The “340-North” alternative would move runway 24R 340 feet to the North and create a centerline taxiway between runways 24L and 24R.
- (4) 340-South: The “340-South” alternative would move runway 24L 340 feet to the South and create a centerline taxiway between runways 24L and 24R. This option would entail the demolition of existing Terminals 1-3 and the construction of a new “linear” terminal facing the North Airfield.
- (5) 3R: The “3R” alternative would reduce the total number of runways at LAX to three by replacing runways 24L and 24R with a single Runway 24, which would handle most of the airport’s Group V and VI aircraft, while smaller planes were concentrated on the South Airfield.

17.3. The FFC Simulation and the Available Data

The Panel was fortunate to have a wealth of information generated by the real-time simulations at NASA-Ames. Actual controllers oversaw simulated landings and takeoffs at LAX (on both the North and South Airfields), during busy hours based on 2020 traffic forecasts prepared by Ricondo Associates. Three visibility conditions were explored in different hours: Daytime Visual, Daytime Instrument, and Night Visual. Across the simulation hours, the number of Group VI aircraft – the grouping with the largest existing airplanes, namely, the Airbus 380 and the Boeing 747-8 – varied from two to six, in order to capture a range of possibilities about the extent of their presence at LAX. Some of the landings were performed by actual pilots in Boeing 747-400 flight simulator, while other aircraft were landed by “pseudo-pilots” using a computer-based interface.

Several types of information were derived directly or indirectly from the simulation. After the sessions, intensive oral and written interviews were conducted with both pilots and controllers. Moreover, some “anomalies” were introduced into the simulation to provide a perspective on how well the controllers were coping with heavy and diverse traffic. For example, some pseudo-pilots were asked deliberately to read back controller instructions incorrectly, to see whether the controller noticed and reacted to the error. In addition, data were available about the frequency and duration of transmitted messages between pilots and controllers. This information offers some insight about controller workload.

At the same time, the Panel considered information from many other sources, including:

- FAA projections about the national risk of fatal runway collisions in 2020
- FAA assessments about the accident-reduction potential of new technologies, such as the ASDE-X radar and Runway Status Lights (RWSL)
- The history of runway incursions on both the South and North Airfields of LAX
- The runway incursion history at other US airports besides LAX
- Worldwide historical data about casualty patterns in fatal runway collisions
- Worldwide historical data about runway excursions, in which a single aircraft deviates sharply and suddenly from its intended path
- Data about easterly arrivals at LAX, which were not included in the NASA simulation

17.4. Findings about Safety

The main findings of the study concerning the safety characteristics of the various alternatives will be summarized next. Detailed descriptions of the analysis for each of the alternatives are provided in Chapters 6–11.

17.4.1. The Baseline Case

After much analysis, the AP unanimously concluded that the existing North Airfield will be extremely safe even under traffic levels projected for 2020. More specifically:

*The AP estimates that, at 2020 traffic levels, fatal runway collisions on the existing North Airfield would occur on average approximately once every 200 years.*

A quick synopsis of the reasoning is as follows:

- 1. Various FAA studies imply that, at 2020 traffic levels, fatal runway collisions would occur at *some* towered US airport once every eight years.
- 2. This estimate assumes high effectiveness for new technologies like AMASS (Airport Movement Area Safety System) ASDE-X radar and Runway Status Lights. (LAX South is one of the very few US airports that have all three technologies.) Thus far, the FAA’s optimism has been justified by events: major runway incursions in the US dropped 80% between Fiscal 2000 and Fiscal 2009 (from 67 to 12). Furthermore, there have been no fatal runway collisions anywhere in the US since March 2000, and the accident on 2/2/91 at the LAX North Airfield –



nineteen years ago – was the last collision at a towered US airport that caused deaths to scheduled airline passengers.

3. To be conservative, the AP estimated that fatal runway collisions would occur at 2020 traffic levels once every four years, rather than every eight. In effect, the AP was assuming twice the level of collision risk estimated by FAA.

4. But if a fatal runway collision occurred at 2020 traffic levels at one of the US towered airports, what is the chance it would take place on the LAX North Airfield rather than elsewhere? The AP made eight different estimates of this probability, based on:

- The runway incursion history at LAX-North relative to that for the entire US
- The LAX-North share of squared traffic levels in the US, a metric that figures prominently in FAA risk models
- Safety levels at other US airports that pilots in the NASA-Ames simulation considered equally safe with LAX-North (the “peer airports”). These peer airports included Atlanta, San Francisco, Miami, and New York-JFK.

5. The eight estimates of the chance that a fatal runway collision that took place in the US would occur at LAX-North ranged from a low of 1 in 140 to a high of 1 in 60. To be conservative, however, the AP estimated as 1 in 50 (2%) the probability that the venue would be LAX-North. In other words, the AP used a risk estimate for LAX-North that was higher than any that arose under its diverse estimation methods.

The Panel also explored whether the growing frequency of Group VI aircraft on the North Airfield might pose incremental collision risk, and concluded that it would not. A major reason for this conclusion is that Group V aircraft (the largest planes for which historical data exist) have not been involved in incursions at LAX to a disproportionate extent.

The Panel then combined its numerical risk estimates:

- if fatal runway collisions occurred once every four years at some towered US airport and 1 in 50 of these collisions took place at LAX-North, it then follows that fatal runway collisions at LAX-North would occur every 4x50=200 years.

Using the “one in every 200 years estimate,” plus estimates about the casualties in a fatal runway collision at LAX North, as well as data about LAX passenger traffic around 2020, the AP reached a further approximation:

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*At 2020 traffic levels, the Panel estimates that fatal runway collisions at LAX-North would claim approximately five lives per decade.*

Because of the margin of error associated with this estimate, a range estimate for the actual rate extends from a low of one death per decade to a high of eight deaths per decade.

*Given that roughly 750 million passengers would use LAX each decade at 2020 traffic levels, the figure “five deaths per decade” works out to one death per 150 million passengers.*

The statistic “one in 150 million” is obviously small in absolute terms. It is also extremely small relative to other accident risks that Los Angeles residents and others face: for example, an American baby born today has approximately a 1 in 100 chance of eventually dying in an automobile accident. Moreover, the risk is small even relative to the exceedingly low risks of passenger air travel: the death risk per flight for US air travelers is approximately 1 in 10 million, which is fifteen times the risk that the LAX-North runways would present in the Baseline case.

#### 17.4.2. The Interim Improvements to the North Airfield (IRSIP)

The AP explored evidence about whether IRSIP would improve North Airfield safety by requiring planes landing on Runway 24R and heading towards terminals to cross Runway 24L further down the runway. The AP estimates that the plan (IRSIP) could increase the chance that a departing aircraft on 24L would already be airborne if a landing plane blunders onto the takeoff runway (from approximately 33% to approximately 51%). But the probability that a landing plane blunders onto 24L in the first place might not decrease significantly if the new runway exits proposed in IRSIP induce the high runway incursion rates associated with taxiways Zulu and AA. Indeed, for planes that now use Taxiway Yankee, the data suggest that the risk of incursion might well go up. Thus, it is possible that closing Taxiway Yankee would do more harm than good, and the matter warrants further study.

#### 17.4.3. Moving Runway 24R 100 Feet North (100-N)

Because such a proposal would essentially replicate on the North Airfield what has already been done on the South Airfield, the AP put considerable weight on evidence about whether incursions have dropped on the South since its reconfiguration. While only about 18 months of data are at hand about safety under the new arrangements, they suggest that the changes have reduced incursion risk on the South by about 40%. The apparent reason for the improvement is the new centerline taxiway, which causes landing planes to slow down before

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crossing the takeoff runway and which gives controllers greater flexibility in deciding when and where planes landing on Runway 25-L should cross Runway 25-R.

The AP also considered a good deal of other evidence about the effectiveness of the 100-N configuration. Data were available from the FFC simulations about anomalies and radio communications between tower and pilot, as well as survey reactions from pilots and controllers. Incursions data from airports other than LAX that have configurations similar to 100-N were also studied. This review indicated that Runway Status Lights might be especially effective when accompanied by a centerline taxiway. Some of this evidence suggested that the benefits of 100-N would exceed the 40% suggested by South Airfield data, while other evidence suggested a benefit smaller than 40%. The AP concluded that, on balance:

*40% is a reasonable estimate of the reduction in the risk of a fatal runway collision if the existing North Airfield were replaced by a 100-N configuration.*

#### 17.4.4. Moving Runway 24R 340 Feet North (340-N)

The AP considered various data about this option, which has the distinguishing feature that its centerline taxiway is far enough from the active runways that Group VI aircraft need not require special treatment. The reconfiguration would also allow some landing pilots crossing 24R to get a better view than otherwise of departing traffic.

The AP concluded that 340-N reduces collision risk relative to 100-N, but not by an enormous factor (perhaps 25%). Much of the benefit of introducing a centerline taxiway would already be achieved with the 100-N configuration. The AP believes that:

*55% is a reasonable estimate of the reduction in the risk of a fatal runway collision if the existing North Airfield were replaced by a 340-N configuration.*

#### 17.4.5. Moving Runway 24L 340 Feet South (340-S)

Operationally, this arrangement is similar to 340-N. But the AP concluded that the safety benefits would be slightly smaller, largely because the FFC simulations suggest that ground arrangements associated with revamping the terminals could get more complex and demanding for controllers. The Academic Panel believes that:

*50% is a reasonable estimate of the reduction in the risk of a fatal runway collision if the existing North Airfield were replaced by a 340-S configuration.*

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#### 17.4.6. Moving to a Three-Runway Airport (3R)

If there were only one runway on the North Airfield, then aircraft landing there would not have to cross a takeoff runway en route to terminals. On the other hand, the North Airfield would be continuously involved in mixed operations, in which landings and takeoffs occur on the same runway. (Mixed operations on the North Airfield would occur even under the other configurations, but to a much lesser extent.) Results from the FFC simulations and data about other US airports that extensively conduct mixed operations suggest that a three-runway configuration would largely achieve the safety benefits for which its proponents hope. The AP believes that:

*50% is a reasonable estimate of the reduction in the risk of a fatal runway collision if the existing North Airfield were replaced by a single Runway 24 under a three-runway configuration for LAX.*

#### 17.5. Capacity Assessment

The AP was asked whether any limitations of airport capacity under individual configurations of the North Airfield would “unduly impact” the ability of LAX to handle the volume and mix of air traffic projected for 2020. Here the experiments and NASA-Ames provided illuminating data about how many departures could be achieved under peak traffic conditions, as well as taxi-in and taxi-out times for, respectively, arriving and departing aircraft. Across the simulation hours, there were variations in weather and visibility conditions and in the number of Group VI aircraft, allowing a clearer picture of the sensitivity of capacity findings to the background assumptions.

The AP concluded that the baseline, 100-N, and 340-S configurations could handle even peak traffic without “unduly” suffering stress and delay. It is noteworthy that, in 2000, when daily operations at LAX were only about 5% below the level projected for 2020, the airport fared quite well.

In the 340-N configuration, however, there was conspicuous improvement in capacity over the baseline and 100-N cases. The AP estimates an annual cost savings of \$15 million just because of the reduction in taxiing times and runway blocking operations. The gain in departure capacity would be modest (perhaps four additional operations per hour), but it would open the door to reduced arrival delays. (The study did not estimate the size of this benefit.) In addition to the capacity gain, having a centerline taxiway allows greater flexibility in handling aircraft, a benefit that is especially helpful in unexpected conditions. Furthermore, pilots who land on

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Runway 24R in 340-N would often have a better view of departing traffic on Runway 24L before crossing that runway.

The capacity results for the three-runway configuration were less encouraging: the reduction in arrivals and departures observed at FFC could have adverse direct and indirect consequences. Given that mixed operations would occur on the North Airfield (i.e., landings and takeoffs on the same runway), arranging for departures in the face of frequent arrivals would be challenging. It is also true that unexpected conditions – such as the temporary shutdown of a runway – can cause considerably more disruption when there are only three runways rather than four. The AP fears, therefore, that the capacity limitations in the three-runway case would be unduly constraining in peak conditions, which would prevail for nine hours of the day under the 2020 forecast.

17.6. Caveats

The various estimates summarized above and presented in more detail elsewhere in this report should be interpreted as plausible approximations, rather than exact results. Among the reasons for caution are:

- The 2020 forecasts about traffic levels at LAX, and about the fraction of traffic involving Group VI aircraft, are subject to considerable uncertainty.
- The experiments at FFC were sophisticated and well conducted, but they can only provide an approximate indication of what might happen under various configurations of the North Airfield.
- Data about historical experience are valuable, but there are issues in generalizing from other airports to LAX, and from past patterns to those that might prevail in the future under new arrangements; moreover, many of the data are subject to the high random variability associated with rare events, a circumstance that poses real challenges for statistical estimation.

17.7. Main Conclusions

The AP is unanimous on all of the following points:

*For projected 2020 traffic levels and traffic mix, the LAX North Airfield is extremely safe under the current configuration.*

The AP estimates that, at 2020 traffic levels, fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers. That level of risk is low even relative to the exceptional safety of US passenger aviation.

All the proposals to create new configurations on the North Airfield would reduce by a substantial percentage the risk of a runway collision.

More specifically, the evidence from the NASA-Ames simulation and numerous kinds of historical data suggest that:

*Moving Runway 24R 100 feet North and creating a centerline taxiway could reduce collision risk on the North by about 40% relative to the baseline.*

*Moving Runway 24R 340 feet North and creating a centerline taxiway could reduce collision risk on the North by about 55% relative to the baseline.*

*Moving Runway 24L 340 feet South and creating a centerline taxiway could reduce collision risk on the North by about 50% relative to the baseline.*

*Creating a single Runway 24 to replace 24L and 24R could reduce collision risk by about 50% relative to the baseline.*

However, because the baseline level of collision risk is so low, reducing that risk by a substantial percentage will have a limited practical effect.

Aviation at LAX is exceedingly safe. Of the 750 million passengers who would use the LAX North Airfield per decade at 2020 traffic levels, only about 80 might be expected to perish in air disasters from all causes in the Baseline case. Of these 80 deaths, five might occur in runway collisions on the North Airfield. Reconfiguration of the North runways might be expected to reduce total deaths to about 78.

In terms of capacity, changes in the configuration could have major effects.

*Moving to a three-runway configuration could cause major difficulties, in terms of flight schedule reliability and congestion, even under visual flight conditions.*

*Moving to the 340-N configuration, on the other hand, might significantly reduce airport congestion during peak hours and could provide appreciable capacity benefits.*

Indeed, a serious case could be made for building 340-N based on its capacity benefits. This would also improve safety. But these safety benefits would essentially be a “side benefit”, not the principal one.

*However, the North Airfield Safety Study was, as the name implies, primarily about safety. All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone.*

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EXHIBIT F

# Los Angeles International Airport North Airfield Safety Study

## Addendum to Final Report

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May 15, 2010

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1. CRITIQUES OF THE NORTH AIRFIELD SAFETY STUDY AND  
RESPONSES TO THEM

After the preliminary version of the North Airfield Safety Study was released on February 19, 2010, eight letters were written about it. These letters were dispatched by:

- Air Line Pilots Association
- Alliance for a Regional Solution to Airport Congestion (ARSAC)
- City of El Segundo
- Cities of Inglewood and Culver City
- Federal Aviation Administration
- LAX Airline Airport Affairs Committee
- LAX-TEC
- Los Angeles International Airport Advisory Committee

In addition, the *Los Angeles Times* wrote an editorial about the study titled “Redefining Safety at LAX,” which appeared on February 23, 2010.

In this addendum, we present these nine commentaries just as we received them. We then offer the Panel’s reaction to the letters; when the Panel decided not to change its report despite comments in the letters, we generally explain why. We did make some changes to the report in response to the letters, including correcting some errors that eluded us in preparing the report but did not escape careful readers.

Our treatment of the individual letters/critiques varies a bit. The Panel prepared a detailed response to the FAA critique, believing that doing so was important to the credibility of the study. That response appears here in its entirety. So does the Panel’s response to the *Los Angeles Times* editorial. For other letters, we prepared brief chapter-by-chapter discussions about points that were raised, identifying the sources of individual comments. Many comments concentrated on our baseline risk estimates for the North Airfield under its existing configuration at 2020 traffic levels.

The Panel decided not to attempt a detailed response to the letter from ARSAC. Many of the requests in that letter go beyond the scope of the Panel’s responsibilities; to the extent that others fall within those responsibilities, we have tried to answer them in the report.

We are grateful for the efforts that the letter-writers made to assist us in improving the report. The discussion about North Airfield safety is richer and clearer because of these letters and also, we hope, because of the responses that they provoked.

2. RESPONSE TO FAA COMMENTS

April 21, 2010

Ms. Gina Marie Lindsey  
Executive Director,  
Los Angeles World Airports  
Los Angeles, CA 90045

Dear Gina Marie:

The FAA has done an outstanding job of advancing aviation safety in the United States. For that reason, we—the authors of the LAX North Airfield Safety Study—take extremely seriously the concerns raised by FAA about the analysis we presented in February 2010. We wanted to report to you in detail what we concluded after reviewing FAA’s comments, so that you can make your own judgment about the cogency of our study.

The FAA’s concerns center on our risk estimates in the baseline case, under which the north runways at LAX would remain where they are. We estimated that, at traffic levels projected for 2020, fatal collisions would occur on the North Airfield on average once every 200 years, and would cause the deaths of one of every 150 million LAX passengers. *After reviewing the FAA critique of our study, we see no reason to amend our estimates.* We disagree with the assessment that our work suffered from “several critical flaws in the study’s assumptions, methodology and conclusions” We continue to believe that our analysis was logical, accurate, and conservative.

We reach these conclusions for five primary reasons:

- The North Airfield Safety Study relied heavily on work performed by FAA. We used FAA effectiveness studies about new runway technologies, FAA models for the distribution of runway risk across US airports, FAA data about the time and place of runway incursions, and FAA severity classifications for individual incursions. Despite its negative tone, the critique does not identify *any* instances in which we applied FAA methodologies inappropriately or cited FAA data erroneously.

- Data analyses in the critique that are said to contradict our findings also contradict the FAA’s own methods and findings related to runway safety.
- Incursion data and other evidence suggest that the existing North Airfield at LAX is just as safe as the South Airfield with its new centerline taxiway.
- Since completion of the centerline taxi on LAX-South in mid-2008, both LAX- North and LAX-South match or outperform the incursion records of Atlanta, Chicago O’Hare, and Dallas-Fort Worth, three airports cited in the FAA critique as safer than LAX.
- Many comments in the critique are not relevant to assessing the *absolute* level of safety on LAX North Airfield, a quantity we were specifically asked to estimate.

We amplify on these comments below, but postpone detailed responses to many individual FAA comments to an Appendix.

*The Baseline Risk Estimate*

We reached our baseline risk estimate by considering in turn three questions:

- At 2020 traffic levels, what will be the average frequency of fatal runway collisions at towered US airports as a group?
- Given that a fatal runway collision occurred under 2020 traffic levels at a towered US airport, what is the probability that it would occur at LAX North Airfield rather than elsewhere?
- Given a fatal runway collision on the LAX North Airfield, what number of deaths might be expected?

As we understand the FAA critique that accompanied Administrator Babbitt’s letter, the FAA did not disagree with our procedures for answering the first and third of these questions. More specifically:

*The critique took no issue with our estimate of the national frequency of fatal runway collisions at 2020 traffic levels.*

Our national risk assessment started with the study “Fatal Runway Collisions Over the Next Two Decades,” which was performed under contract with FAA and was presented to the FAA Administrator. It was published in the *Air Traffic Control Quarterly* in 2000 after a peer-review process, and estimated risk based on technologies and procedures used in the 1990’s. The critique does not criticize this national-level study or suggest that we misquoted its findings.



We went on to note three major technological innovations that arose in the first decade of the 21<sup>st</sup> century: AMASS, ASDE-X, and Runway Status Lights. We cited *FAA's own safety analyses*, which estimated that, taken together, these three technologies would reduce runway collision risk by 88%. Again, FAA does not suggest that we misrepresented these studies.

We cited recent evidence that suggests that these technologies and changes in procedures have indeed improved aviation safety. Over the last ten years, category A and B runway incursions have declined by 80% at towered US airports. We pointed out that the last fatal runway incursion at a towered US airport occurred in March 2000 and that, in the ten years since that time, there has not been a fatal collision in over 500 million landings and takeoffs. FAA does not challenge the accuracy of these statistics.

Taking these factors together, we estimated that, at 2020 traffic levels, fatal runway collisions at towered US airports would occur on average every four years. That estimate was conservative, and applied nothing more than simple arithmetic to the information we cited above.

*Nor does the critique take issue with our estimate of the consequences of a fatal collision on the LAX North Airfield.*

We estimated that a fatal runway collision at LAX-North would cause 100 deaths. That number is *fourteen times* the average of seven deaths in US runway collisions in the last forty years, and about three times as high as the greatest death toll in an actual US runway collision (which arose at LAX in February 1991). This high statistic reflects our full awareness of a point raised in the FAA critique: if a fatal runway collision occurred at LAX-North, it would have a higher chance of involving large passenger planes than a collision at many other airports. (The critique suggests a factor-of-seven correction for this tendency (14% vs 2%), but we applied a larger factor-of-fourteen adjustment.) Our strategy was to incorporate aircraft size into the projected *consequence* of a fatal collision at LAX-North, rather than in the estimated probability of such a collision.

*The critique does question some (though not all) aspects of our procedure for estimating the chance that a US runway collision would occur at LAX-North rather than elsewhere. But we consider its arguments unconvincing.*

In the second stage of our analysis, we estimated the probability that a fatal US runway collision at 2020 traffic levels would occur on the LAX North Airfield rather than at another one of the roughly 500 other towered US airports. There is no definitive way to make such an estimate, so we proceeded in *eight* different ways.

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Several of these approaches used the *FAA's quadratic traffic model* of runway risk, which posits (based on empirical evidence) that major runway incursions at towered US airports occur in proportion to the square of their numbers of operations. We worked with quadratic traffic shares in 2000—the recent year in which LAX's proportion of national traffic was greatest—as well as projected shares in 2020. FAA's critique does not take issue with our use of this key FAA model for distributing risk across airports; nor does it suggest that we used the model inappropriately.

Still other estimates arose from the simulation at NASA Ames. Actual Boeing -747 pilots landed in cockpit simulators in the baseline configuration at LAX North under 2020 traffic levels (and with Group VI aircraft like the Airbus 380 in the traffic mix). These pilots were asked directly to compare the safety of their landings at LAX-North baseline with the landings these pilots now perform in the same visibility conditions at other US airports. On a scale from 1 to 7, in which 1 meant “LAX-North much safer” to “LAX-North much less safe,” the pilots gave LAX North an average rating of 3.65. In effect, they judged LAX-North slightly safer than the other airports as a group. Questioning revealed that these other airports included Atlanta, JFK, Dallas-Fort Worth, and San Francisco. The critique does not suggest that these pilots gave inaccurate assessments, or that it was improper to use these assessments in estimating risk at LAX-North.

But the critique does raise questions about our interpretation of recent incursion data at LAX and elsewhere. For *some* of our LAX-North risk estimates, we explored the possibility that recent incursion patterns serve as “barometers” for runway collision risk. The critique does not object to this approach; on the contrary, it uses it extensively. There was, however, a major difference between our approach and that in the critique. We made use of the FAA severity classification for every runway incursion, while the critique took the surprising position that the severity classification was irrelevant. Thus, the critique performed analyses with *total* numbers of incursions, ignoring the difference between a category A incursion—in which a collision was either narrowly avoided or actually occurred—and a category D incursion that posed “little or no risk of collision.”

That convention is contrary to FAA's usual practices. An FAA Fact Sheet released on 10/8/09, for example, begins with the statement:

“The reduction in the number and severity of runway incursions is one of FAA's top priorities. The number of serious runway incursions—classified as Categories A and B—dropped by more than 63 percent from fiscal year 2000 through fiscal year 2008. In fiscal year 2009—

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which ended September 30—there were 12 serious runway incursions, 50 percent fewer than in the previous fiscal year.”

The sheet provided a detailed table of total A and B incursions by fiscal year. It did note in one sentence that “all categories of runway incursions were down by six percent in fiscal year 2009 versus fiscal year 2008—951 in 2009 compared to 1009 in 2008. But it was clear that FAA gave far greater weight to the trend in the few dozen serious incursions than in the nearly 1000 other incursions it did not classify as serious.

The critique challenges our assumption that technologies like AMASS and ASDE-X reduce runway collision risk at LAX-North, stating that there were three incursions per year both before and after these technologies reached LAX North. In our work, we focused on runway incursions that had appreciable potential for collisions, namely, those in categories A through C. For the years 1999-2009 that we considered in our study, such incursions at LAX North exhibited the pattern shown in Table 1.

Table 1. Runway Incursions at Los Angeles International Airport North Airfield.

Period	Annual Rate of Incursions		
	A	B	C
Before AMASS (1999-2000)	1.00	1.00	1.00
After AMASS (2002-2009)	0.00	0.38	0.50

Table 1 shows that, of the ten A-C incursions at LAX North over 1999-2009, six of them occurred in the two years before AMASS reached LAX, including both of the Category A incursions. The rate of A-C incursions fell from three per year before AMASS to ½ per year after its arrival (i.e. by a factor of six). Yet the critique argues that AMASS brought no safety progress to LAX-North, because three serious incursions in 2000 (one A and two B's) were replaced by three category-D incursions in 2009 that entailed “little or no” collision risk. The Panel considers this position implausible.

And neither, apparently, does FAA. In its airport-by-airport analysis the safety benefits of AMASS, FAA used as its key safety metric the “before/after” change in the rate of A and B incursions in the years surrounding the installation. To illustrate its methodology, FAA focused

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on one airport: LAX. It estimated that the traffic-adjusted level of A and B incursions on the North and South airfields dropped between 59% and 66% when AMASS was introduced. *This statistic meant that AMASS brought safety benefits to LAX wholly in line with those observed elsewhere.*

The critique also noted that experience with Group VI aircraft like the Airbus 380 is so limited at this time that we cannot make direct assessments of whether they pose special risks. We agree, but we tried to cope with this issue by doing the next best thing: examining the historical record of Group V operations at LAX (i.e., we assumed that experience with the 747-400 says something about risk for the 747-8). We found no evidence that Group V planes were involved in runway incursions at LAX to a disproportionate extent. Thus, we concluded that Group VI aircraft—if given the special handling they require—would not pose incremental threats to safety. To put it another way, Group VI aircraft require special cautionary procedures, but these procedures, which are already in place at LAX, counteract the additional risk that might arise in their absence.

To summarize:

*The FAA critique took issue with only one aspect of one of the three components of our baseline risk analysis for LAX North.* Its objections there strike us as unconvincing and often inconsistent with usual FAA techniques for analyzing runway safety. We therefore reaffirm our confidence in our risk calculation.

*The North and South Airfields of LAX*

FAA is pleased that the LAX South Airfield was reconfigured in 2008 to include a centerline taxiway between its two runways, which were moved 100 feet further apart. It believes that the reconfiguration may have reduced runway incursions on the South Airfield by 80%. (We think 40% a more plausible estimate, because AMASS/ASDE-X and reduced traffic deserve some of the credit for the drop.) FAA wonders why a similar reconfiguration on the North Airfield (or one that would move the parallel runways even further apart) would not seem a natural step in making LAX safer. That is a reasonable question, and one that we certainly considered in our work. Indeed, we estimated that increasing the separation between the runways would reduce the risk of fatal runway collisions by 40-55%. But that question is separate from the question: how great was the baseline risk in the first place?

The critique pays considerable attention to the point that two runway incursions occurred at LAX-North in March 2010. But the critique did not mention something else that is apparent

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from a visit to the FAA website (Runway Safety Office Runway Incursion Data Base): the five LAX incursions prior to March 2010 all occurred on the South airfield, and after it received its next centerline taxiway. Indeed, since the centerline taxiway was opened on June 24, 2008, the LAX incursion pattern is shown in Table 2.

Table 2. LAX Runway Incursions since Center Taxiway Opened in the South.

Airfield	Runway Incursions
South	12
North	6

Note: The “North” tally includes the 3/16/10 incursion not yet posted at the FAA website.

Nor were the incursions on the North systematically more severe than those on the South: while two planes on the North got within 3000 feet of one another on March 6, 2010, two planes got within 82 feet of each other on the South on October 25, 2009.

It is also instructive to consider the responses of air traffic controllers who took part in the NASA-Ames simulation. The controllers were asked to compare the LAX-North baseline configuration with the new South Airfield with its centerline taxiway. On a scale from 1 to 7, in which 1 meant “LAX North much safer” and 7 meant “LAX South much safer,” the controllers gave an average response of 4.2. In short, they judged the existing north configuration without a centerline taxiway as *about equally safe* as the south airfield with such a taxiway.

We do not mean to be critical, but the critique suffers an inconsistency. It cannot depict the new LAX South airfield as a paragon of safety and yet claim that the North—which appears just as safe as the South now—poses an unacceptable risk to LAX passengers. If LAX North is really “not good enough,” then it follows that neither is LAX South.

Fortunately, it appears that both LAX airfields are extremely safe. The critique presents comparisons that suggest that, over 2000–09, LAX had a higher incursion rate than Atlanta, Chicago O’Hare, and Dallas-Fort Worth. But those comparisons give heavy weight to developments on the South airfield prior to its reconstruction, a change that everyone agrees improved safety. If we focus on the present era that started when the centerline taxiway opened on the South, the critique’s comparison looks quite different (see Tables 3 and 4). If we consider

only incursions that pose collision risk (i.e., categories A–C), the picture is more dramatic as shown in Table 4.

Table 3. Runway Incursions, July 2008–December 2009.

Airport	Number of Runway Incursions	Rate per 100,000 Operations
LAX	12	1.43
DFW	19	1.96
ATL	23	1.58
ORD	18	1.42

Table 4. A–C Runway Incursions, July 2008–December 2009.

Airport	Number of Runway Incursions	Rate per 100,000 Operations
LAX	4	0.48
DFW	15	1.55
ATL	14	0.96
ORD	11	0.87

In light of these statistics, we would suggest that it is time to stop describing LAX as a high-risk airport. Both the North and South airfields more than “hold their own” against other major US airports.

*The Critique’s Other FAA Comments*

As noted, we discuss in Section 2 other issues raised in the critique. Some of them do not pertain to our baseline risk estimate for LAX-North. The critique notes, for example, that several studies prior to our own have recommended moving the north runways further apart. But, as we have pointed out elsewhere<sup>1</sup>, these studies offered no estimates of the level of risk in the baseline case. Our risk estimates are not inconsistent with previous baseline-risk estimates because there were no such estimates.

We admire FAA’s achievements in runway safety and every other aspect of aviation safety, and have repeatedly praised FAA in this regard in our published work. If the FAA critique had presented valid criticisms of our analysis, then we would have hastened to make full corrections: never would concerns about “saving face” have meant anything to us compared to the imperative of saving lives. But we were charged with the task of estimating the absolute level of risk for the LAX North Airfield, and were encouraged by all parties to do nothing but tell the truth. This we have done, and this we will continue to do.

Sincerely,

All Six Members of the Academic Panel (named)

<sup>1</sup> *Los Angeles Times*, Letter to the Editor, February 28, 2010

**2.1. Responses to Specific Comments in FAA Critique**

Below we first quote the eleven criticisms in the critique, and then respond.

1. The Academic Panel inappropriately uses an aggregate probability calculation to reach an airport-specific conclusion at LAX.

*This statement does not accurately describe what we did. The first stage of our analysis was the estimation of the national risk of a fatal runway collision at 2020 traffic levels. But we did not assume that the national statistic applied to the LAX North Airfield; instead, we moved promptly to the question “if a fatal runway collision occurred in the US at 2020 traffic levels, what is the probability it would do so at LAX North rather than elsewhere?” We obtained answers to this latter question in eight different ways, all of which allowed for the possibility of a much higher risk level at LAX-North than prevailed at other airports.*

*We do not agree that “the rate of runway incursions (at LAX) is higher than comparable airports.” As we showed earlier, the rate of incursions at LAX—both North and South—has been well below the average for Atlanta, O’Hare, and Dallas-Fort Worth since June 2008, when the centerline taxiway was completed on the South. We see little value in calculations that are dominated by events prior to June 2008, a period when everyone agrees that LAX was at greater hazard.*

2. The methodology used by the Panel in determining the risk for a runway collision did not adequately consider the specific risk factors of the LAX North Airfield.

*Every aspect of our LAX-North risk calculation in the baseline case was sensitive to specific risk factors there. We asked both pilots and controllers to compare baseline safety at 2020 traffic levels with that at the South Airfield or at other airports, taking account of whatever factors they thought relevant. If the specific risk factors at LAX North had led to disproportionate numbers of incursions there, that circumstance would automatically be reflected in several of our metrics for estimating its share of national collision risk.*

*As for more specific responses:*

The LAX North Airfield risk factors (according to the critique) include:



(a) The current LAX waiver to FAA Order JO 721 O.3V, Facility Operation and Administration. This waiver was developed in response to the increasing size of aircraft that use LAX. Waiver 98- T -69D authorizes LAX to hold certain aircraft types at specific taxiway locations even though these aircraft are within the obstacle free zone and the runway safety area.

*The Academic Panel had access to all FAA Modifications of Standard (MOS) for LAX and used the waivers in coordination of LAX tower supervisors and NASA to develop FFC simulation procedures. The Panel and NASA consulted with experienced LAX tower personnel on the operational procedures to handle ADG VI aircraft in the North and South airfields. The AP observed and recorded operations of ADG VI at LAX using personal computer data collection analysis, video equipment and ASDE-X display data to understand the impact of FAA MOS waivers at the airport. Before all FFC simulations, all participating controllers and pseudo-pilots were fully briefed on how the airport would be operated under each of the six configurations studied including specific handling procedures of ADG VI aircraft. Such procedures were derived from FAA MOS documents.*

(b) The NASS does not address the impact of 2020 aircraft levels and traffic mix on the risk of the hazard introduced by this waiver. The 100-north and 340-north alternatives would eliminate this hazard.

*The Panel considered LAX demand scenarios with increased demand levels and substantial variations of ADG VI aircraft in the mix. The analysis done by the AP Panel suggests that hazards can be mitigated but not "eliminated." Specifically a reduction of 35% in runway incursion risk is predicted with 340-N. There are many airports in the NAS with no operational constraints on the aircraft (i.e., no MOS waivers) and yet runway incursions and other hazards continue to occur.*

*We used the LAX year 2020 demand scenario prepared by LAX and Ricondo Associates as a guideline in our demand projections. The baseline 2020 demand scenario was studied carefully and judged to be consistent with the statutory capacity limits of the airport: 153 contact gates and 78 million passengers annually. The baseline LAX 2020 scenario assumed 2,284 operations daily (~143-157 during the peak hour). This is 10% above the demand levels observed at LAX airport in the peak days of the year 2000 and early 2001. LAX tower record data confirmed the FAA ASPM data used by the Panel to assess historical demand. By comparison, according to the current FAA Terminal Area Forecast (TAF) projections LAX will not reach the level of daily operations projected in the LAX year 2020 demand scenario until the year 2028.*

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*The LAX/Ricondo 2020 baseline scenario assumes up to 4 ADG VI operations per hour in the busiest periods of operation of the airport in the year 2020. The Panel created simulation demand sets with variations of ADG VI aircraft ranging from a low 2 (half of the ADG VI aircraft demand expected at LAX by LAX) to a high of 6 ADG VI per hour (50% above the LAX demand scenario). Thus, the number of ADG VI operations is an experimental variable in the simulation study.*

(c) The unique air traffic control operating rules at LAX for handling of very large aircraft such as the A380 Operational Plan V.12. This introduces an additional level of complexity into the operating system at the airport. The FAA notes that with a new centerline taxiway, LAX would have air traffic control (ATC) procedures and pilot expectations consistent with other large airports in the United States. This can reduce the potential for human error.

*The level of complexity stated was simulated in FFC. Each configuration had operational limits on how ADG VI were handled using approved FAA MOS. The study measured the relative and absolute risks of operating an airport under various configurations. It is important to recognize that other airports in the NAS expected to receive ADG VI aircraft in the future will have similar limitations as LAX, such as no centerline taxiways. One example is SFO. The question addressed by the study was to estimate the level of safety of the existing airport and compare it to the level of safety associated with each of the various configurations suggested by the sponsor and by the community.*

LAX accommodates a large number of foreign flag air carriers and a large number of international pilots for whom English is not their native language. The study does not address how language barriers coupled with the special ATC procedures affects the rate of runway incursions or the risk of a fatal runway collision.

*The AP Panel recognized this issue early in the design of the study. It was not possible to bring foreign pilots to the study (except for one Cathay Pacific pilot to command the NASA Boeing 747-400 simulator). The study introduced numerous pseudo-pilot errors that attempted to model the foreign language effect. However, it is not clear to us that foreign crews are a primary cause of runway incursions at the numerous international airports.*

(e) The north airfield not meeting FAA standards. Design standards not met include:

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(i) Insufficient lateral separation between parallel runways for Airplane Design Group (ADG) V and VI aircraft.

*The Panel was asked to estimate the safety of operating the North Airfield under certain configurations and levels of demand, and not to assess the consistency of these operations with FAA design standards. The AP Panel recognizes that all the North Airfield configurations studied except 3R (a three-runway airport) would fall short of at least one FAA design standard. For example, the recommended lateral separation between parallel runways (for VFR Operations) for ADG V and VI is 1,200 feet (FAA AC 150/5300-13 Paragraph 208). This implies configurations Baseline, Baseline-S, 100-N, 340-N and 340-S all fail to meet the recommended standard. A second recommended standard for simultaneous approaches and departures recommends 1,200 feet of runway separation for ADG V and ADG VI. Again, only 3R would meet such a standard (as there is no parallel runway under this alternative). The South Airfield, as modified with the new centerline taxiway, does not meet that standard either.*

*In short, if deviations from recommended FAA design standards were enough to invalidate a configuration, there would have been no point in conducting the study.*

(ii) Insufficient area to hold ADG V and VI heavy aircraft between Runway 24R and Runway 24L.

*The Baseline configuration has well-known drawbacks of holding capacity between the two runways. This requires special handling of ADG VI and some long ADG V aircraft such as the Boeing 777-300ER. Configuration 100-N improves holding capacity but restricts movements on runway 24L while ADG VI aircraft occupy the centerline taxiway. Configurations 340-N and 340-S improve the holding capacity of the Baseline substantially and further improve in operational efficiency as noted in the report.*

*The statement seems to imply that these limitations were not considered in the FFC simulations. But they were: there were instances in the simulation where small and large aircraft queued at a single runway exit (a highly undesirable condition). This happens infrequently today.*

(iii) Current modifications to standards to allow A380 and other ADG VI aircraft operations at LAX.

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*FAA Modifications of Standard were considered in the simulations. For example, ADG VI speeds were restricted to 15 mph while taxiing in the airfield. ATC operational procedures for 100-N and on the South considered ADG VI aircraft handling procedures developed at LAX today. This considered the MOS developed for LAX.*

(iv) Insufficient runway width for ADG VI aircraft such as the A380 and the Boeing 747-8.

*FAA Modifications of Standard contain provisions to operate ADG VI from 150-foot-wide runways with wider shoulders (50 feet on each side). The Panel recommended 200-foot-wide runways early in the project for the outboard runways (25L is already 200 feet wide). This would be consistent with ADG VI aircraft design standards. Runway width in the FFC simulations had no effect on the pilot and ATC responses because pilots flying the Boeing 747-400 were accustomed to runway widths of 150 feet. All configurations studied should be retro-fitted with 200-foot-wide runways. This does not invalidate any of the results of the simulations.*

3. The NASS did not include simulation of several hazards that are major risk contributors at LAX.

*The NASA simulations, like any simulation, could not cover all conceivable possibilities. However, they were very extensive and did go beyond what was initially planned. More specifically:*

*The NASA FFC simulator is a high-fidelity, human-in-the-loop simulation. The Panel studied the performance of individual aircraft LAX arrival patterns using PDARS data and modified many of the default performance behaviors of the FFC simulations to enhance the fidelity of these simulations. The Boeing 747-400 flight simulator used in conjunction with the FFC experiments is a Level-D simulator (i.e., replicates both air and ground behaviors of the aircraft at the highest level certified by the FAA). This aircraft simulator had a Boeing 747-400 rated pilot and has the ability to taxi and hold the aircraft at any position in the airfield with the same accuracy as the real aircraft.*

*While the fidelity of the aircraft performance programmed in FFC can always be improved with the fine-tuning of multiple aircraft parameter databases, the fidelity was generally considered adequate for the experiments. The FAA accepts results of much cruder fast-time simulations to prepare cost-benefit analyses of billion-dollar airport projects using models like SIMMOD and TAAM. These fast-time simulation models do*

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not address critical pilot-ATC communications workload and other operational issues that can be studied in FFC. They also fall short when it comes to modeling complex real-time ATC decision-making behaviors to balance demand in the airfield. The FFC simulations are complementary to fast-time simulation techniques used to justify large airport investments.

The simulations did not include air traffic control communication errors to pilots.

That is not the case. Audio tapes from the FFC simulator were reviewed by AP Panel members to understand the errors made by ATC personnel. The errors made by ATC controllers included failure to clear an aircraft, failure to detect a hold line blunder, etc. These were factored in the analysis. We reviewed in detail the audio tapes of local controllers and identified patterns of errors to be used in the analysis. Each FFC simulation includes multiple channels of audio (i.e., 150 GB of data in all) that can be further studied if necessary.

Lastly, the simulation failed to study night instrument meteorological conditions, which are arguably the most hazardous conditions in the airport environment.

For budgetary reasons, it was not possible to include night IMC in the simulations. (The simulations did include day IMC, day VMC, and night VMC.) However, we used a great deal of information from outside the simulation to make risk inferences that include night IMC. For example, if night IMC was especially hazardous at LAX North relative to other venues, then that circumstance would have been expected to show up in the incursion data.

4. The Panel did not fully account for all the risk associated with the operation of very large aircraft at LAX.

The Panel noted that, so far, there is no evidence that actual Group VI operations around the world have involved heightened risk of incursions. But we did the next best thing absent extensive Group VI data: we conducted a historical review of involvement of Group V aircraft in LAX runway incursions. If, for example, high fatigue might be associated with Group VI operations, that problem should already be present in Group V operations that we studied. (Boeing 777 and Airbus A340 aircraft have been flying ultra-long flights out of LAX; Singapore Airlines now flies nonstop from Singapore to LAX.) The critique notes that “ADG V aircraft do not have many of the same special procedures for operating at LAX” (as ADG VI aircraft do). In fact some ADG V aircraft

have special handling procedures similar to ADG VI at LAX in the North airfield (e.g., due to lack of holding capacity between runways 24R and 24L). The ADG VI “special procedures” are designed precisely to avoid extra risk for ADG VI aircraft. (The procedures may affect airport capacity, but that is not the same as safety.)

More specifically:

The risk of a runway collision is calculated by:

$$Pr[\text{runway incursion occurs}] * Pr[\text{incursion leads to collision}]$$

Experience with ADG V aircraft provides strong evidence that ADG VI aircraft will not have a significantly higher risk of incursion (the first term) than other aircraft. Both ADG V and VI aircraft cannot align perpendicularly to the inbound runway under the current North (and previous South) architectures. Both have visibility issues – it is true that these may be more severe with ADG VI aircraft but nonetheless they are similar. Further, the ability to look down the inbound runway provides a type of redundancy to controller clearances, but this is exactly what runway status lights also provide.

There is perhaps less evidence one can point to regarding the risk that an incursion leads to a collision (second term). Our conclusion (that there are no significant differences for this case) is based on the following logic. First, the FAA has required many special procedures for ADG VI aircraft. These procedures should substantially mitigate the increased risk associated with ADG VI aircraft, to the degree that such risk exists. Second, we point again to the similarities between ADG V and ADG VI aircraft operations. Finally, while one might argue that runway geometry may impact the risk of a runway incursion, it should have much less impact on the risk that an incursion leads to a collision. In conclusion, we do not believe that the second term changes significantly across the various alternative geometries considered in this study.

5. The NASS overlooks other fatal runway collisions since 1991, giving the impression that this type of event has become rare.

This statement is not correct: our report specifically mentions the 2000 collision at Sarasota, and includes the 1994 event at St. Louis in the risk calculations. We made clear that we (as FAA generally does) focused on the risk at towered US airports: the 1996 collision at Quincy, Illinois took place at an airport without a control tower.

The critique does not challenge our statement that, since the Sarasota collision over ten years ago, there have been no fatal runway collisions at towered US airports. During that period, more than 500 million landings and takeoffs have occurred at these airports. If our report “(gives) the impression that this type of event has become rare,” that could be because it has indeed become very rare.

6. The NASS assumes that system-wide reductions in incursions due to the use of technology such as Airport Surface Detection Equipment, Model X (ASDE-X), runway status lights (RWSL) and the Airport Movement Area Safety System (AMASS) apply equally at LAX.

We did not make this assumption. If these technologies were less effective at LAX than elsewhere, then LAX would not have benefitted from the reduction in incursions that these technologies allow. Our metrics would have picked up that pattern. Pilots and controllers in the simulation would also have noted the difficulty in their safety evaluations for LAX-North.

We do not agree that, because incursions remained at about three per year after AMASS arrived, the new technologies made no difference at LAX-North. As we noted earlier, incursions with a potential for collision dropped by a factor of six after AMASS reached LAX. (RWSLs have not yet reached LAX-North, and ASDE-X only arrived in 2009.) FAA itself estimated that AMASS had reduced collision risk at LAX between 59% and 66%, which is in line with the improvements elsewhere. We did not assume a priori that AMASS would be as effective at LAX as elsewhere, but the empirical evidence indicates that it was.

7. In overlooking the fact that technology has not significantly changed the rate of incursions on the north airfield, the Panel fails to capture how the current airfield geometry at LAX can limit the effectiveness of warning technologies and contribute to runway incursions.

As noted earlier, we believe that this “fact” is not informative, and neither does FAA. We never suggested that a centerline taxiway would have no safety benefits: we assume that the 40% reduction in relevant incursions observed at LAX-South would also occur on LAX-North. The issue is: what is the baseline level of risk that would be reduced by 40%?

8. It appears that the Panel did not give adequate weighting to the risk reduction on the South Airfield.

We certainly studied the improvement on the South Airfield closely, and included it in our risk assessment. (Indeed, the critique quotes our own statistics about fewer incursions on the South after its reconstruction.) The critique, however, appears to discount the role of both AMASS and reduced traffic as contributing factors to the decline in South Airfield incursions, despite their apparent role in the years before the centerline taxiway was completed in 2008. We think we gave accurate weighting to the benefits of the centerline taxiway, and assumed the same percentage benefits would arise from such a taxiway on the North.

9. The NASS is overly reliant on historical numbers of fatal runway collisions as the basis of risk.

By no means did we rely solely on fatal runway events in our analysis. We relied heavily on data about the increase in airport operations between now and 2020, and on the effectiveness of new technologies both as estimated by FAA and as evidenced in the reduction of non-fatal incursions. When the critique states that “the Panel should also have examined the rate of runway incursions as a measure of collision risk,” it ignores the point that we studied extensively such data, and used them in our estimates of both national risk and risk on LAX-North. On the other hand, we cannot imagine that it is irrelevant that fatal runway collisions have not occurred in the US over the last 500 million operations at towered airports.

The critique appears to suggest that the fatal runway collisions are merely “the tip of the iceberg” and that lower-severity events deserve substantial weight in assessing safety benefits from North Airfield improvements. For this to be true, total costs from non-fatal collisions would have to be of the same or greater magnitude as those from fatal ones. The AP has looked into this issue.

The relative magnitude of fatal and non-fatal runway collision costs depends upon their relative frequency and relative cost. Regarding frequency, the FAA notes that there have been three non-fatal collisions since 2001. The AP reviewed NTSB records and found two such aircraft-to-aircraft collisions on runways since 2001. One, on February 9, 2001 at Leesburg FL, involved a non-towered airport. Since the basis of our analysis is collisions at towered airports, it appears that there have been either one (based on the NTSB records) or two (based on the FAA statement in the critique) non-fatal collisions since 2001, during which time there have been no fatal collisions. Barnett (2000, p. 263) notes that between 1989 and 1998, there were three fatal collisions and



four non-fatal ones. Summing results for these two periods, we obtain four fatal collisions and five or six non-fatal ones. Thus it appears that the frequency of non-fatal collisions is, at most, about twice that of fatal ones.

We now consider the relative cost of non-fatal and fatal collisions. Our estimate is based upon “Economic Values for FAA Investment and Regulatory Decisions, A Guide” prepared by Gellman Research Associates for FAA in 2004 (Gellman, 2004). This publication includes cost factors for fatalities, injuries, and aircraft damage. To apply these cost factors, we need to assume levels of fatalities, injuries, and damage for fatal and non-fatal accidents. In our analysis, we assumed that a fatal collision caused 100 fatalities, the cost of which, based on the Guide, is \$300 million. Assuming both aircraft are destroyed, there is an additional cost of about \$23 million based on the Guide values. Let us assume that there are no injuries in fatal accidents. For non-fatal collisions, we reviewed NTSB accident records involving non-fatal collisions (not necessarily on the runways) over the past decade involving Part 121 or Part 135 aircraft. A review of 18 such accidents found a total of 1 serious injury and 6 minor injuries, or an average of 1/18 serious and 1/3 minor injury per accident. Based on ICAO cost factors for serious and minor injuries, the total cost would be about \$47,000. Assuming that such an accident involves one destroyed and one damaged aircraft, the total property damage would be \$15.2 million, which completely dominates the injury cost.

Thus, it appears that costs of fatal and non-fatal collisions are respectively \$323 million and \$15.2 million, yielding a cost ratio of about 20 to 1. Taking into account the relative frequency and the relative costs of non-fatal collisions, it appears that the costs of the latter are about 10% or less of the costs of the former. Considering such collisions therefore does not materially affect the results of our assessment.

10. The differences between a cost-benefit approach versus a Safety Management Systems (SMS) approach to safety management.

In context, this comment suggests that the NASS adopts a cost-benefit approach in assessing the north airfield alternatives, and that such an approach is of “limited applicability in airport specific safety-related decisions,” because “there are other factors that influence the acceptability of safety risks beyond the economics of fatality, injury, and property loss valuation.”

The AP did not explicitly perform a cost-benefit analysis in its study. It does, however, take the view that safety benefits should be assessed in terms of the avoidance of losses from aircraft collisions, which in our view are dominated by fatalities (see answer to comment 9). The FAA routinely performs a cost-benefit analysis (CBA) to evaluate many safety investments. It publishes guidance on safety-related values such as the value of a statistical life, injury costs by severity category, and aircraft damage costs. It has established procedures for performing CBA for airport projects involving navigation aids, lighting, towers, and other facilities, published in Order 7.031C, Airport Planning Standard Number One—Terminal Air Navigation Facilities and Air Traffic Control Services. The FAA does not require a CBA of airport safety projects funded under AIP.

It is not clear what “other factors” FAA believes should be considered.

As has been emphasized repeatedly, the AP has adopted a policy of full disclosure in sharing the assumptions, data, analysis, and reasoning it employed to reach its conclusions. Two tenets of its conclusions were: (1) that the dominant safety benefit from changing the North Airfield was a reduction in losses from runway collisions and (2) that benefits from further reduction in risk from a low baseline level (one event every 200 years) are small relative to the costs of airfield reconfiguration. While both (1) and (2) are consistent with FAA CBA guidance, it is ultimately up to decision makers and stakeholders whether to accept them. The AP also recognized and stated that a case for a reconfiguration of the North Airfield could conceivably be made on the grounds of a combination of safety and capacity/delay benefits. The results of our study should be viewed as one more datum for the process of resolving this complex issue.

Finally, this comment in the critique suggests that SMS and cost-benefit analysis are alternative approaches to safety management. The AP disagrees. Cost benefit analysis is not an approach to safety management, but one for determining whether an expenditure of resources will yield a commensurate benefit. SMS is an approach to managing safety that is performance-based rather than rule based. Under SMS safety improvements are assessed in terms of their effect on risk. SMS can be used to identify measures that do (or do not) have the potential to significantly (in an incremental sense) reduce risk, but it cannot, by itself, be used to determine whether such actions are worthwhile. The latter requires an assessment of the baseline level of risk (like the one

the AP has carried out) and of the costs of the propose measures—in other words a cost-benefit analysis.

11. The NASS seemingly downgrades the risk potential of runway incursions.

This statement is inaccurate. We gave great weight to incursion data in our work, though we could not go along with the critique’s “one incursion, one vote” rule that ignores the FAA’s own distinction between “serious” incursions (Categories A and B) and the rest. We recognize that a Category A runway incursion at LAX-North is far more likely to involve a Part 121 aircraft than a similar incursion at (say) Van Nuys. That is why we assumed a fatal collision at LAX-North would take 100 lives, despite a national average of seven deaths per fatal collision over the last forty years. That said, there have been no Category A incursions on LAX-North over the millions of operations there since AMASS arrived. This last circumstance is relevant to probability calculations, though it by no means implies that the risk has dropped to zero.

3. EDITORIAL

Redefining Safety at LAX

A new study of its north field runways should not be the last word on improvements at the airport. Los Angeles Times (February 23, 2010)

Two years ago, the question of whether the two runways on Los Angeles International Airport's north airfield should be rebuilt farther apart didn't seem hard to answer. A report from the Government Accountability Office found that LAX had the most close calls among aircraft of any of the country's busiest commercial airports and the highest number of severe incidents. The Federal Aviation Administration had been demanding for decades that the airport address the runways' design flaws, and five independent studies on airport safety concluded that they were too close together for comfort.

And then, last week, an academic panel working with NASA unloosed a flock of sea gulls into airline regulators' jet engines. After an 18-month study, it found that although moving the runways farther apart would improve safety, the risk reduction would be so minuscule that the project wouldn't be worth the cost.

This comes as an answer to the prayers of the airport's neighbors, who have long fought to block the project out of fear that moving a runway 100 feet or more closer to their homes would harm their quality of life. Prompted by demands from area City Councilman Bill Rosendahl, airport commissioners ordered the NASA study despite the existing, overwhelming evidence. The tactic worked -- the neighbors finally found some experts who agreed with them. That's good enough for Rosendahl and Mayor Antonio Villaraigosa, who say that runway expansion plans are now essentially dead.

If that pleases airport neighbors, it shouldn't please anyone else. One study in your favor out of six isn't a ringing endorsement. Moreover, the statistical analysis and modeling performed by the NASA panel, although convincing in its assessment that the risk of a deadly accident at the north airfield is very low (expected to happen only once every 200 years at 2020 traffic levels), also found that adding 100 feet of separation between the runways would reduce the risk of fatal collisions by 40%, and adding 340 feet would lower the risk by 55%. With the FAA and airlines putting up the \$500 million for the project, isn't that worthwhile?

The NASA panel also found that the 340-foot separation plan could significantly reduce airport congestion and improve capacity -- another notion that alarms neighbors.

We're as puzzled as anybody about how airport experts could come to such widely differing conclusions on safety, and we're less convinced about the necessity of separation than we were two years



ago. But we're certain that the Board of Airport Commissioners should not allow this perplexing study to be the last word on the north airfield and its troubles.

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Expanding on an LAX study

Re "Redefining safety at LAX," Editorial, Feb. 23

The Times wondered why our "perplexing" study about safety on the LAX north airfield reached different conclusions from five studies that preceded it. Actually, it didn't.

All six studies concluded that moving the LAX north runways farther apart would reduce by a substantial percentage the risk of a runway collision. But ours was the first study that directly asked: How great is the risk in the first place? Our frequency estimate -- one fatal collision every 200 years on average - - did not contradict earlier estimates because there were no such estimates.

Given that your editorial board described the analysis behind the 200-year estimate as "convincing," it is unclear what you found "perplexing" in our work.

The Times also wrote that "the [LAX] neighbors finally found some experts who agreed with them." We hope you were not suggesting that we or NASA were chosen for the study because we were predisposed toward a particular conclusion. Neither the community nor Los Angeles World Airports ever asked us to do anything but tell the truth.

We concluded that spending \$500 million to reconfigure the north runways would be hard to justify on safety grounds alone, because that money might save more lives if spent in other ways. But we explicitly said that capacity benefits could well make a case for reconfiguration.

Our study offered new information for the debate about LAX's future, but was not intended to end it.

Arnold Barnett  
Cambridge, Mass.

The writer, a professor of statistics at MIT, was chairman of the panel that wrote the LAX report. He co-wrote this letter with the five other panel members.

4. RESPONSES TO COMMENTS AND QUESTIONS ABOUT CHAPTER 6:

Safety Assessment in the Baseline Case

As noted, responses to the FAA critique and the *Los Angeles Times* editorial appear earlier in this section. The questions below arose in the other seven documents about the Panel's report.

- What weight was ascribed to pilot and controller responses in the NASA simulation relative to other factors in the assessment that the existing North Airfield would be "extremely safe" at 2020 traffic levels and traffic mix? (LA Airline Airport Affairs Committee)

*These responses received a great deal of weight. Simulation pilots who landed in the baseline case (under 2020 conditions) were asked to compare the safety of their landings with those these pilots experience today at other airports in similar visibility conditions. Controllers were asked to compare the safety of the existing North Airfield with the current South Airfield, which has a centerline taxiway. In both cases, the responses indicated that LAX North was about equally safe with the other airfields considered. On a 1-7 scale in which 1 means "LAX North much safer" and 7 means "LAX North far less safe," the average rating was 3.7 among pilots and 4.2 for controllers, right in the middle of the scale.*

*The pilots who rated LAX-North baseline were asked which other US airports entered their comparisons. The nine airports they mentioned are listed in the Report, and included DFW, JFK, SFO, and ATL. Because the pilots said LAX-North was as safe as these airports, some (though not all) of our eight estimates of the chance that a fatal US runway collision in 2020 would occur at LAX-North were based on safety data from these other airports. The logic was that if LAX-North is as safe as (say) Atlanta, and the risk at Atlanta is X, then X is also an estimate of the risk at LAX North. Numerical risk estimates arising in this way were very similar to other estimates derived exclusively from LAX data.*

*But suppose the pilots had given LAX-North baseline an average rating of 6 out of 7 rather than 3.7. Then we would have inferred that the pilots considered landings at LAX North perhaps five times as risky as those elsewhere. We would have derived risk estimates for LAX-North that incorporated this discrepancy and, to put it briefly, our estimate of the chance that LAX-North would be the venue of a fatal US runway collision would have risen from 2% to about 5%. This increase would in turn have more than doubled our LAX-North risk estimate. In other words, pilot (and controller) assessments played a large role in our estimates, and our*

*judgment that LAX-North was extremely safe would not have been possible had they indicated otherwise.*

- Why did the Academic Panel focus on fatalities in runway collisions at LAX-North when its focus was supposed to be on runway incursions? (Inglewood/Culver City)

*The Panel always promised to estimate "as specifically as possible" the level of risk under 2020 traffic conditions for each configuration it studied about the North Airfield. There seemed a near-universal consensus that a runway collision with a high death toll was the danger of primary interest. For example, the earlier study titled "Fatal Runway Collisions Over the Next Two Decades" that we cited in our report was prepared at the request of FAA, as part of its decision process about the deployment of ASDE-X radar. While runway collisions can also cause non-fatal problems, we recall the Supreme Court justice who explained that "death is different," and, elsewhere in this Addendum, we estimated (in response to FAA comments) that the economic consequences of non-fatal collisions were an order of magnitude lower than those for fatal events.*

- Why include the death toll in the collision at LAX in February 1991 in an assessment of future hazards at LAX-North? Doing so artificially inflates the estimated death toll in a future collision. (Inglewood/Culver City)

*Our estimates of the death toll given that a fatal runway collision occurs were based on worldwide patterns over many decades, with the LAX event serving as only one data point in our analysis. (Most of that analysis appears in the Appendix to our report, as part of the paper "Fatal Runway Collisions over the Next Two Decades.") While runway configuration may have played no role in the 1991 LAX collision, its outcome is useful in suggesting the degree of survivability when two planes collide, regardless of the particular reason for the crash. (Our risk assessment also considered collisions between planes and ground vehicles or obstacles on the runway.) The 1991 event with its 34 deaths does not "artificially" increase death toll estimates: indeed, the worst aviation accident in history was a 1977 runway collision in the Canary Islands, which killed 583 people.*

- Why compare runway risks to risks not associated with airport runways, an approach that is "potentially misleading?" (Inglewood/Culver City)

*We presented absolute mortality risk estimates for LAX-North, but believed we should offer some statistics about other risks to offer perspective to readers. In deciding whether a level of runway risk is large or small, it seems valuable to take note of the overall level of risk that air travelers face, as well as the risks that citizens face that are unrelated to aviation. To cite other mortal hazards faced by residents of Los Angeles is not to imply that all such residents use LAX,*

*or that all users of LAX are residents of Los Angeles. But doing so provides some "benchmark" that makes the runway risk statistics less abstract. Individuals who consider our comparisons irrelevant or unhelpful are obviously free to ignore them.*

- Given that LAX-North now lacks a centerline taxiway, why make risk assessments for LAX-North baseline using data from other US airports (e.g. ATL, DFW) that have centerline taxiways? (Air Line Pilots Association)

*As explained in the first answer above, pilots in the NASA simulation who landed in the baseline configuration at 2020 traffic levels were asked to compare the safety of those landings which those they now perform at other US airports. They were encouraged to consider whatever factors they thought relevant. These pilots presumably took account of that fact that LAX-North lacks the centerline taxiway that other airports have, much as they may have considered that some of those airports have crisscrossing runways while LAX does not. On balance, they concluded that LAX-North was about equally safe with the other airports, meaning that risk estimates for 2020 for those airports could underlie some—but by no means all—estimates about LAX-North.*

- Why didn't you give substantial weight to conditions at LAX in 2000, given that traffic in 2020 will return to 2000 levels and that recent years have been easier given substantial drops in traffic at LAX? (Air Line Pilots Association)

*We did give considerable weight to LAX conditions in 2000. In estimating the chance that a US runway collision at 2020 traffic levels would occur at LAX-North rather than elsewhere, we used incursion data for the airfield over 1999-2009. Because the rate of A-C incursions at LAX-North was far higher over 1999-2000 than in the later years, these early years had a highly disproportionate role in the data for the full period. Also, in making risk estimates based on the LAX-North share of (squared) US traffic levels, we used data from 2000 precisely because that was the year when LAX operations reached their peak.*

*All our calculations recognized that projected 2020 LAX traffic levels would be considerably higher than those around 2009, and would even exceed 2000 levels by about 5%.*

- Shouldn't the decline in LAX traffic between 2000 and (say) 2009 be given most of the credit for the decline in LAX incursions over that period? (Air Line Pilots Association)

*We are disinclined to think so, although we recognize that the drop in traffic probably had some role in the decline. We believe that the arrival of AMASS, ASDE-X, RWSL's—coupled with improvements in signage and procedures—are the primary factors. As noted in our report, FAA estimated after detailed study that the combination of AMASS, ASDE-X, and RWSL's would reduce collision risk by about 88%. That these estimates were not wildly optimistic is suggested*



by the fact that category A and B runway incursions in the US dropped 80% between 2000 and 2009 (and the national drop in air traffic was far less steep than that at LAX). Moreover, there have been no fatal runway collisions anywhere in the US over the last ten years (as of 5/1/10), as compared to six in the previous ten.

*Is it possible that new technologies and procedures will be less effective at LAX-*

*North than elsewhere? As we noted in our response to FAA, the empirical evidence works against that view. When LAX traffic returns to 2000 traffic levels in the years ahead, it will do so at a time when pilots and controllers will benefit from numerous advances in safety since the turn of this century; we therefore believe that the environment will be one of far lesser risk.*

- Under the quadratic risk model, wouldn't LAX be safer if traffic were equally divided between the North and South Airfields rather than heavier on the South (as it is now)? (El Segundo)

*An interesting question, and the answer is yes. But the effect would be minimal under the model. Now we have a 55% South /45% North traffic split at LAX. If X is the risk that would prevail in 2020 under this split, the risk would only decline to .99X if the split became 50/50 (i.e., by 1%). (More specifically, the risk would be proportional to  $(1/2)^2 T^2 + (1/2)^2 T^2$  rather than  $(.55)^2 T^2 + (.45)^2 T^2$ , where T is total traffic at LAX.) And the quadratic model is only an approximation: given the associated changes on the taxiways and in the airspace near the airport, it is not certain that shifting from 55/45 to 50/50 would actually benefit safety.*

## 5. RESPONSES TO COMMENTS AND QUESTIONS ABOUT CHAPTER 7

### Baseline with IRSIP

Several comments referred to potential enhancements at LAX and, more specifically, at the North Airfield with the existing ("baseline") configuration, i.e., in the absence of a centerline taxiway. Since the objectives of such enhancements are consistent with those of the Interim Runway Safety Improvement Project (IRSIP), we have chosen to review and respond to these comments as addenda to Chapter 7 or our report, which dealt with IRSIP.

A. The following four recommendations were submitted by the Los Angeles International Airport Advisory Committee, (representing residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City and Westchester/Playa del Rey):

- Lengthen Runway 24L toward the east to a minimum length of 11,500 feet from the current 10,286 feet.
- Complete the installation of runway status lights (RWSL) at all runway and taxiway intersections.
- Require a full complement of certified air traffic controllers at all times in the LAX tower.
- Undertake the interim improvements to the North Airfield with the additional requirement that closing or relocating Taxiway Yankee be studied further prior to final approval.

*AP's Response: Recommendations (ii), (iii) and (iv) are either implicitly assumed in our analysis or explicitly stated. For example, the risk estimates implicitly assume that an adequately staffed air traffic control team will be in place at LAX at all times (with staffing levels possibly varying according to traffic intensity, time of day, etc.). As another example, the point about the need for further study of the proposed closing of Taxiway Yankee was made explicitly in our report. The AP therefore feels comfortable about endorsing these three recommendations, since they are entirely consistent with the AP's report and analysis.*

*Recommendation (i) is more complicated, as it falls outside the scope of the AP's charge. The AP was not asked to examine modifications to the North Airfield baseline that go beyond those presented in the IRSIP project's outline. We do, however, recommend that*

*Recommendation (i) be considered carefully, possibly as part of the study that will also determine the future of Taxiway Yankee (Recommendation 4).*

B. Mayor Kelly McDowell of El Segundo in commenting on the AP's report, expresses the desire for better balancing of operations between the North and South Airfields and suggests specifically the lengthening of Runway 24L to the east, as one of the ways that will facilitate such balancing and may implicitly also be calling for a centerline taxiway on the North Airfield (in the interest of "balancing").

*AP's Response: The question of how to best allocate operations between the North and South Airfields is a complicated one, because it requires consideration of several issues, such as the complexity of aircraft circulation patterns between gates/stands and runways, the configuration of the terminal airspace, the types of aircraft that will utilize each runway, etc. This topic deserves a study by itself, once the decision is made regarding the future configuration of the North Airfield. As indicated under A above, in the AP's response to the Los Angeles International Airport Advisory Committee, the question of lengthening Runway 24L falls outside the scope of AP's charge, but certainly deserves careful consideration.*

## 6. OTHER RESPONSES

This section contains the AP Panel responses to other organizations.

### Chevalier, Allen and Lichman

*(i) Corrected Tables 8.5 and 8.6 and added more explanation and sources of information.*

*(ii) We note that the comments correctly identified some errors in the numbers provided in our tables. These have been corrected. We also added explanations related to the source of our incursion data.*

### Chevalier, Allen and Lichman (Item III)

*Aviation accidents are almost always the result of many confounding factors "going wrong" at the same time. Similarly, they can be prevented by one of many safeguards. Thus, while runway geometry might not be the root cause of an incursion, it is quite possible that improved runway geometry might prevent an accident that might otherwise occur due to a pilot or controller error. We have discussed the causes of incursions at various locations in the report and certainly the general sequence of events that lead to certain types of incursions played a strong role in our analysis. However, we did not find it particularly useful in our analysis to dwell extensively on whether the primary cause of specific incursions was due to pilot or controller error. For example, the addition of runway status lights could alert a pilot to stop when given an erroneous instruction by a controller (controller error) but could also alert a pilot to stop who was distracted and about to ignore a correct controller instruction (pilot error).*

### Chevalier, Allen and Lichman (Item X)

*The study fails to explain why taxi times to and from 100-N would be longer than taxi times to and from 340-N*

*Table 13-1 of the report presents a summary of the taxi-in time results obtained in the FFC simulations. Statistical analysis of the data for 52 FFC runs shows that there are significant differences in taxi-in times for each alternative (at 95% confidence level). 340-South performs last in terms of taxi-in times with a mean taxi-in time of 708 seconds per arrival. The best alternative in terms of taxi-in times is 340-North with a mean taxi-in time of 612 seconds per operation followed closely by 100-North (630 seconds per operation). While runway 24R in 340-North is located further away from the gates compared to other alternatives, the taxiing times are better than even alternative 100-North because of improved ground flows observed in 340-North.*



In other words, alternative 100-North produced more frequent aircraft stops on the ground for arriving aircraft compared to alternative 340-N. The ground stops for arriving aircraft are affected by both arrival and departing traffic flows in the airfield. Since 340-North has the best departure saturation capacity of all alternatives (i.e., fewer departure queues), this produced fewer bottlenecks on the ground network thus reducing taxi times in the airfield for both arrivals and departures in 340-North compared to others.

Chevalier, Allen and Lichman (Item IX)

This is beyond the scope of our analysis. NASA and the AP Panel reviewed previous manned simulation studies done for LAX and concluded that it was necessary to introduce a Ground Control Position to direct ground traffic at the busy midfield terminals in the future.

ARSAC

The AP Panel was given 49 questions by ARSAC. Many of the questions are very general and require separate studies by themselves and fall outside our charge, which was to compare five alternatives for the North Airfield with respect to safety. Many requests for additional analysis lie beyond the scope of the charter given to the AP (and NASA). These include: an analysis of human factors mechanisms, ranking of incremental safety improvements,

Several of the comments ask for a more detailed analysis of the "Nine Questions". We admit that a more thorough analysis of many of these could certainly be done. However, we view such in depth analyses as beyond the scope of our charter and allotted resources.

LAX TEC

We did not undertake a comprehensive capacity analysis. However, as stated above our report indicates it is likely that runway reconfiguration can be justified on capacity grounds. The AP Panel was charged to investigate whether certain configurations of the North Airfield could not guarantee at 2020 traffic levels an acceptably-high level of passenger safety. The AP Panel believes capacity and operational efficiency can be further studied to estimate the economic operational costs and benefits of various airfield configurations.

LAX Airline Airport Affairs Committee

(i) How much weight was attached to the comments of controllers and pilots

The responses by ATC controllers and pilots were considered carefully along with all the other elements of the analysis. The comments about each one of the alternatives were summarized in each of the relevant chapters and the numerical scores were also tabulated and

analyzed statistically. When there were comments that stood out as being in conflict with numerical scores or the empirical analyses of incursion data, this was pointed out. But this did not really happen to any extent that might affect the eventual conclusions of the AP. In any case we did not assign specific weights to the comments or, for that matter, any of the other elements of the analyses that were carried out.

The absolute risk numbers calculated were based on models that used as a starting point historical data (not pilot or controller survey results). On the other hand, survey results were used to define a set of comparable airports and to estimate the relative standing of LAX against these other airports. Other sources of data were also used to obtain estimates that served as "backups" for the numbers provided by the surveys.

(ii) Further studies that will compare in detail the North Airfield alternatives with respect to other attributes (e.g., capacity and delays) are needed to obtain a complete view.

The AP does not disagree. Our charge was limited to, primarily, assessing safety and, as a secondary objective, performing a preliminary analysis of capacity and operational efficiency. As indicated above our report indicates changes may be justified on capacity grounds

ALPA

(i) ALPA stated "The AP ignored the conditions that existed in Year 2000, when LAX was heavily congested, and instead concentrated on more recent years when the airport was much less congested.

Far from studying LAX in conditions of reduced traffic, the AP's analyses and simulations focused on projected traffic levels in 2020 with the airport assumed to be operating with the maximum number of movements that can be sustained with the expanded set of gates. In addition, the period 1999 - August 2001 is not a good one to draw statistical evidence from, as the incursion-related technologies, as well as the centerline taxiway on the South Airfield, were either partially implemented or were not in place at all at the time.

The restriction to the years 2002 through 2007 in our incursion analysis was specifically used in order to obtain a common basis for comparison of incursion rates before and after the introduction of the center taxiway on the South Airfield. The 2002 to 2007 period, when compared to the 1999 to 2001 period, had reduced traffic levels and the use of new technologies, ASDE-3 and AMASS. The traffic levels after the introduction of the center taxiway have been similar to those in the 2002 to 2007 period and, of course, ASDE-X and AMASS are present. This provides an "apples to apples" comparison for the estimation of the factor by which the ENS

incursion rates have been reduced. Note that this analysis was not used to estimate absolute risk levels.

The fact that increased traffic levels generally lead to higher risk levels was certainly taken into account. In particular, the models used to estimate the baseline risk employed the assumption that risk increases according to a quadratic function of the traffic level of an airport. These models certainly assumed that the higher 2020 traffic levels would lead to substantially higher incursion (and collision) risks.

(ii) Influence of ADG VI on Study Results

Another concern of one of ALPA's comments concerns the issue of Group VI aircraft (no A380 pilots in the simulation pilot mix, more Group VI aircraft in the future, RWSL less visible from Group VI cockpits, etc.). This issue has been addressed in our response to the FAA.

The second comment by ALPA pertains to their recommendation that the North Airfield should be redesigned to satisfy "Group VI standards without waivers": none of the alternatives given to the AP Panel satisfy these conditions and the AP study would be entirely irrelevant if this recommendation were to be followed; what we tried to do was to be responsive to our charge.

To the extent that it will be difficult or cumbersome to employ special procedures for Group VI aircraft under higher traffic levels, is predominantly a capacity problem, not a safety problem. The report indicates that it is likely possible to justify runway enhancements based on capacity grounds.

(iii) ALPA Comment on slide # 80 of the AP Panel presentation states "We believe that the data upon which its conclusions were based is flawed. Incursion data between 2004-2008 (pre-centerline taxiway) and 2008-2009 (post-centerline taxiway) is erroneous. The report's time frame primarily reflects a period of waning demand instead of focusing on the peak traffic period where operations were on the edge of the safety envelope and sometimes outside of it. The capacity and operational activity at LAX between 1999 and 2001 was stretched to the point where, at times, operational control broke down. This was not the case during the 2004 to 2009 time frame..."

Slide #80 contains Table 9-5 of the preliminary report. While including years 1999-2001 would have increased incursion rates for LAX during the pre-centerline taxiway period, this would not change the central conclusions of these tables, which concerns how rates changed between the pre- and post-centerline taxiway periods, and how rates in the latter period compare to those for other airports.

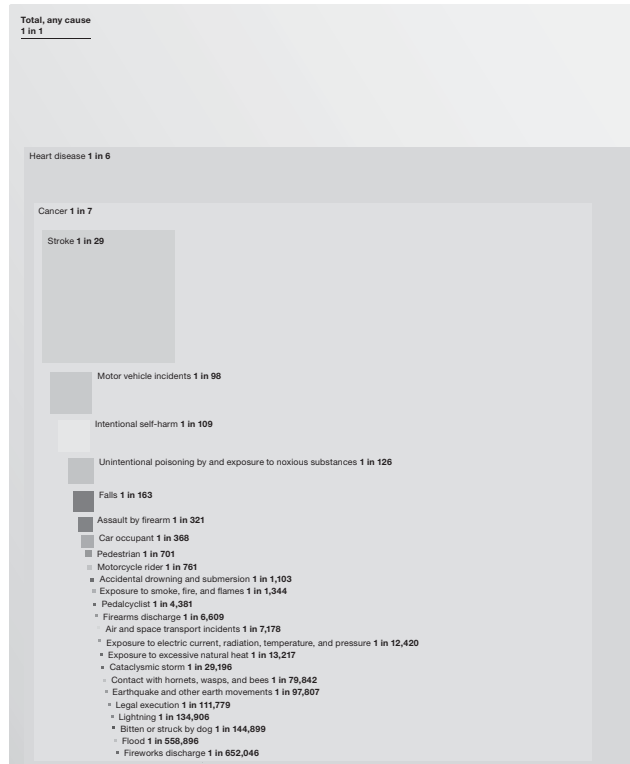
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2. Barnett, A., Paull, G., and J. Iadeluca, Effectiveness Fatal US Runway Collisions Over the Next Two Decades, Air Traffic Control Quarterly, vol 8, no 4, 253-276.  
3. Gellman Research Associates "Economic Values for FAA Investment and Regulatory Decisions, A Guide", 2004.



## The Odds of Dying from...(cont.)

Lifetime odds of death for selected causes, United States, 2008\*



Source: National Safety Council estimates based on data from National Center for Health Statistics—Mortality Data for 2008 as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Population and life expectancy data are from the U.S. Census Bureau. For mortality figures, estimated one-year and lifetime odds, and external cause classification codes based on the Tenth Revision of the World Health Organization's "The International Classification of Diseases" (ICD) for the causes illustrated, see table on pages 41-42.

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From: tmarcellus@aol.com [tmarcellus@aol.com]  
Sent: Wednesday, October 10, 2012 8:19 AM  
To: spasecomments@lawa.org; SPASEIR Comments  
Cc: tmarcellus@aol.com  
Subject: Comments to Draft Environmental Impact Report

My personal comments on the Draft Environmental Impact Report are attached.

Please acknowledge receipt.

Terry Marcelus,  
Westchester

SPAS-PC00150

## COMMENTS OF TERRY A. MARCELLUS TO SPAS DRAFT ENVIRONMENTAL IMPACT REPORT

The undersigned has already commented on the SPAS Report and the Draft Environmental Impact Report in the media and as a speaker at the September 27, 2012 Town Hall sponsored by the Neighborhood Council of Westchester Playa. Those comments were in large part to express support for Alternative 2 of the DEIR which would improve airfield efficiency but which would not move the northernmost runway, would not expand outward the perimeter fence of LAX, would not dig up Sepulveda Boulevard, and would not reroute and tunnel Lincoln Boulevard.

As a life-long resident of Westchester, my views are informed by my extensive knowledge of both the history of LAX and the communities adjacent to it. I view it as sheer political and financial folly to even consider a multi-billion dollar runway project that will achieve no significant benefits in either airfield efficiency or safety.

These comments on the DEIR however are not based on my local knowledge or community affiliations. Rather they are written from the perspective of nearly 40 years as an attorney at law and member of the California Bar Association with experience in CEQA/NEPA compliance and infrastructure development.

Knowing to a certainty that protracted litigation will result from a decision to expand LAX and reroute and tunnel Lincoln Blvd., at this time I offer comments on just two issues.

WITHIN ITS FIRST FEW PAGES THE DEIR VIOLATES THE TERMS OF THE SETTLEMENT AGREEMENT AND SHOWS ITSELF TO BE A BAIT AND SWITCH ON THE PLAINTIFFS IN THE LITIGATION AND THE PUBLIC.

Article V, section C of the Settlement Agreement, a binding legal document which was the genesis of the DEIR and the SPAS Report, states:

Upon the completion of the Initial phase, LAWA will prepare a proposed LAX Specific Plan Amendment Study and prepare all necessary environmental documents. LAWA will make a good faith effort to complete the LAX Specific Plan Amendment Study Process within 24 months of the commencement date of this second phase. The LAX Specific Plan Amendment Study will, consistent with previous local and federal approvals, identify Specific Plan amendments that plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA. (Emphasis added).

"Creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by LAWA." These words constitute the heart and soul of the Settlement Agreement. Without this specific assurance there would have been no settlement. They are the words relied upon by the community as six years, not 24 months passed, and as doubts grew that the SPAS report would indeed enhance safety and security or minimize environmental impacts on the surrounding communities.

Achieving a regional solution to air traffic in Southern California is the key to equalizing both the benefits and the burdens airports bring to communities. It is vitally important for our region in the event of a natural or man-made disaster impacted LAX. And on 28-lined legal paper, in clear words, it is what LAWA agreed in Court to do.

How did LAWA comply with these terms of the Settlement Agreement? What did LAWA do to fulfill its promise?

In the draft EIR, in clear contempt for the Settlement Agreement and the process which brought it about, LAWA declares its "Project Goal" 3 to be the following:

"Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region."

What a remarkable transformation of priorities and goals. From a solemn commitment to regionalization of air traffic and constrained growth at LAX, to hucksters hype of a growth agenda at LAX. From a serious recognition of a region's transportation needs, to a chamber of commerce promo.

CEQA/NEPA documents must be consistent with their purpose and need and with the project described. The goal of the entire SPAS effort was to fulfill the requirements of the Settlement Agreement. LAWA has failed to do so. Nowhere in the DEIR or SPAS Report is there discussion of the region's overall air traffic circumstances. There is no discussion of the potential of LAWA-owned Palmdale airport, auspiciously located at the hub of future rail transportation lines. There is no discussion of the potential and the reality of Ontario airport which has actually lost a major portion of its traffic in the six years LAWA has spent preparing the SPAS Report and DEIR.

Of the three major areas studied by SPAS, ground transportation, terminal modernization and airfield reconfiguration, the failure of the SPAS document to follow its court-ordered mandate calls into question most directly those airfield changes which would require expanding the fence line of LAX and rerouting Lincoln Blvd. The need to provide public transit to the airport and to modernize the terminals is a reality.

At page 1-2 of the DEIR, LAWA devotes two sentences to the Stipulated Settlement, the document which is the foundation of the entire SPAS effort. While LAWA can devote page after page to a self service discussion of LAX as an economic engine, it introduces the Stipulated Settlement with the back of its hand and an attitude that it is of little current significance. The Court may feel otherwise.

LAWA needs to avoid additional litigation by eliminating the SPAS alternatives that would move the northern runway, concentrate its efforts on ground transportation and terminal modernization thereby creating thousands of long term jobs, and follow the Court order to encourage growth at other airports, particularly those owned by LAWA.

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**THE DEIR FAILS TO ACCURATELY STATE THE ENVIRONMENTAL IMPACT OF MOVING THE NORTHERN RUNWAY, EXPANDING THE PERIMETER FENCE OF LAX, DIGGING UP SEPULVEDA BLVD AND REROUTING LINCOLN BLVD.**

For many reasons moving the northern runway, expanding the LAX fence outwards, digging up Sepulveda Blvd., and rerouting and tunneling Lincoln Blvd will be a massive public works project. The DEIR consistently fails to recognize or intentionally minimizes the environmental impact both during and after construction of such a project. Each of the major elements of such a project would have significant environmental impacts. Taken together the elements constitute a program that would have environmental impacts far greater than those recognized in the DEIR.

Major project elements include:

- Moving runway 24R/6L. Years ago when LAXA moved the southernmost runway it had a construction cost in excess of half a billion dollars. It uncovered an old runway of which LAXA had no record or knowledge. The proposed move of runway 24R/6L would be between twice as far up to six times as far as the southern runway move.
- Conversion of the Argo Drainage Channel to a box culvert. The Argo Drainage Channel is under the control of the Army Corp of Engineers, and is one of the most important flood control facilities in the region. Taken alone, this project would merit study of the most rigorous level.
- Expanding the perimeter fence of LAX. The last time the perimeter fence of LAX was expanded outwards the communities of Westchester and Playa del Rey lost over 4,000 homes and a significant portion of its business district.
- Excavation of Sepulveda Blvd. and rerouting Lincoln Blvd. The intersection of Sepulveda and Lincoln is one of the busiest and most important intersections in the county of Los Angeles. For LAX traffic, it is the last intersection before which travelers from the north enter the airport. For non-LAX regional traffic it is the only major link between the South Bay and the Westside of Los Angeles. At a time when LAXA has been consistently unaware and surprised about what it finds under its own property which it has owned and operated for decades, this project element will take LAXA far outside its own campus and into an area crisscrossed with crisscrossed with major sewer outfall, oil and gas, fiber optic, and wet and dry utility structures.

The DEIR consistently conceals or uses minimizing language to describe the environmental impact of the Lincoln Blvd. program. In many portions of the DEIR reference is made to the runway move without even mentioning these major project elements.

Just as the DEIR ignores, downplays, and minimizes the terms of the Stipulated Settlement, so also the DEIR ignores, downplays and minimizes the environmental impact both during and after construction of the runway move and Lincoln Blvd. realignment.

DEIR tactics used to minimize the environmental impact of the runway move and Lincoln Blvd. realignment include:

- Simply omitting the fact that the Argo Drainage Channel work, the perimeter fence expansion and the Lincoln and Sepulveda work are necessary in order to move the runway.
- Referring to these very large projects with minimizing language such as mere "modifications".
- Referring to these very large projects as "improvements", a description that is highly debatable and not the job of staff to determine.

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Examples of the use of these deceptive tactics are many:

- The realignment of Lincoln is treated as if it were a mere curb-and-gutter job where work can be done in non-peak hours and traffic can be managed by single lane closures. In fact more than a mile of Lincoln Blvd. will be altered and the heavily used intersection of Lincoln and Sepulveda will be completely dug up.
- The extensive work on Sepulveda Blvd. is barely mentioned. In fact Sepulveda Blvd. has for decades been the route under which oil from the Baldwin Hills oilfields is transported to the refineries in the South Bay.
- The heavy impact both during and after construction in terms of noise, vibration, visual impairment, air pollution, and light and glare in the areas immediately adjacent to the airport is obscured by using statistics for the region as a whole. Unbelievably, LAXA makes the assertion that the impact of noise will be reduced by the project.

On the first page of the DEIR it is pointed out that it is a Program Level Environmental Impact Report prepared pursuant to the California Environmental Quality Act. As a result, before a single shovel of dirt can be tossed (by electeds in hard hats undoubtedly), a full program level Environmental Impact Statement under the National Environmental Protection Act must be prepared and a Record of Decision from the federal government must be obtained.

Approval of these two program level documents is just the opening act to the effort required and the battles that await preparation of a project level EIR/EIS for the runway move, the expansion of the perimeter fence and the realignment and tunneling of Lincoln Blvd. LAXA will then be dealing directly and in infinite detail with such agencies as Caltrans, the Army Corp of Engineers, the Los Angeles Department of Transportation and many, many others. And at the end of this trail lies the Los Angeles Superior Court. Years of expense and uncertainty for both LAXA and the citizens of Los Angeles County lie ahead.

Future passenger traffic at LAX is highly uncertain in view of modest growth and the recent passenger friendly improvements completed at other airports in California. The fate of New Large Aircraft such as the A-380 is questionable at best in view of the clearly emerging preference of airlines for using (and filling) smaller two engine aircraft. Amid these uncertainties, the need to improve ground transportation to LAX and the monetary value of modernizing Terminals 1, 2 and 3 is perfectly clear.

LAXA has one great advantage as it considers moving runway 24R/6L northward. It owns outright the property between the current airfield and Westchester Parkway. That land is not going away. No one else can develop it in conflict with LAXA's future use of the property. It will be as available 20 years from now as it is today.

Money is not hanging off of the rose bushes in the garden next to the Administration Building. LAXA is already engaged in a spending program in excess of \$3 billion. At some point the airlines will resist ever higher landing fees at an airport disfavored by the traveling public.

LAXA can safely meet today's air travel demand with its current airfield. LAXA should withdraw from consideration the DEIR alternatives that would move the northern runway. LAXA has received great praise and no community opposition for solving problems at the Tom Bradley International Terminal and the Central Utility Plant. LAXA should continue working to solve today's problems today, and deal with tomorrow's problems tomorrow because tomorrow's problems may never occur.

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**Attachments:** CSE SPAS EIR response 10-9-12.docx; Injury\_Facts\_37.pdf; Alt1vAlt2Costs.pdf; OEAnalysisConclusions.pdf; OEAnalysisTotals.pdf; EnvironmentallySuperior.pdf; SafetyStudyConclusions.pdf; 260NvNISCost.pdf; LAX has competitive advantage (1).pdf

**From:** Craig Eggers [roadrider90293@gmail.com]  
**Sent:** Wednesday, October 10, 2012 9:41 AM  
**To:** SPASEIR Comments  
**Subject:** Fwd: SPAS EIR - my comments, questions and thoughts

FYI

----- Forwarded message -----  
From: **Craig Eggers** <roadrider90293@gmail.com>  
Date: Tue, Oct 9, 2012 at 5:31 PM  
Subject: SPAS EIR - my comments, questions and thoughts  
To: Diego Alvarez <davarez@lawa.org>

Hi Diego,

Attached are my comments, questions and thoughts concerning the SPAS EIR, along with other supporting documents.

Please acknowledge receipt of this e-mail.

Thanks,

Craig Eggers  
7813 West 83rd Street  
Playa del Rey, CA 90293  
310-704-4696

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**Craig S. Eggers**  
7813 West 83rd Street  
Playa del Rey, California 90293  
310-704-4696  
integritysearch@ca.rr.com

October 9, 2012

Ms. Gina Marie Lindsey  
Executive Director  
Los Angeles World Airports  
Post Office Box 92216  
Los Angeles, California 90009-© 2216

Dear Ms. Lindsey,

As a 30-year resident of Westchester Playa del Rey, I support a modern and revitalized LAX. After considering the Specific Plan Amendment Study Draft Environmental Impact Report ("SPAS" or "Study") that details the possible options for improvements at LAX we are excited to support a combination of Alternative 2 and Alternative 9 for the following reasons:

- Combining Alternative 2 and 9 fulfills SPAS goal to have airfield, terminal and transportation improvements.
- Alternatives 2 and 9 are the most affordable design options to ensure that LAX capacity needs are met to protect the economy and tourism.
- Independent evaluators have shown these alternatives to allow for safe operation of all aircraft at LAX.
- The analysis presented in the Study shows that Alternative 2 is superior to all others in airport operational efficiency.
- The analysis also shows that Alternatives 2 is clearly the environmentally superior alternative to the others when air quality and environmental impacts are considered.
- These alternatives will bring \$10.5 billion dollars in investment to LAX and the City of Los Angeles.
- The combination of Alternative 2 and 9 provides permanent long-term job opportunities by creating a state-of-the-art passenger facility and transportation system that requires ongoing maintenance and support thus strengthening the Southern California economy.
- Funding for these upgrades will make this the largest project in Los Angeles history.

Knowing that funding sources are limited, we encourage LAXA to invest in the infrastructure that will improve the passenger experience and address the transportation issues that surround LAX. As the first line of welcome to travelers to Los Angeles, I am excited to see improvements made to LAX that will modernize and revitalize the nation's #1 origination-destination and third busiest airport in country. We believe that these alternatives will invest in Los Angeles' economy and build an airport that we can be proud of - that maintains and increases safety, efficiency, and community.

Below are a series of summaries and questions that I consider germane to the EIR process and ask that all points raised be addressed in your study results.

Sincerely,

Craig Eggers

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Sadly but truly it can be said that one need go no further than Page 1-1 to discern key failings of the Report. Paragraph One, Sentence One of the Report presages LAWA's failure to understanding its place in the city, the county, the region and the world. The sentence reads:

"This Specific Plan Amendment Study (SPAS) Report identifies potential amendments to the LAX Specific Plan that plan for the modernization and improvement of Los Angeles International Airport (LAX) in a manner that is designed for a practical capacity of 78.9 million annual passengers while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region, particularly those owned and operated by Los Angeles World Airports (LAWA)."

This white paper will assess whether the Lincoln Blvd. realignment and tunnel project is consistent with LAWA's mandate to "minimize environmental impacts on the surrounding community," but with respect to "enhancing safety and security," LAWA's documents fail to give a full and complete disclosure of the finding by the distinguished NASA safety panel that LAX is a safe airport in its current airfield configuration.

Similarly, neither the SPAS Report nor the DEIR include a discussion of what LAWA has done to "encourage airlines to go to other airports in the region, particularly those owned and operated by ... LAWA," i.e. Ontario. One would have to google "Free Ontario Airport" to understand LAX's failings at that facility. Indeed, after years of failure to create a viable airport in Palmdale, the SPAS Report and DEIR fail to recognize and discuss its very strategic and advantageous location to the ever-growing rail network in Southern California. Within the next few years the Palmdale Airport will be at the hub of Metrolink commuter rail service, the Desert Express high speed rail line servicing Las Vegas, and the California High Speed Rail running into the California Central Valley. Ontario Airport is similarly well-placed with the Foothill Light Rail Line having a planned station at the airport.

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#### INTRODUCTION AND SUMMARY

The SPAS Report and DEIR recently released by LAWA purports to be a Program Level EIR, not a Project Level EIR, despite the fact that numerous specific projects are identified including an automated people mover, consolidated rental car facility, movement of taxiways and runways on the airfield and modernization of terminals.

This white paper is written to examine one of the projects specifically identified in the documents in the context of the Program versus Project Level EIR debate. It is being written to assist members of the community and the community's legal team to locate and understand detail relevant to the issue which is buried within thousands of pages of technical writing.

The specific project considered herein is the realignment of Lincoln Boulevard to accommodate the move northward of the outboard runway of LAX. This project will in effect swing Lincoln Boulevard, California State Route 1, on a wider arc around the airfield, bringing it much closer to homes, businesses, churches, schools and other sensitive uses in the Westchester community. It will also require that Lincoln be depressed below grade into a tunnel of a length which will depend on the extent of the runway move.

This white paper does not undertake to study all aspects of the runway move. A similar white paper could be written about the implications of converting the Argo Trench to a box culvert or the elimination of the old tunnel which still exists under the north airfield.

Three of the alternatives proposed by LAWA would involve extending the perimeter fence of LAX hundreds of feet into the community and realigning and tunneling Lincoln Boulevard, California State Route 1. All would involve realigning and tunneling Lincoln Blvd.

Alt 1 relocates runway 6L/24R, the outboard runway of the north airfield, 260 feet to the north; Alt 5 relocates this runway 350 feet to the north; and Alt 6 relocates this runway 100 feet to the north. Each of these alternatives require that 6080 feet of Lincoln Blvd. be realigned and each would require that it be depressed into a tunnel. In the case Alt 1, the tunnel would be 252 linear feet; Alt 5 would require a 765 foot tunnel; and Alt 6 would require a 540 foot tunnel.

In contrast to Alts 1, 5 and 6, Alternative 2 would not require moving the LAX perimeter fence or realigning and tunneling Lincoln Blvd.

The subject of Program Level versus Project Level EIRs is dealt with the California's CEQA Guidelines. Under the regulations stated therein, a Program Level EIR may be used to adopt a general plan for the conceptual planning of a district or area. It is designed to provide some level of analysis of "future and unspecified development" (CEQA Guideline 15146(b)).

In summary, this white paper demonstrates that the realignment and tunneling of Lincoln Blvd. is a specific, tangible, identified project, not a "future and unspecified" project. A high level of technical analysis has been performed on the project, far more than the "conceptual planning" sanctioned by the Guidelines for a Program Level EIR.

The DEIR and SPAS Report analyze the Lincoln Blvd. project in significant detail including its alignment, linear length tunneling and sloping, and its cost. Doing so reveals that a "project", not a "program" is being proposed. Having opened the door of technical analysis, LAWA is obligated to perform the analysis completely and accurately. LAWA cannot escape the effects of faulty, incomplete, misleading and inaccurate analysis by claiming only a "program level" analysis is required.

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Simply stated, LAWA cannot have its cake and eat it too. It cannot disclose innocuous or general details and conceal specific details which reveal serious flaws. It cannot calculate and state the costs of a project without including all of the costs. And it cannot identify some of the impacts of the project without revealing all of the impacts.

One does not need to be a civil engineer to discern that if LAWA is able to calculate the exact length of the tunnel required for the realigned Lincoln Blvd., then it must know Lincoln's proposed path including how much closer it will be to residences, businesses, schools, churches and other sensitive uses. It must also know how deep below surface level the tunnel must be placed including the extensive web of oil and gas pipelines, outfall sewers, water, electrical, fiber optic and other subsurface facilities which will have to be identified, located, and relocated as a result of the project. None of these factors are addressed in the DEIR or SPAS Report.

Having clearly revealed that it has taken the Lincoln Boulevard realignment project past conceptual planning and into preliminary engineering, LAWA must be forced by either community outcry or by court decree to treat the outward expansion of the LAX perimeter fence and the realignment and tunneling of Lincoln Boulevard as a project which can only be entitled by means of a project level EIR.

During the scoping phase of the SPAS process, numerous comments were offered asking that the subsurface structures below Lincoln and Sepulveda boulevards be studied. The failure to do so, or the failure to disclose the result of doing so, constitutes a fatal flaw in the DEIR.

A word about the real-world context of this program versus project level debate: Gina Marie Lindsay and other advocates for moving the runway are openly and repeatedly refusing to defer the issue of the movement of the runway to a later time when more is known about LAX's passenger levels and the success or failure of the New Large Aircraft which the runway move is designed to accommodate. They are declaring that no other projects at LAX can be planned or implemented until the location of the runway is established. Clearly, this statement reveals that a program level EIR is simply not what LAWA needs at this time. At this time LAWA needs and should produce a Project Level EIR to move the runways. If LAWA has determined that the runway move and the attendant realignment and tunneling of Lincoln Blvd. is the lynchpin for all other LAWA projects, then it should withdraw the Program Level EIR, isolate the runway/Lincoln Blvd. project, study it thoroughly and circulate a project level DEIR for it.

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Attachment of Detail Comments and Questions for LAWA to address as part of the final release of the SPAS DEIR due 10/10/2012

Los Angeles International Airport -- LAX Specific Plan Amendment Study Draft EIR July 2012

General comment: These comments are by no means comprehensive as we have been given inadequate time to fully evaluate the statements and studies presented in the 12,000 pages (6000 DEIR, supporting 6000 SPAS Report).

These comments were prepared by many readers. Many, but not all, have specified a specific section in the DEIR. Comments are in regular text and questions are in italics. These are supplemental to the general issues and questions raised in the basic letter, ARSAC position letter with questions, and other attachments where questions are asked. The newly referenced check in for a midfield terminal, for instance, is noted as non-spas and is not in the existing Master Plan.

Question: What is the basis for LAWA interpretation of SPAS project relevancy for inclusions in this DEIR? Doesn't inclusion of this have a ripple impact on CTA parking? The way that the alternatives are presented makes it nearly impossible to ensure we understand what was evaluated in any particular circumstance.

Question: How can we determine what is assumed in each evaluation? How does LAWA justify the tearing and reference to Alt D EIR without specificity?

The 2006 Stipulated Settlement calls for reworking the Master Plan to include potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of LAX at 78.9 million annual passengers (the "Alternative Projects"). Question: How has LAWA determined which projects are part of SPAS and how is it finishing the task to incorporate the entire package of projects into a coherent, comprehensive group of projects into a Master Plan?

Hydrology can impact long term viability of the north airfield from impacts of an unknown water source that can flood areas, distribute pollution, and has caused sinkholes. We note that LAWA is making changes to the Argo Ditch Flood Channel as noted in Hydrology tech reports 6 and S-5.

Question: On what basis has LAWA confirmed that projects won't change underground water pathways causing problems? How has LAWA analyzed past sinkhole occurrences? By what authority have they redesigned the Argo ditch without coordinating with the design authority?

Question: IF NOP was released in 2010 shouldn't data used in analyses be from then forward? Is there a table of data periods used for the various analyses and the period covered by the data? Why must LAWA choose, in some cases year old data instead of from NOP inception for twelve months since monthly values are frequently available?

Reference to the Alt D EIR is generally used as justification for not studying something yet specifics are not included in this DEIR document (ie archeology, hydrology issues). Question: Please create a list of each element that is not being freshly studied.

Alternative 7 includes moving runway 24R 100' south. It seems to be a hybrid of ARSAC submittal and the LAWA fatal flaw versions. Question: How was the included version of 100' S determined? Where is this documented? Could this version be tweaked to improve taxiway changes or improve the gate availability of a new Terminal 0?

Safety is the political reason given for runway expansion. The Academic Panel/NASA study (NASS) is referenced in the DEIR as equivalent to several less rigorous studies. LAWA also included an FAA response letter to the NASS and called it "a study."

Question: When establishing safety needs and status why didn't LAWA include the Academic response to the FAA letter? Why were none of the NTSB concerns with FAA design criteria not included in the discussions of runway safety? What other studies of runway safety have been conducted that are relevant to the design issues at LAX? How has LAWA reviewed actual data? Has LAWA kept incursion and excursion data for LAX since it stopped posting it on its

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304 website? When the FAA fails to post incident data for extended periods of time after an event does LAWA keep track status or ask why it has not been presented?

The comments below are for the Main Document of the DEIR.

Page 1-1 1.1. INTRODUCTION AND EXECUTIVE SUMMARY

General Question: Overview includes reference to Palmdale airport. Has LAWA officially given up LA/Palmdale operational certificate and therefore all responsibility?

Page 1-1 to 1-2 1.1.1 LAX Master Plan and EIR

In December 2004, the Los Angeles City Council approved the LAX Master Plan2 and related entitlements for the future development of LAX. The LAX Master Plan provides the first major new facilities for, and improvements to, the airport since 1984, and plans to accommodate projected growth in passengers and cargo at LAX through the year 2015. The LAX Master Plan serves as a broad policy statement regarding the conceptual strategic planning framework for future improvements at LAX and working guidelines to be consulted by LAWA as it formulates and processes site-specific projects under the LAX Master Plan program.

Environmental Review and Approval (Phase III): Phase III of the LAX Master Plan Study included a thorough evaluation of the potential environmental effects associated with the four build alternatives,...

Questions:

1. Since they reference the phases, does LAWA have to review the assumptions to see if their assumptions still justify disregarding ideas?
  2. Must this also only go to 2015 or could it be required to go to 2020 or beyond?
- Figure 1-2 shows the existing airport and the Argo drainage channel just north and east of 24R to west of 24R. Will there be a chart that shows the utilities underground such as the major sewer lines and tunnels in the area so that construction impacts are assessable? If included, where is it? If not included, why not?

Page 1-9 1.1.2 The Stipulated Settlement

In January 2005, the City of El Segundo, the City of Inglewood, the City of Culver City, the County of Los Angeles, and the Alliance for a Regional Solution to Airport Congestion (Petitioners) filed petitions challenging the approval of the LAX Master Plan Program. In early 2006, the City of Los Angeles and Petitioners agreed to, and the court approved, a Stipulated Settlement of the subject lawsuits (Stipulated Settlement) "... is designed for a practical capacity of 78.9 MAP while enhancing safety and security, minimizing environmental impacts on the surrounding communities, and creating conditions that encourage airlines to go to other airports in the region,..."

Question: How does LAWA interpret this statement of minimizing environmental impacts? Is the best performing environmentally preferred since it minimizes impacts? What specific conditions are used by LAWA to create conditions that encourage airlines to go to other airports?

Page 1-10 1.2 Summary of Proposed Project

The proposed project is the LAX SPAS. As noted above, the SPAS process involves the identification and evaluation of potential alternative designs, technologies, and configurations for the LAX Master Plan Program that would provide solutions to the problems that the Yellow Light Projects were designed to address.

Question: Where is the table of problems that the Yellow Light Projects were designed to address and what quantifiable numbers are assigned to these problems so that we can assess if the

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solutions are adequate or in the case of multiple solutions which more closely matches the solution of the Yellow Light Project?

Page 1-10 1.2.1 Project Objectives

1. Provide North Airfield Improvements that Support the Safe and Efficient Movement of Aircraft at LAX...

Existing problems associated with the outdated airfield design include, but are not limited to, the following:

LAX does not have an airfield, in either the north complex or the south complex, that is fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group (ADG) V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).

The north airfield configuration requires non-standard operating procedures, which are not optimal for safety and increase aircraft delay.

Question: 1.2.1 bullet 1 LAWA states that neither of the airfield complexes meet Grp V or Grp VI but the basis for the SAIP was that it would. Are the designs contemplated supposed to meet the requirements in place at the time Alt D was passed, requirements current at NOP release, or current/future requirements in the draft AC 150/5300-13A approved last month?

Is it the LAWA position that all standards MUST be met without waiver or is there some standards of practicality and cost involved? What are those factors?

Question: 1.2.1 bullet 2

If the north airfield configuration is not "...optimal for safety and increase aircraft delay." What condition is acceptable for safety and aircraft times and how was it determined? What assumptions in airfield conditions are made? What would be the time phasing of implementation of the design changes? Is the answer that LAWA is to provide safety based on total project implementation? What technical improvements and signage marking improvements are assumed? What about staffing and work load? What other factors has LAWA included in its assumptions?

Page 1-11

The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

Question: Although ARSAC has acknowledged support for extending 24L east, how many flights per year are not acceptable for assignment to the current north runway? Is this based on a decision made by a carrier or is it related to the aircraft and weather conditions? How is this decision made? Please quantify the number of aircraft involved and where they originated for the past years and show how this can be extrapolated to the future. What is the time taxing penalty for aircraft moving from one complex to the other?

The outdated airfield design creates a situation where aircraft are at increased risk of hazards. Those hazards include potential collisions with other aircraft, such as when a landing aircraft might move in the path of a departing aircraft (incursion). 7 Other potential hazards include, but are not limited to, insufficient side-by-side passing clearances between certain types of aircraft arriving/departing on runways and aircraft on nearby taxiways. Such hazards contribute to the potential for conflicts between taxiing aircraft and ground vehicles on runways, taxiways, and nearby service roads

Question: The reference to incursions says that it is based on inadequate spacing between runways and taxiways. Everyone of the designs submitted by LAWA to move north which includes

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a center line taxiway leaves a condition where an aircraft on the taxiway is closer to an adjoining runway than is currently the condition between the two runways. What is the basis for which LAWA has determined that this is acceptable?

With one exception, the north airfield configuration does not comply with FAA Runway Safety Area (RSA) requirements. Question: If the RSA requirements are not met, how does LAWA justify or explain that these RSA would not have changed in previous approved Master Plans or the FAA Record of Decision? Will LAWA explain and list all of the requirements which will NOW be required to be met, but were acceptable to be grandfathered as is before? The north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75.

Question: "The north airfield high-speed taxiways are not in compliance..." LAWA is not required to meet every Engineering Brief as these are advisory. Has LAWA performed studies or reviewed any FAA studies to show that these must be required? Past history on the south complex was that high speed turnoffs (hst) were ADDED for safety and then it was recently changed for the SAIP which removed hst's. How do we know that the requirement will not change back to hst's before the north is reconfigured?

The north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing departing aircraft.

Question: What requirement is not met to specify that the "north airfield does not provide sufficient areas... for holding... flights..." Since this study is to address items fixed by yellow light projects, what specifically changed in Alt D to justify this?

The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

Question: If "existing Runway Protection Zone (RPZ) ...includes residential uses" what changes are in the yellow light project that fixed this or caused it to be worse? The RPZ was approved by the FAA in its Record of Decision.

Page 1-11

In identifying and evaluating alternatives to the north airfield improvements called for in the LAX Master Plan, LAWA is seeking to provide north airfield improvements that support the safe and efficient movement of aircraft at LAX; specifically, such improvements:

Are consistent with FAA design standards for the largest aircraft types currently in service and anticipated for the future (ADG V and VI aircraft) for all weather conditions;

Minimize modifications of standards, waivers, or operational restrictions, all of which reduce efficiency and level of service;

Reduce the potential for airfield hazards, including incursions, and enhance the overall safety of airfield operations through runway and taxiway design;

Accommodate a greater percentage of departing aircraft, thereby increasing airfield efficiency;

Provide sufficient areas at the ends of the runways for holding arriving flights and sequencing departing aircraft; and

Minimize or eliminate the extent to which Runway Protection Zones overlay residential areas.

Question: the six bullets state LAWA north airfield improvement technical goals, but LAWA will never have unlimited funds. Please identify associated costs to relate these goals. Going back to the purpose of this study, however, --to identify the issues Alt D addressed which of these were

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directly accomplished in Alt D? What numerical improvements did (do) they achieve?

2. Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic, Especially as Related to the Central Terminal Area

Page 1-11 Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the CTA, have various ground access options including private vehicles, transportation service providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground access within the CTA, where departing and arriving passengers are dropped off and picked up at curbside or can park their vehicles, is provided by an upper-level roadway and a lower-level roadway that loop around the center of the CTA

and connect with surface streets on the east side of the CTA. The subject roadway system poses a Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 5

number of concerns relative to traffic flows including, but not limited to, the following: CTA roadway system design currently creates queuing, weaving, and conflict points at various locations that impede traffic flow;

During peak travel times, inbound airport traffic currently extends out of the CTA roadways onto public streets and may worsen as airport activity returns and grows;

Question: 1.2.1 Topic 2 - Improve Ground Access

What were the Alt D ground access improvements? Numerically, how many more people could get to their gates?

Again, all of the bullets describe more of the "problems" with the current rather than what improvements were accomplished that need to be addressed. Since virtually no significant changes are imposed on CTA traffic by the LAWA alternatives what does LAWA believe should be done to improve traffic? Is this objective considered lower priority? How can these improvements be combined with the serious capital improvement and refurbishment projects that LAWA must entertain just to keep LAX open?

Page 1-12 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region LAX serves a key role in the region's economy, particularly as related to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic flight traveling round-trip from LAX everyday added \$623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with \$156 million in wages. 8 Given the continued growth in, and reliance on, new large aircraft such as the Airbus A380 by major airlines operating on those long distance international routes, it is important that LAX be able to effectively accommodate those aircraft.

LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger-scale, LAX related regional employment provided over 400,000 jobs and \$60 billion in economic output.

Question: Although air commerce is tied strongly to our regional economy, where does LAWA prove that the amount of economic benefits couldn't be provided by having the same amount of economic activity disbursed around the region. How is this objective consistent with fixing the problems which Alt D fixed? Are the numbers quoted based on LAWA's dominant position with 75% of all activity? A prior 1968 LAX Master Plan EIR recognized the importance of regionalization. Is this objective lost by the current LAWA administration? It also talks about job growth. Since there's not unlimited funds, has LAWA done an evaluation of job/economic impacts of the various types of jobs? We understand

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that landside projects provide twice the job creation of airside ones and 8X more economic benefits. What has LAWA's studies shown?

Terminal Construction Projects, 2011.

Question: LAWA appears to be relying on this LAEDC analysis. Where in the document pile is this analysis? If not included, please make it available.  
Page 1-13 4. Plan Improvements That Do Not Result in More Than 153 Passenger Gates at 78.9 MAP

In identifying and evaluating alternatives to the demolition of Terminals 1, 2, and 3, LAWA is seeking to maintain consistency with the LAX Master Plan design for a total of 153 passenger gates, which was based on a future passenger activity level of 78.9 MAP at LAX in 2015  
Question: No more than 153 gates? What schedule for phase out of gates has LAWA created or assumed when evaluating their alternatives? Is there a plan to remove the remote gates? Separate projects like the AA gates in the southeast portion of LAX are apparently not part of this study since a separate NOP and negdec was used. What other gate related projects are contemplated?

Page 1-13 5. Enhance Safety and Security at LAX

In identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the outcome of the SPAS process, to enhance safety and security at LAX.

Question: There were dozens of recommendations in the 2004 RAND Study of LAX Security. Which of these have been introduced in the new alternatives? If not in the alternatives, how many have been addressed by separate projects?

Page 1-13 6. Minimize Environmental Impacts on Surrounding Communities

LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities

Question: 1.2.2 Airfield Improvements  
Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars?  
Where are the assumptions listed used in the estimates? ie location of gates, taxiways, types of aircraft, frequency of aircraft, tower staffing, etc.

Page 1-13 7. Produce an Improvement Program that is Efficient, Sustainable, Feasible, and Fiscally Responsible

The nature and scope of improvements associated with the Yellow Light Projects are substantial. Each of

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those projects represents a major undertaking, requiring substantial funding; considerable planning, engineering, and design; and major construction activities. The costs for each of these major improvement projects would be financed primarily by Airport Improvement Program grants, Passenger Facility Charges (PFCs), and bond sales, all of which are subject to federal requirements regarding expenditure of airport funds, and which will also be utilized to finance other airport improvements outside of the scope of SPAS. The ability to successfully fund such improvements is, to a large extent, dependent on whether certain airport activity levels are reached. Additionally, the types of improvements associated with the Yellow Light Projects and the alternatives thereto represent major long-term investments in the airport's infrastructure that must be efficient and sustainable for many years. The construction of these major improvements poses the potential for major disruptions to existing airport operations. In identifying and evaluating alternatives to those Yellow Light Projects, LAWA is seeking to produce an improvement program that is efficient, sustainable, feasible, and fiscally responsible. (underline is emphasis)

Question: Since LAWA is concerned about cost, what has LAWA identified as a prioritization for projects? Are any time phasing issues addressed? Has LAWA identified the potential disruptions? What are they? What assumptions have been made in the establishment of the costs? Who prepared the cost estimates and how reliable are they? ie Alt D was estimated at \$6B prior to the approval cycle and increased to \$12 at approval. Current estimates for Alt D we've heard exceed \$100B. What is the actual current estimate? Cost estimates were done for LAWA in 2008 for SPAS. How have they changed in scope and confidence?

Page 1-13 1.2.2 Overview of SPAS Alternatives

Nine alternatives offering various options to the Yellow Light Projects, including one alternative that provides for implementation of the Yellow Light Projects (i.e., implement the Yellow Light Projects as generally reflected in the LAX Master Plan instead of options to those improvements), are addressed within this Draft EIR for SPAS. Figure 1-4 identifies the location of the Yellow Light Project areas. The types of improvements used to define the key characteristics of each SPAS alternative can be grouped into the following three categories:  
Airfield Improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences in airfield improvements associated with the various SPAS alternatives pertain to: Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility conditions, and, in certain visibility conditions, would either require Federal Aviation Administration (FAA) approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited;

Question: Where is taxiway placement to facilitate movement listed? How much improvement can be accomplished by moving and changing taxiways as opposed to runways? How do the analyses used in this study differ from those in the Northside Safety Analysis for which LAWA paid a couple million dollars?  
Where are the assumptions listed used in the estimates? ie location of gates, taxiways, types of

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aircraft, frequency of aircraft, tower staffing, etc.

Page 1-14

Whether an increase in the separation distance between Runway 6L/24R and Runway 6R/24L would allow for the construction of a centerfield parallel taxiway between the runways, to enable aircraft arriving on the outboard (6L/24R) runway to exit onto the center taxiway and hold while aircraft are departing on the inboard (6R/24L) runway, thereby allowing the departing aircraft to safely pass before the arriving aircraft proceeds to the terminal gates;

The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;

Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on longhaul flights and improve the balance between the north airfield and the south airfield relative to such departures;

Whether Runway 6L/24R would be reconfigured or extended to relocate its associated RPZ with respect to residential uses, and/or to improve the north airfield and the south airfield relative to the operation of aircraft;

How RSA requirements would be met, in terms of runway extensions, declared distances, 11 displaced thresholds, 12 or a combination thereof; and

Separation distances between Runway 6R/24L, Taxiway E, Taxiway D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain limitations, particularly as related to the interface between aircraft going to or from the gates at Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

Question: Which flight mix was assumed as several were developed during the past four years? How was it determined?

How does this flight mix assumption compare with the Part 161 study that LAWA is about to complete?

Terminal Improvements - Terminal improvements consist primarily of additions/demolitions to existing terminals/concourses, and, for most SPAS alternatives, the construction of a new terminal - Terminal 0 ("zero"). The primary differences in terminal improvements for the various SPAS alternatives are directly related to the movement of runways and taxiways under each alternative. Specifically, the alternatives differ in the location of their building limit lines (i.e., the "object free" safety area along runways and taxiways where no part of a structure can be present) and their aircraft parking limit lines (APLL) (i.e., the safety clearance setback area along runways and taxiways into which no part of an aircraft parked at a gate can extend). The northernmost limit of concourse building area and/or aircraft gate parking positions is defined by the southernmost safety clearance distance for the runways and taxiways in the north airfield. Depending on the location and design of the runways and taxiways associated with each alternative, the locations of the building limit line and APLL may differ between alternatives.  
Question: How has LAWA reconciled and quantified Alt D improvements for comparison to current program proposed? ie More or less terminal area? curb space? seating area near gates? concessions? TSA and baggage handling areas? What assumptions has LAWA made about the need and schedule for fixing current infrastructure?

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ie upper roadway, bridges, terminals, etc .

Page 1-17 1.2.2 Terminals....

In general, the building lines and APLLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to) the north concourses for Bradley West and the MSC. While the amount of concourse area and the layout of aircraft gates vary between alternatives, none of the SPAS alternatives includes more than 153 passenger gates.

Question: The locations and purposes of the terminal 0 appear to have been located to create new gate types which are different than existing ones. Where is the chart which shows the number and types of gates that must be present? Include this information since although there is to be no more than 153 gates it appears that "remote gates" are not taken out of service.

Page 1-17 1.2.2 Terminals....

Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing. For those alternatives that include development of the new Terminal 0, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 96th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA.

Question: 1.2.2 Terminals

The shift of the 96th street bridge appears to be the only major change to CTA traffic flow despite numerous suggestions during SPAS meetings. Is there a listing of all of the traffic flow improvements in one location or table? Please list them as it appears that most have not been considered.

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined Alternative 4 represents what would reasonably be expected to occur if all ongoing and reasonably foreseeable non-Yellow Light improvements identified in the LAX Master Plan (i.e., "Alternative D") were implemented, and none of the Yellow Light Projects or any of the identified alternatives to the LAX Master Plan Program were constructed or implemented. Analysis of Alternative 4 will allow decision-makers and the public to evaluate the impacts of simply eliminating the Yellow Light Projects from the LAX Master Plan Program. Alternative 4 is a fully integrated alternative, consisting of airfield, terminal, and ground access components. Ongoing and reasonably-foreseeable non-Yellow Light projects that would be developed include the Bradley

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306est Project, an extension to Runway 6R/24L for RSA improvements, the MSC and related new passenger processor and connector within the CTA, and various terminal improvements. In addition, a CONRAC at Parking Lot C would be constructed and a new parking structure would be developed at the ITC site to accommodate the public parking displaced by the CONRAC. A portion of the Argo Drainage Channel would be covered to comply with existing RSA requirements by converting a portion of the existing open unlined channel to an enclosed concrete box culvert. There would be no modifications to Lincoln Boulevard under this alternative. This alternative is illustrated in Figure 1-8.

Question: How do Alternatives 3 and 4, the two LAWA identifies as unique and not "interchangeable" consider major capital improvements which will need to be made just to keep airport ground access functional? ie CTA upper roadway/bridge repairs to take care of creeping rust issues, parking lots and passenger bridges to terminals, etc.

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 5 provides, as noted above, a focus on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxiway D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxiway/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 1-9.

Question: 1.2.2 Alternative 5 description notes that alts 1, 2, and 6 taxiway/taxilanes would not fully accommodate ADG VI aircraft. What chart lists the taxiway/taxilane aircraft accommodations? Since the SPAS is supposed to address the same "problems" fixed by Alt D what specific changes in alt D changed taxiway/taxilane limits and how is this different from each of the alternatives?

Page 1-25 1.2.2 Alternatives interchangeability and functionally defined

Alternative 6, similar to Alternative 5, also focuses on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the improvements associated with Alternatives 8 and 9. The distinguishing feature of this alternative is the movement of Runway 6L/24R 100 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed. All other physical aspects of the airfield and terminal improvements associated with this alternative would be essentially the same as those of Alternative 1, described above, with a lesser portion of the Argo Drainage Channel requiring covering (i.e., conversion to a concrete box culvert) and a lesser portion of Lincoln Boulevard requiring tunneling. This alternative is illustrated in Figure 1-10.

Question: 1.2.2 Alternative 6 notes conversion of the argo ditch to a concrete box culvert. Since this is created to accommodate runoff and flow of water from an unknown water source what calculations has LAWA performed to ensure adequacy of flow capacity? Does it (or any other changes to the argo ditch) accommodate a 100 year storm (worst case flow condition)?

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Page 1-26 1.2.3 Preliminary Evaluation of Relationship Between Project

Objectives and SPAS Alternatives

Based on the project objectives presented above in Section 1.2.1 and the characteristics of the nine SPAS alternatives summarized in Section 1.2.2, Table 1-2 presents a preliminary evaluation of the relationship between each project objective and each SPAS alternative. A more detailed evaluation of that relationship will be completed in conjunction with further evaluation of the alternatives through preparation of the Final EIR and during the public hearings process. Table 1-3 provides additional information summarizing key characteristics associated with the SPAS alternatives that pertain to each objective. (underline for emphasis)

Question: The underlined sentence above states that further evaluations will be conducted. Is LAWA planning to recirculate their documents when this is done? How will LAWA ensure that each of the detailed assessments are changed to match the Alternative changes?

Page 1-45

Chapter1 -- Introduction and Executive Summary

This chapter introduces the project background and project description, an overview of the report organization, a discussion of areas of known controversy and issues to be resolved, and a delineation of documents that are incorporated by reference into this EIR. Also included is a summary of the environmental analysis and identification of the environmentally superior alternative. (underlined for emphasis)

Question: Since the analysis is summarized and environmentally superior alternative identified, why hasn't LAWA selected this as a preferred to go forward?

Page 1-46 1.3 Organization of this EIR

Chapter 6 -- Evaluation of Amendments to the LAX Specific Plan

This chapter evaluates the environmental impacts associated with amendments to the LAX Specific Plan, including a revision to Section 7.H that would require completion of passenger and airline surveys and studies, the results of which would help inform LAWA as to potential actions that could be taken to encourage airlines to provide increased domestic passenger service at other airports in the region, particularly those owned or operated by LAWA, as well as administrative amendments to the LAX Specific Plan that might be needed depending on the SPAS alternative. (Underline for emphasis)

Question: If the underlined action to require passenger and airline surveys is performed, how will LAWA make these public and how will they correlate this information to result in actions? What other Amendments to the LAX Specific Plan are contemplated? When will final versions of the changes become available and how will they be distributed?

Page 1-46 1.4 Executive Summary of Environmental Impacts Related to SPAS Table 1-4 summarizes the environmental impacts after mitigation of the SPAS alternatives as identified in

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Chapter 4, Environmental Impacts Analysis, of this EIR. Impacts associated with implementation of the alternatives include those directly associated with proposed physical improvements (e.g., impacts to biological resources that would occur from grading activities, impacts to aesthetics, views, light, and glare that would occur from development of new structures or modification of existing structures). Impacts associated with implementation of the alternatives also include those associated with proposed or anticipated changes in airport operations (e.g., noise impacts, air pollutant emissions from aircraft operations, traffic impacts from vehicles traveling to and from the airport). The majority of the operations related impacts summarized in this section, and more fully addressed in Chapters 4 and 5, are primarily attributable to future growth in aircraft and passenger activity levels at LAX that are projected to occur independent of the SPAS alternatives. The Draft EIR analyzes and identifies mitigation for such impacts even though they are attributable to future growth not related to the proposed project.

Question: None of the past EIRs have mentioned sink holes, but we are aware that they are occurring all over the airport. What is the frequency and magnitude of the occurrences over the past 10 years? ie before and after the drought period?

Since LAWA is now aware of the Manchester Tunnel and it had water before the drought, have they measured the water since the drought ended? Where are the results of the water tests from the Manchester Tunnel? What did they reveal?

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS

Specifically, the impacts analyses completed for the SPAS project include an evaluation of conditions projected to occur upon completion (buildout) of each alternative compared to conditions that existed at the time the Notice of Preparation (NOP) for the Draft EIR was published (i.e., existing baseline conditions). The analyses of operations-related impacts, such as those pertaining to air quality, noise, and traffic, account for the growth in activity projected to occur between 2009 (56.5 MAP and 1,493 average daily aircraft operations [landings and takeoffs combined]) and 2025 (78.9 MAP and 1,937 average daily aircraft operations). 13 This 30 to 40 percent increase in aircraft and passenger activity at LAX is projected to occur regardless of SPAS (i.e., would occur even if none of the SPAS alternatives were implemented). The SPAS Draft EIR analysis evaluates how the improvements specific to each alternative would interact with that projected growth and delineates the differences, or the similarities, in impacts between alternatives.

Question: How does the estimate of activity on page 1-46 2009 (56.5 MAP) to 2025 (78.9 MAP) correlate to what was used in the North Airfield Safety Study? Were the same flight mixes used? How do they differ?

Page 1-47 1.4 Executive Summary of Environmental Impacts Related to SPAS

As indicated in Table 1-4, impacts are anticipated to be less than significant after mitigation for all nine alternatives relative to most environmental topics. Unavoidable significant impacts are expected to occur for all alternatives relative to air quality, greenhouse gas emissions, human health risk, aircraft noise, construction equipment noise, on-airport surface transportation, and off-airport surface transportation.14 With the exception of construction equipment noise impacts, the vast majority of the unavoidable significant impacts that occur under all alternatives are primarily attributable to the projected growth

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in airport activity... (underlined for emphasis)

Question: Even though many impacts are significant and unavoidable, why hasn't LAWA presented the quantified each significant impacts in a way that each alternative performance can be compared and rank ordered? Will this be normalized to separate unavoidable impacts resulting from the assumed airport growth?

Pages 1-49 to 1-60 Table 1-5 Summary Comparison of Unavoidable Significant Impacts

Question: Table 1-5 What assumptions are made to show the differences in human health risk for each of the alternatives? Why is no runway separation best? and no airfield improvements worst by a significant amount. In Alt 4 are there no taxiway changes as well?

Question: In table 1-5 what would the number of on-airport intersections w/o feasible fix be for the ARSAC suggested fix which we can't find in the DEIR where the 96th st bridge is moved east with a new drop off structure and moving sidewalk to support Terminal 1 allowing cars to enter the drop off and then exit directly to Sepulveda without having to clog up the CTA?

Question: Page 1-54 to 1-56 Table 1-6 LAX Master Plan Commitments, LAX Master Plan Mitigation Measures, and SPAS-Specific Mitigation Measures as Related to the SPAS Alternatives

Question: Page 1-54 Table 1-6 What is the characteristic of the alt 1 (260' N), alt 5 (350' N), and Alt 6 (100' N) related to MM-SAF (SPAS)-1 Runway Protection Zone Reviews that impacts safety? What does note 4 to the table mean?

Question: Table 1-6 On-airport Shows no mitigations for Alts 5,6,7 in any intersection or on-airport condition. How is this possible when Alt 1 has mitigations?

Question: Table 1-6 Wastewater Generation How is it possible that there are no wastewater generation mitigations for any SPAS or LAX Master Plan elements? If the runways are moved north and Lincoln/Sepulveda interface is necessarily below current levels it could impact the major sewer lines going to Hyperion. If the argo ditch is covered and/or enclosed and LAWA's capacity guess is too low can't there may be quite a wastewater issue causing spillage on to the runways and towards the terminals and or business district? What special precautions does LAWA plan to design?

Page 1-61 Aesthetics

Alternative 3 would include the greatest extent of development throughout the airport environment, including improvements within the Los Angeles/EI Segundo Dunes, north airfield, CTA, Lot C, Manchester Square, and Continental City. These improvements would affect aesthetics and views from sensitive

receptors within the CTA, Century Corridor/eastern boundary, and southern, western, and northern boundary areas. Within the CTA, improvements related to the APM and terminal improvements under

Alternative 3 would result in significant impacts to focal views of the Theme Building.

Implementation of Mitigation Measure MM-HA (SPAS)-1, Preservation of Historic Resources: Theme Building and Setting

(Alternative 3), described in Section 4.1, Aesthetics, would reduce impacts to views associated with Alternative 3 within the CTA to a level that is less than significant.

Compared to Alternative 3, improvements that would affect aesthetics and views under Alternatives 1 and

2 would not be as extensive, particularly within the CTA, Manchester Square, and Continental City. Impacts to views of the Theme Building under Alternatives 1 and 2 would be less than significant. Ground access facilities associated with Alternative 3, including the CONRAC, APM, and GTC,

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would not be developed under these alternatives. Alternative 4 has limited improvements with the potential to affect visual resources, including a CONRAC in the Lot C area and a parking structure in Continental City.  
(underline for emphasis)

Question: Aesthetics - what is the second paragraph of page 1-61 saying? Is there an explanation of the assumptions used to draw conclusions of this nature with more detail than section 4.1 of the document?

Page 1-62 Air Quality

Table 1-7 and the text below summarize the conclusions regarding significant air quality impacts, all of which are based on the comparisons to baseline (2009) conditions or, in the case of construction impacts, the SCAQMD construction emission thresholds.

Question: Page 1-62 Air Quality references comparisons to a 2009 baseline condition. Why was this year chosen when the NOP was created in 2011 as a baseline and what year is assumed as the final year for comparisons? In order to assess intermediate air quality conditions there has to be some sort of construction order and schedule assumed. Where is this documented and the assumptions listed?

Why is the air quality apportionment study data which is currently 3 years beyond completion schedule not included in any of the discussion? As LAWA has not released any data from the first phase, second phase, or second (plus) phases which LAWA indicates are complete, how is this data reconciled with whatever IS used?

Question: Table 1-7 Air Quality Impacts after Mitigation: Many of the elements and especially particulate matter of each size (ultra fines not addressed) show significant, unavoidable impact. Are some of the alternatives "better" than others? How are they ranked and what is the basis for the ranking? Is there a ranking that combines levels with concentrations?

Page 1-70 Table 1-9

Summary of Impacts to Listed/Eligible Historical Resources After Mitigation

Question: Where is the Union Savings and other historic buildings located on a map in this document? Are these the only historical resources?

Page 1-70 Cultural Resources

No direct impacts to any historical resources would result from Alternatives 1, 2, 4, 5, 6, 7, or 8. Indirect impacts to historical resources associated with proposed concourse and terminal improvements under Alternatives 1, 2, 5, 6, and 7 would be less than significant due to their height limitations, design, and distance from the Theme Building and Setting and the intervening development. Similarly, indirect impacts to the Union Savings and Loan Building under Alternatives 1, 2, 8, and 9 would be less than significant due to the distance of the improvements to this resource. Impacts to historical resources under Alternatives 1, 2, and 5 through 9 would be further reduced with implementation of LAX Master Plan Commitment HR-1, Preservation of Historic Resources.

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Question: Page 1-70 discusses historical resource impacts. What potential impacts were considered if the hydrology efforts are found to be inadequate? Can't some of the movements of land and underground structures cause redirection of unknown water sources? What about leaching of airfield contaminants and those contaminants from the old Garret Research Site (Park One) by new water flow patterns and deposit into new locations? Can't this also make some historic resources require significant clean up since they would no longer be buried under the Park One lot? What about "normally expected" fuel contaminants that occurred from pipeline leaks as well as normal aircraft operations?

Page 1-72 Table 1-10 Summary of Impacts to Recorded Archaeological Resources

**Note from table:** Alternatives 1 through 4 consist of airfield, terminal, and ground access improvements. Alternatives 5 through 7 focus on airfield and terminal improvements only. Alternatives 8 and 9 focus on ground access improvements only. The airfield/terminal improvements associated with Alternatives 1, 2, 5, 6, and 7 could be paired with the ground access improvements associated with Alternatives 1, 2, 8, or 9. Similarly, the ground access improvements associated with Alternatives 1, 2, 8, and 9 could be paired with the airfield improvements associated with Alternatives 1, 2, 5, 6, or 7. The full impacts of any alternative must consider airfield, terminal, and ground access contributions. The airfield, terminal, and ground access improvements associated with Alternatives 3 and 4 are specific to each of those alternatives and cannot be paired with other alternatives.

Question: The note at the bottom of Table 1-10 (above) talks about the mix and match concept but doesn't properly spell out a concept for evaluation. Has LAWA identified the native american indian sites which used to be located in the areas in and around LAX? How are they watching for artifacts and other indications of encampments and burial grounds?

Page 1-74 Table 1-11 Summary of Human Health Risk Impacts After Mitigation

Question: What is the basis for these categorizations of significance of health risks?

Question: Table 1-11 Summary of Human Health Risk Impacts states that all alternatives have acute non-cancer health hazards as significant and unavoidable. Where have these been assessed in enough detail to rank order the impacts?

What assumptions have been made to get to these conclusions? Again, as in several other commented areas, why has LAWA used a 2009 baseline? Although this table on page 1-74 talks about "buildout in 2025" are there other impacts which are compared at other times? LAWA has talked about time-phased and condition-phased implementation of various projects. What if significant elements have not been constructed by 2025?

Question: Table 1-11 health risks

Under what category are TAC (toxic air contaminants) which are generated during construction from toxic fugitive dust piles inadequately controlled during construction? One example are the piles in the staging area behind the Sepulveda Ralphs Market off Westchester Parkway which has been uncovered and unaddressed for in excess of 6 months despite several community requests.

Page 1-75 Health Risks section

...The increased acrolein emissions are attributable mostly to the increase in passenger activity

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levels and associated aircraft operations anticipated to occur between 2009 and 2025 for all alternatives....

Question: Page 1-75 highlight phrase notes that acrolein emissions are attributed to passenger activity levels. Is taxi time to gate a significant item in allowing for comparing the bad impacts from each alternative? What assumptions in flight mix, gate location, times of day (relative amounts of air traffic ie peak hours or not), and other factors were made? What were all of the factors?

Page 1-75 Health Risks section

LAX Master Plan mitigation measures would reduce TAC emissions associated with all of the SPAS alternatives. However, even with implementation of these measures, acute non-cancer health hazards at some fence-line receptors would exceed the threshold of significance under all of the alternatives, compared to 2009 baseline conditions. As such, acute non-cancer health hazard impacts under all of the SPAS alternatives are considered to be significant and unavoidable.

Question: Why is 2009 used as the baseline condition when the NOP was released in 2010?

Page 1-76 Safety

Currently, no active solid waste landfills are located within a five-mile radius of LAX. Therefore, none of the alternatives would relocate a runway to within 10,000 feet of a solid waste landfill. Under all of the alternatives, no new facilities would be constructed or operational conditions implemented that would serve as attractants to birds. In accordance with FAA requirements, the airfield would continue to be maintained to avoid the ponding of water, the growth of vegetation, and the development of other conditions that may serve as attractants to nuisance wildlife, including birds. Therefore, impacts under all of the alternatives with respect to birdstrikes would be less than significant.

Question: Were is an analysis of the impacts of tunnels, utilities such as major sewer lines, hot oil lines and high voltage power on safety? Where is unknown water source causing sink holes? evaluated in this document? What is the frequency and magnitude of sink holes? When a tunnel is removed, what controls for sink holes are in place if unknown water sources are in the area?

Question: page 1-76 discusses safety and states that there are no impacts because there are no solid waste landfills within a five-mile radius. However there are known contaminants within the airport airside and landside plus areas in the Northside Development area that contain toxic items used or leaked into the ground as well as having had many oil wells and gas wells naturally occurring and operated in the past at these locations. When can disturbing the ground that may have covered contamination become a safety hazard? What about during construction and movement of the contaminated soil?

Page 1-76 and 1-77 Table 1-12 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

Question: Table 1-12 summarizes safety and efficiency enhancements but there are some questionable items which give credit for improvements to certain alternatives over others. Where are the details and assumptions listed which justify classifications for each of the line items? Footnote 1 of this table indicates "greater amount of FAA Airport Design Standards for ADG V and VI are met as noted, but since there is a new version of AC150/5300-13A in draft review at this

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time is this still true? Under current design standards if a center line taxiway has an aircraft between two runways the actual separation distance from the taxiway to the adjacent runway is smaller than the current separation without the center line taxiway. How is this justified by LAWA and how is it considered in the current FAA design standard? The new draft mentions this condition and notes this issue on separation distances. Where did LAWA address this? Also, when a centerline taxiway exists how are the new failure modes such as landing or taking off from a taxiway addressed?

Question: Related to table item on "Realigns/straightens Taxilane D... Table 1-12 Safety and Efficiency Enhancements

Why is the first item only referring to Taxilane D as full ADG VI when the version of Alt 6 given to Diego Alvarez twice and the one sent in a letter to GML in Jan 2011 each had full ADG VI? This again raises the question of what version of Alt 6 is used by LAWA in its evaluation, either of the two with poison pills in them drawn by LAWA or the corrected one provided by ARSAC?

Page 1-77 Safety enhancement evaluations...

Regarding cumulative impacts, none of the ongoing and reasonably foreseeable on-airport improvements identified in Chapter 5, Cumulative Impacts, would increase the potential for aviation incidents or accidents. Future development within LAX Northside would place new structures north of the north airfield complex. The relocation of Runway 6L/24R to the north under Alternatives 1, 5, and 6 and the westerly shift of the displaced landing threshold for Runway 24L would shift the associated FAR Part 77 Airspace Surfaces accordingly, drawing them closer to LAX Northside. Depending on the location, design, height, and timing of future development in LAX Northside, there would be a potential cumulative impact on aviation safety due to structures penetrating the Part 77 Airspace Surfaces (i.e., the potential for future development to penetrate existing Part 77 surfaces and, in combination with the shifting of the surfaces, increase the amount of penetration). FAR Part 77 imaginary surfaces are primarily intended to serve as a means of identifying objects that require more detailed analyses specific to the types of airspace operations and related safety requirements that occur within those surfaces. A determination of whether such penetrations of a Part 77 surface pose an aviation safety hazard, and the identification of the appropriate measure(s) to address any such hazard, occur through the more detailed analysis, which is completed by, or in coordination with, the FAA. Options to address potential aviation safety hazards can range from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on structures to make them highly visible to pilots and indicating such objects on aviation maps, to...

Question: Re: Cumulative impact on safety of on-airport improvements; Didn't Congress mandate that all RPZ be resolved by 2015 and that new runways be constructed with full RPZ implemented?

Page 1-78 Hazardous Materials

Proposed improvements associated with all of the SPAS alternatives would require excavation in areas of known contamination. Alternative 3 would have the potential to affect ongoing remediation at the greatest

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308umber of sites, whereas Alternative 4 would affect the fewest. However, implementation of LAX Master Plan Commitment HM-1, Ensure Continued Implementation of Existing Remediation Efforts, impacts associated with interference with remediation efforts under all of the SPAS alternatives would be less than significant.

Question: LAWA has made low to no impact, but have they actually tested soil at each of the areas where digging is to be done? When was this testing done and were are the reports? When the Manchester Tunnel was finally acknowledged and LAWA examined its contents were reports created? Where are those reports? When were those reports written? What levels of water and contamination were found? Were samples taken one time or have they been taken since the drought ended two years ago?

Page 1-78 Hazardous Materials

... A lack of adequate access could impair the effective implementation of emergency response activities by impeding the movement of emergency vehicles....

Question: Page 1-78 has a notation (above) noting potential for lack of adequate access...emergency response... This was a defect noted by ARSAC and others when reviewing Alternative D and was one of many other safety and security issues noted in a RAND study provided to LAWA. Has LAWA reviewed the alternatives studied against the recommendations? If not, why not. If so, which of the recommendations were implemented in the alternatives?

Question: p 1-78 Safety The statement says that Alternatives 5-7 do not propose ground access improvements, but if the tunnel under the north runways is opened and thereby destabilized, there may need for special access to the runway areas. Is this not considered? If it was, where will the access come from and what impact will it have on air operations? How long could this condition linger?

Page 1-79 Table 1-13 Summary of Hydrology and Water Quality Impacts After Mitigation

Question: What studies have been made on the north complex for sink holes? Does the CDM report contain this information to be included as part of the DEIR? Has the covering of the argo ditch been assessed to ensure that mitigation is adequate under all conditions? What about movement of Lincoln Blvd to a new site and lowering it. Has all underground water flow been measured and monitored to ensure that it is not going to be driven onto the LAWA property and runways or terminal areas? Just because the baseline condition may or may not have been adequately determined doesn't relieve LAWA of responsibility to ensure that new construction doesn't cause more problems. This relates also to the Argo Flood Channel as well as underground utilities and tunnels.

Page 1-79 Hydrology

Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, changes associated with the alternatives would represent a marginal increase in regional impervious area. However, the increases in impervious area and the associated increase in storm water peak flow rates could potentially exceed the capacity of the storm water facilities in area sub-basins, which would result in flooding in any location

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where capacity was exceeded...

Question: P 1-79 Hydrology

The storm water capacity and runoff is identified as an issue and the DEIR notes "under Alternatives 1,2,and 4 through 9....improvements may not fully mitigate flooding impacts..." Therefore what other measures have been evaluated to make sure that LAX operations are not impacted nor operations on lands outside of LAX? Several paragraphs of this section are highlighted to identify questions of how a new mitigation was established to be adequate when construction and movement of Lincoln or other areas could drive more underground water into the area. If the argo ditch is enclosed what impacts could an earthquake have including loss of proper water flow? What quake level must occur to present unacceptable impacts? Please list all potential impacts.

Page 1-79 Hydrology...flooding would be less than significant. However, under Alternatives 1, 2, and 4 through 9, the LAX Conceptual Drainage Plan improvements may not fully mitigate flooding impacts, as these improvements were not specifically designed for these alternatives. This would be a significant impact....

Question: If this is a significant impact what mitigations are necessary?

Page 1-80 Hydrology

Also, under Alternatives 1 and 5, the entire channel would be structurally covered to support aircraft and, therefore, not subject to erosion or siltation. Under Alternatives 2, 4, and 7, only the easterly end of the channel (750 linear feet) would be lined; however, there would be no increase in the peak flow rates through the Argo Drainage Channel under these alternatives and, therefore, no increase in the potential for erosion or sedimentation. Under Alternatives 3 and 6 portions of the Argo Drainage Channel would remain unlined and there would be an increase in peak flows to the channel, resulting in the potential for erosion and sedimentation. As described in Section 4.8, Hydrology/Water Quality, a new mitigation measure, MM-HWQ (SPAS)-1, Conceptual Drainage Plan Revision and Update, is proposed to tailor the LAX Conceptual Drainage Plan recommendations to the specific characteristics of the selected SPAS alternative. This measure would reduce erosion and sedimentation impacts associated with Alternatives 3 and 6 to a level that is less than significant. Therefore, the impact of erosion or siltation due to runoff from the airport would be less than significant for all drainage facilities under all alternatives.

Question: If siltation and erosion are considered not to be a problem, why are sink holes occurring all over the airfield necessitating repairs? If silt clogs a flow what issues could occur to impact operations or even safety?

Page 1-82 Land Use Planning – Plan Consistency

No significant impacts due to a plan inconsistency or plan conflict with the applicable plans analyzed were identified for any of the SPAS alternatives. However, each of the alternatives would include plan amendments to either an off-airport or on-airport plan to ensure precise consistency with the applicable plan. Alternatives 1 and 4 would include amendments to the greatest number of plans, and Alternative 3 would include amendments to the fewest. All of the alternatives, with the exception of Alternative 3, would include amendments to the LAX Plan and LAX Specific Plan. All of the alternatives with ground access components (i.e., Alternatives 1 through 4, 8, and 9) would include amendments to the City of Los Angeles Transportation Element. Alternatives 1, 3, 4, 5, and 6 would also include amendments to the

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City of Los Angeles 2010 Bicycle Plan. Finally, all of the alternatives with airfield components, with the exception of Alternative 3, (i.e., Alternatives 1, 2, 4, 5, 6, and 7) would include amendments to the Los Angeles County Airport Land Use Plan (ALUP). With an amendment to the LAX Plan, LAX Specific Plan, City of Los Angeles Transportation Element, and City of Los Angeles 2010 Bicycle Plan to ensure precise consistency, impacts related to conflicts with plans and regulations would be less than significant. Detailed questions dated 10-10-2012attached to LAX SPAS DEIR comments Page 16 Question: Page 1-82 talks about Chapter 5 Cumulative Impacts and Plan Consistency. Has any table been prepared to highlight these necessary changes? This section states that "Because acquisition and removal of businesses would not require changes..." however LAWA has told businesses in informal meetings that they would help relocate them into local areas which COULD require changes.

Page 1-83 Aircraft Noise Exposure

...in Table 1-16, Alternative 4 would result in the greatest number of residential units, population, and non-residential noise-sensitive facilities that would be newly exposed to 65 CNEL or higher noise levels. This alternative would also result in the greatest number of residential units and acres that would be newly exposed to the 75 CNEL....

Question: Table 1-16 and the highlighted note on page 1-83 states that Alternative 4 (Alt D) would result in the greatest number of residential units...newly exposed... This is counter intuitive as it leaves the outboard runways 24R in place and moves the inboard south 340'. Assuming that these newly impacted residences and other facilities are to the east, one would expect an equal number or greater number would be found moving north. What is the basis of these statements? What noise model and assumptions were used? What Integrated Noise Model was chosen and how was this validated? Was CNEL the only criteria used? Was any combination of factors such as single event also addressed? Which factors were they? If newer, more dense residential units were built in areas already impacted would they not be considered impacted because structures after a certain date require sound mitigation to preclude being included?

Page 1-86 Table 1-20 Awakening Probability Impacts of All Alternatives

Question: Table 1-20 indicates that all of the runway movement alternatives reduce the exposed population for likelihood of being awakened. This is far from intuitive since more people are impacted as shown by previous tables. How is this justified? Under Mitigation Evaluation on same page, 1-86, numerous noise abatement program items are listed. One noise abatement used at LAX is take off on inboard and landing on outboard. This is not always followed, however, due to the fact that at certain times of the day more aircraft are landing than taking off and vice versa. This leads to both runways used for take offs at some periods which results in increased noise over the "modeled" amounts. What assumptions are identified which impact the conclusion as the one noted above, and where in the DEIR are they listed?

Page 1-86 Mitigation Evaluation

The airport has a long history of addressing concerns related to aircraft noise. The operational elements of the current LAX noise abatement program are:  
Use preferred inboard runways for departures and arrivals and interior parallel Taxiways C and E during the hours between 10:00 p.m. and 7:00 a.m. This measure is intended to move nighttime noise to the interior of the airfield and away from noise-sensitive areas adjacent to the airport to the extent

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north and south.

Question: Even though this is an objective to keep takeoffs on the inboard runway, what percentage of aircraft take off from the outboard? Doesn't this occur especially when a majority of aircraft are waiting for takeoff rather than a mix of landings and takeoff?

Page 1-86 Mitigation Evaluation (third bullet)

Conduct departures to the west along the runway heading until reaching the coastline. The measure has been the subject of continuing concern to assure better compliance to achieve the desired effect.

Question: Since a significant number of early turns have occurred and still occur how is this modeled into the sleep awakenings modeling? With a substantial number (even though reduced in recent times) of outboard over-ocean takeoffs on the south side how is this included in the model to establish sleep awakening impacts?

Page 1-88 Airport Operating Regulations

Local regulations would be needed to implement mandatory reductions in airport operations, shifts in flight schedules, or changes in aircraft permitted to operate at the airport. With the adoption of the Noise and Capacity Act of 1990, Congress required that airport operators could adopt such regulations only upon completion of a detailed study of the potential impacts of and alternatives to the proposed regulations. In most cases, the regulations can be adopted only after explicit FAA approval of the proposed restrictions.17 Before the FAA will consider a proposal to adopt a noise or access restriction, the airport sponsor must complete an analysis in compliance with 14 CFR Part 161. The analysis must demonstrate that the proposed restriction would meet the following six statutory conditions: Detailed questions dated 10-10-2012attached to LAX SPAS DEIR comments Page 17 Question: What is the status of the Part 161 request LAWA has been preparing for the past four to five years? How is it accounted for in the conclusions made in this document? Is it assumed that it is granted? If not, what impacts are exacerbated and by how much?

Page 1-89 Airport Facilities

The construction and alteration of airport facilities can either directly or indirectly affect noise levels off the airport. Noise barriers, for example, can reduce the noise from aircraft ground operations that are heard off airport property. LAWA has already constructed noise barriers along the northern edge of the airport to reduce runway noise impacts to noise-sensitive uses to the north. Additionally, the LAX Master Plan and the LAX Noise Variance from the state include provisions for the future installation of two ground runup enclosures at LAX. Changes in runway length can alter noise patterns, as can the construction of new runways. The construction of taxiways can alter runway use by making the use of a given runway more convenient and safer for aircraft operators. Alternatives 1, 2, 3, 5, 6, and 7 include high-speed exists for arriving aircraft to exit from the runway and transition onto a taxiway that directs aircraft away from

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noisesensitive uses located to the north. Other airport facility improvements that serve to reduce aircraft noise impacts include the electrification of all passenger gates at LAX, along with the installation of preconditioned (i.e., cooled) air systems, to reduce the need for parked aircraft to operate the on-board auxiliary power unit (i.e., turbine engine that provides power and cooling to the aircraft).

Question: page 1-89 Aircraft Noise abatement. There is a requirement for several hush hangers to be placed west of TBIT which is included in the CA DOT noise variance. Where are they to be located? If they are not present how has this been considered in the noise exposure predictions?

Page 1-91 Table 1-22 Additional Schools Exposed to Significant Noise Impacts for Each Alternative 2025 Noise Exposure

Question: Table 1-22 Schools exposed to additional noise. The note indicates Alts 1,5,6,7 are comparable. Is the capacity of the runways assumed to be the same for each of these alternatives? If so, were the same aircraft mixes and numbers of aircraft creating the noise assumed to be the same? Since most of the schools are affected but not impacted per the legal definition, was there a predicted higher number of interruptions (single event) for one alternative over another?

Page 1-92 Road Traffic Noise

The ground access improvements proposed under Alternatives 1, 2, 3, 4, 8, and 9 would result in changes in road traffic noise levels at off-site noise-sensitive receptors. The predicted changes in road traffic noise levels under each of these alternatives would be less than a 3 A-weighted decibel (dBA) increase in CNEL; therefore, the road traffic noise impacts associated with Alternatives 1, 2, 3, 4, 8, and 9 would be less than significant. Alternatives 5, 6, and 7 do not include ground access improvements and would therefore not affect road traffic noise levels at off-site noise-sensitive uses.

Question: Even though the underlined section above alternatives do not include ground access improvements will there be unacceptable levels of noise from construction equipment moving facilities north? How much impact?

Page 1-92 Road Traffic Noise

Regarding cumulative impacts, as discussed in Section 5.5.10.2 in Chapter 5, Cumulative Impacts, the increases in road traffic noise anticipated to occur between baseline (2010) conditions and future (2025) conditions, including the projected growth in regional traffic combined with the effects of each SPAS alternative, would not result in a 3+ dBA CNEL increase at any of the noise-sensitive receptor locations evaluated. As such, cumulative road traffic noise impacts would be less than significant.

Question: Is the rationale for no cumulative impact from noise along the northside due to an assumption that the previous 1982 LandUse Plan called for more traffic than that scaled back in Alternative D and neither has been enacted?

Page 1-96 Fire Protection

Airfield improvements under Alternatives 1, 2, 3, 4, 5, 6, and 7 would enhance the safety and

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efficiency of the airfield compared to baseline conditions, thereby decreasing the potential need for emergency fire response associated with airfield accidents.

Question: Where is the analysis that supports the above statement? What safety and efficiency factors are improved?

Page 1-97 Law Enforcement

It is anticipated that these facilities would be relocated to the future LAX Public Safety Building and Supporting Facilities that is being planned independent of SPAS.

Question: Page 1-97 A new public safety building is planned to be "independent of SPAS." Where is the list of all projects independent of SPAS listed and their contributions to traffic?

Page 1-98 On-Airport Transportation Curbside Operations

No significant impacts to curbside operations would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, all of the alternatives would have a significant cumulative impact at the inner curbside at TBIT on the arrivals level.

Question: Does this mean that no matter what LAWA has in any of its alternatives traffic around TBIT will be terrible? Aren't there other improvements that could address this that should have been considered? Why not?

Page 1-98 On-Airport Transportation Roadway Links

No significant impacts to on-airport roadway links would occur under any of the alternatives addressed (Alternatives 1, 2, 4, 8, and 9) relative to the Baseline (2009) versus Baseline (2009) With Alternative analyses. For Future (2025) versus Future (2025) With Alternative conditions, Alternatives 1 and 2 would have significant cumulative impacts at three roadway links, all on the arrivals level; Alternative 4 would have significant cumulative impacts at five roadway links, all on the arrivals level; Alternative 8 would... Question: 1-98 Roadway Links indicates No significant impacts, but LAWA has been pushing a BRT (articulated bus that shares CTA levels). How is it possible to add giant buses into a congested curbside area and not cause even more congestion?

Page 1-99 On-Airport Transportation Public Parking Impacts

The airport's public parking supply in each of the Future (2025) alternative scenarios is sufficient to accommodate the airport's estimated future (2025) public parking demand for all the alternatives; supplies which are assumed to be 15 percent greater than the space demand to account for fluctuations in vehicles arrivals in the facilities. Therefore, impacts associated with parking are considered less than significant...

Question: Page 1-99 Public Parking Impacts. Has LAWA assumed that the parking structures will continue operation as is through 2025? Will there be major repairs or renovation to these facilities? What percentage of people are expected to park on-airport vs. off-airport? Was an assumption of

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off-site check in made? If not, why not?

Page 1-100 Note from Table 1-24 Summary of Off-Airport Transportation Impacts After Mitigation

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. It would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. As such, the total number of intersections that may be temporarily significantly impacted during construction cannot be determined at this time. Question: The note in table 1-24 states that "no construction plans, programs, or schedules .... It would be speculative to estimate..." Was any consideration of construction traffic made? If not, why not?

Page 1-100

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods. Nevertheless, based on a qualitative evaluation,...

Question: Even at a program level some basic amounts of construction related traffic should be quantifiable if the general types of construction are identified. On the runway related movements it can be more difficult, but the amount of construction and a survey of potential complications should enable LAWA to make an estimate. Why hasn't these elements been properly considered. The cost estimates use boiler plate \$/sq yard of runway, why can't construction related efforts be estimated at least as well as that?

Page 1-101 Transportation-Related Fuel

... As discussed above, the SPAS alternatives with ground access components (i.e., Alternatives 1, 2, 3, 4, 8, and 9) include a variety of design features to shift individuals away from personal vehicle use to other more efficient modes of transportation, which would reduce transportation related fuel consumption. With these design features, Alternatives 1, 2, 3, 4, 8, and 9 would not result in a wasteful, inefficient, or unnecessary consumption of Jet A fuel, gasoline, or diesel....

Question: p 1-101 Transportation-Related Fuel

This section states that there will be no "wasteful, inefficient, or unnecessary consumption..." Since we would continue to expect the CTA to be gridlocked during peak hours, what does that statement mean? How many cars are assumed to be able to use the CTA during peak hours? What number of people changing access modes is necessary to reduce vehicle access enough to remove this limiting constraint on passenger growth?

Page 1-101 Solid Waste

Improvements associated with the proposed alternatives would not, in themselves, alter passenger-related municipal solid waste generation. Passenger activity at LAX would increase by 2025 due to

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projected growth with or without implementation of the SPAS alternatives, and those future passenger activity levels would be the same under each of the alternatives. As a result of increased passenger activity levels, passenger-related solid waste generation at LAX would increase by 22 percent compared to baseline (2010) conditions. The increase in solid waste generation would be the same under all alternatives. The Sunshine Canyon Landfill has sufficient physical and permitted capacity to accommodate this increase in solid waste generation. LAWA would continue to implement and enhance existing programs aimed at reducing waste generation, which are designed to fulfill LAX Master Plan Commitment SW-1, Implement an Enhanced Recycling Program, and increase the diversion rate to meet the state's 70 percent requirement by 2020. Therefore, under all alternatives, impacts to solid waste disposal capacity and to diversion-related policies and objectives associated with the solid waste generated from the increased number of passengers would be less than significant. With respect to cumulative impacts, passenger activity levels at LAX are forecasted to be 78.9 MAP by 2025 as a result of natural growth. The increase in passenger activity is expected to occur with or without implementation of any of the SPAS alternatives. Projected increased passenger demand at LAX, in...

Question: Since solid waste is expected to be significant regardless of alternative can LAWA utilize conversion techniques for its waste similar to that identified in RENEW LA which could reduce waste by 90% and thereby reduce the need for Sunshine Canyon or any other dump?

Page 1-103 1.5 Environmentally Superior Alternative Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. Based on the analyses in Chapter 4, Environmental Impact Analysis, and Chapter 5, Cumulative Impacts, of this EIR, Alternative 2 is considered to be the Environmentally Superior Alternative of the nine alternatives evaluated in detail throughout this document.21

Question: Section 1.5 Environmentally Superior Alternative. Since Alternative 2 is the environmentally superior noted alternative and the Settlement Agreement calls for the least impact, how are any of the other alternatives justified?

Page 1-105 Incorporation by Reference

Question: Was the 2004 LAX Master Plan Final EIR and addendums recently delivered and available at the libraries? Which ones?

Page 2-2 Project Objectives (third bullet)

The primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts.

Question: p 2-2 Project objectives states that runway 24L length can't handle "fully loaded 747-400" but isn't it true that many of these aircraft do take off from the north complex? What number and percent of the 747-400 must taxi to from the north to the south? What percentage is this number of the total aircraft operations? If the runway is "too short" what should it be and how did

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### 310 Alternative D account for this problem?

#### Page 2-2 Project objectives (eighth bullet)

The existing Runway Protection Zone (RPZ) associated with Runway 6L/24R includes residential uses.

Question: p2-2 Project objectives states "The existing Runway Protection Zone...includes residential uses." The Alt D yellow light project moved the inboard runway south with no change in the location of 24R therefore the RPZ remained the same. Since the key component of the Stipulated Settlement objective is to address the issues resolved by the yellow light project how is this an issue that is appropriate for consideration? If anything, since the RPZ was fixed by Alt D then no action which changes that for the worse should be unacceptable.

#### Page 2-2 2. Improve the Ground Access System at LAX to Better Accommodate Airport-Related Traffic,

Travelers, visitors, employees, vendors, and others utilizing the commercial passenger terminal at LAX, defined by the Central Terminal Area (CTA), have various ground access options including private vehicles, transportation service providers (i.e., taxis, shuttles, limousines, etc.), and public transit. Ground...

Question: P2-2 Improve Ground Access System...Especially... Central Terminal Area\* What quantifiable values are need to conveniently access the CTA curbside at each terminal? What specific queuing, weaving, and conflict points are being addressed to reduce the impedance of traffic? What causes each of these limits? Since no quantifiable numbers are provided it's hard to judge actual effectiveness.

#### Page 2-3 Improve Ground Access

Curbside demand is unevenly distributed, especially during peak periods, creating concentrations of passengers that are not accommodated by the existing curbside system;

Question: Page 2-3 Project objectives states that ground access is critical. I agree, but what is LAWA doing to reduce peak time access? Since it is stated that curbside demand is unevenly distributed what amounts of changes (quantitative measure) is needed? Would a third level for buses and emergency vehicles help the situation as has been suggested at SPAS meetings but has never made it into any LAWA plan?

#### Page 2-3 Improve Ground Access

The roadway system is not designed to efficiently accommodate security screening of vehicles entering the CTA.

Question: P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SetOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regionalization has not been fostered?

Page 2-3 3. Maintain LAX's Position as the Premier International Gateway in Supporting and Advancing the Economic Growth and Vitality of the Los Angeles Region LAX serves a key role in the region's economy. This is particularly true relative to LAX's position as the international gateway for the western United States. According to a study completed in 2007 by the Los Angeles Economic Development Corporation (LAEDC), over the course of 2006 an average transoceanic

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flight traveling round-trip from LAX everyday added \$623 million in economic output and sustained 3,120 direct and indirect jobs in Southern California with \$156 million in wages.<sup>25</sup> Given the continued growth in, and reliance on, new large aircraft such as the Airbus A380 by major airlines operating on those long distance international routes, it is important that LAX be able to effectively accommodate those aircraft.

LAX is a major employer on both a local level and a regional level. According to the LAX Master Plan Final EIS/EIR, on-airport employment at LAX provided almost 59,000 jobs and, on a larger-scale, LAX related regional employment provided over 400,000 jobs and \$60 billion in economic output.<sup>26</sup> (underlined for emphasis)

Question: Page 2-3 Project objectives states that the roadway system is not designed to efficiently accommodate security screening, but again LAWA's plans have failed to address a recommended, effective fix of putting weight scales and cameras into the roadway at critical points. These could be monitored automatically at all times. How many check points does LAWA need to avoid creating a security bottleneck? How many cars per hour can be accommodated in any one location? Has LAWA considered a special access for buses and commercial vehicles?

Question: P2-3 Project objectives states that LAX must remain the premier point for all activity to keep the vitality of the region. The SetOntarioFree.com has a study that shows an extra 1.6 million cars are being directed to the LAX area that could be handled in Ontario. Since the area is already gridlocked how much business expenses are wasted by employees and transportation of goods in an unnecessarily gridlocked area where regionalization has not been fostered?

#### Page 2-4 5. Enhance Safety and Security at LAX

During the preparation of the LAX Master Plan, which began in the 1990s, Alternative D was formulated following the events of September 11, 2001 and integrated into the CEQA review process for the LAX Master Plan as the "Enhanced Safety and Security Plan." In now identifying and evaluating alternatives to the Yellow Light Projects, which are key elements of the LAX Master Plan, LAWA is seeking to maintain the ability of the LAX Master Plan, if and as modified by the outcome of the SPAS process, to enhance safety and security at LAX.

Question: Page 2-4 Program Objectives Item 5 calls for enhanced safety and security per Alt D. During the review and approval of Alt D there was a report prepared by RAND Corp which identified many "fixes" that could be incorporated quickly and effectively. How many of those have been done, if any? Did LAWA consider the RAND report when creating its potential designs? What portions?

#### Page 2-4 6. Minimize Environmental Impacts on Surrounding Communities

LAX is a major international airport located within a very urbanized area, with established communities situated directly to the north, east, and south. These communities are affected to varying degrees by existing operations at the airport. Recognizing that these existing effects to the surrounding communities may change based on the alternatives being considered in SPAS, LAWA seeks to identify and apply ways to avoid, reduce, or minimize environmental impacts on surrounding communities. (underlined for emphasis)

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Question: page 2-4 Program Objectives item 6 highlighted section states that LAWA is concerned about environmental impacts on surrounding communities. What area do they consider "surrounding" since areas both north including Santa Monica and Culver City, LA County areas, and the entire South Bay is affected (not necessarily impacted by the legal definition). Also all those communities on the arrival flight paths as far away as Palm Springs, but also midway like Lahabra Heights and Monterey Park are also very affected by even slight changes in flight paths or absolute numbers of aircraft operations.

#### Page 2-5 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Problems the North Airfield Reconfiguration was Designed to Address: Under existing conditions, the north airfield does not meet FAA standards for ADG V and VI aircraft under any weather conditions. Failure to meet these standards results in restricted operations when ADG V or VI aircraft utilize the north airfield, impacting operations of all aircraft on the north airfield. Restricted operating procedures increase operational delays and aircraft-related emissions and adversely affect passenger convenience. Additionally, without a centerline taxiway and other airfield improvements, there is an increased risk of incursions and collisions. Further, Runway 24L is not long enough to accommodate some fully-loaded departing aircraft, resulting in higher utilization of the south airfield by these aircraft.

Question: Section 2.3 Project Characteristics  
Defining problems: Agreed that neither Alt D nor existing conditions meet full ADG V or VI design standards. Nor would any of the alternatives. The excuse for these is that there is some accommodation necessary for the larger aircraft. What is the quantified impact in seconds and number of these aircraft that impact. As the percentage of these NLA is small and most A380s will not arrive during peak hours how much practical impact is there? Similarly, since an A380 is designed for take off and landings in shorter distances than a 747 then only the very heavily loaded with full fuel are even at issue. How many of these are anticipated by 2025? What is the percentage of total aircraft operations?

#### Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Problem the Demolition of Terminals 1, 2, and 3 was Designed to Address: Under the LAX Master Plan, substantial portions of Terminals 1, 2, and 3, notably the piers/concourses, would be demolished in order to provide room for the relocation of Runway 6R/24L 340 feet to the south of the existing runway centerline. The existing terminals would be replaced by a linear concourse that would provide aircraft gates and passenger hold rooms but no passenger processing capacity. Under the LAX Master Plan, the passenger processing capacity provided by existing Terminals 1, 2, and 3 would be replaced by new passenger processing facilities in the interior of the CTA (where the existing parking garages are currently located). Only the demolition of Terminals 1, 2, and 3 is a Yellow Light Project.

Question: section 2.1 Problems addressed...

Quantify how much terminal space is needed to handle the 78.9 MAP. Also curb space requirement specifics?

Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR ...Problem the Ground Transportation Center was Designed to Address: Under the LAX Master Plan, the function of the GTC is to replace CTA curb front for drop off and pick up of passengers and to replace a portion of the private vehicle parking area and all of the commercial vehicle (e.g., taxis, shuttle vans, and limousines) staging area. The GTC was designed to allow closure of the CTA to private vehicle access and provide the curb front function at a location well removed from the main terminal area to enhance security within the CTA. The GTC, in conjunction with the Intermodal Transportation Center (ITC) and other parking facilities proposed

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as part of the LAX Master Plan, also provided replacement parking for the existing parking that would be eliminated under the LAX Master Plan, such as in the CTA and Parking Lots C and D. Problem APM 2 was Designed to Address: Under the LAX Master Plan, the function of APM 2 is to provide connection between the planned GTC and the CTA.

Question: section 2.1 Problems addressed...  
How many parking spaces are required? How many are lost given that LAWA has called for the ConRAC in Manchester Square? Why isn't Belford Square area used or contemplated for any airport use since it was vacated at the same time as Manchester Square? What is the anticipated number of cars given that LAWA has plans for a people mover (or direct train connection or bus connection)? How many cars does LAWA anticipate will be removed from consideration by the 8 flyaway routes to be developed?

#### Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Airfield Improvements - Airfield improvements include changes to the runways, taxiways, navigational aids, and service and maintenance roads associated with the north airfield. The primary differences

in airfield improvements associated with the various SPAS alternatives pertain to: Separation distances between runways and taxiways. Separation distances largely determine the maximum size aircraft that can freely operate on that system under various visibility conditions, and, in certain visibility conditions, would either require FAA approval of special operating procedures (i.e., Modifications of Standards or other forms of operational waivers) or would be prohibited...

Question: P 2.6 Airfield improvements states an obvious that "separation distances determine the maximum size aircraft that can freely operate on that system..." but fails to provide any quantitative information. This section also talks about a centerfield parallel taxiway between runways without referencing any specific states. In other airports when a CLT was built, how many new incursion opportunities occurred due to an aircraft on the CLT or mistakenly landed on it?

#### Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Whether Runway 6R/24L would be extended 1,250 feet eastward to provide greater departure length in west flow condition that would better accommodate departures of large aircraft on long haul

flights and improve the balance between the north airfield and the south airfield relative to such departures;

Question: 2.3 Problems addressed... talks about the need for balance between the two runways and implies that there must be a balance of each type of aircraft. What number of ADG V and ADGVI aircraft originate from gates on the south and how many originate from gates on the north? If the number is not exactly 50% on each, doesn't this add to the taxiway traffic unnecessarily?

#### Page 2-6 Project Characteristics 2.3.1 Alternatives Addressed in this Draft EIR

Separation distances between Runway 6R/24L, Taxiway E, Taxilane D, the adjacent vehicle service road, and the aircraft gates/parking positions at the north end of the CTA, which largely determine the maximum size aircraft that can either freely operate on that system or would be subject to certain limitations, particularly as related to the interface between aircraft going to or from the gates at Terminals 1 through 3 and aircraft taxiing to the east end of Runway 6R/24L for departure.

Question: Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives. When the assessment of efficiencies (travel distance times to get off a runway and get to their gate) were these variances

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in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation? Page 2-7 Project Characteristics Terminal Improvements

In general, the building lines and APLs associated with most of the alternatives extend southward, overlapping, to varying degrees, portions of the concourse areas for Terminals 1 through 3, which would require removal (demolition) of those building areas that encroach past the building limit line and/or the elimination or reduction in aircraft size capability of gate parking positions that encroach past the parking limit line. Conversely, the building and parking limit lines associated with several alternatives do not extend as far south as the limit lines defined in the LAX Master Plan, which assumed the movement of Runway 6R/24L 340 feet south and defined the northerly building limits for the Tom Bradley International Terminal (TBIT) West Gates, currently under construction as part of the Bradley West Project, and the future Midfield Satellite Concourse (MSC). In those cases, establishing building and parking limit lines farther north than the current LAX Master Plan limit lines would allow the opportunity for a future northward extension (i.e., an addition to) the north concourses for Bradley West and the MSC.

While the amount of concourse area and the layout of aircraft gates vary between alternatives, all of the SPAS alternatives include no more than 153 passenger gates. Certain alternatives propose a westerly realignment of the Terminal 3 concourse to provide a wider alleyway between the concourses at Terminals 2 and 3 for aircraft taxiing. For those alternatives that include development of the new Terminal 0, the existing alignment of Sky Way (the primary access road connecting CTA to southbound Sepulveda and 96th Street Bridge) would be shifted east, into the area now occupied by the Park One parking lot, providing an improved entrance roadway into the CTA. (underline for emphasis)

Question: Page 2-7 highlighted note states that concourse areas and layout of aircraft gates vary between alternatives.

When the assessment of efficiencies (travel distance times to get off a runway and get to their gate) were these variances in gate locations used in the calculations? What amount of sensitivity to change in gate locations exists in the efficiency times? What variances impact is there for taxiway availability versus runway separation? Page 2-8 Project Characteristics Ground Access Improvements

Yellow Light projects that are integral parts of the overall ground access system. Such projects include the Consolidated Rental Car Facility (CONRAC), the ITC, the APM connecting the ITC and CONRAC to the CTA, and the West Employee Parking facility. The ground access improvements proposed under the various SPAS alternatives represent different combinations of options to the Yellow Light Projects. Due to integral nature of these key non-Yellow Light projects with the overall ground access system, the SPAS alternatives include proposed modifications to, or proposed deletion of, these non-Yellow Light projects.

Question: P2-8 Ground access improvements. The ITC in Alternative D is in Continental City near the Green Line. Since LAWA has not included it in any of their plans what numerical changes in traffic flow have occurred? How does this impact traffic flows and the assessment of intersections? Although LAWA has done their traffic assessments based on one design day we also know that the access to LAX CTA varies substantially by time of day. The assessments don't appear to assess this type of impact inside or outside of the CTA. What impacts will the time of day have on intersection service level grade?

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Page 2-8 2.3.1.1 Alternative 1 Overview

Alternative 1 is a fully-integrated alternative, consisting of airfield, terminal, and ground access components. The distinguishing airfield improvement feature of this alternative is the movement of Runway 6L/24R 260 feet north, along with the addition of a centerfield taxiway, the extension of Runway 6R/24L, improvements to Taxiway D and Taxiway E, and relocation of the service road. Terminal Improvements include addition of new Terminal 0, loss or modifications to concourse areas and/or gates

Question: 2.3.1.1. Alternative 1 description. Where are the detail drawings that identifies the number of gates in terminal 0 and their location to be used in the efficiency calculations?

Page 2-9 2.3.1.1.1 Airfield Facilities

Alternative 1 meets FAA airport (runway) design standards for ADG V with a Category II/III outboard runway (Runway 6L/24R) and Category I inboard runway (Runway 6R/24L), and provides sufficient space

Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 24 between Runway 6R/24L and the centerfield taxiway for ADG V aircraft to hold prior to crossing the runway with a pilot line-of-sight of the end of Runway 24L. This alternative provides the FAA standard

ADG VI runway-to-taxiway separation between Runway 6L/24R and the centerfield taxiway for approach visibility at or above one-half mile (Category I approaches). Taxiway E and Taxiway D dimensions would meet ADG V standards.

Question: 2.3.1.1.1 Airfield Facilities... States that it meets FAA requirements for ADG V and ADG VI runway to taxiway.

Is this statement based on AC150 5300-13 or -13A which goes into effect next month? If the FAA changes requirements (which it is doing) how has LAWA planned to accommodate these changes?

Page 2-9 Runway Modifications

Runway 6L/24R

Relocate 260 feet north of current location to accommodate a new centerfield parallel taxiway (see below) and to provide for ADG V separation distances

Extend 604 feet west so that the RPZ no longer extends over residential areas

Establish dual displaced thresholds to remove existing residences from the RPZ (east end displaced threshold) and maintain existing westerly aircraft landing heights (west end displaced threshold)

Widen to 200 feet to meet FAA standards

Question: 2.3.1.1.1 Modification of Runway 24R 604' west... If the runway is extended west, what additional noise will occur on the PDR areas in terms of single event noise? How will this impact the possibility of extra go-arounds over the PDR community? It might be an appropriate time if the runway is fully rebuilt, but is it necessary to expand to 200' wide runway since even the A380 is approved for a 150' wide runway with hardened shoulders?

Page 2-9 Taxiway Modifications

Centerfield Taxiway

Construct an 82-foot-wide centerfield taxiway between Runways 6L/24R and 6R/24L, with a centerline separation distance of 500 feet to Runway 6L/24R and 460 feet to Runway 6R/24L, to enhance safety and reduce incursions and other airfield hazards, while providing for ADG V separation distances; also provide exit taxiways from Runway 6L/24R to the centerfield taxiway, taxiways from the centerfield taxiway to and across Runway 6R/24L, and other related airfield taxiway improvements...

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Question: If the centerfield taxiway is installed LAWA states that it enhances safety and reduces incursions. The \$2M Northside Safety Study paid for by LAWA using the top academic experts chosen by LAWA stated a % improvement but of an extremely small base number resulting in no appreciable improvement. What number of incursions and incidents has LAWA calculated will be alleviated? Does that change if the flight mix changes? What about impacts of control tower movement or staffing? What about new construction which causes increased non-visibility areas? Page 2-10 Other Airfield-Related Features

Cover the entire length of the Argo Drainage Channel (9,857 linear feet) such that the weight of an aircraft could be supported within the RSA by converting the existing open unlined channel to a concrete box culvert.

Question: 2.3.1.1.1 Alt 1 features. How much capacity will the Argo Flood Channel have after being converted to a concrete box culvert? Will it be the same or less than current? Will it require the bottom to be moved or lowered resulting in disturbance of the substructure where there is an unknown water source? How has the total volume capacity been calculated for the channel? Does it consider 100 year storms? Fifty year storms? Where will the extra water go and what will its impact be?

Page 2-10 Terminal Facilities

Construct a new Terminal 0 with seven gates in the western portion of the area now occupied by Park One to replace gates lost or downsized at Terminals 1 through 3

Question: 2.3.1.1.2 Terminal Facilities. States that Terminal 0 will replace lost or downsized gates. What has LAWA done with the existing remote gates? Will they continue to be available? If they are to be removed, how will this be accomplished?

Page 2-10 Terminal Facilities

Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 25

Demolish and reconstruct the Terminal 3 concourse and associated gates, with the building centerline shifted 40 feet to the west to increase the width of the alleyway between Terminals 2 and 3 to allow for dual-directional aircraft movement and comply with FAA standards

Question: 2.3.1.1.2 Demo and reconstruction of Terminal 3 40' west to provide better spacing from Terminal 2. This happens to be a good idea that should have been included in all of the alternatives where terminals could be moved. Why wasn't it?

Page 2-10 Terminal Facilities

Demolish and replace the northerly end of the TBIT concourse and associated gates (with new concourse and gates in line with the new Bradley West concourse) to the Alternative 1 APLL Provide the opportunity to extend the northerly end of the future MSC to the Alternative 1 APLL...

Question: 2.3.1.1.2 Demo and replace northerly end of TBIT. Is this demo of the TBIT currently being built? What is assumed in all of the evaluations for aircraft movement efficiency? Will more gates be added? Where? How many?

Page 2-10 Terminal Facilities

The commuter facility currently in use east of Sepulveda Boulevard would be maintained

West remote gates would be eliminated upon completion of the airfield and terminals improvements

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Question: 2.3.1.1.2 Continue use of commuter facility. Is this the AA terminal? What aircraft mix is assumed in the evaluations? How is this considered in the equivalent gate count? Is this done for every one of the options? Why not?

Page 2-10 Terminal Facilities

The total number of gates used at LAX for scheduled passenger service would be 153

Question: 2.3.1.1.2 West remote gates will be removed. How will they be removed? Will the concrete be changed or will the gates just stop being used so that they become available after 2020? What was assumed for the efficiency calculations? With remotes or without? If used, how does this impact conclusions? Is open space with a roll up stairs and articulated bus still be available for use?

Page 2-13 2.3.1.1.3 Ground Access Facilities

Relocate Lincoln Boulevard to the north, outside of the Runway 6L/24R RSA, with a portion below grade and/or tunneled.

Question: Page 2-13 and nowhere in the document is Belford Square area plans mentioned. How can the impacts of LAX be assessed without some assumption of its use?

Page 2-13 2.3.1.1.3 Parking

Generally, no changes to existing CTA parking conditions would occur as a result of SPAS, although future pricing structures may change long-term/short-term composition

Parking Lot E, would no longer be used for employee parking, although this property could be used for other airport purposes in the future. Changes to the use of this parking area would occur independently from SPAS.

No changes are proposed to Public Parking Lot C

Parking Lot D would provide approximately 1,944 employee parking spaces. The Jenny Lot east of Parking Lot D would provide approximately 2,000 employee parking spaces. These parking areas were not in use in the 2010 baseline year; however, their use for parking is occurring independently from SPAS.

Development of the ITF would include approximately 4,900 short-term public parking spaces to facilitate passenger drop off and pick up outside of CTA

Construct parking within Manchester Square, including 4,200 long-term spaces and 3,500 employee parking spaces

No public or employee parking is proposed for the area referred to as Continental City

Question: We know that CTA parking will be changing even if LAWA doesn't define the cause as SPAS changes. How are the cumulative impacts established?

Question: Page 2-13 ground access states that no parking would be placed in Continental City. What is intended to be placed there? Why is it not identified as part of the Master Plan or used to determine the comprehensive impacts?

Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 26

Question: Page 2-13 and nowhere in the document is Belford Square area plans mentioned. How can the cumulative impacts of LAX be assessed without some assumption of its use?

Page 2-15 Figure 2-2 LAX Specific Plan Amendment Study Draft EIR Alternative 2

Question: Figure 2-2 Why are the relocated taxiways in Alternatives 2 vs. 4 different? There were both supposed to be based on the safety study which LAWA prepared three years ago to do some quick fixes of taxiways for safety

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312 improvement.  
Page 2-26 2.3.1.5 Alternative 5 Overview  
As noted above in Section 2.3.1, the focus of this alternative is on airfield improvements and associated terminal improvements, as may be compared to such improvements proposed under Alternatives 1 through 4. This alternative is compatible with the ground access improvements associated with Alternatives 1 and 2, as well as the ground access improvements associated with Alternatives 8 and 9, described below. The distinguishing feature of this alternative is the movement of Runway 6L/24R 350 feet north. Similar to Alternative 1, a new centerfield taxiway would be constructed, Runway 6R/24L would be extended, Taxiway D and Taxiway E would be modified/improved, and the service road would be relocated. Under this alternative, the taxiway/taxiway improvements would meet FAA design requirements to fully accommodate ADG VI aircraft. (Under Alternatives 1, 2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards, which would impose certain limitations and special requirements during the operation of those aircraft.) The increased runway-taxiway separation requirements under this alternative would cause the aircraft taxiway operations area to extend farther south than under Alternatives 1, 2, and 6, which, in turn, would result in comparatively less concourse and/or gate area for the potential TBIT extension and MSC extension. Under this alternative, a greater portion of Lincoln Boulevard would be below grade and/or tunneled than under Alternative 1. This alternative is illustrated in Figure 2-5. (underline for emphasis)  
Question: 2.3.1.5 Alternative 5 States that for "Alternatives 1,2, and 6, the taxiway configuration would either not meet or only partially meet ADG VI design standards..." The ARSAC submitted Alternative 7 contained a taxiway that meets ADG VI. How was this considered in the evaluations? Why does the underline statement say that the taxiway doesn't meet the ADG VI standards?  
Page 2-33 2.3.1.6.3 Ground Access Facilities  
Alternative 6 includes airfield and terminal components only. This alternative is compatible with the ground access improvements associated with Alternatives 1, 2, 8, and 9.  
Question: 2.3.1.6.2 Alt 6 terminal facilities section states "same as Alternative 1" for facilities and gate configuration.  
Does this mean that LAWA is including the same Terminal 0 with the same intent of eliminating the remote gates?  
Page 2-33 2.3.1.7 Alternative 7  
Question: 2.3.1.6.2 Alt 7 terminal facilities section states "similar to Alternatives 5 and 6" ....  
Terminal improvements...  
Does this mean that LAWA is including the same Terminal 0 with the same intent of eliminating the remote gates?  
Page 2-34 2.3.1.7.1 Airfield Facilities, Taxiway Modifications, Centerfield Taxiway  
Construct an 82-foot-wide centerfield taxiway between Runways centerline separation distance of 400 feet to each runway, to enhance and other airfield hazards, while providing for ADG V separation distances; from Runway 6L/24R to the centerfield taxiway, taxiways from the Runway 6R/24L, and other related airfield taxiway improvements. (underlined for emphasis)  
Question: 2.3.1.7 Alt 7 centerfield taxiway is listed as 82-foot-wide. Is this the same for all centerfield taxiways?  
Highlighted item on centerfield taxiway indicates 400' separation from each runway. Has LAWA or

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FAA done any evaluations of safety impact of a distance less than the initial distance between runways when a centerfield taxiway is made? What were the results and where can they be found? Does LAWA and FAA consider the safety the same if an aircraft is on the taxiway or not? Why?  
Question: Is the Terminal 0 the same in these alternatives? What are the differences? Why?  
Page 2-37 2.3.1.8 Alternative 8  
Question: Several presentations made by LAWA prior to the release of the draft EIR used Alternative 8 to represent no ConRAC and LAWA stated an unofficial desire to delay or eliminate the ConRAC. Do any options show the elimination of the ConRAC?  
Page 2-45 Summary of SPAS Alternatives  
Question: Table 2-2 shows most alternatives extend runway 24L east 1250' but Alt D is 1280'-- why? What causes the 30' difference?  
Question: Table 2-2 shows Terminal 0 as 330,000 sq ft in all but Alt 7 when it is built. Why? Are the number of gates the same in each Terminal zero? If not, why not?  
Question: Table 2-2 shows many changes in the terminals with demolitions and reconfigured square feet. How many gates does this represent in each change? What kind of gates? (ie ADG VI dual, single? etc. ) Please provide information in terms of gate types AND single gate equivalents so that it can be compared to the Stipulated Settlement number requirement.  
Page 2-53 Figure 2-10 Existing Facilities Affected by SPAS Improvements  
Question: Item notation 9, Urgent Care Facility is shown to be relocated subject to tenant decision. What alternatives force this move?  
Page 2-69 Potential Construction Staging Areas  
Question: Areas C and D are north of Westchester Parkway adjacent to residences. What usage limitations are specified? There are already uncovered dirt mounds in area D which have been inadequately addressed for at least five months, what actions are planned and what provisions are to be put in place to preclude repetition in future uses?  
Question: Area E appears to be Belford Square set aside for potential staging. Is this assumed to be near permanent (or at least beyond the Master Plan? If not, what uses are planned? What kinds of staging are planned? Similarly, what is planned for Manchester Square (F) and Continental City (G)?  
Page 2-71 2.3.2.1 Alternative Location  
Implementation of any of the SPAS alternatives would not be feasible at any location other than LAX.  
Pursuant to the Stipulated Settlement, the SPAS will plan for the modernization and improvement of LAX.  
Implementing the SPAS alternatives at any other location would not accomplish this fundamental goal.  
The existing facilities at LAX cannot accommodate the existing demand and forecasted increase in the numbers of aircraft, cargo, and passengers without significant delays and a very poor level of service. As the existing facilities are used beyond their design capacity, the level of service provided to the user degrades. This lowering of the level of service may be demonstrated by increased congestion

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within the passenger terminals, the various surface roads on and around the airport, and on the airfield itself. The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) for the Los Angeles region. Air service and economic benefits would likely relocate to other regions both within the state of California and to other states. Therefore, any comprehensive solution to meeting the regional demand for transportation must include improvements at LAX. (underline for emphasis)  
Question: The sentence in the paragraph makes a strong statement of LAX facility limitations. What is the limiting factor that creates the concern? What is the current capacity of aircraft on the existing runways? What is the current capacity of the existing taxiways? What is the current capacity of the existing gates? What is the current capacity of the current roadways in the CTA and also in the streets surrounding LAX?  
Question: While there is already CTA curbside traffic over-congestion, what reconfiguration is needed to handle the 78.9 MAP? How much can be accomplished by the re-routing of traffic as opposed to expanding the amount of curbside space?  
Question: The subject paragraph states that everything must be done at LAX to alleviate congestion. If other regional airports increase in capacity doesn't this reduce peak hour needs? What if alternative transportation were available, such as HSR to reduce demand? What was actually considered? The statement that economic benefits would be lost to CA if not at LAX, but what evidence is there that this is true? Isn't the entire regional impacts tied together and that if congestion around LAX were reduced the costs of doing business on the coastal area would reduce thereby INCREASING overall economic benefits? LAWA provided a 2012 LAEDC study that LAX was responsible for about \$40 billion in economic impacts as evidence that LAX needs to be expanded whereas a 10-24-2005 LAWA presentation stated, "Contributes \$60 billion annually to the regional economy." Since LAWA, as operator, is responsible for the reduction in service at Ontario (or in the case of Palmdale no service), why isn't improvements at those facilities a larger driver for economic benefits?  
Page 2-71 2.3.2.2 Alternative Designs  
Several alternative concepts were formulated and considered during development of the nine SPAS alternatives addressed in this EIR. Chapter 5 of the SPAS Report describes the basis, nature, and characteristics of those early concepts. The SPAS Report is available for review at LAWA's Facilities Planning Division, One World Way (LAX), Los Angeles or online at [www.laxspas.org](http://www.laxspas.org). Three of the airfield improvement concepts initially considered for inclusion in this Draft EIR were subsequently refined or consolidated. Specifically, an airfield improvement concept proposing to relocate Runway 6L/24R 400 feet north, which would meet all FAA standards for ADG VI aircraft, was subsequently refined to meet the basic requirements with only a 350-foot northward move. That refined alternative is Alternative 5 in this Draft EIR. Two other airfield improvement concepts, one proposing to move Runway 6L/24R 200

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feet north and the other to move the subject runway 300 feet to the north were consolidated into the 260-foot north move, which is Alternative 1 in this Draft EIR. (underline for emphasis)  
Question: The alternatives were stated to have been melded to meet full ADG VI aircraft standards. However, the same argument was used prior to "fixing" the south runway complex. As the "fix" was being instituted the standards were changed and made those runways undesirable for use with NLA. What has been studied to meet the newer, greater separation standards of AC150 5300-13A? If the separation standard is currently resolved by not using the adjacent runway for a short period, what frequency of NLA causes excessive delay? It certainly isn't current conditions or the runways would be closed to NLA traffic.  
Page 2-72 2.3.2.4 Next Generation Technology  
The application of NextGen to the SPAS effort was considered by LAWA to determine if any component of NextGen could provide for a viable concept. Although NextGen systems could provide for better ground situational awareness for air traffic controllers and pilots, and it could make airfield operations more efficient, it would not increase safety-related physical separation distances on the ground to meet ADG V and VI runway and/or taxiway/taxiway separation standards and obstacle free zone requirements. Based on this evaluation, LAWA determined that no component of NextGen technology can provide a viable concept (i.e., a SPAS alternative) and, therefore, NextGen was eliminated from further consideration.  
Question: NextGen is a broad category of technology. The FAA has been evaluating and developing numerous elements for safety such as runway status lights, but also other ground and air technological improvements. Where in the EIR are these enumerated and why haven't they been included in the consideration as parts of the solution?  
Question: The existing airfield has several "non-visibility" areas created by recent projects. How is the design of this SPAS program addressing them?  
Page 2-74 2.4 Intended Use of this EIR  
This EIR will be used by LAWA, the Board of Airport Commissioners, and the Los Angeles City Council to evaluate and consider the potential environmental impacts of each of the SPAS alternatives and to take action relative to amendments to the LAX Specific Plan. Certification of the SPAS EIR would complete the program-level CEQA compliance review for the SPAS process. Depending on the outcome of the SPAS process, additional project-level CEQA review may be required for implementation of the improvements associated with the selected SPAS alternative. In addition to use of this EIR by the City of Los Angeles, implementation of the selected SPAS alternative may require various federal, state, and local approvals, for which the approving agencies may use this EIR in their respective environmental reviews and decision-making and approval processes. Provided below is an overview of the actions and permits anticipated to be required for the project.  
Question: The above paragraph says that project level EIRs "may" be required. Why not "must" be

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required since there are so many impacting construction details that are not addressed. In a previous paragraph LAWA dismissed dual runway moves as impractical due to logistics. Several factors on runway movement could be even more confounding that that issue (such as the Manchester tunnel which would need to be removed due to its destabilizing effects when a runway is moved along with the unknown water source impacts)? What other factors does LAWA consider to be cause for impractical phasing decisions?

Page 2-74 and -75 Federal Actions

Decisions regarding project eligibility for federal grant-in aid funds or PFC funds for land acquisition, site preparation, runway and taxiway construction, environmental activities, and mitigation;.... U.S. Army Corps of Engineers (USACOE). Key action by the USACOE may include:

Issuance of a Clean Water Act Section 404 permit if/as needed for impacts to jurisdictional wetlands

(i.e., should jurisdictional wetlands be determined to exist within the Argo Drainage Channel). Question: What commitments or comments have been provided to LAWA regarding project funding during this EIR

preparation? What assurances have they received which grants waivers in advance? Question: Since earlier sections acknowledge that the USACOE have not been consulted on items such as jurisdictional wetlands and the Argo Drainage Channel when will this be addressed to determine the adequacy of LAWA assumptions?

Page 2-77 2.4.4 Other Actions

Other permits and approvals of specified types, but as yet unknown, may be issued to implement various aspects of the selected SPAS alternative.

Question: Please describe what additional permits and types of approvals LAWA is referring to and the conditions under which they would expect this to occur?

Page 3-1 3.1 Land Use Setting

As indicated in Chapter 1, Introduction and Executive Summary, and Chapter 2, Project Description, depicted in Figures 1-1 and 1-2, the SPAS improvement areas are located at LAX, within highly developed, urbanized area consisting of airport, commercial, transportation (i.e., interstate highways), residential uses. West of the project site are the Los Angeles/El Segundo Dunes (Dunes), Environmentally Sensitive Habitat Area (ESHA), and beyond the Dunes is the Pacific Ocean.

Surrounding land uses include the following:

Open space, recreation, and residential to the north;

Commercial, industrial, and residential to the east and south; and

Dockweiler State Beach and Pacific Ocean to the west.

The land use setting for each of the SPAS improvement areas is provided below.

Question: 3.1 Land Use Setting - Surrounding land uses: There are commercial uses to the north as well. What does LAWA consider the use of the Westchester Business District?

Question: 3.1 Land Use Setting. Surrounding land uses: In addition to Dockweiler State Beach there are also protected dunes with protect species and other adjacent habitat lands. Why is this not identified when the paragraph above it lists this land use?

Question: 3.1 Land Use Setting - North Airfield: left out the construction staging and construction support which is home to many dunes of potentially contaminated dirt deposited from other areas of the airfield.

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How/when will this be reconciled?

Page 3-3 Land Use...

Cultural Resources - The findings of the historical resources surveys of LAWA-owned property and adjacent areas conducted as part of the LAX Master Plan EIR indicated that four buildings within the overall boundary of LAX are considered potentially significant historical/architectural resources: (1) Hangar One (listed on the National Register of Historic Places [National Register]) on the southeastern portion of LAX near the northwest corner of Aviation Boulevard and Imperial Highway;

(2) the Theme Building and Setting (eligible for listing on the National Register) in the center of the LAX terminals; (3) the WWII Munitions Storage Bunker (eligible for listing on the National Register) near the western boundary of LAX; and (4) the Intermediate Terminal Complex (eligible for listing on the California Register of Historical Resources [California Register]) on the south side of Century Boulevard between Sepulveda Boulevard and Airport Boulevard. Immediately adjacent to the airport

the Union Savings and Loan Building at 9800 S. Sepulveda Boulevard is eligible for listing on the California Register and for local designation. Eight archaeological resources have been recorded within the SPAS cultural resources study area. Due to the lack of important prehistoric or historic association and/or insufficient integrity, all but one of these sites were determined by the Federal Aviation Administration (FAA) to be ineligible for federal, state, and/or local designation as part of the

Section 106 process undertaken for the LAX Master Plan EIS-30

Similarly, with the exception of one site, these sites are not considered to be historical or unique archaeological resources pursuant to CEQA or the Public Resources Code.

Question: 3.1 Environmental Setting - Cultural Resources: Just because the Alt D EIR did not identify the former uses by Native Americans doesn't mean their historic use was not there. What studies has LAWA conducted to identify burial grounds and other significant uses?

Page 3-4 Hazards/Hazardous Materials

...With respect to aviation safety, the runways and taxiways within the north airfield at LAX were designed and constructed in the late 1960s. Issues associated with the outdated airfield design include, but are not limited to, the following:

The north airfield is not fully designed for the largest aircraft types currently in service (i.e., Aircraft Design Group [ADG] V aircraft, such as the Boeing 747-400, and ADG VI aircraft, such as the Airbus A380).

Question: 3.1 Environmental Setting - Hazards/Hazardous Materials talks extensively about waived conditions for aircraft operation, but fails to discuss the multiple sources of toxic contamination from the former oil field, airport activities and fuel, rocket testing, and chemical contamination related to manufacturing. Why doesn't this section mention the unknown water source and water flow characteristics which could spread contamination within the airport lands and also to adjacent habited lands?

Page 3-4 Hydrology/Water Quality - Much of the SPAS improvement areas are developed and paved, although there are areas of disturbed, undeveloped pervious areas adjacent to the runways in the north airfield and within Manchester Square and Continental City. Surface water from LAX drains into storm drain facilities within the jurisdiction of the County of Los Angeles and the City of Los Angeles, which discharge to either San Pedro Bay, via the Dominguez Channel, or to Santa Monica Bay. The Argo

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Drainage Channel, a 9,857-foot-long drainage channel, lies to the north of, and approximately parallel to, Runway 6L/24R. This channel is unlined and uncovered across most of the north airfield, becoming a subsurface box culvert at the west end of the airfield before emptying into Santa Monica Bay. The project site is located within the West Coast Groundwater Basin. Groundwater beneath LAX is not used for municipal or agricultural purposes. Due to its largely impervious nature, the project site provides a negligible amount of recharge to the regional groundwater basin. Existing surface water pollutants typically include total suspended solids, oil and grease, metals, and fuel hydrocarbons, as associated with airfield activities and aircraft maintenance. No 100-year floodplain areas are located within the airport boundaries. (underlined for emphasis)

Question: Since LAX is within the Dominguez flood plain why is the 100 year storm not applicable? Page 3-4 Noise - The existing noise setting at the project site, a very active international commercial airport, is dominated by aircraft activities that occur throughout the day and evening, primarily involving commercial jets. These activities generate noise from aircraft arriving and departing on the north and south runway complexes, aircraft movements on taxiways, and aircraft undergoing maintenance activities that require engine testing (i.e., engine "run-ups"). Traffic noise from vehicles on-airport and on off-site area roadways and highways, as well as ongoing construction activities at LAX, also contribute to the existing noise setting at and near the SPAS improvement areas.

Question: 3.1 Environmental Setting - Noise. When CNEL is calculated how is the ground air traffic and any maintenance included in the calculations? How is topography included in the application of the INM model? Which version was used? What flight mix was assumed and is it the same one used in determining ground efficiency times from runway to gate?

Page 3-5 Utilities - The City of Los Angeles Department of Water and Power (LADWP) is the water purveyor for most areas in the City of Los Angeles, including LAX. LAX is served by a trunk line in Sepulveda Boulevard that distributes water to transmission lines running along the airport perimeter. LAX also uses reclaimed water from the West Basin Municipal Water District's (WBMWD) Edward C. Little Water Recycling Facility and has implemented other measures to decrease potable water use at the airport. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant (HTP), a City-owned treatment plant located adjacent to the southwest boundary of LAX, approximately two miles southwest of the CTA. Electric power at LAX is supplied by LADWP.

LAWA participates in LADWP's "Green Power for LA" program to purchase electricity from renewable resources and incorporates energy efficiency and conservation into existing buildings and new construction. In addition to obtaining electricity from LADWP, LAWA operates the CUP, which provides heating and air conditioning to the CTA. The CUP also houses a co-generation system that generates electrical power, which is sold to LADWP. The CUP is currently being replaced with a more modern facility with higher capacity and greater efficiency. LAWA has had a comprehensive, facility-wide recycling program at LAX to reduce solid waste generation and disposal since 1992. This program includes collection of recyclable materials generated by LAWA and within airport terminals and airfield areas; collection of materials from airlines and tenants at no cost to participants; independent airline and tenant recycling programs; and source reduction through purchase of recycled products and reuse of materials. Solid waste that cannot be recycled is transferred to the Sunshine Canyon Landfill in Sylmar for disposal.

Question: In other sections of this EIR LAWA acknowledges that the amount of waste will be increasing just because

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more passengers will be accommodated at LAX. Where are the innovative ways to improve recycle and reuse studied by LAWA?

Question: 3.1 Environmental Setting - Utilities

At one time there were some fuel cell experiments done at LAX to provide power. What were the results and where was any potential contamination from them deposited?

Page 3-5 3.3.1 LAX Development Projects Not Related to the SPAS Elements

LAX development projects that are not related to the SPAS elements include the following: Airfield-Related Improvements

Question: 3.3.1 LAX non-SPAS projects

Where are the hush hangers shown in Alt D and agreed to install by 2015 as a condition of the CA Noise Variance?

Where is the Continental City activity which appears to be starting? What about activity in Belford Square? What is planned there?

Page 3-6 3.3.1 LAX Development Projects Not Related to the SPAS Elements

LAX development projects that are not related to the SPAS elements include the following: Terminal-Related Improvements

Question: 3.3.1 LAX non-SPAS projects

What cargo related projects are planned? What about relocations of LAWA staff or LAWA PD?

Page 3-7 3.3.2 Non-LAX Planned Development

A list of other development projects in the City of Los Angeles and neighboring communities within the vicinity of the project area is provided in Chapter 5, Cumulative Impacts. A total of 140 projects in the LAX area (illustrated in Figure 5-1 and briefly described in Table 5-2) have been identified whose development could occur within the same time frame as SPAS. Information regarding the background development projects is based on site visits and/or consultation with staff from and/or websites of the County of Los Angeles and the cities of Culver City, El Segundo, Hawthorne, Inglewood, and Los Angeles.

Question: 3.3.2 LAX non-SPAS projects

There are numerous residential and commercial projects throughout the areas that are contained within the intersections identified for the traffic study not in Table 5-2. A sanity check item missing is Howard Hughes Center covering multiple large towers (over 1M sq ft). Playa Vista phases are not show either. There is a 140 unit apt bldg on La Tijera/74th just west of the 405 exit being planned as well of several others off Airport blvd also not listed. Which other ones has LAWA not included? What date is the list "as of"? Does LAWA believe that nothing will be built in this area after that time?

Page 4-1 Environmental Impact Analysis - Public Services

Question: Page 4-1 Environmental Intro. Shouldn't public services include health care/ trauma care? What about related EMT and the ability to handle disasters?

Page 4-2 and -3 Commitments

The Applicable LAX Master Plan Commitments and Mitigation Measures section lists the LAX Master Plan commitments and mitigation measures applicable to the SPAS alternatives. As background, in conjunction with approval of the LAX Master Plan and certification of the Final EIR in December 2004, the Los Angeles City Council adopted a Mitigation Monitoring and Reporting Program (MMRP)<sup>34</sup> to ensure that mitigation measures and LAX Master Plan commitments identified in the Final EIR are implemented. Mitigation

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314 measures are activities, policies, or practices designed to avoid or minimize significant environmental impacts. Besides mitigation measures, the MMRP for the LAX Master Plan includes Master Plan commitments. LAX Master Plan commitments were determined to be more appropriate than mitigation measures where: (1) standards and regulations exist with which compliance is already required by the applicable regulatory 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. The timing of implementation of LAX Master Plan commitments and mitigation measures is set forth in the LAX Master Plan MMRP. Unless otherwise noted, the impacts analysis for the SPAS alternatives assumes that the applicable LAX Master Plan commitments and mitigation measures would be implemented concurrently with and as part of each alternative. To the extent that the LAX Master Plan commitments and mitigation measures would not reduce significant environmental impacts to a level that is less than significant, SPAS-specific...

The Impacts Analysis section presents the analysis of impacts for the nine SPAS alternatives for the buildout horizon year 2025. Impacts were compared to the thresholds of significance to determine whether they would be under CEQA, significant or less than significant. For purposes of determining significance, potential impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below.

Level of Significance After Mitigation is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Section 7.1, Significant Environmental Effects, of this EIR. The level of significance after mitigation is not included for those environmental topics where no significant impacts would occur and, as a result, where no mitigation measures specific to SPAS are required. (underlines for emphasis)

Question: Since many projects identified in this EIR are were not in the LAX Master Plan and several projects referenced as not being part of the EIR are also not in the Master Plan (such as terminals 1.5 or 2.5 or the midfield check in inside the CTA) how has LAWA identified and included mitigations in the MMRP let alone provide implementation schedules? How are the construction impacts of these projects included?

Question: Many of the "significant unavoidable impacts" are acknowledged by LAWA as resultant from the growth of flights, passengers, etc. for all alternatives. How has LAWA provided an assessment of these which allows for comparison of the alternatives so that the least of the unavoidable impacts can be chosen and why hasn't LAWA presented possible partial mitigations for these impacts?

Question: Although detail phasing is generally in a project EIR and since the EIR is willing to consider general phasing of

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mitigations, why doesn't it address phasing of the key project improvements?

Page 4-4 Environmental Baseline

The Notice of Preparation (NOP) for the SPAS EIR was first published in March 2008; however, the EIR work effort was temporarily suspended while the North Airfield Safety Study (NASS) was being completed, based on the possibility that the study results would yield new information relative to the range of airfield alternatives being considered for the SPAS Draft EIR (see Section 4.7.2, Safety, for a description of that study). Upon completion of the NASS, work on the SPAS Draft EIR resumed and a revised NOP was published in October 2010.

In accordance with the provisions of CEQA, October 2010 is the baseline date for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to October 2010 were not available or where October 2010, by itself, was not an appropriate representation of baseline conditions, this Draft EIR identifies this fact, explains what data was used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions.

For example, in some cases, available reports and other documentation were only available for timeframes preceding 2010. For those topics which relied upon site surveys, such information was collected during preparation of the Draft EIR, typically in 2011. Due to the highly developed nature of LAX and the surrounding communities, and the lack of economic growth in recent years, site conditions at and around LAX have not materially changed. Therefore, the available information in 2009 or 2011 that was used to characterize baseline conditions is considered to be generally representative of 2010 conditions.

The methodology discussion for each environmental topic addressed in this section describes the nature, timeframe, and basis of the data used to characterize existing baseline conditions. (underline for emphasis)

Question: Even though a full year was desired, why was it necessary to go back to 2009 when most of the elements of studied have data collected and reported monthly?

4-10 Aesthetics

Policy P7: Provide and maintain landscaped buffer areas along the southern boundary of Airport Airside and northern boundary of LAX Northside that include setbacks, landscaping, screening, other appropriate mechanisms with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy, and better screening views of airport facilities from adjacent residential areas.

Question: Why is there no complimentary landscape policy for the east and west ends of LAX where there is substantial traffic passing along the north-south routes daily?

Page 4-12 Aesthetics

LAWA committed to updating design-related guidelines and plans, including the LAX Street Frontage and Landscape Development Plan, in order to avoid view degradation and incompatibility between on-site and off-site land uses. The LAX Street Frontage and Landscape Development Plan Update, 40 adopted in 2005, fulfills this component of LAX Master Plan Commitment DA-2, and now serves as a basis for reviewing future public and private development projects at LAX....

The objectives set forth in the LAX Street Frontage and Landscape Development Plan Update are

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identified below:

Coordinate and enhance the visual and aesthetic appeal of streets, buffer areas, and open space surrounding LAX.

Maintain and improve safety and security at and surrounding LAX through coordination of street frontage and landscape design with airport security and in compliance with the LAX Wildlife Hazards Management Plan.

Enhance pedestrian, bicycle, and vehicular circulation on streets internal to and surrounding LAX, and comply with airport security requirements, as feasible and practical.

Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities.

Ensure that street frontage and landscape design is cost-effective, efficient, environmentally sensitive, and sustainable.

Provide the basis for the design and review of public and private development projects at LAX by establishing a hierarchy of landscape treatments based on airport gateways and public facilities. The LAX Street Frontage and Landscape Development Plan Update also calls for the preparation of a Neighborhood Compatibility Program (NCP), based on commitments made in the LAX Master Plan, which outlines interface treatments along the airport perimeter for the purpose of "ensuring that the airport complements surrounding properties and neighborhoods." The NCP, which is to address all issues relating to compatibility, including landscape buffers, noise, light spillover, odor, and vibration, is to include the following measures to ensure that this policy is achieved

Question: If this plan has been in place since 2005 why haven't improvements been made to the perimeters? Is there a schedule to get started?

Page 4-83 Impacts Summary 4.2.1. Introduction

Question: LAWA started an air quality apportionment study in 2006 but has failed to provide any data or information to the public other than a verbal statement that it has finished two and a half phases. What data from this study has been used to evaluate impacts for this EIR. If none, why not? How does the data from this study compare with the assumptions made to result in air quality evaluations. What concentration assumptions were made based on LAWA property boundaries? Did it assume ownership of Manchester Square and Belford Square? What uses were assumed for these properties?

Question: There are many particulate studies of PM 0.1 including one on the LAX properties by Froines (UCLA) which concluded that these smaller, more dangerous particles are evident in plumes correlating to takeoffs and landings. The study also showed that the measurement of larger particles were NOT a predictor for the ultra-fine particles. On page 4-84 LAWA acknowledged that "fugitive dust generated by construction activities is a major source of suspended particulate matter..." What has LAWA done to evaluate the contamination in the construction piles placed around the perimeter of LAX which is adjacent to residential and commercial areas?

Page 4-88 Meteorology

Airport-specific meteorological data were used to analyze air quality impacts. The data set used consisted of twelve continuous months of hourly surface data collected at LAX for calendar year 2007, the most recent data year available from the SCAQMD's on-airport meteorological station. This data

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set, provided by the SCAQMD, included ambient temperature, wind speed, wind direction, and atmospheric stability parameters, as well as mixing height parameters from the appropriate upper air station, and was provided "AERMOD-ready," including hourly O3 concentrations from the LAX Hastings monitoring station collected in 2007. The location of the on-airport SCAQMD meteorological and air quality monitoring station is identified in Figure 4.2-1.

Question: Why is CY 2007 considered representative since the number of aircraft (a major contributor) and port activities (another major contributor) were artificially low due to the recession? Also wasn't 2007 abnormal drought conditions that impacts assumptions of wind and atmospheric conditions?

Page 4-91 Emission Source Types: Aircraft

Information on the number and types of aircraft operations considered at LAX for 2009 and 2025 was developed as part of the LAX SPAS forecasts. The aircraft activity levels for baseline conditions are from calendar year 2009 (i.e., full years' worth of aircraft activity data in order to develop peak month average day activity characteristics to be used in modeling). The aircraft activity levels for future conditions were based on aircraft activity growth forecasts for LAX in the year 2025. These data were used to develop airport simulation models (SIMMOD) of aircraft operations for baseline (2009) conditions and future (2025) conditions. The simulation models used information about facilities and operations to predict specific timing, volume, and location (e.g., runway used) for future aircraft operations. This modeling provides specific information regarding aircraft engine operations, such as time-in-mode (i.e., the amount of time aircraft engines are idling, or being used for taxiing, or are in take-off or landing modes), that is used to estimate aircraft emissions. Detailed SIMMOD runs were completed for Alternatives 1 through 4.

For Alternatives 5 through 7, the existing SIMMOD data were reviewed to assess the operational characteristics applicable to those alternatives and adjusted where necessary to reflect the airfield design configuration specific to each alternative. Such adjustments took into account the runway improvements associated with each alternative, particularly whether a runway would be relocated closer to or farther from the CTA, as this would affect aircraft taxiing distance/time, and the extent a runway relocation would result in a loss of aircraft gates on the north side of the CTA, potentially causing aircraft to use more gates on the south side of the CTA.

Question: What does the above paragraph mean? Was actual flight data used from 2009 or was it "approximated and summarized?" Similarly, which aircraft growth forecasts were used and the assumptions made? Several were generated during the past several years ie one in 2006, one for the Part 161 Study, one in 2008, one for the Northside Safety Study.

What assumptions were made for the 2009 airport layout and availability of runways and taxiways? What about location and number of gates in use? Was APU use assumed to be 100%, 90% or what? Since LAWA had conducted dispersal

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and particulate studies on the actual flight field why did it revert to FAA EDMS models instead of actual information?

Question: For an estimation of construction equipment emissions did LAWA use a formula to approximate the number and types of equipment? If LAWA hasn't decided what construction (or when) is to occur and its phasing, how did LAWA

estimate maximum amounts for a worst case condition?

Page 4-100 4.2.3.4 Existing Airport Emissions

The baseline (2009) airport-related emissions, including those from aircraft, GSE, and APU operations, on-airport and off-airport roadways, parking lots and structures, and the CUP are shown in Table 4.2-4.

Question: Were the baseline values shown in Table 4.2-4 measured or estimated by modeling? Subsequent sections state that the main drivers of these values is increased ground traffic and air traffic. Since most of the alternatives

assume the same numbers of vehicles and aircraft, how are the smaller differences among alternatives displayed to give decision makers a frame of reference as to the significance of the differences (even if all are designated as significant, not mitigatable)?

Page 4-105 Table 4.2-8 Construction-Related Air Quality Mitigation Measures Not Quantified in the Construction Emissions Inventories....

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 hours. Fugitive Dust

Question: Since the measure noted above has not been followed on several occasions for several months at a time, how is the estimate of impacts valid?

Page 4-105 -106 LAX Master Plan - Mitigation Plan for Air Quality; MM-AQ-3, Transportation-Related Mitigation Measures.

This measure applies to mass transit, surface traffic, and on-site parking facilities. The principal feature of MM-AQ-3 is to replicate and expand the current LAX FlyAway service to other communities within regions of Los Angeles County. This initiative also includes a public outreach program to encourage the use of both the existing and new facilities. For the mitigated emissions inventory presented in Section 4.6.8.5 of the LAX Master Plan Final EIR, only emissions reductions associated with the new FlyAway capacity were quantified to account for the ensuing decrease in VMT regionwide combined with less traffic congestion in the vicinity of the airport and the use of clean-fueled buses used in FlyAway service. The remaining, secondary, transportation-related air quality mitigation measures contained in MM-AQ-3 may also be implemented to help ensure the emission reduction goals of the LAX Master Plan Final EIR and MMRP are achieved.

Question: Little of the FlyAway outreach has been accomplished that is required in the Settlement Agreement. What assumptions are made by LAWA about what is to be accomplished since this section talks about "equally feasible and practical, but that are not specifically identified in the MMRP, may also be considered." What was assumed complete in the assessments?

Page 4-106 Table 4.2-9 Transportation-Related Air Quality Mitigation Measures

Provide free parking and preferential parking locations for ultra low emission vehicles/super low

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emission vehicles/zero emission vehicles (ULEV/SULEV/ZEV) in all (including employee) LAX lots; provide free charging stations for ZEV; include public outreach to reduce air emissions from automobiles accessing airport parking...

Expand LAWA's rideshare program to include all airport tenants Additional Rideship

Question: How much of the above parking has been assigned and how much will be assigned in the future? What is the schedule for doing so? How much and what percentage of rideshare is currently occurring now, what is the target?

Page 4-107 Air Quality LAX Master Plan Community Benefits Agreement; X.A., Electrification of Passenger Gates.

This provision requires that all passenger gates newly constructed by LAWA shall be equipped with and able to provide grid electricity to parked aircraft (for lighting and ventilation) from and after the date of initial operation and that LAWA will ensure that all aircraft (unless exempt) use the gate provided grid electricity in lieu of electricity provided by operation of an auxiliary or ground power unit.

This provision would apply in conjunction with construction or modification of passenger gates that occurs as a result of

implementing any of the SPAS alternatives, specifically Alternatives 1, 2, 3, 5, 6, and 7.

Question: There is also a requirement to address existing gates as well as new ones. What percentage and how many

do not provide grid electricity availability? What is the completion schedule? How many new gates are planned to replace old ones? Will those gates be kept closed until electricity is available? If a unit fails, what is the target to get it back on line?

Question: General air quality. When taxiways are closed for extended periods causing longer than programmed routes to gates is there a way this is included in the air quality modeling?

Page 4-108 to -111 4.2.6.1 Construction Emissions Impacts Analysis

Peak daily construction emissions for Alternatives 1 through 9 are presented in Table 4.2-10. To provide a more

representative basis of comparison between all nine alternatives, the emissions of those

alternatives that focus solely on airfield and related terminal improvements (Alternatives 5, 6, and 7) were combined with the range of emissions that could

occur under various ground access improvements scenarios. Similarly, the emissions of those

alternatives that focus solely on ground access improvements (i.e., Alternatives 8 and 9) were combined with the range of

emissions that could occur under various airfield/terminal improvements scenarios -- see Notes 2 and 3 in Table 4.2-10.

In so doing, the total potential emissions associated with these focused alternatives can be better compared to the

emissions associated with the "fully integrated" alternatives (i.e., Alternatives 1 through 4, which consider...

Question: Since LAWA has failed to do more than a program level review, how is it determining the amount of

construction required? What did it assume was necessary for the tunnels, utilities, and water flow mitigation work? Did

LAWA include the amounts of construction work necessary to move and change Lincoln Blvd and Sepulveda? How was

the amount of work determined? The SPAS report cost section lists some numbers, but does not provide assumptions

made. Almost all emissions in Table 4.2.10 show "threshold significant." Has LAWA made

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recommendations on how to reduce these numbers? Where?

Pages 4-120 to Table 4.2-13 and 4.2-14 Incremental Project Operational Emissions Compared to Baseline (2009) Conditions and Future (2015)

...The vast majority of the aircraft emissions increases shown in Table 4.2-13 are due to the anticipated growth in aircraft activity. Within Table 4.2-14, the incremental aircraft emissions associated with each alternative in 2025 are measured

against the 2025 emissions of Alternative 4. The same aircraft activity level and fleet mix are assumed for all alternatives in 2025. As such, the incremental aircraft emissions shown in Table 4.2-14 are only influenced by the differences in the airfield configuration specific to each alternative.

Question: Since detailed gate layouts are not assumed in the "Program level" of this document, how were the gate assignments (and therefore types of aircraft for emission calculation) determined? Related, how did LAWA estimate the time to gate for each class of aircraft since the locations of airlines (and their particular types used) could change substantially between now and 2025?

Pages around 4-147 There are Peak Operational Concentration Figures for each Alternative presented.

Question: What is the color coding of the areas on the figures represent? The highest concentration items for the varied parameters are shown on each figure and are different for each alternative. Is there a summary overview chart that

explains why each alternate is different? What can be done to mitigate?

4.3 Biological -- skipped others are submitting separately

Page 4-218 Figure 4.3-7 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 1

Page 4-227 Figure 4.3-8 Vegetation/Land Uses - Alternative 2

Page 4-229 Figure 4.3-9 Vegetation/Land Uses and Sensitive Species: Navigational Aids - Alternative 2

Question: There are black rectangles shown near the end of runway 6L (just north) and in the dunes which are not identified by coded legend colors. Similarly there is a black bar in Figure 4.3-8 just north of 6L but 1/3 from the west end.

The black bars in Figure 4.3-9 are similar to the Alt 1 version. These bars are in each alternative figure. What do they represent? What is their function or impacts?

Page 4-339 Figure 4.5-1 Surveyed Historical resources

Question: Several underground, lead lined air raid/bomb shelters were constructed at LAX. These are not shown in the diagram. Where are they located?

4.6 Greenhouse gases --skipped others are submitting separately

4.7 Health Risk --skipped others are submitting separately

4.7.2 Safety information is in Appendix G2

Page 4-485 Table 4.7.2-1 Birdstrikes at LAX by Year

Question: How many bird strikes occurred on the north complex versus the south runway complex? The number of

events does not appear to be a function of number of aircraft operations since 2001 was the highest and the variance of

strike numbers is quite high. What explanation is given for the variability?

Page 4-486 Safety

The ALP for LAX was updated in conjunction with the FAA's issuance of the Record of Decision in 2005 for the LAX

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Master Plan Improvements. That ALP update includes a plan sheet for future conditions (i.e.,buildout of the LAX Master Plan improvements) and a plan sheet for current airport conditions. The ALP plan sheet for current airport conditions is in

the process of being updated by LAWA, in coordination with the FAA, to incorporate improvements completed since 2005, such as the South Airfield Improvement Project (SAIP), the Crossfield Taxiway Project (i.e., Taxi Lane R), and the new

Airport Rescue and Fire Fighting (ARFF) station, as well as other recent and pending near-term improvements at LAX.

Depending on the outcome of the SPAS process, the LAX ALP may need to be amended to reflect the airport

modifications identified by LAWA. Such amendment of the LAX ALP would first require completion of the NEPA review

process by the FAA and issuance of a Record of Decision specific to the proposed ALP modifications.

It is common at airports throughout the country to have facilities depicted on ALPs that depart from FAA Airport Design

Standards in order to meet local site conditions and constraints. Such differences do not compromise safety. Operational

changes and restrictions are made to preserve an acceptable level of safety.... (underline for emphasis)

Question: When updating to "current" will LAWA/FAA include both Crossfield Taxiways planned (ie S and T) or just S as

built? Question: Since the ROD has approved the mod of standards for handling ADG V and ADG VI and the FAA uses these

operational changes then these operations are "safe." Does LAWA or the FAA predict when the frequency and number of

operations would make changes or restrictions not practical?

Page 4-488 Safety

Of particular relevance to the SPAS alternatives are the runway to taxiway separation requirements related

to large aircraft, as follows:

Aircraft Design Group (ADG) V Aircraft (e.g., B747)

400 feet - Good visibility (approach visibility >1/2 mile)

500 feet - Low visibility (approach visibility <1/2 mile)

ADG VI Aircraft (e.g., A380)

500 feet - Good visibility (approach visibility >1/2 mile)

550 feet - Low visibility (approach visibility <1/2 mile)

Relative to the existing (baseline) configuration of the north airfield at LAX, the two existing

runways (Runways 6L/24R and 6R/24L) are separated by 700 feet, which allows simultaneous arrivals and departures during good visibility conditions. In low visibility conditions, Air Traffic Control (ATC) will

not land or depart aircraft simultaneously on Runways 6R/24L and 6L/24R; however, ATC can clear two

aircraft for landing on adjacent runways if the trailing aircraft has a visual sighting of the aircraft ahead. In

addition, ATC has a procedure called "2 increasing to 3" where they can clear an aircraft to land in low

visibility conditions after an aircraft on the adjacent runway has begun its takeoff roll, as long as the arriving aircraft is at least two miles out.

To the south of Runway 6R/24L is Taxiway E, which meets FAA Airport Design Standards for ADG V

aircraft during periods of good visibility. The movement of the A380, an ADG VI aircraft, on

Taxiway E

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During poor visibility conditions is only allowed with the observance of several restrictions and special conditions set forth by FAA, specific to that taxiway. During good visibility conditions, the A380 can operate on the full length of Taxiway E with no restrictions on 6R/24L due to an approved MOS from FAA. Vehicular traffic on the adjacent service road is restricted anytime an A380 is on Taxiway E. During conditions, not more than one ADG VI aircraft can be on the first 3,000 feet of the taxiway from the runway threshold. South of Taxiway E is Taxilane D, which is separated by 300 feet, with a service road between them for most of its length. Based on FAA design standards, the maximum size aircraft that can operate on this existing taxilane ranges from ADG III in the eastern portion to ADG VI between Taxiway R and Taxiway S in the western portion, with the difference being defined by variations in its and the service road's alignment and nearby obstructions (i.e., parked aircraft, etc.). (underline for emphasis) Question: Since there is an approved MOS for moving ADG VI along taxiway E during good visibility, how often is IFR required at LAX? How many aircraft ops can be accommodated in IFR before movement along taxiway E is impacted? If taxiway E is made to accommodate Grp VI is this a mute question? Page 4-492 Runway Safety The FAA completed an RSA evaluation and analysis for LAX in 2006, in accordance with FAA Order 5200.8, Runway Safety Area Program, to reconsider the adequacy of existing RSAs at LAX.389 The FAA determined that none of the RSAs at LAX met current standards but all are practicable to improve. U.S. Congressional House Rule 3058 provides the statutory requirements that airports must comply with current RSA requirements by December 31, 2015. In light of the above, a Runway Safety Area Practicability Study was conducted by LAWA identifying, evaluating, and recommending preferred RSA improvement solutions for LAX runways within operational, environmental, and financial constraints. 390 The Runway 7L/25R Study was finalized and submitted to the FAA for their review and determination in December 2009. These improvements are currently scheduled to take place in 2013. Identification of potential solutions for noncompliant RSAs in the north airfield was included in an evaluation completed in April 2010.391 The analysis noted that permanent RSA compliance solutions for these runways can be integrated into all the SPAS build alternatives, such as by extending the eastern end of Runway 6R/24L and by covering the eastern portion of the Argo Drainage Channel for Runway 6L/24R. The FAA has acknowledged that implementation of solutions to RSA compliance issues in the north airfield may not be practicable by December 31, 2015, particularly given overall runway improvements associated with the SPAS alternatives, including RSA improvements, are not proposed to be completed by 2015. The FAA and LAWA are coordinating on the identification and evaluation of potential interim solutions. 390 Although the 2006 RSA evaluation by FAA found none of the RSAs at LAX to comply with current requirements, the FAA acknowledged that RSA improvements for Runway 7R/25L would be made with the LAX Runway 25L Relocation and Outer Taxiway Project (South Airfield Improvement Project), which has since been completed. As such, it

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was not necessary to identify solutions for Runway 7R/25L in the Runway Safety Area Practicability Study; however, RSA improvements to the other runway within the south airfield complex - Runway 7L/25R - would still be needed and were, therefore, addressed in the Practicability Study. 391 Ricondo & Associates, Inc., Runway 6L-24R & 6R-24L Safety Area (RSA) Practicability Study, April 2010. Question: What accommodation has been agreed to by the FAA? With the impending release of AC150/5300-13A are there any changes that will affect these agreements? Where are the documents in footnotes 390 and 391 available? Question: Has any runway approach changes been made or are any contemplated to respond to the RPZ not being fully clear? Page 4-498 Runway Safety Based on FAA guidelines, Table 4.7.2-4 delineates the calculated declared distances for runways in the north airfield. To date, declared distances for LAX have not been added to the ALP. Question: Since offsets have been in place at LAX for some time, why have the declared distances not been added to the ALP since release in 2005? Does this impact safety or is this just an administrative exercise? Page 4-499 Figure 4.7.2-4 Parcels Within RPZ Baseline Conditions (2010) Notes: 3/ For planning purposes, all runways are assumed to have approaches with minimums less than .1 mile. Question: What does note three mean? If the approach is > .1 mile how does this impact RPZ and safety? Page 4-501 Other FAA/LAWA Safety Measures The FAA and LAWA have worked together in recent years to deploy new technologies and enhanced training to improve airfield safety at LAX. The following provides a summary of these recent and ongoing improvements: Airport Movement Area Safety System (AMASS) was installed and fully operational at LAX in 2003. AMASS is a radar-based system that tracks ground movements and provides an automatic visual and audio alert to tower controllers when it detects potential incursions or collisions on runways and taxiways. Enhanced airfield signs, lighting, and pavement markings to FAA updated standards have been installed. In 2009, Airport Surface Detection Equipment, Model X (ASDE-X) was installed at LAX. ASDE-X provides a more precise surface detection technology than AMASS by providing accurate target position and identification information and thus gives controllers a more reliable view of airport operations. A Phase 1 upgrade to the multi lateration receiver units was completed in 2011 and a Phase 2 enhancement and upgrade to the ASDE-X equipment is scheduled for installation at LAX in 2013. Recurrent training takes place with all airport, airline, and FAA personnel with access to or control of the LAX airfield movement areas (runways, taxiways, and service roads). The FAA and LAWA are deploying Runway Status Lights (RWSL) technology at LAX. This tool increases situational awareness for aircrews and airport vehicles and thus serves as an additional layer of runway safety against incursions. A Prototype Program (Phase 1) has been installed and operating since June 2009. LAX was the first airport to have RWSLs installed on multiple runways. In February 2010, LAWA and the FAA entered into a Memorandum of Agreement for a full implementation (Phase 2) of RWSL technology. This is to include upgrading existing prototype equipment and new installations on both north and south runway complexes. The design was

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Detailed questions dated 10-10-2012 attached to LAX SPAS DEIR comments Page 39 completed in May 2011; however, the FAA informed LAWA that same month that the implementation schedule was on hold due to budgetary constraints. Based on discussions between LAWA and the FAA in December 2011, the FAA is re-evaluating the scope and budget with the goal of initiating the implementation in 2012. In order for the safety benefit of this technology to be fully realized, an airfield geometry designed to accommodate modern aircraft is needed. As part of the overall goal of improving operational safety at LAX, the FAA has made procedural changes since 2007 that are related to airspace operations. Question: What other improvements, such as more extensive ground movement tracking system which includes all vehicles, are available to improve flight field safety? When can they be implemented? How would improving tower staffing help? Runway status lights were only partially installed three years ago. Why is it taking so long to complete installation of the rest of the airfield coverage? What other situational awareness systems should be installed at LAX for safety?

Page 4-502 to 4-504 North Airfield Safety Studies

Seven independent assessments of north airfield safety were completed. The following is a summary of each of these studies. LAX North Airfield Special Peer Review, March 2007 - A special peer review process involving airport industry experts was formed to objectively review the facts concerning the north airfield improvements (i.e., various options for increasing the separation distance between Runways 6L/24R and 6R/24L, adding a centerfield parallel taxiway, and modifying the locations designs of taxiway/runway intersections) and to provide the group's insight and advice on the best solution and way to move forward. The Peer Review Group consisted of 13 aviation experts from the private, airport, and public sector with experience in planning, engineering and operations of major U.S. airports. The Peer Review Group393 evaluated the north airfield from the perspectives of operational safety, airfield balance, and efficiencies. They found that there is a definite need for improvements to the north airfield, that doing nothing is not an option, and massive terminal demolition is not feasible. The Group concluded that shifting the northerly runway 340 feet northward offers maximum safety, balance, and efficiency advantages. This option provides for new large aircraft operations, does not impact the apron/gate terminal infrastructure, presents fewer construction phasing impacts, and provides for a full-length center taxiway to promote safe and efficient aircraft landing and takeoff operations. Analysis of LAX North Airfield Alternatives, May 2007 - An analysis of LAX north airfield alternatives was prepared by the International Aviation Management Group, Inc.,394 an aviation planning firm headed by a professor of Airport Operations and Management from Embry Riddle Aeronautical University. The purpose of this study was to provide expert and objective guidance as to which alternatives being considered for the SPAS at the time (i.e., provide more separation between runways by moving Runway 6L/24R north by either 100 feet or 340 feet, or moving Runway 6R/24L south by either 100 feet or 340 feet, or keeping runways in current locations) were most appropriate for further study as they relate to operational safety, aircraft compatibility, capacity, and environmental considerations. The study determined that the alternatives that provided an additional runway separation of 340 feet (LAX Master Plan Alternative D [340 feet south] and 340-foot north alternative) were the most appropriate for further study, while the least appropriate alternatives were the no additional separation and the 100-foot south concepts. Los Angeles International Airport North Airfield Assessment, May 2007 - A north airfield assessment was prepared by URS Corporation,395 a large multi-disciplinary worldwide aviation consulting and engineering firm. The study examined options for reconfiguring the north airfield to address airfield safety related to runway incursions, the need to accommodate ADG VI aircraft, operational efficiencies, and cost factors. The study concluded that several aircraft types create operational challenges to the existing airfield and that addition of a center taxiway, which could occur if there was more separation between the existing runways, would eliminate several risks and problems. The study recommended, based upon FAA standards, pursuing relocating

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Runway 6L/24R 350 feet northerly and increasing its runway takeoff length. Current FAA design standards require greater separation between parallel runways and between runways and taxiways than what exists in the north airfield today, to safely and efficiently accommodate larger aircraft. Los Angeles International Airport Modernization - Tomorrow is Now, May 2007 - Twenty-two members of the Airline Pilots Association (ALPA) 396 formed a committee to present their findings and recommendations in a presentation entitled "Los Angeles International Airport Modernization - Tomorrow is Now." ALPA is an international organization of over 60,000 pilots representing over 40 airlines that is heavily engaged in safety issues and improvements for the airline industry. The ALPA Committee recommended that Runway 6L/24R be relocated northward to provide 623 feet, but not less than 550 feet, of runway to taxiway separation and that mirroring the separation on the south airfield is not an option. LAX North Airfield Proposed Runway Configuration - Safety Risk Assessment, May 2007 - The Washington Consulting Group, Inc. (WCG)397 led a panel of subject matter experts through a safety risk assessment on the north airfield proposed runway configurations. WCG is an Air Traffic Management Systems and Air Traffic Controller Training firm that is expert in conducting an FAA defined Safety Risk Management (SRM) Study. The SRM panel was to identify operational hazards, analyze associated risks, and establish mitigating strategies to ensure the safe and expeditious management of air traffic and then specifically develop and prioritize improvements that will increase the level of airfield safety. The analysis by panel produced a list of ten preliminary hazards associated with aircraft operating on the existing north airfield. Table 4.7.2-5 describes the ten hazards. LAX North Airfield Safety Study (NASS) - Following the completion of the five studies described above, City of Los Angeles elected officials requested preparation of an additional independent safety study, referred to as the LAX NASS, and formed the North Runway Safety Advisory Committee (NRSAC) composed of LAX stakeholders to oversee the study. The study's objective was to "inform decision makers on the scope and severity of operational safety problems of the north airfield and a range of potential solutions." The primary aim of the study was to estimate as specifically as possible the level of future safety associated with each of the alternate configurations of the north airfield, and, secondarily, look at capacity implications of each. In support of the safety study, LAWA contracted with NASA Ames in May 2008, to perform detailed airfield simulation modeling, and with a six member Academic Panel in July 2008, made up of distinguished professors and aviation safety efficiency experts from the Massachusetts Institute of Technology; Virginia Polytechnic Institute and State University (Virginia Tech); University of California, Berkeley; George Mason University; and University of Maryland.

The Preliminary NASS Report was released in February 2010, and the Final Report with all supportive documentation was submitted in May 2010.398 The following were the Academic Panel's main conclusions: The LAX north airfield is extremely safe under the current configuration for the projected 2020 forecast. New configurations of the north airfield that include increased runway separation and the addition of a centerfield taxiway would reduce by a substantial percentage (40-55 percent) the risk of a fatal runway collision. Since the baseline level of risk is so low, reducing that risk by a substantial level is of "limited practical importance." The 340-foot north alternative significantly improves the operational efficiency of LAX and it would improve safety. Based on safety grounds alone, the Panel found it hard to argue for reconfiguring the north airfield. FAA's Response to the NASS Report - In response to the NASS Report, the FAA's Office of Airports, Office of Accident Investigation and Prevention, Runway Safety Office, Western Pacific Regional Flight Standards Division, and the Air Traffic Organization conducted a detailed review of the study and identified several critical flaws in the assumptions, methodology, and conclusions. In April 2010, the FAA Administrator provided FAA's comments and position on the NASS and the

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north airfield in a letter to the Mayor of Los Angeles and to Los Angeles World Airports. 399 The FAA stated that they strongly disagree with the study's main conclusion that reducing the risk of a fatal runway collision is of limited practical importance and the study's conclusion that reconfiguring the north airfield on the grounds of safety alone is not a compelling argument.

Besides taking issue with several of the assumptions, methodologies, and uses of data in the report, the FAA made the following statements:

The only complete and single-most significant solution for LAX's safety and efficiency needs must include airfield geometry designed to accommodate modern aircraft. Everything possible must be done to make the north airfield as safe as it can be.

North airfield safety and efficiency would be greatly improved by further separating the two runways and constructing a center taxiway between them. This would address equally important issues of standards, safety, and efficiency.

FAA firmly believes the 40-55 percent reduction in risk would be more than sufficient justification for the reconfiguration of the north airfield on safety grounds alone.

Question: What information was provided to the review panels to support their conclusions? What number of aircraft operations and flight mix was assumed? What budget were they given to conclude that "massive terminal demolition is not feasible." ? What efficiency advantages did they find since the comprehensive NASA study and this DEIR results disagree with that conclusion? Did the Peer Review Group identify the new safety failure modes of erroneous landings on the taxiways experienced at other airports? Are these center taxiways more effective at airports with much larger land areas?

Question: There was only one comprehensive study, the NASS to which the FAA was a significant participant. The DEIR lists seven studies, but in the context of the statements there were eight. The Academic Panel responded to the FAA conclusions and found fault with their methodology. Why are the AP responses to the FAA assertions not included in this DEIR?

Page 4-510 Table 4.7.2-7 Runway Incursions/Incidents at LAX (2001-2011)

... For the FAA, an incident without an aircraft in potential conflict -- such as an unauthorized aircraft crossing an empty runway -- was previously defined as a "surface incident" and not a runway incursion. The new definition means that some incidents formerly classified as surface incidents are instead classified as C or D category runway incursions, which are low-risk incidents with ample time and/or distance to avoid a collision. The classification of the most serious kinds of runway incursions, Categories A and B, remains unchanged.

Question: There are no category A or B shown for either complex in the table. There was an event in 2011 where a landing aircraft missed an aircraft waiting to take off on 25R by less than 75 feet. Is it true that the FAA fails to post events until the full evaluation is complete? What else is not included in the totals presented? Seven 2011 category C are shown for the north airfield. Please identify their causes and correlate to the design changes in the alternatives. Under the new definitions when two aircraft back into each other is this counted as two?

Page 4-512 Runway Safety

Part 77 imaginary surfaces provide a means of identifying objects that require a more detailed safety analysis. This analysis, performed by the FAA, considers the airspace operations and safety requirements applicable to the Part 77 surface, as well as the nature, location, and extent of the object's penetration into the Part 77 surface. The analysis requires detailed runway design and engineering data not available at this conceptual level of planning, and would occur during the normal course of FAA review and approval of proposed airfield improvements. The analysis would set forth and define the appropriate means and measures to address potential safety concerns related to objects located within the Part 77 surface. As described above in Section 4.7.2.3, options for addressing potential safety hazards associated with objects located within controlled airspace

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areas can range widely and can include (1) doing nothing (i.e., for low-risk objects); (2) placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on aviation maps; (3) lowering, reducing, or removing the object, and; (4) modifying an approach or departure procedure to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. ...

Question: This section acknowledges that the Westchester Business District is within the RPZ. The underlined section above states that a Part 77 surface analysis requires more depth than currently available. How, then, can LAWA promise anyone that they will not have to remove our businesses without a commitment from the FAA? What is to stop the FAA from changing their mind after making a verbal or even written commitment to LAWA? If the approach is changed to be closer to homes and businesses doesn't this transfer some risk to those on the ground?

Page 4-514 and 515 Table 4.7.2-8

Summary of North Airfield Runways and Parallel Taxiways Compliance with FAA Airport Design Standards

Question: The subject table shows runway separations from between 700' to 1050' but separations less than current spacing between the proposed center taxiway to a runway by as much as 300'. How is this presented as safer? All Taxiway E ADG sizes allowed are shown to be the largest, ADG VI except Alt D with Taxiway D being a mixture of ratings with less than ADG V for parts currently, but all reasonable changes including no additional separation being ADG V. It also shows runway to taxiway separation is BETTER if the runway is not moved! Based on this safety design standards Alternative 2 is superior. How is this reconciled with the desire to expand north?

Page 4-524 Hydrology/Water Quality

Potentially affected areas are mostly developed/urbanized; hence, surface hydrology is characterized primarily by runoff flowing across impervious surfaces into the existing storm drain system, and water quality is characterized by typical urban storm water pollutants (i.e., oil and grease, metals, nitrogen, fecal coliform, trash, etc.). Implementation of the above measures could result in reduced surface runoff to the extent that existing structures and impervious surfaces are removed, and also reduce or change urban stormwater pollutants to the extent existing urban uses are taken out of service or replaced with lower intensity uses. Construction activities associated with the removal or modification of existing structures could result in short-term erosion and sedimentation and other construction-related water quality pollutants (i.e., from fueling/servicing of construction equipment, storage of materials including temporary stockpiles of demolition debris, etc.). Mitigation of such construction-related pollutants would be accomplished through adherence with the requirement of the State Water Resources Control Board General (Construction) Permit (2009-0009-DWQ). Hydrology and water quality impacts are anticipated to...

Question: This section states that the major issue is surface runoff, but if this area has unknown sources from Centinela Creek and feeds the Dominguez flood plain, can the underground water create more problems and potential flooding than the surface water when there are major utilities needing to be moved and a six lane tunnel being removed along with the modification of the Argo Drainage Channel?

Page 4-525 Land Use and Planning

The potentially affected areas are designated in the City's General Plan for Commercial (Community) land use. Similarly, the subject areas are zoned for commercial uses, primarily C1-Light Commercial and C2- General Commercial. The removal of existing uses would not require a General Plan amendment or a change in zoning. The potential replacement of existing uses with

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other uses compatible with an RPZ would need to be reviewed in light of the provisions of the existing zoning relative to permitted and conditional uses. In general, however, the removal of existing uses and replacement with lower intensity uses is not expected to conflict with the existing land use plans for the area. Similarly, it is not expected to create physical or functional incompatibility with existing land uses nearby. To the extent that implementation of any measures required to address potential airspace obstructions or incompatible structures/uses requires the removal of existing uses, implementation of LAX Master Plan Commitment RBR-1, Residential and Business Relocation Program, and LAX Master Plan Mitigation Measure MMRBR-1, Phasing for Business Relocations, would reduce impacts associated with business relocation.

With implementation of the commitment and mitigation measure, impacts related to business relocation would likely be reduced to a level that is less than significant; however, as noted above, it would be premature and speculative to reach a final significance conclusion at this time regarding this type of potential secondary impact.

Question: If the construction destroys the Lincoln Blvd and Sepulveda Blvd intersection then traffic on Sepulveda, which Westchester Business District relies, will cause major losses if/when construction takes an extended period. Coupled with many closures and forced move of hundreds of businesses there can be a significant impact. When will this be evaluated? It should be done as part of the SPAS process, not wait until a project level EIR is prepared because the consequence is too great.

Page 4-525 Transportation

...Construction activities associated with the removal or modification of existing structures would result in temporary construction-related traffic and possible lane closures and detours...

Question: The DEIR indicates that Terminal 3 will be rebuilt in a different location. How will only a lane detour occur in the CTA when the upper roadway is attached to Terminal 3 at its present location? When LAWA (or CalTrans) starts moving Lincoln Blvd to a totally new location below grade, how can this be achieved with a possible lane closure?

Page 4-527 Air surfaces

... The improvements proposed at the east end of Runway 6R/24L and the covering of the eastern end of the Argo Drainage Channel would bring the RSAs for the north airfield into compliance with FAA standards....

Question: The DEIR indicates that LAWA has not consulted USCOE on modifications to the Argo Channel. If this causes flooding to occur onto the runways how long will the north airfield be closed? How long can operations on one half of the airport support the full complement of arrivals?

Page 4-547

"As indicated in Table 4.7.2-8, implementation of Alternative 5 would increase the separation distance between Runways 6L/24R and 6R/24L from 700 feet to 1,050 feet, but would not change the existing capabilities relative to allowing simultaneous arrivals and departures."

Question: This (or similar statement) is made for each of the alternatives which increases runway separation. How much improvement is due to the runway separation versus how much is due to the taxiway separation improvement?

Page 4-548 Other Safety Considerations

As described above in Section 4.7.2.3, numerous safety studies have been prepared relative to aircraft operations on the north airfield. While the nature, approach, and scope of analysis may

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differ between the studies, there is general consensus between the studies that increased separation between runways and the addition of a centerfield parallel taxiway can reduce the potential for a runway collision or incursion and enhance safety, particularly as related to future operations involving a greater number of large aircraft. Additionally, the safety benefits of relocated and redesigned runway crossing points along the last-third of Runway 6R/24L, including the advantage of pilot visibility to the end of the runway, were noted in some of the studies. The airfield improvements proposed under Alternative 5 provide for these desired safety improvements.

Question: Although the above statement states "general consensus...addition of a centerfield parallel taxiway (CFT) can reduce potential for a runway collision or incursion..." a blanket statement of this type needs proof. Again, what if any is added by the CFT as opposed to fixing the other taxiways and/or changing the location of exit ramps from the runway? How much safety is lost by having the taxiway closer to an adjacent runway as opposed to the larger separation between the two runways? How much does positioning of the gates relative to the landing area impact safety if moved to locations where the landing site is beyond the gate and must taxi back on a fully separated taxiway?

Page 4-553 Implementation of Alternative 5 would not involve construction of a runway within 10,000 feet of a solid waste landfill or create an attractant to birds. In general, implementation of this alternative would enhance aircraft safety and efficiency, as summarized above, particularly with respect to better achieving compliance with FAA Airport Design Standards for operation of large aircraft. The 350-foot northward shift of Runway 6L/24R would, however, result in a northward shift of the Part 77 imaginary surfaces placing portions of two multi-story structures within Part 77 Surfaces. As described above, there are several options available to address potential safety hazards associated with objects being located within controlled airspace areas, ranging from doing nothing (i.e., for low-risk objects), to placing high-visibility markings and lighting on the object to make it highly visible to pilots and indicating such objects on aviation maps, to lowering, reducing, or removing the object, and, in some cases, an approach or departure procedure will be modified to allow aircraft to safely navigate around or above an object that penetrates a Part 77 surface. The most appropriate option(s) would be determined in conjunction with detailed airfield improvement engineering and would be subject to FAA review and concurrence prior to FAA approval of an ALP amendment for such an airfield modification. Such measures would reduce this safety impact to a level that is less than significant. Secondary or indirect impacts associated with implementation of such options could range from no impact, such as in the case of low-risk objects that do not require any safety measures, to impacts typically associated with removal of an object/structure, such as temporary construction-related air quality, noise, and traffic impacts, visual impacts (i.e., changes in existing appearance), and land use impacts. Such secondary or indirect impacts would be similar to those described at the end of the impacts analysis for Alternative 1 above.

Question: Based on the above statement and this applies to all alternatives: although incursions are important from a safety point, a larger panel of experts and the FAA have stated that excursions are, in general, more serious. This doesn't seem to be addressed in most of these discussions. As you move runways closer to residences and commercial properties doesn't the potential impact of an excursion increase? Where is this addressed? How much less safe is the movement of operations closer to homes and commercial property? If the plan by LAWA is to mitigate impacts on the Westchester Business District by relocating into the Northside Development area what risks are increased and by how much?

Pages 4-569 and 570 Table 4.7.2-16 Summary of Safety and Efficiency Enhancements to the North Airfield Operations

Question: Why was the airside redesigned in the alternatives such that Taxiway D was enhanced to ADG VI for Alternatives 3,5 but only ADG V for Alternatives 1,2,6,7 ? The main difference appears that Alt 5 moves/rebuilds terminal 3, why weren't the others?

Page 4-571 4.7.2.7 Mitigation Measures

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Alternatives 1 through 9 would not have a significant impact with respect to safety; therefore, no mitigation is required.

Question: If the primary reason for runway and taxiway movement is for "safety" why is there "no significant impact?"  
Page 4-577 4.7.3 Hazardous Materials Table 4.7.3-1 Existing Soil and Groundwater Contamination and Remediation

Status Note 1This list includes only those sites with known contamination, as determined through database and information from LAWA personnel.

Question: Where was past rocket fuel testing done on the northside? Which areas on the south and west have fuel dispensed that pose a significant possibility of leakage? What other potential contamination sites exist based on type of land use airport operation? Where are the lead lined fallout shelters? Why were only those identified by LAWA in a database listed in this table?

Question: Must these sites be cleaned up before or during project construction? Are the costs for this clean up included in the cost estimates? Since there are underground springs and water flow under LAX has the distribution of contaminants been evaluated? When this contaminated dirt has been moved to staging areas are these cleaned up? Is there testing data to confirm? Where is this data and how is it presented and available to the public?

Page 4-582 HM-2. Handling of Contaminated Materials Encountered During Construction.

Prior to the initiation of construction, LAWA will develop a program to coordinate all efforts associated with the handling of contaminated materials encountered during construction.411 The intent of this program will be to ensure that all contaminated soils and/or groundwater encountered during construction are handled in accordance with all applicable regulations. 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. LAWA will notify the appropriate regulatory agency when contamination has been identified. If warranted by the extent of the contamination, as determined by the regulatory agency with jurisdiction, LAWA will conduct remediation prior to initiation of...

Question: Taxiway S, for instance, was recently constructed and dirt excavated. This soil was near the fuel farm and subsequently moved to staging areas. Where is the documentation that this soil was tested? Was the staging area tested for contamination? If this soil was moved from one staging area to another how was it tracked and documented?

Page 4-586 Hazardous Materials

Due to the extent of the VOC contamination associated with the Park One (Former Honeywell/Allied Signal Aerospace) site, it is possible that remediation will still be underway when construction of Terminal 0 and the redesigned entry roadways is initiated. Remediation for this site consists of an SVE system that includes small above ground vessels for treating the soil vapor, pipes connecting the dry wells to the vessels, and groundwater monitoring wells. Due to the extent of excavation needed for the Alternative 1 improvements, it is likely that part, or all, of the remediation system would have to be removed during construction, if it is still in operation at the time the SPAS improvements are constructed. This would entail destruction of the extraction wells and removal of underground piping and aboveground vessels.

Removing the active remediation system at Park One for an extended period would interfere with existing clean up efforts. However, temporary cessation of remediation would not have any impacts on human health as groundwater beneath the site is not used for municipal purposes and contaminated soils lie beneath asphalt and would not be exposed.

Question: Since the groundwater will be contaminated from this site and the water is then allowed

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to flow into the ocean what regular testing is done to ensure safety?

Page 4-599 Hydrology 4.8.2 Methodology

The various sources and methodologies used for the hydrology and water quality analyses are consistent with the methodologies as applied in Technical Report 6, Hydrology and Water Quality Technical Report, and Technical Report S-5, Supplemental Hydrology and Water Quality Technical Report, of the LAX Master Plan Final EIR. Relevant portions of those documents are incorporated by reference and summarized in this section (see Section 1.6 in Chapter 1, Introduction and Executive Summary, regarding where these documents are available for public review)... 413Similar to Manchester Square, the Belford residential area is also being acquired under the Aircraft Noise Mitigation Program; however, the Belford Area is not included in the hydrology and water quality analysis because none of the SPAS alternatives propose a future reuse of that area. Question: 4-599 LAWA acknowledges this is tiered and relies on old Alt D reports. One has to question their accuracy.

The Manchester Tunnel which extends Lincoln Blvd under the north runway could not have been considered at that time because the key LAWA managers were denying its existence until about two years ago!

Question: 4-599 Note 413 states that the hydrology report excludes Belford Square because none of the alternatives propose a future reuse of the area. How does a Master Plan not cover a significant piece of LAWA property? What is planned for this area?  
Page 4-601 Operational Impacts Wet Weather Flows Estimating the mass of pollutant load discharged to a water body requires knowledge of surface water runoff volume, discharge location, and pollutant load sources for a given area. Pollutants transferred out of the HWQSA by wet weather flows are the result of non-point pollution sources. A commonly accepted method is to estimate pollutant loads on an average annual basis using average pollutant concentration data from relevant published storm water investigations and monitoring, combined with estimates of annual average runoff from the project area. The U.S. Environmental Protection Agency's (USEPA) National Urban Runoff Program's (NURP) Final Report presents the results of an extensive runoff sampling and analysis program that consisted of collecting samples from more than 2,300 separate storm.

Question: This analysis appears to assume that the wet weather runoff is "normal" as if it were from a residential or commercial street setting. Since it's known that many of the areas within airside are particularly contaminated it would be reasonable to assume more contaminants in the runoff. Where is this documented and how is it controlled?

Page 4-604 Hydrology/Water Quality 4.8.3 Existing Conditions

The affected environment for this evaluation includes the HWQSA. The baseline conditions for drainage and water quality are described separately below.

As previously noted, the only hydrology issue considered for this analysis is drainage. Drainage is discussed as it relates specifically to the management of the systems designed to convey storm water runoff to prevent flooding as well as to the potential to cause or increase the potential for erosion or siltation. The environmental setting with respect to drainage and the potential for flooding focuses on the existing drainage system at LAX, as well as the off-site drainage facilities to which the drainage system at LAX discharges and regulatory issues that apply in designing drainage and flood control structures....

Note 429 The Conceptual Drainage Plan provides the basis by which detailed drainage improvement plans associated with LAX Master Plan projects are to be designed in conjunction with site engineering specific to each LAX Master Plan improvement project.

Question: 4.8.3 Only hydrology issue consider is drainage. Why were other issues ignored? Why

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are the LA City and County reports not referenced as noted in the body of the document except for a 2005 City plan? Note 429 simply states that there is a Conceptual Drainage Plan.

Page 4-630 4.8.6.6 Alternative 6

Alternative 6 focuses on airfield and terminal improvements only. However, as noted in Section 4.8.2, for purposes of this analysis, impacts associated with ground access improvements are also considered.

The distinguishing changes considered in this analysis relative to hydrology and water quality are the northerly movement and westerly extension of Runway 6L/24R, conversion of a portion of the unlined Argo Drainage Channel into a concrete box culvert (1,400 linear feet), conversion of open space to accommodate the realignment of Lincoln Boulevard, conversion of industrial area for the ITF, and conversion of the Manchester Square area to parking use. (underline for emphasis)

Question: 4.8.6.6 Alternative 6 analysis of Hydrology/Water Quality talks about extension of Runway 24R west but this was (and is) not part of the submitted plan by petitioners. What was the reason for ignoring the petitioner input?

Page 4-632 4.8.6.7 Alternative 7 Hydrology

Under Alternative 7, the total impervious area within the HWQSA would increase by 61 acres as compared to baseline conditions of 3,082 acres. Since much of the area surrounding the airport in both the Santa Monica Bay and Dominguez Channel watersheds is developed (i.e., impervious) under baseline conditions, this change would represent a marginal increase (2.0 percent) in regional impervious area.

The changes in impervious area would only occur within the Dominguez Channel Watershed, and would represent an increase of 5.5 percent (see Table 22 in Appendix H, Hydrology and Water Quality). As noted above, previous studies indicate that, under baseline conditions, the conveyance capacity of drainage infrastructure within the Argo sub-basin and Imperial sub-basin (including both the Pershing and Imperial components of the sub-basin) is adequate for the LADPW 50-year storm, while the Dominguez Channel sub-basin infrastructure would flood under these same conditions. Detailed analysis of the Dominguez Channel sub-basin capacity under this design storm for Alternative 7 was not conducted given the conceptual level of planning associated with all SPAS alternatives at this time as discussed in Section 4.8.2. As shown in Table 4.8-5, the increase in impervious surface in the portion of the HWQSA tributary to Dominguez Channel is 5.5 percent, which would result in a net increase in peak flow rates to be conveyed by the drainage systems serving these areas. As previously noted, the Dominguez Channel is currently over capacity off-site and downstream from LAX; therefore, a 5.5 percent increase in peak.

Question: Why was 50-year storm condition chosen instead of the 100 year storm condition given the criticality of LAX air operations?

Page 4-638 4.8.7 Mitigation Measures Hydrology and Water Quality

Compliance with the Conceptual Drainage Plan, developed in accordance with LAX Master Plan Commitment HWQ-1, would ensure that impacts to hydrology and water quality associated with Alternative 3 would be less than significant. Therefore, no mitigation specific to SPAS is required for this alternative.

Question: 4.8.7 Mitigation Measures for Hydrology and Water Quality states that since Alt D was less than significant then so is any SPAS alternative based on Alt D. At the time of Alt D the Manchester Tunnel was unknown to LAWA and therefore the impact of underground, unknown sourced water was not considered. Now that this is known LAWA should have done more analysis. What are the results and impacts or mitigations now necessary?

Page 4-638 4.8.7 Mitigation Measures Hydrology and Water Quality

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The CDP revision and update will provide the basis and specifications by which detailed drainage improvement plans shall be designed in conjunction with site engineering specific to each improvement associated with any selected SPAS alternative, as well as the remaining LAX Master Plan improvements that would not change due to the SPAS alternative, including, if necessary, improvements to address increased erosion and sedimentation. Consistent with the requirements for the 2005 CDP, the drainage system design and identification of needed improvements shall be based upon providing flood protection for a minimum 10-year storm event. As also required in the 2005 CDP, water quality treatment BMPs, which may include infiltration basins/systems, bioretention, vegetated swales, detention/retention basins/systems, media filtration, water quality inlets, catch...

Question: 4.8.7 Mitigation measures. LAWA again states that it bases its Conceptual Drainage Plan (CDP) on the old LAX Plan. However new factors have been raised such as the need to run artesian wells for several years in order to build the Manchester tunnel. These have apparently not been taken into consideration and should be updated. Further, since the potential issue of sandy soil combined with an unknown water source creates more serious consequences from not providing adequate flood protection. This means that LAWA should have provided more adequate mitigation in its plan for beyond a min 10-year storm event. Rather it should have addressed the 50 year or 100 year event to reduce potential consequences. Please provide this information and update impacts.

Page 4-649 Figure 4.9-2 Los Angeles County Airport Land Use Plan Land Use Compatibility Table

Question: The Los Angeles County Airport Land Use Plan, 1991 quoted in the subject table shows "Caution. Review Noise Insulation Needs" for residential land use category from 60 CNEL. Where are the reports in the DEIR showing this review? Contours shown are for 65 CNEL.

Page 4-654 4.9 Land Use Planning

The LAX Northside area provides for the development of uses that are consistent with airport needs and neighborhood conditions, while also serving as an airport buffer zone (comprised of compatible development and landscape) for the Westchester community. It may also serve as a relocation area for businesses displaced by the implementation of the LAX Master Plan... Note 481 LAX Northside, part of the LAX Master Plan approved by the City of Los Angeles in 2004, is an approved airport development project that includes future development of 4.5 million square feet of commercial and airport-related industrial land uses to be built on 340 acres of vacant land located north of Runway 6L/24R (the northern most runway at LAX) along and north of Westchester Parkway. Currently, LAWA is engaged in the LAX Northside Plan Update, which is considering development of a different land use mix, including mixed-use, community/civic space, office/education/research space, and airport support uses, on 340 acres.

Question: How can the above uses for the LAX Northside be applied if the existing 1982 Northside Plan was negated by changes assumed in the approval of Alternative D? Is this assuming completion of a new Northside Plan by LAWA? The above paragraph states that it may service as a relocation area for displaced businesses. Must the rezoning of the Northside be completed before this is accomplished?

Page 4-657 LAX Plan The policies most pertinent to SPAS-related land use issues include:

Land Use - LAX Northside

Question: When quoting the LAX Plan policies why did the DEIR left out P2 and P3 for the LAX Northside as it relates to SPAS? These two policies are P2. Provide community outreach efforts to property owners and occupants through measures such as public notification and public meetings, when new development on airport property is in proximity to, and could potentially affect, nearby residential uses. P3. Orient LAX Northside development to encourage access from Westchester Parkway and other roadways internal to LAX Northside. Since LAWA is stating that this will be

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used as a relocation site one would expect that these policies would also be adhered to.

Question: Although policies were not listed in order of the LAX Plan, the DEIR deleted only Safety policy P6. Consult with the Los Angeles Fire Department during the design phase of facilities to review plans and incorporate recommendations that enhance airport safety. Why?

Question: The DEIR delineated "most pertinent" policies of the LAX plan and failed to list any Security policies such as:  
 P1. Evaluate, develop and improve, as necessary, Central Terminal Area, Intermodal Transportation Center, and Satellite Terminal FlyAway security – both physical and operational – as part of overall security improvements at LAX.  
 P2. Develop entry security improvements in the Central Terminal Area by limiting access by non-secure private, public and commercial vehicles.  
 P3. Design and construct facilities that provide for security of passengers by providing multiple levels of security screening procedures while maintaining ease of use.  
 P4. Provide law enforcement and fire facilities to enhance the ability to respond to emergency situations and facilitate coordination with other emergency response agencies.  
 Why does LAWA feel that security policies are not important enough to identify in the document? Why is Circulation and Access also ignored? What about Noise, Hazardous Waste, and Design policies?

Page 4-663 LAX Street Frontage and Landscape Development Plan Update

Question: Has LAWA ever distributed or circulated this Plan for comment or is it considered an internal policy statement only? The one objective listed in the DEIR of "Enhance LAX's compatibility with adjacent land uses, neighborhoods, and communities." is laudable, but what other things does this plan call for? Since it hasn't been updated since 2005, are there any updates?

Page 4-664 4.9.3.3 Existing Incompatible Land Uses

Aircraft Noise Mitigation Program

The City of Los Angeles, as the airport proprietor, addresses incompatible land use within the communities surrounding LAX pursuant to the land use compatibility requirements of the California Airport Noise Standards (California Code of Regulations, Title 21, Subchapter 6, Section 5000 et seq.). LAX operates under a variance to the California Airport Noise Standards (Noise Standards) that was effective February 13, 2011 and was issued for a period of three years. 487 The variance remains in effect so long as LAWA submits another application one month prior to the expiration date and continues to demonstrate that programs are being implemented to reduce noise impacts. Under the variance, LAWA...

Question: What penalties occur if LAWA fails to adhere to the four items listed? Has LAWA provided the quarterly reports within the prescribed 45 days? Several other variance conditions were stipulated such as the requirement for hush houses for maintenance/testing of aircraft. How has this provision and others not listed been incorporated into the program level plans? If not, why not?

Page 4-665 Noise Variance

As summarized in the ANMP tables updated for 2010, 491 all incompatible land uses within the 1992 fourth quarter 65 CNEL noise contour or within 65 CNEL areas extending beyond the 1992 contour based on the most recent quarterly report, are eligible for participation in the ANMP. Although the area significantly impacted by noise has been reduced since 1992, and a number of parcels within the 1992 contour are no longer exposed to noise levels of 65 CNEL and higher, all incompatible residential, school, church, and hospital parcels within the 65 CNEL noise contours defined above are eligible for mitigation under the ANMP. 492

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Question: Has the FAA notified LAWA of changes to the applicability of the 1992 contour? How is this included in the baseline and subsequent comparisons of noise impacts?

Page 4-666 Noise Variance

...As presented in the ANMP tables, of the 33,165 residential units identified within the ANMP contours at that time, approximately 12,402 previously incompatible dwelling units were made compatible.

Residential sound insulation had been completed for 1,241 units in unincorporated Los Angeles County; 4,827 units in the City of Los Angeles; 677 units in El Segundo; and 2,971 units in Inglewood. Dwelling units have also been made compatible through land recycling, including approximately 816 units in Inglewood and 1,870 units in the City of Los Angeles. El Segundo's residential sound insulation program also includes additional units within the 60 CNEL noise contour identified for the approved LAX Master Plan and is funded by the FAA through the end of 2015. 493 The number of units receiving sound insulation under El Segundo's program is not formally published. 49...

Question: How many units remain unmitigated? If jurisdictions in El Segundo, LA County, and Inglewood are allowed to include air conditioners as part of the mitigation, why is the FAA opposed (and LAWA not fighting for) this for LA residents?

Question: The same section discusses a Part 161 Noise Study. Why has it not been completed? Does the Part 161 Noise Study use the same aircraft fleet mix assumptions as the noise contour studies? If not, why not?

Page 4-667 LAWA Voluntary Residential Acquisition/Relocation Program

Question: Footnote 498 lists a BOAC action to establish the Voluntary Acquisition Project for both Manchester Square and Belford Square. How does one get a copy of this very old item since it's not on-line? Most people were aware of the MS aspects, but few, if any knew Belford Square was a part as it was never shown in other documents or even Alt D. It was raised in SPAS early on, but LAWA has not responded to potential uses recommended.

Page 4-668 Land Use and Planning LAX Master Plan Draft Relocation Plan  
 The Draft Relocation Plan includes parcel-level detail for the properties proposed for acquisition under the approved LAX Master Plan, an assessment of relocation effects, and procedures for implementing LAWA's LAX Master Plan Relocation Assistance Program (RAP) in accordance with applicable laws, regulations, and policies. 500, 501 The Plan includes an inventory of acquisition and relocation properties, an assessment of acquisition and relocation needs, and an assessment of relocation opportunities. No residential uses are proposed for acquisition. The LAX Master Plan program identifies approximately 34 businesses located on approximately 77 acres that would be acquired to accommodate airport development.

Question: Where are these documents available for review and how do these properties relate to any of the alternatives?

Page 4-673 Table 4.9-4 Summary of Existing Off-Airport Residential Uses and Non-Residential Noise-Sensitive Facilities in the Study Area

Question: What does Title 21 compatible and Title 24 compliant mean?  
 Page 4.9 Land Use Planning Westchester-Playa Del Rey Community Plan  
 ... Most of the topography is level except for an amount of varied, hillside terrain located in the northwest and west portions of the Plan area where there are significant coastal bluffs. The land use consists primarily of low to low-medium density residential uses, with commercial uses concentrated near the transit corridors of Lincoln Boulevard, Sepulveda Boulevard, and Century Boulevard. Residential land uses account for approximately 2,357 net

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acres with approximately 22,794 dwelling units, of which 49 percent are multi-family units. Concentrations of multifamily residential uses are located near La Tijera Boulevard and Manchester Avenue. 524...

Question: Many of the areas within Westchester as well as PDR are also hilly with peaks and valleys which amplify sound from aircraft. The DEIR characterization is inaccurate. How has this been used in the evaluation for sound impact? The concentration of multifamily residential uses is also misleading. It is south of Manchester and east of Airport not as described. How was this description used in the evaluation of impacts?

Page 4-684 Land Use 4.9.4 Thresholds of Significance

A significant land use impact would occur if the direct and indirect changes in the environment caused by the particular SPAS alternative would result in one or more of the following future conditions:

Conflict with any applicable land use plan, policy, or regulation (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.  
 Create physical incompatibility with existing land uses through increased aircraft noise exposure.

Question: Please define what the second bullet "create physical incompatibility" means.

Page 4-692 Consistency with Land Use Plans - On-Airport Land Table 4.9-5  
 General Comparison of Acquisition Area Land Use - SPAS Alternatives

1 No acquisition is proposed under Alternatives 5, 6, and 7 since these alternatives only include airfield and terminal components.

Question: The DEIR indicates no acquisition is anticipated by the DEIR. When will LAWA acknowledge that movement of runways north will require acquisition of a significant portion of the Westchester Business District and some homes? How will these costs be accounted for in the SPAS report which is a part of the DEIR by reference?

Section 4.10 Noise

Question: It appears that the 1992 Contour was not used and that a new baseline contour was recalculated. Is that correct?

Question: Table 4.10.1-5 lists schools expected to be impacted by above 55 interior dBA. Why is St. Bernards not listed despite being in the 65 CNEL contour. Why?

Question: What does Alt 1 "no additional improvements" mean? Alt 1 moves 24R 26S' north and Table 4.10.1-9 matches earlier population exposure increase numbers. "No additional improvements" is more equivalent to LAX upgrade alternatives 3 or 4 of the Plan. Alt 2 is correctly described as no greater separation but with 24L extended east. What is the true meaning of the referenced "no additional improvements"?

Question: The ANSI Awakening Probability figures look like the CNEL noise contours, but at night the aircraft are operating in "over ocean" about 80% of the time. Explain the reason for the % probabilities mirroring the contours. What explains the drop in awakenings in 2025? Is this based on Leq8 instead of CNEL and that changes differently than CNEL?

Question: Figure 4.10.1-17 is a sample of contours calculated for 60 CNEL et. al. but it's impossible to compare with the baseline condition to see changes. Please provide an overlay with the baseline for each alternative.

Question: Taking an overview of the contours and awakening the bottom line is that the south gets better, the northeast gets worse most and the north increases about in proportion to the amount the runway moves. This is the basic conclusion from Table 4.10.1-55 regarding CNEL and from

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Table 4.10.1-57 disruptions are about the same regardless of what alternative is chosen again reinforcing the notion that it doesn't matter which is chosen overall, but the noise is definitely worse on the north regardless of which is chosen. It's not said in these few words, but is this the conclusion we should be drawing?

Question: Doing a sanity check on the aircraft numbers used for noise needs some clarification. In 2001 68MAP resulted from 800K ops or about 85 passengers per aircraft. Given the increase in load factor and increase in aircraft size that number should increase to about 110 passengers per aircraft or about 78 MAP. Was this the basis for the assumptions made?

Question: A key assumption raised was over ocean ops from midnight to 6:30 AM however in order to get to 78 MAP there will have to be many more flight late at night because peak hours will be maxed out around 70 MAP. If over ocean ops ends up turning around at 2 AM instead of midnight then the awakening numbers will change dramatically as well as the CNEL bands because of the night penalty on more flights. How will this impact the contours and the conclusions drawn?

Page 4-930 4.10.1 Aircraft Noise Shifting Noise to Compatible Areas

Shifting Noise to Compatible Areas because of obstacles to the direct reduction of aircraft noise levels, it is more effective for airport operators to focus on the noise abatement methods that shift noise from sensitive areas (such as residential neighborhoods) to compatible areas (such as industrial areas). This can be accomplished through changes in runway use and arrival or departure routes or through facility changes on the airport itself, such as the modification of runways or the construction of noise barriers. Runway Use and Flight Route Changes  
 The use of particular runways for aircraft landings and takeoffs is dictated by several factors, including the length of the runway, the runway gradient (or slope), the instrument approach procedures available to the runway, the minimum departure climb requirements from the runway, and the wind and weather. It is possible to establish runway use programs that encourage the use of runways that direct aircraft over compatible land uses and away from noise-sensitive areas, although allowances for exceptions must be made in recognition of the many other factors influencing the selection of runways for safe flight operations. LAWA previously established and currently implements the Preferential Runway Use Policy to reduce aircraft noise impacts to noise-sensitive uses (i.e., aircraft departures typically occurring on the inbound runways and aircraft arrivals typically occurring on the outbound runways, thereby placing the noisier of the two types of operations away from noise-sensitive uses).  
 Subject to certain limitations, aircraft routes can also be altered so that aircraft tend to fly over compatible areas and away from the most noise-sensitive areas. However, numerous constraints on the design of flight routes must be considered before changes are made. In large metropolitan areas with multiple airports, the volume of aircraft alone creates serious constraints. Flight routes must be designed to ensure the safe separation of aircraft and to ensure that arrivals and departures from each airport can be made safely and with relative efficiency. The control of aircraft in flight is the responsibility of the FAA. Thus, if airport operators desire to pursue changes in aircraft flight routes, they must coordinate with the FAA in undertaking the studies required to determine if the modifications are feasible.

Question: Since the FAA SoCal Metrolplex redesign is in process, how would these changes impact the contours and the conclusions? Would the approach and take off route changes overshadow that of the runway movements? How about the increase in aircraft? What constitutes a shifting of noise by the definitions fostered by the FAA?

4.10.2 Road Traffic Noise –skipped

4.10.3 Construction Traffic –skipped

Page 4-955 Figure 4.10.3-1 Construction Noise Analysis Sensitive Noise Receptor Areas and Potential Construction Staging Areas

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Question: Why are none of the construction staging areas on the south/west end of LAX along Pershing near the cement recycle activities since LAWA already modified the Imperial/Pershing intersection islands?

Page 4-975 Transit noise

Figure 4.10-4-1 provides an overview of several different types of non-project specific noises from transit sources and, for comparison, non-transit sources, and what the typical sound level is in A-weighted decibels (dBA) for those sources. Traffic noise, defined as unwanted sound, is associated with highway/transit projects and is usually in the form of loud or persistent noises from cars, trucks, and buses. Traffic noise, as may occur along the busway proposed under Alternatives 1-2 and 8, is generated primarily from engines/transmissions, mufflers, wind shear, and tire contact with the roadway.

APM noise, as may occur under Alternatives 3 and 9, is generated primarily from electric control systems and traction (electric) motors, gear systems, wind shear, and contact between wheels and the rails. While train horns and crossing notification systems can also be typical noise sources for APM/light rail systems, this is not considered to be a concern relative to Alternatives 3 and 9, since the proposed APM systems would be exclusive grade-separated alignments with no vehicle or pedestrian crossings along the routes.

Question: 4.10.4.2.1 Transit Noise. This section states that train horns and crossing notifications are not considered because they would be grade separated. The articulated buses will not be grade separated and may have to use their horns as they weave through traffic. Is this considered in the evaluation?

Page 4-990 4.10.4.7.3 Summary of Impacts Transit Noise

Alternatives 1, 2, and 8 would result in significant transit noise impacts at noise-sensitive receptors (hotels) associated with the elevated/dedicated busway system proposed under these alternatives. Although Alternative 8 proposes the same elevated/dedicated busway system as that of Alternatives 1 and 2, the average daily transit noise levels and associated impacts of Alternative 8 would be comparatively greater due to greater number of hourly operations during the daytime hours (i.e., 128 trips per hour versus 54), which is mostly attributable to the CONRAC proposed under Alternative 8. Alternatives 1 and 2 would result in a significant transit noise impact at two hotels (Four Points Sheraton and Hilton Hotel), while Alternative 8 would result in a significant transit noise impact at three hotels (Courtyard by Marriott, Four Points Sheraton, and Hilton Hotel).

Question: If the rail line (either Green Line or Crenshaw LAX Line) went into the CTA what impacts would be improved?  
What service level improvements would be seen?

Page 4-1013 4.11 Fire Protection

Question: The statement is made repetitively that because a center line taxiway will be present the demand on the fire stations will be reduced. However, there will be a substantial growth in passengers at LAX and isn't 95% of all fire department calls for paramedic services? Where is that considered? How much more paramedic services will be required?

Page 4-1019 4.11 Law Enforcement

Question: The section again mentions general efficiencies plus TSA, and ICE efficiencies will reduce stress on law enforcement. However, as the number of passengers grows doesn't crime and general civil police support increase?

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Where is that discussed? Also specialized support should go up as the number of operations continues to increase.  
Where is that discussed? Why aren't roadway cameras and weight scales mentioned as well as other security enhancing equipment and procedures?

Page 4-1043 4.12.1 On-Airport Transportation

Question: Section 4.12 Page 4-1043 the evaluations use an average day, but shouldn't the calculations be done to see what happens on a peak day as well? Doesn't capacity have to be able to handle the peaks?

Page 4-1043 4.12.1 On-Airport Transportation

659As further described in the introduction to Chapter 4, "baseline conditions" used in the analysis of certain environmental topics, such as air quality, aircraft noise, and traffic, were based on a full year's worth of airport operations data in order to best delineate the relevant existing operational characteristics of the airport. The Notice of Preparation (NOP) for the SPAS EIR was published in October 2010 and while that time period is used to define "baseline conditions" for most other topics in the EIR impacts analysis, that specific point in time does not account for the fluctuations in airport activities that typically occur through the course of a year and would not accurately represent the existing conditions relevant to air quality, aircraft noise, and traffic. As such, LAX activity data for Calendar Year 2009 (i.e., a full year's worth of airport activity data prior to publication of the NOP) is taken into account in defining "baseline (2009) conditions" for the On-Airport Transportation analysis.

Question: Note 659 discusses baseline conditions and the desire for a full year of data. The argument is that a full calendar year would be from start of 2009, but why, for instance was it not July to July or something closer to the 2010 NOP date?

Page 4-1044 On-Airport Transportation

This comparison is provided for the purpose of identifying impacts pursuant to the requirements of CEQA; however, it is hypothetical in nature given the underlying assumption that all of the ground access improvements proposed to be completed by 2025 under each alternative theoretically exist today and apply to the baseline (2009) condition.

Question: 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

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That future (2025) scenario does not include any of the ground access improvements proposed under the various SPAS alternatives, and also does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025. Rather, that "Future (2025) Without Alternative" condition assumes the same 2009 passenger activity levels daily flight schedules as in the baseline (2009) condition, and serves as the basis for comparison for the "Future (2025) With Alternative" condition scenario. The Future (2025) With Alternative traffic condition scenarios consists of: (1) the baseline (2009) physical conditions and configuration of the CTA plus reasonably foreseeable on-airport ground access system improvements anticipated to occur by 2025, independent of, and separate from, SPAS; (2) the 2025 passenger levels and daily flight schedules; (3) reasonably foreseeable regional (nonairport) programmed improvements and ambient growth in off-airport traffic, as may affect on-airport traffic; and (4) the proposed SPAS improvements associated with each of the alternatives. It is important to note that the impacts analysis associated with comparing the Future (2025) With Alternative condition to the Future (2025) Without Alternative condition is very conservative, because the increase in on-airport traffic volumes assumed for each with-alternative scenario would actually be attributable to natural

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growth in passenger activity predicted to occur at LAX by 2025 regardless of SPAS.

Question: 4.12.1 states (highlighted) "does not include any increase in on-airport traffic from natural growth in passenger activity levels anticipated to occur at LAX by 2025." How is this even a logical situation since LAWA has stated throughout the document that they expect 2025 to have 78.9 MAP regardless of alternatives chosen or no improvements?

Page 4-1046 On-Airport Transportation

On-Airport Traffic Data Collected in 2009 - As noted above, data collected for the Bradley West Project EIR was supplemented with additional data collected in 2009. This included data from the in-pavement vehicle loop detector system which records the volume of all traffic entering and exiting the CTA and the AVI system which uses transponders to record the number and types of AVI equipped commercial vehicles entering and exiting the CTA. These counts representing baseline (2009) conditions were collected for Fridays in August 2009. Since August is considered to be the peak month for airport-related passenger and traffic activity at LAX, and Fridays are typically the busiest day of the week for the airport roadway system, the new intersection turning movement counts were collected for the departures level on Friday, August 14th and for the arrivals level on Friday, August 21st and 28th during the a.m., mid-day, and p.m. commuter peak periods. Video from August 2008 obtained at the entrance to the CTA and at the departures level roadway in front of the Tom Bradley International Terminal (TBIT) from the airport's Closed Circuit Television (CCTV) system was also used to serve as a source for traffic counts and vehicle classification.

Question: P 4-1046 how was the 2006 data compared with and combined with the 2008 data as well as the August 2009 data? Were there significant differences in the older data from the Oct 2 and Oct 9 2009 data? What were they?

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Note 665 Applied Management & Planning Group, 2006 Air Passenger Survey Final Report Los Angeles International Airport, December 2011. The 2006 survey is the most recent complete published passenger survey for LAX. Although an updated passenger survey was undertaken in 2011, the survey results are still in the process of being compiled and reviewed. Preliminary results of the 2011 survey data, subject to further review and confirmation, show an increase in connecting passenger percentages, suggesting that LAX is becoming less of an "Origin and Destination" (O&D) airport, which, in turn, reduces vehicle trips to and from the airport. For the purposes of this EIR analysis, the information contained in the 2006 survey is still considered to be reasonably representative of the existing airport traffic conditions and trip generation, which provides a more conservative impacts analysis than if airport trips were reduced based on lower proportions of O&D activity.

Question: Note 665 states that LAWA is relying on a 2006 survey. Since economic conditions were much worse in 2006 and traffic was lower along with changes in the Open Skies conditions how is this six year old study whose data is necessarily earlier a valid use?

To further supplement the existing data sets, additional data were collected during field surveys conducted on Friday, October 2nd, 2009, and Friday, October 9th, 2009 between 10:30 a.m. and 12:30 p.m. on the departures level, and between 8:30 p.m. and 10:30 p.m. on the arrivals level. Specifically, the following surveys were conducted:

- intersection turning movement counts - for intersections along Center Way
- Vehicle classification survey - at lower level entrance to the airport
- Vehicle dwell time survey - at Terminals 1, 4, and 7
- Vehicle license plate survey - at Terminal 1 and Terminal 7 lower level curbsides
- Public parking garage entry counts - Parking Garages 1, 3, and 7

The survey data represents activity on a typical busy day on the CTA roadways and curbsides at

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LAX. Survey times were established based on the peak passenger activity in the CTA which was determined from the 2008 (design day) gated passenger schedule.

After reviewing and compiling the field data, the results were adjusted from October 2009 conditions to August 2009 conditions using multiple control data sources including passenger schedules, AVI, and in-pavement loop detector data as well as turning movement volumes.

Question: The above section talks about vehicle dwell time at Terminals 1, 4, & 7. Were there differences in dwell time by time of day? How did the number of traffic officers change the amount of dwell time? Was there a difference in dwell time noted for passengers with or without baggage to be checked? Were the differences significant? Was a preponderance of the traffic due to business travel or personal? Did dwell times change significantly when buses were competing for the same curb space?

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666 In probability theory, a Poisson process is a stochastic process which counts the number of events and the time that these events occur in a given time interval. The time between each pair of consecutive events has an exponential distribution with parameter and each of these inter-arrival times is assumed to be independent of other inter-arrival times.

Question: P 4-1047 CTA Traffic Conditions Baseline Was there any changes in signage between the survey times? Was there any construction or changes to where the buses and taxis were instructed to stop? How would a change in airlines location from one terminal to another impact the numbers calculated?

Page 4-1048 Prepare Level of Service Analysis

Prepare Level of Service Analysis - The roadway model provides a quantitative representation of the traffic operations associated with the CTA curbsides, CTA roadways, and CTA intersections as needed to assess the potential effects of project traffic. Model outputs were post-processed to calculate the Level of Service (LOS) for each terminal building curbside and curbside roadway segment during each peak period analyzed. This model uses peak hour vehicle volumes combined with average dwell time by vehicle mode to estimate the demand for curbside frontage on both the departures and arrivals levels. To account for non-uniform arrival rates during the peak-hour, the model applies a statistical "surge" factor based on a Poisson666 arrivals distribution to obtain an estimate of occupied "spaces" during the peak hour. These estimated space requirements are multiplied by the average length of the vehicle (including a buffer to represent the space between two parked vehicles and lost space due to parking inefficiencies) to determine the demand for curbside frontage in linear feet. The linear distance representing these stopped vehicles was then divided by the linear curbside length along the terminal frontages to calculate a ratio that is used to define curbside LOS which is further discussed in Section 4.12.1.3.13 below.

Question: P4-1048 4.12.1 On-Airport Transportation How would a backup of traffic going into the CTA impact the traffic dwell time? IE As traffic builds up the parked car may not stop all the way next to the curb in order to be able to get out after dropping off the passenger. This reduces the amount of practical, usable curb space. How was this considered in the calculations?  
If cars have to go around multiple times to pick up or drop off a passenger how does this impact the calculations due to the increase in lane changes that will be necessary?

Page 4-1048 Prepare Level of Service Analysis

Note 669 The on-airport transportation analysis includes Alternatives 1, 4, 8, and 9. The on-airport transportation analysis results for Alternative 1 are identical to those for Alternatives 2, 5, 6, and 7, and any reference to results from Alternative 1 can be considered valid for Alternatives 2, 5, 6, and 7. Alternative 3 was not considered for the on-airport transportation analyses.

Question: Footnote 669 on future traffic conditions page 4-1048 states that results for Alt 1 are same as those for Alts 2, 5, 6, or 7. Since 5, 6, 7 do not include a busway or APM but Alts 1, 2 use

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a busway, how is this justified?

#### Page 4-1050 4.12.1.3.2 On-Airport Landside Facilities

The on-airport landside facilities are comprised of the CTA curbsides, roadways, and public parking facilities. The two level on-airport curbside and roadway network is accessed from the following three off airport roadways:  
Century Boulevard  
Sepulveda Boulevard  
96th Street Bridge/Sky Way

Question: Sec 4.12.1.3.2 On-Airport Landside Facilities lists three accesses: Century, Sepulveda, and 96th St Bridge. During SPAS briefings we were told that traffic entering the CTA was 1/3 from Century, 1/3 from Sepulveda south and 1/3 from Sepulveda north (which would include 96th St bridge). We were also told that the amount of traffic from the three entry sources differed substantially by time of day. Were the time of day studies completed? What were the results? How will they impact back up of traffic in the CTA? How does this specifically impact terminal 1? Are the terminal 1 impacts different from points further into the CTA? The "annual traffic studies" recently posted on the LAWA website do not address this critical question that is necessary to assess what mitigations can work most effectively.

#### Page 4-1057 4.12.1.3.7 Peak Month Activity

Monthly traffic data in the vicinity of LAX over the past eight years were reviewed to identify the typical peak month of traffic activity associated with airport operations. The average daily traffic (ADT) volumes accessing the CTA by month for January 2003 through December 2010 are provided in Table 4.12.1-2. As shown in bold within Table 4.12.1-2, CTA traffic reached peak activity during the summer months of July and August. August is typically the peak month for airport roadway traffic followed closely by July. For the purpose of this analysis, August 2009 was used as the peak month for traffic data.

Question: Table 4.12.1-2 CTA Average Daily Traffic Volume shows an average day in each month and then a total which includes only one day of the month! When these numbers are extrapolated to corrected totals the number of trips into the CTA is still less than 0.5 per passenger. Is there a breakdown of types of vehicles to match this table (ie bus which holds 10, bus that holds 30, van or taxi holding 4) so that a reasonable number of trips into the CTA matches with the MAP? Page 4-1067 Figure 4.12.1-5 Arriving and Departing Passenger Flow at Curbside Baseline and Figure 4.12.1-9 2025 Arriving and Departing Passenger Flows at Curbside for SPAS Alternatives

Question: The numbers of vehicles in this chart are inconsistent with those from other sections and seem low. Translating the baseline into specific hourly numbers results in a total annual count of 139250 monthly or about 50 MAP instead of the 61 MAP in 2009. The values for 2025 is closer and calculates to about 73 MAP. How were these values determined and if they are off how does it impact the LOS conclusions? Even if they are off, however, it is noted that there is substantial congestion now and it will continue in 2025. The future estimate of arrivals and departures appears to represent about 72-73 MAP not the 78.9 listed for all alternatives in the summary section. If this is low, are the calculations for impact also low which will result in worse than predicted levels of service?

#### Page 4-1073 4.12.1.3.12 Vehicle Trip Generation and Distribution Model Calibration

The purpose of developing the vehicle trip generation and distribution model is to have a tool that accurately projects future vehicle volumes based on a future passenger volume. Before the model could be used to project future peak hour traffic volumes, it was necessary to calibrate the model to ensure that the results would reliably predict actual observed baseline traffic conditions as represented by the balanced roadway volumes. This process involved comparing model output for the CTA's departures and arrivals peak hours with roadway and curbside traffic data from the

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balanced roadway network. A review of the passenger data for August 2009 indicated that, for model validation purposes, the departures peak hour occurred between 9:59 a.m. - 10:59 a.m., and the arrivals peak hour occurred between 10:59 a.m. - 11:59 a.m.

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Question: 4.12.1.3.12 Model Calibration What was the percentage off of 2009 actuals to the 2009 predicted? In other words, what accuracy was determined for the model prediction? Page 4-1083 Table 4.12.1-10 Peak Hour CTA Signalized Intersection Turning Movement Volumes and Level of Service Analysis - Baseline (2009) Conditions

Question: General question regarding methodology is that this effort is only done during a couple peak hours. In the SPAS meetings we're told that entry into the CTA is about 1/3 Sepulveda going south, 1/3 Sepulveda going north, and 1/3 Century going west. The issues is that it is not consistent by time of day where during the day Century is frequently empty as opposed to later in the evening when it is totally backed up. The assumption is that it has to do with 405 congestion encouraging people to get off the freeway before getting to Century. How can this be taken into account with the modeling? What will it take to get representative answers about level of service during peak arrival or departure hours when total traffic including non-airport traffic results in a shift of total traffic peak hours?

#### Page 4-1139 CTA Intersection Impacts

Table 4.12.1-29 delineates the contribution of Alternative 1-2 to cumulative impacts by comparing the signalized intersection operations for the Future (2025) With Alternative 1-2 traffic conditions measured against the Future (2025) Without Alternative traffic conditions. As shown in Table 4.12.1-29, implementation of Alternative 1-2, in conjunction with other cumulative projects, would not result in a change to the volume to capacity levels of on-airport intersections that exceeds the aforementioned thresholds, with the exception of the World Way South and Center Way intersection (Intersection #9) during the arrivals level peak hour. The cumulative impact to this intersection is considered to be significant, and the contribution of Alternative 1-2 to this cumulative impact would be cumulatively considerable. This impact is unavoidable as potential measures to mitigate this impact are infeasible, as explained in Section 4.12.1.10.2 below.

Question: Generally, there are not a lot of changes to the CTA configuration so it is expected that vehicle traffic LOS will remain poor. Has the amount of curb space been calculated to ensure good LOS? How do "non-SPAS" projects such as Terminal 1.5 or Terminal 2.5 fit into the calculations? Were they included? Is there a summary list of these projects? What are they?

#### Page 4-1167 Table 4.12.1-40 Public Parking Demand - Capacity

Question: If the demand is as low as predicted, is it still possible that there are times of the day that the lots will be full? What is planned to level out demand?

#### Page 4-1168 Table 4.12.1-41 Summary of Curbside Impacts

Question: The impacts shown in the chart are "no" for virtually everything, yet we know that the CTA is already grid locked during peak hours and the passenger handling need will be increased dramatically by 2025. How is this reconciled with the observation that LOS is already poor and traffic will be increasing substantially as the number of passengers increases.

#### Page 1183 4.12.2 Off-Airport Transportation

##### 4.12.2.1 Introduction

The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs. This analysis also considers remote facilities that serve airport-related functions, such as parking and off airport cargo. The impacts of

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passengers, employees, cargo, ancillary, and collateral development (non-airport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On-Airport Transportation. The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport passenger activity projected to occur by 2025, the build-out horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

Question: Page 4-1183 Off-Airport Transportation states that the growth in passenger activity levels is independent of SPAS and would occur regardless of projects to the same 78.9 maximum. The question, then, is what traffic capacity enhancements are proposed that will reduce the impacts on airport service and surrounding communities. This section appears to imply that there isn't much to do to improve the situation. Is that correct? What if the traffic were spread to other regional airports? Would service levels improve? What about mass transit improvements? Will that improve the level of service?

#### Page 4-1183 Off-Airport Transportation

Footnote 679 The airfield and terminal improvements associated with Alternatives 5 through 7 could ostensibly be paired with the ground access improvements proposed under Alternatives 1-2, 8, or 9. Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same as addressed herein for Alternatives 1-2, 8, and 9, depending on which set of ground access improvements one of those alternatives is paired with.

Question: Footnote 679 page 1183 states that "... Given that Alternatives 5 through 7 would accommodate the same passenger loads as all other alternatives, the traffic impacts associated with Alternatives 5 through 7 would be the same..." This is saying that there is no capacity improvement for any of the runway alternatives! So why spend the major dollars for no improvement since the Northside Safety Study showed that the safety improvement is minuscule when the percentage improvement is tied to the degree of safety.

#### Page 4-1201 Table 4.12.2-6 Estimated Project Alternative Transit Demand

Footnotes: 1Assumes an Average Vehicle Ridership Factor of 1.4. 2Assumes a 5% public transit mode share.

Question: What is the basis of these two assumptions? Wasn't a factor of 1.7 determined by LAWA in the past? Isn't public transit currently only 3% or does this include taxis, shuttles, et. al. not just buses and trains?

#### Page 4-1204 Figure 4.12.2-2 LAX SPAS Traffic Model Components

##### Peak Period to Peak Hour Factors Derived from Traffic Counts...

Question: Were the off airport peak hours chosen based on the airport traffic or the rest of the traffic patterns? Since there is limited north-south capacity that is generally full whether LAX is at peak or not this should be evaluated and solutions sought.

Page 4-1205-6 Table 4.12.2-7 and text "As shown in Table 4.12.2-7, the LAX SPAS Traffic Model meets and exceeds the guidelines for model accuracy in the a.m., m.d., and p.m. peak hours for uncongested roadways;" and "As shown in Table 4.12.2-8, the model demand volume estimates closely match count volumes for uncongested locations (i.e., model volumes only higher by 4

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percent or less). For congested locations, the model's peak hour demand volumes are higher than the constrained peak hour counts by 24 percent and 18 percent in the a.m. and p.m. peak hours, respectively.

Therefore, the LAX baseline year (2010) traffic model is considered to be valid to 2010 traffic conditions and acceptable for forecasting future year traffic volumes. ... Reasonably foreseeable and funded improvements were included if they would be constructed by 2025 (see Appendix K2-1).

Question: If the model assumes unconstrained roadways is this a valid assumption? Why?

Question: How sensitive is the traffic around LAX to the number and location of the parking slots? Can the model be used to recommend changes? Was this done? When calculating LOS values for the intersections the value of use/volume capacity is shown. If a street has major traffic on one street and limited to none on the second is the LOS artificially better? Even if "accepted practice" allows this can this be reviewed and solutions sought?

#### Page 4-1307 4.12.2.7.2 Recommended Mitigation Program

Implementation of LAX Master Plan Commitments ST-9, ST-12, ST-14, ST-17, ST-18, ST-19, ST-20, ST21, 716 and ST-22 and LAX Master Plan Mitigation Measure MM-ST-14 would reduce construction-related off-airport transportation impacts associated with Alternatives 1-2, 3, 4, 8, and 9. No additional measures are available to address construction-related off-airport transportation impacts at this stage of planning. There would be significant impacts to some CMP arterial monitoring intersections and freeway monitoring stations under Alternatives 1-2, 3, 4, 8, and 9. Physical mitigation is available for Intersection 26 (La Cienega Boulevard and Centinela Avenue) as shown below under MM-ST (SPAS)-10. No additional measures are feasible and available to address the impacts to other impacted arterial and freeway facilities.

Question: Since LAX is only allowed to pay for improvements in proportion to the traffic directly from/to LAX is there any estimate how much money would be required to implement the mitigations identified even if not all can be identified at this time? What is the total cost? What is LAWA's share? The mitigations all relate to intersections. How about signage to direct airport traffic onto LaCienega to Century during the day when both streets are relatively empty?

#### Page 4-1330 4.13.1 Energy

LAWA operates a CUP at LAX, which provides heating and cooling to the Central Terminal Area (CTA). The CUP houses a co-generation system that generates electrical power, which is sold to the City of Los Angeles Department of Water and Power (LADWP). In addition to producing electricity, the CUP's cogeneration 729 facility reduces fuel usage by 10 to 30 percent compared to separate electricity and heat processes. 730Additional information regarding the CUP is provided below.

Question: The Scattergood Power Generation Plant is about to change over the next five years and there will be significant excess natural gas generated at Hyperion Water Treatment Plant which was being provided to Scattergood. Has LAX explored using some of that gas to support its power needs? When will solar panels be installed on the roofs of all buildings? Has LAWA investigated low profile wind turbines near the runways?

#### Page 5-2 Cumulative Impacts Table 5-1 Summary of Cumulative Land Use Assumptions

Question: Table 5-1 Westchester-PDR area is a bedroom community with considerably more people during the day and is a major thru way for transportation from the South Bay to West LA/Santa Monica (with people stopping here. How was this considered? See the W-PDR Community Plan EIR for details.

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Page 5-12 Cumulative Impacts Question: Only one of the office buildings #121 is shown in the list for Howard Hughes yet there are half a dozen approved including a dozen story building. Why are these not included?

Page 5-17 5.3.1 Airfield-Related Improvements

Question: Where is the additional RONS listed in previous EIRs or the 3 Hush hangers previously promised and required in 2015 by the CalTrans noise variance? What about new projects like the Runway Status Lights (there are many upcoming improvements on this). What about control tower projects/changes to address the several non-visibility issues that remain and new ones created by the TIBIT design? What improvements to the remote gates are planned? As outsiders it is not for us to guess what LAWA has in mind.

Page 5-18 5.3.2 Terminal-Related Improvements

Question: The list presented fails to mention the parking structure bridges or terminal 0 add-ons or cargo improvements or terminal 1.5 or terminal 2.5. As outsiders it is not for us to guess what LAWA has in mind.

Question: When is LAWA going to create a comprehensive list and generate a ROM cost estimate for all of these projects so that BOAC can actually plan on how it can finance them?

Page 5-21 5.3.3 Infrastructure/Security Improvements

CTA Second Level Roadway Expansion Joint and Deck Repairs - Repair and/or replacement of expansion joints and bearing pads on the CTA upper level roadway as well as repair and sealing of cracks of the roadway surface. Scheduled for completion in 2014.

Question: What about the creeping rust issues that requires more than resealing? What about the additional security issues recommended by RAND more than seven years ago and reiterated by the Israeli consultations? I.e. Blast Glass installations, cameras embedded into the roadway entrances, weight scales in the roadway, and more?

Page 5-22 5.3.4 Land Development and Miscellaneous Improvements

Manchester Square/Belford - In conjunction with residential acquisition occurring under the Aircraft Noise Mitigation Program, voluntary land acquisition within the Manchester Square and Belford areas will continue on an ongoing basis and involve the demolition of acquired structures. Following demolition, properties are fenced, landscaped, and maintained.

Question: What is planned in these locations so that impacts can be assessed and included?

Page 1655 Cumulative Impacts 5.5.2 Air Quality

Question: When will the three year late air quality apportionment study be released? Why is none of the first two phases considered in the evaluations for this DEIR?

The questions in this attachment are in addition to those previously attached that came from various members for LAWA to answer and are in no particular order:

Question: The Master Plan is to allow for future LAX growth and effectiveness within a regional network. How was HSR or other major rail considered in the design to facilitate accesses?

Question: How does this DEIR account for AC150/5300-13A changes (the draft released several months ago and went into effect September 30, 2012) that increased space requirements for ADG V and VI? Similarly, the FAA is starting phase 2 of the

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Southern California Metroplex airspace redesign in October 2012. How has this been considered in the design of the airport since it can modify approach paths and change environmental impacts?

Question: Please confirm that any building or facility in Lot C will be no higher than one floor and fulfills the runway safety area and runway protection zone areas requirements without waiver.

Question: Please address the potential consequences in the table below:

Action Potential Consequence Removal or mitigation of the 1960s six lane, 740' Manchester tunnel that was to extend from Lincoln on the north to El Segundo was decommissioned because it was destabilizing the runways. It remains under the current runways. LAWA estimated \$14M whereas it was \$10M to add a "welcome to LAX sign" in the median of Sepulveda. We're told it could be several \$billion to do it right. Not doing it right could cause major sink hole problems. It's related to an unknown underground water source. There's also a concern of leeching contamination from the airfield or from the Park One (Garrett and Rocketdyne did fuel and rocket testing on the north areas).

During the years the tunnel was built they had to run an artesian well. There was steam and water in the tunnel during the drought. LAWA has refused to check the tunnel since the rains.

The Major Hyperton sewer lines goes right where they want to put the runway. They may need to move the sewers. It will be a long, expensive process because they don't know the precise locations.

Realignment north of the runway necessitates Lincoln Blvd movement by LAWA or CalTrans. The DEIR calls for Lincoln into a tunnel or below grade plus a new interface with Sepulveda Blvd. Major loss of N-S traffic capacity for extended period. 405 already gridlocked. Again, cost is a major factor along with interruption of traffic and Westchester Business District (if it survives).

Argo Flood Channel (they call ditch) would need to be turned into a covered, limited capacity flow channel. Messing with this area could cause changes to the underground water. Inadequate capacity could flood the runways or north into Westchester. It might even impact the north terminals after a major 50 or 100 years storm. Is the permeable covering on the ditch strong enough to hold a fully loaded A380? If not, what technology will be used to ensure that it is?

Question: What capacity must the people mover be capable of handling from the Consolidated Rental Car facility to the CTA?

Question: When applying the SIMMOD model did LAWA take the numbers of each type of aircraft and plug them in to predict which runways for landing and takeoff they would logically be assigned to by the FAA? Is the model validated to ensure safe spacing distances and to match available runway capacity?

Question: What "special handling" was necessary for the north or south complex since the specific aircraft available for inclusion is airline gate assignment dependent and since they appear to have used the "black box" method of not using specific gate locations how does the model know if an aircraft was destined for a gate on the north or south or for that matter specific area of gates since not all aircraft fit into all gate locations?

Question: Appendix matrix J1-1 Aircraft Noise Technical Analysis Table 7 et.al contain specific tracks assumed. Alts 1, 5, 6, and 7 are predicted to be exactly the same in 2025 but very different from the 2009 Baseline percentages. How is this explained?

Question: A chart of the annual number of operations was presented to the LAXCommunity

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Roundtable. 2009 is about 10% less when compared with 2011(with 2009 at a low point). How would this impact the noise and pollution analysis results?

Question: Since LAWA is attempting to move aircraft and facilities closer to communities what biological contamination precautions are being improved?

Question: Several 2007 runway safety studies are mentioned in the DEIR/SPAS Report. Several technical improvements such as runway safety lights are available and RSL are installed at some, but not all intersections. None of those studies seems to have assumed that any of the technical improvements were to be implemented. If they are all implemented, what is the impact on runway safety? What is the perceived cost?

Question: Regarding DEIR meeting outreach: What list of people or organizations did LAWA notify? At one of the hearings we noted the scarce attendance and asked who had received postcards. We were told that LAWA couldn't find the lists or prior meeting participants to which to send postcards. Many of those initial lists are published in the preliminary SPAS report! We did a quick survey at the last two Westchester Neighbors Assn general meetings and found that only two people had received postcards out of approximately 60 at each meeting (approximately . in attendance had attended prior LAX meetings).

Question: When LAWA did a security analysis, did it take into consideration all of the RAND studies? What perimeter assumptions and accesses did LAWA assume? What controls into the CTA and also what airfield (and through the fence) assumptions were made? Who actually conducted the study and who approved the contractor?

Question: What kinds of safety studies were conducted? Was it assumed that all structures were sound and in good repair? If not where are cost estimates and identification of the refurbishments that will be needed? How many vehicle accidents are assumed to occur at LAX and was this accounted for in the traffic analyses? Was taxiway and gate locations considered as part of the safety studies? What about line of sight issues (and non-visibility areas) in all areas of the airside? Are sink holes considered a safety issue? How often and to what extent have sink holes limited regular flow of vehicles and aircraft on the airside? What other landside safety evaluations were conducted? What were the results?

Question: The DEIR states that the project would, "provide a better balance between north and south airfields." Does the DEIR ever state the current balance and how it intends to improve this balance? Since there are differing numbers of gates on the two complexes does balancing equally make operations less efficient when aircraft are moved to the complex away from their gate location? How does the existence of cargo operations concentration on the south complex impact the definition of "balanced?" Since the Stipulated Settlement called for resolving the issues addressed by the yellow light project, how is this applicable except to be a noble objective to "share the impacts equally?"

Question: Table 4.7.3-8 compares many runway spacing characteristics. The distance between taxiway and runway is particularly interesting and is LESS than runway spacing between runways for EVERY alternative when a centerline taxiway is installed. There appears to be controversy between FAA and NTSB about the proper spacing between runways, runway-taxiways, and runway-objects. The ACRP Airport Cooperative Research Program studies addressing lateral deviation of aircraft during landing and take offs away from the runway centerline show potential safety problems. Also, there are numerous reports of erroneous landings on a taxiway in error. Does the parallel nature of runway-taxiway create another failure mode that can lead to an air disaster? How is this accounted for? Fifteen years ago the FAA changed its emphasis from right angle taxiway exits from runways to high speed turn offs and is not going

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back to right angle exits. What does LAWA anticipate will be the next change? The standards changed during the reconstruction of the South Airfield Project so that NLAs like the A380 are now discouraged from the south. Instead these larger aircraft operate on the north where LAWA/FAA management initially told us that these aircraft could not safely land. In view of all of these reversals of standards and opinion of what is the safest method of operation and knowing that the runway-taxiway spacing requirements of AC150/5300-13A was just invoked this month, what IS the best design that we should plan for?

Question: Section 4.5 Cultural Resources (page 4-349) indicates the prior EIR was relied upon. There have been sections of historical roadway identified by local residents that remain within the airfield boundaries. Are any of these roads that date back to the late 1800s into the 1930s a potential source of artifacts or cultural information? Since they were not identified earlier and LAWA now intends to tear up some of these areas shouldn't they be more completely scrutinized? Why not? Has LAWA consulted the Centinela Valley Historical Society to find out about older artifact locations? If not, why not?

Question: The impact of the reconfiguration of Runway 6R/24L eastward to meet FAA runway safety requirements seems to have the biggest noise impact, since Alternative 4 would result in the greatest number of newly exposed units and population. However, this impact seems to be overwhelmed in the other alternatives that also have this extension but relocate runways. So relocating runways north tends to obscure the significant impact to our neighbors to the east.

Question: Is this your understanding of the finding? What is the definition of the term "newly exposed" in either the report or Appendices J1-1 or J1-2? Where is, and/or please provide, the data used to calculate the number of units or population exposed by the various alternatives that supports the findings?

Question: Is "newly exposed" the best or only noise impact metric to use in comparing alternatives. Newly exposed would seem to indicate how many people would suffer certain unacceptable levels of noise that wouldn't have that exposure without the change. What factors result in Alt 5 scoring so well with that metric?

Question: What would be the ranking of the alternatives if cost impact of mitigation measures, such as additional soundproofing, were used?

Question: In the section on noise impacts LAWA created some interesting charts on % awakening. What assumptions were made on these comparative alternatives? Was the condition of over ocean operations assumed for all nights? If not, why not? If yes, why are the numbers so imbalanced?

Question: What is the basis for the 15% assumption for midsize jets moved over from the south to the north?

Question: Turning to the Off-airport Transportation Analysis, the "bottom line" seems to be captured on page 4-1242, where the report concludes that "all of the alternatives would result in significant impacts relative to Future (2025) conditions. This conclusion is supported on page 4-1318, where many of the significant Westchester intersections have "N.F.M." (no feasible physical mitigation) under all the scenarios. Interestingly Alternatives 5, 6, and 7 weren't studied, since they have no changes to ground transportation. Moreover, although the report claims that Future (2025) conditions were studied with and without alternatives, where is the report of the 2025 impacts without Alternatives.

Question: Numerous suggestions were made during the SPAS meetings led by LAWA.

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Why are none of them referenced or identified and analyzed? For instance, more than 5 yrs ago an off site passenger check in was suggested for location near the 405 Freeway in Howard Hughes Center with a bus or people mover to improve the CTA. This commuter passenger option at Howard Hughes, was suggested so that their single vehicle transportation need not drive all the way from the freeway to LAX. Howard Hughes passengers would be taken by mass transit instead. It's nowhere in the DEIR. Why not?

Question: LAWA acknowledges what we've concluded in the first paragraph (underlined) below that a solution is not known and the direct passenger growth is larger than any of the options' impact. Aren't there changes that can be made? What about mass transit? What flyaway's were assumed in the analysis? What about benefits of regionalization?

Page 1183 4.12.2 Off-Airport Transportation 4.12.2.1 Introduction

The off-airport transportation analysis for the SPAS alternatives addresses traffic-related impacts outside the airport boundaries, including arterial roads, highway segments, and ramps that serve traffic approaching and departing the airport environs. This analysis also considers remote facilities that serve airport-related functions, such as parking and off-airport cargo. The impacts of passengers, employees, cargo, ancillary, and collateral development (non-airport activities on airport property) on off-airport roads are also included. Impacts to on-airport transportation associated with operation of the SPAS alternatives are addressed in Section 4.12.1, On-Airport Transportation. The primary focus of the analysis presented in this section is on changes in existing (baseline) traffic conditions that would result from the ground access improvements proposed under each SPAS alternative. Additionally, the off-airport transportation analysis completed for the SPAS alternatives accounts for increases in airport-related traffic that would occur in conjunction with increases in airport

passenger activity projected to occur by 2025, the buildout horizon year for the SPAS alternatives. Such future growth in passenger activity levels at LAX is independent of the SPAS alternatives and would occur even if no improvements were implemented.

Question: <http://navigatela.lacity.org/index.cfm> allows for review of the sewers impacted by the movement of Lincoln Boulevard. So does the attached picture so one of the three outfall sewers. Sections 1 and 2 (i.e. page 1-18 and table 2-3) is where nominal, incomplete information is located for the realignment and tunneling of Lincoln is discussed. This is in an area of highly concentrated utilities including major outfall sewers which can't be moved. What depth is anticipated for this realigned roadway? How will it interface with Sepulveda and where? How much more impact on other roadways and traffic should be expected during construction and afterwards? Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation.

1. Will the tunnel height restrict certain vehicles from entering?
2. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
3. Will there be hazardous materials restrictions for the tunnel?
4. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
5. Will there be emergency evacuation areas or exits? How many and where? Call boxes?
6. Will there be traffic controls such as stop lights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
7. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

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Question: Why is the totality of the Master Plan not addressed? Elements such as Terminals 1.5 and 2.5 are referred to in the DEIR, but never explained. The DEIR states that these are outside of SPAS. These elements, however, are not in the approved 2004 Alternative D Master Plan. In which portions of the environmental assessments were these projects included? Which version of gate alignment and size were assumed? How will this be incorporated into the Master Plan?

Question: Traffic issues are generally noted as significant and not mitigatable and/or not addressed. Adequate alternative plans as well as cumulative impacts are understated because several key major projects are not fully listed such as planned buildout of several Howard Hughes towers. Mass transit into and/or around LAX would significantly impact businesses but are not addressed. None of the mass transit alternatives have capacity for more than a few million annual passengers. How will the rest of the passengers be serviced?

Question: Not all reasonable traffic routings were assessed. What additional studies will be done to reduce traffic (and attendant congestion, noise and pollution) in residential neighborhoods?

Question: "Section 4.11.2 Law Enforcement talks about staff reduction facilitated by improved scale of efficiency, but as the number of travelers, service vendors, and gate facilities and more terminals increase won't there be an increased need for staff? Will there not be increased crime due to the sheer increase in numbers of people passing through LAX? As traffic increases and the number of entries into the CTA remain large how will staffing be increased to adequately support security as well as traffic control? Doesn't more traffic mean more vehicle accidents as well? How will these needs be met?"

Question: How does the DEIR address ensuring the law enforcement staffing numbers of LAWAPD will do better than merely keeping up with attrition because growth in numbers are needed to keep up with the anticipated growth of LAX?

Question: What is LAWA doing to ensure that staffing of LAPD resources do not again violate in whole or in part either Los City Charter Sections 635 or 636 or any other parts of the FAR pertaining to federal revenue diversion as we have seen in years past?

Question: How does proper staffing at LAWA impact the staffing of LAPD resources which are vital and are much needed elsewhere in the City of Los Angeles and are part of the Mayor's promise to have 10,000 LAPD officers on the streets of LA?

#### Section 4.7.1 Health Risk Assessments

...These estimates show that program-related cancer risks for all evaluated receptors (residential adults, residential children, school children, and adult workers) are predicted to be below the threshold of significance of 10 in one million for Alternative 1 and are expected to result in decreases in cancer risks due to anticipated decreases in DPM emissions. Therefore, cancer risk impacts to human health under Alternative 1 would be less than significant and would be beneficial. As noted above, these beneficial impacts are primarily due to ongoing implementation of more stringent motor vehicle emissions standards, cleaner future fleet mixes, and the decrease in stationary source emissions attributable to the replacement CUP, currently under construction. These reductions in future emissions, particularly those associated with future motor vehicle emissions, are anticipated to more than offset the estimated increases in other types of emissions, such as from aircraft, APU, and GSE....

Question: What is the basis for saying that LAWA additional emissions are compensated for by future vehicle reductions per vehicle? Where is this assumption

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scoped and demonstrated?

This section lays the ground work for much of the environmental assessments by establishing the flight mix of aircraft used. LAWA must identify the impact on these assessments for any necessary changes or inaccuracies.

General comments and some questions

1. SPAS Report Section F-1 states that the design data should be 2010, but uses the busiest day in the second highest traffic month- Tuesday, August 18, 2009. July 2009 was apparently the busiest month in 2009. Ground traffic data was gathered on a different date- a Friday in August 2011. Westchester/Playa del Rey residents have repeated called on LAWA to choose a traffic data gathering date in mid-September to account for traffic from Loyola Marymount University, Otis Institute for Art and the public and private K-12 schools in the area. Shouldn't the base design year data be the same for all elements of the EIR? Should the air traffic and ground traffic data be on the same date or at least the same month in the same year?
2. The year 2025 was chosen as the future design date. Isn't the LAX Master Plan supposed to run through 2015? Where is the authority in CEQA or NEPA to push out the design date to 2025? (The FAA projects air traffic will double worldwide by 2031. Historically, since the start of the Jet Age in October 1958, worldwide air traffic generally has doubled every 20 years with about 50% of the world's air traffic in the USA.)
3. SPAS Report Section F-1 lists 1,563 daily flights (passenger, cargo, general aviation, military) for 2009 and predicts 2,053 daily operations for 2025. LAX had about 2,000 daily operations in the year 2000 and LAX was bursting at the seams. Go-arounds for aircraft coming into land on the north complex were a daily occurrence, as the airfield could not handle the congestion. At 2,053 daily ops, capacity appears to exceed 85 MAP, well above the 78.9 MAP cap.
4. There are many problems with the fleet mix.
  - a. There is no differentiation between all-passenger and all-cargo aircraft. This is important for determining which aircraft will park where on the airfield: passenger gates or cargo ramps
  - b. For ADG I and ADG II aircraft, the report breaks them down in Regional Jets and Propellers, however, it does not specify manufacturers and models of these aircraft. This is important to know because US airlines are sending the Bombardier Canadair 50-seat CRJ100 and CRJ200 into retirement. The costs to operate these aircraft have become too high and with upcoming major engine overhauls coming, no airline wants to pick up those costs. For the same hourly block hour cost, a US airline can use a 2-class 75 seat CRJ700 or a 90 seat CRJ-900. US airlines may also push out the Embraer regional jets such as the 37 seat ERJ-135 and larger ERJ-140 and ERJ-145 jets. As of November 2012, American Airlines is replacing its American Eagle 44-seat ERJ-140 jet operation at LAX with contracted Skywest 50-seat Canadair CRJ-200's. Larger sized aircraft on a one-to-one flight replacement can result in a capacity increase.
  - c. Airbus A320 series (A318, A319, A320, A321) shows a modest increase from 259 to 273 daily flights. That number appears to be a little low. There have been a huge number of orders for the existing A320 series and the new A320 NEO (new engine option). Attachment to ARSAC LAX SPAS DEIR comments Page 2
  - d. Boeing 737 series. Although one of the stated assumptions in Section F-1 is the older aircraft would be retired there again is no breakdown between the 737 Classics Series (-100 and -200, now retired, 300/400/500 series still in operation and being retired), the current NextGen 737 series (-600, -700, -800, and -900 and -900ER) and the new 737 MAX series.
  - e. Numbers for A300 and A310 remain at 8. These must be cargo aircraft, but are not specified as such. Number should be lower as FedEx retires these aircraft from their fleet in favor of converted passenger Boeing 757's and new Boeing 767's.
  - f. Boeing 767 series shows an INCREASE from 77 to 190 daily operations. This number appears unbelievable as airlines are retiring their 767's in favor of Boeing 787's or smaller aircraft such as Airbus 320 series or Boeing 737 Next Generation (-600, -700, -

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- a. 800, -900) or 737 MAX series.
- g. DC-10 series declines from 11 to 5 daily operations. It is doubtful any DC-10's will be in service in 2025.
- h. MD-11 series increases from 7 to 10 daily operations. Again, this number should decline. Airlines that have MD-11's as freighters are retiring these aircraft due to the cost of operation (e.g. fuel).
- i. Two Lockheed C-130's a day into LAX. Does LAX really have that much military traffic into LAX every day?
- j. The Airbus A350, the competitor to the Boeing 777 and 787 Dreamliner, is not even listed in the report. Airlines at LAX (or previously at LAX and may return- Aer Lingus, Finnair, TAP Portugal) that have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai, and United. Other A350 buyers include Qatar Airways, TAM (Brazil) and Vietnam Airlines.
- k. The ADG V Boeing 747 is way too high, declining from 74 to 65. Many passenger airlines are replacing their 747's with Airbus A380's or Boeing 777-300ER's. Again, there is no breakdown of 747 types here, so one has to assume that there are no more 747-100's, -200's and 300's, but how many are Boeing 747-400 passenger and cargo airplanes? Please list 747's projected in use at LAX by airlines and routes.
- l. The A380 prediction is also very off with 27 predicted. The real number is a low of 12, a high of 16 and most likely 14. This is based upon which airlines have ordered the A380 and how they have announced to deploy them to LAX. For example, LAX may never see an Airbus A380 from Thai Airways (6 orders) or Malaysia Airways (2 orders) because those airlines are using those aircraft on the Kangaroo Route from London through their respective hubs of Bangkok and Kuala Lumpur to Australia.
- m. The 747-8 prediction of 12 is also too high. Again, there is no breakdown between passenger and cargo flights. Most of the 747-8 order book is for the freighter version. Lufthansa (20 orders) has announced 747-8 passenger service between LAX and its 747 base in Frankfurt, Germany. Other likely 747-8 passenger operators include Korean Air (5 passenger and 5 cargo orders), Air China (5 passenger orders) and TransAero (Russia- 4 unconfirmed orders). Cargo operators are Cathay Pacific (747-8F already seen at LAX), Cargolux, Atlas Air, Air Bridge (Volga-Dnepr), Nippon Cargo Airlines and Korean Airlines Cargo. A projection of 3 passenger flights and 7 cargo flights for a total of 10 747-8 flights a day is more likely.

#### Specific Questions

Page 16- Table 6

The report notes that August 18, 2009 was used as the design date. Table 6 shows a total of 1,563 average daily operations. In looking at the FAA Aircraft Movements for LAX in 2009, there were 544,833 operations that would average to 1,492 operations per day. According to the LAWA Volume of Air Traffic (VOAT) report for LAX posted on the LAWA website, the August 2009 monthly total for flight operations (scheduled, commuter, charter, but excluding cargo operations) is 50,047; this averages to 1,614 operations per day.

1. How did Ricoondo arrive at the 1,438 daily flights for Scheduled Passenger Operations? Were the 2009 Air Carrier total from the Ten Year Summary of FAA Aircraft Movements simply divided by 365 for a daily average of 1,200 operations and the Air Taxi total from the same chart daily average of 238 simply added together to get 1,438 average daily operations? What accounts for the variances between the Ricoondo figure, FAA and the LAX VOAT?
2. Why didn't Ricoondo break out the Air Taxi numbers as a separate figure since there is established data for Air Taxi?
3. Where did Ricoondo obtain data for the average number of Cargo flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual flight data?
4. How was the General Aviation daily average determined? Was this average derived from dividing the annual 16,797 operations by 365 to get a daily average of 58?
5. Where did Ricoondo obtain data for the average number of Non-Scheduled Passenger flights? Was this number based on a 2009 annual average or an August 2009 monthly average or actual

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6. For the Military daily average, was this average derived from dividing the annual 3,058 operations by 365 to get a daily average of 8?

Page 17- Table 7

1. It appears that the data in Table 6 is inconsistent with the data in Table 7 for Scheduled Passenger Operations. In Table 6, the number of operations is 1,438 and in Table 7 the total number of operations is 1,563. In Table 6, the figure 1,563 is a total for all operations (scheduled, cargo, military, etc.). What accounts for this difference?
2. In Seats/Operation, the Domestic and International totals do not add up. Was there a factor applied to the total? Why was this not clearly explained?

Page 18- Table 8

1. In the ADG I, ADG II and ADG III, propellers and regional jets are not broken out by manufacturer and model (e.g. Canadair CRJ-200, Embraer 140). Why were these not specified? Please list this information.
2. The Airbus A330 has been operated at LAX by Aer Lingus, Air Berlin (formerly LTU), Korean Air and Qantas. Why is the A330 is not listed in Table 8?
3. Are the aircraft listed on Table 8 solely passenger aircraft, or a combination of passenger, cargo combi aircraft (e.g. Boeing 747-400 Combi)? If cargo aircraft is included, then why are the Douglas DC-8 and Lockheed L-1011 not listed?

Page 21- Table 9

1. Air Berlin operated LAX-Düsseldorf in 2009 with an Airbus A330-200. Air Berlin had acquired LTU in 2007. Why is it not listed under TBIT?
- Page 23- Departure and Arrival Times of Scheduled Activity
1. How does one know in the 2025 schedules presented what are an existing flight and a "new operation created"? Please provide a list of the 2009 flight routes including aircraft and the 2025 projection that shows aircraft changed for a route and also new routes added.

Page 24- Cargo Operations

1. Why were the 12 "orphan flights" not added to the 58 daily cargo flights for 2009? Could the 12 have been counted as half an operation and added into the daily total for a new total of 64 average daily cargo flights?

Page 26, Table 12

1. In the ADG I, ADG II and ADG III, propellers and regional jets are not broken out by manufacturer and model (e.g. Canadair CRJ-200, Embraer 140). Why were these not specified? Please list this information.
2. Why does the Airbus A320 series (A318, A319, A320, A321 and A320neo [New Engine Option]) show only a modest increase in aircraft while the Boeing 737 series shows a greater increase? Please break out the Airbus A320 series by number of models by airline and route.
3. The Boeing 717 has been operated at LAX by AirTran and Midwest Airlines. Although AirTran has been acquired by Southwest and Midwest has been acquired by Frontier Airlines, the 717 remains in commercial service with Hawaiian and soon, Delta Airlines under a sub-lease with Southwest. Delta may operate the 717 into LAX. The Boeing 717 was built between 1999 and 2006 so it will still be a serviceable aircraft in 2025. Why is the 717 not listed in Table 12?
4. Does this table account for retirement of older Boeing 737's such as first-generation -100 and -200 series as well as the second-generation -300, -400 and -500 series? How much of the total is 737 Next Generation aircraft, -600, -700, -800, -900 and -900ER series? How much is the new

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737 MAX series? Please break out the Boeing 737 series by number of models by airline and route.

5. The Boeing 767 total dramatically increases from 77 in 2009 to 190 in 2025. What accounts for this increase in 767's when airlines are ordering 787's or smaller aircraft such as the 737 Next Generation or Airbus A321 as replacement aircraft for 767's? Please break out the Boeing 767 series by number of models by airline and route. Please differentiate between passenger and cargo aircraft.
6. On page 24, under cargo operations, an assumption is stated that the DC-10's will be replaced by 777F's. Why is the DC-10 still listed for 2025? Are these passenger or cargo aircraft or both? Please specify how many passenger and cargo and by airline.
7. The figure of 22 for the Airbus A340 series (A340-300, A340-500 and A340-600) appears to be too high. Production of the A340 has ceased and the A340-500 has been discarded by some airlines due to the high cost of operations. Only Singapore Airlines is operating an A340-500 into LAX once a day. What data is there is support the figure of 22?
8. The figure of 65 appears too high for the Boeing 747 (assumed to be -400 series). How many of these are passenger aircraft and how many are cargo aircraft? Many passenger airlines (Japan Airlines and All Nippon Airways are good examples) have retired their 747's in favor of the Attachment to ARSAC LAX SPAS DEIR Comments Page 5
- Boeing 777-300ER. Please break out the Boeing 747 series by number of models by airline and route.
9. The figure of 27 for the Airbus A380 series appears to be too high. What data is there is support the figure of 27? A total of 12 to 16 daily A380 flights appear to be a more reasonable number. What data is there is support the figure of 27?
10. The figure of 12 for the Boeing 747-8 appears to be too high. What data is there is support the figure of 12? How many are passenger aircraft and how many are cargo aircraft? A total of 10 daily 747-8 flights appear to be a more reasonable number. What data is there is support the figure of 12?
11. Why is the Airbus A350 XWB not listed on Table 12? Several airlines operating at LAX have ordered this aircraft and likely will operate it into LAX. Airline which have ordered the A350 include Hawaiian Airlines, China Airlines, Aeroflot, Alitalia, Asiana, Avianca, Cathay Pacific, Thai Airways and United Airlines. Former LAX tenants such as Aer Lingus, Finnair and TAP Portugal have also ordered the A350. Other A350 customer airlines not presently serving LAX include Qatar Airways, TAM (Brazil) and Vietnam Airlines.

Page 28- Gating

1. In Section 4.3, it states, "Non-scheduled aircraft were not gated." If LAWA or Ricoondo has data concerning non-scheduled flights, then where were these aircraft parked on the LAX airfield?
2. Under Section 4.3.1, it states that "the gating exercise focused on only Alternatives 1 through 4" and that estimating "performance assumptions and projections for Alternatives 5 through 7, as utilized in the aircraft noise and air quality analyses." How can the public and decision makers make an "apples-to-apples" comparison of gate when Alternatives 1 through 4 used one standard of gate assumptions and the other Alternatives 5 through 7 used a different set of gate assumptions? This appears to be a deficiency in the Draft EIR to fail to properly evaluate the alternatives. Who made the decision "taking into account contract scope and budget considerations" to apply different standards to evaluate gating between the different gate configurations? What did the LAWA/Ricondo contract state about how the gates in all of the Alternatives were to be evaluated? Were different alternatives to be given different treatments in the contract?
3. In Section 4.3.3, Methodology and Results, "For programmatic planning purposes and because airline assignments throughout the LAX terminals in 2025 would be uncertain at the time this analysis was undertaken, the focus of this analysis was placed on maximizing the level of service and gate utilization." While many long-term airline leases will have expired by 2025, the focus of gating exercise makes no sense in relation to the reality of airline operations. No airline would want to have their operations spread across 9 different terminals at LAX. With a few exceptions (e.g. United at Terminals 6, 7 and 8), airlines at LAX historically have kept their

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operations in one terminal to maximize the use of their personnel and for customer convenience, including access to the airlines' respective VIP lounges for their premium passengers. Reference the "LAX Terminal Leases as of 2012" below. Since the airlines in Terminals 4 through 8 have made substantial investments in their facilities and due to consolidation in the airline industry (less airlines), why was the gating simulation not performed on the basis of the existing terminal assignments? For example, in Figure 46, it appears that a Southwest Airlines flight is operating out of Gate 70B to Houston Hobby Airport (HOU). United Airlines, Terminal 7 tenant, operates only to Houston Intercontinental Airport (IAH) from LAX. Southwest has operated out of Terminal 1.

LAX Terminal Leases as of 2012

Terminal Airline Lease expires Comment 4 American December 4, 2024 American Airlines can reject the lease while in reorganizing under Chapter 11 of the US Bankruptcy code 5 Delta November 1, 2025, 6 United August 17, 2017 Assumption of Continental Airlines lease 6 Alaska March 20, 2022 New 10 year lease 7 & 8 United August 17, 2017

PDF pages 47 to 150- Appendix B- Ramp Charts

1. In the 2025 ramp charts (only Alternatives 1 through 4 were studied; Alternatives 5 through 7 were not studied), there are domestic flights listed at the Tom Bradley International Terminal (TBIT). From 1984 to 1987, World Airways had been the only domestic operator at TBIT. In the beginning of TBIT operations, some domestic World Airways passengers were sent to the US Customs Hall to claim their baggage. Will the new TBIT be set-up for domestic flights to avoid sending domestic passengers into the Customs Hall? Since the focus of TBIT is to be international flights, why were domestic flights included in the TBIT ramp simulations? Will domestic passengers get a good impression of LAX if they are sent to US Customs in error?
2. In the 2025 ramp charts (see Figure 47 specifically), there are two Airbus A380 flights listed as Paris-Charles de Gaulle to Los Angeles and then onward to London-Heathrow and vice versa (CDG-LAX-LHR and LHR-LAX-CDG) at Gates 156 and 154. There are other examples of these as well that seem extremely unrealistic- AKL-LAX-TPE, CDG-LAX-MUC, ZRH-LAX-CDG, BNE-LAX-LHR to list a few. There are no airlines presently operating those routes as described above. Airlines have operated certain flights on the same route and time for more than 50 years. The gating simulation does not appear to be realistic. Were these flight schedules used in the gating simulation derived from actual flight schedules? Were some of the flights invented? Were some of the aircraft choices for the routes arbitrarily chosen?

3. In the 2025 ramp charts (see Figure 50 specifically), there is a 747-400 flight listed at Gate MSC-4 at the Tom Bradley International Terminal (TBIT) with a routing of Dallas/Fort Worth-Los Angeles-Anchorage (DFW-LAX-ANC). This looks a like a cargo flight routing. No US passenger airline is operating a 747 on those routes. Were cargo flights listed at passenger gates as passenger flights on the gating charts? What are those flights?
- Note that on Page 28- "...taking into account contract scope and budget considerations...the gating exercise focused on only Alternatives 1 through 4." "From a gating standing, the terminal and gate layouts assumed under SPAS Alternatives 1 and 2 are identical." Alternatives 5 through 7 were not analyzed in this section. WHERE IS THIS ANALYSIS COMPLETED? IF NOT, WHY NOT?

BACK-UP MATERIALS  
TEN YEAR SUMMARY- FAA AIRCRAFT MOVEMENTS  
Attachment to ARSAC LAX SPAS DEIR Comments Page 7  
[http://www.lawa.org/welcome\\_LAX.aspx?id=806](http://www.lawa.org/welcome_LAX.aspx?id=806)  
<http://www.lawa.org/welcomeLAX.aspx>  
Statistics — Ten Year Summary—FAA Aircraft Movements

Air Carrier Air Taxi Military General Aviation Total  
1994 418,166 214,473 14,213 43,036 689,888  
1995 472,134 230,997 3,178 26,330 732,639  
1996 502,056 233,832 3,262 24,716 763,866  
1997 524,035 227,479 3,572 26,406 781,492

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1998 525,089 219,123 3,326 26,031 773,569  
1999 542,082 215,886 2,646 18,536 779,150  
2000 565,805 198,306 2,304 17,018 783,433  
2001 524,014 193,892 2,052 16,156 738,433  
2002 449,712 177,123 2,115 16,474 645,424  
2003 433,370 171,199 2,561 15,248 622,378  
2004 458,774 179,262 3,002 14,059 655,097  
2005 454,934 178,017 2,607 15,071 650,629  
2006 463,341 174,745 2,614 16,142 656,842  
2007 467,193 193,930 2,614 17,217 680,954  
2008 453,232 150,561 2,316 16,397 622,506  
2009 438,059 96,919 3,058 16,797 544,833  
Attachment to ARSAC LAX SPAS DEIR Comments Page 8  
2010 455,340 97,723 2,712 20,060 575,835  
2011 473,282 109,885 2,390 18,355 603,912  
TEN YEAR SUMMARY – PASSENGERS  
[http://www.lawa.org/welcome\\_LAX.aspx?id=800](http://www.lawa.org/welcome_LAX.aspx?id=800)  
<http://www.lawa.org/welcomeLAX.aspx>  
Statistics — Ten Year Summary—Passengers

YEAR DEPARTING ARRIVING TOTAL  
1994 25,812,087 25,238,188 51,050,275  
1995 27,234,353 26,674,870 53,909,223  
1996 29,162,942 28,811,617 57,974,559  
1997 30,313,688 29,828,900 60,142,588  
1998 30,826,859 30,388,853 61,215,712  
1999 32,298,944 31,980,627 64,279,571  
2000 33,836,077 33,467,105 67,303,182  
2001 31,007,930 30,598,274 61,606,204  
2002 28,181,481 28,042,362 56,223,843  
2003 27,544,606 27,438,232 54,982,838  
2004 30,343,873 30,360,695 60,704,568  
2005 30,649,324 30,840,074 61,489,398  
Attachment to ARSAC LAX SPAS DEIR Comments Page 9  
2006 30,500,130 30,540,936 61,041,066  
2007 31,244,261 31,194,322 62,438,583  
2008 29,930,985 29,884,661 59,815,646  
2009 28,288,211 28,232,632 56,520,843  
2010 29,605,542 29,463,867 59,069,409  
2011 30,923,005 30,939,047 61,862,052  
TEN YEAR SUMMARY – AIR FREIGHT  
[http://www.lawa.org/welcome\\_LAX.aspx?id=802](http://www.lawa.org/welcome_LAX.aspx?id=802)  
<http://www.lawa.org/welcomeLAX.aspx>  
Statistics — Ten Year Summary—Air Freight

YEAR AIR FREIGHT IN TONS  
1994 1,516,567  
1995 1,567,248  
1996 1,696,663  
1997 1,852,487  
1998 1,787,400  
1999 1,884,526  
2000 2,002,614  
2001 1,779,065  
2002 1,869,932  
Attachment to ARSAC LAX SPAS DEIR Comments Page 10  
2003 1,924,883

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2004 2,022,911  
 2005 2,048,817  
 2006 2,022,687  
 2007 2,010,820  
 2008 1,723,038  
 2009 1,599,782  
 2010 1,852,791  
 2011 1,773,215  
 TEN YEAR SUMMARY – AIR MAIL  
<http://www.lawa.org/welcomeLAX.aspx>  
[http://www.lawa.org/welcome\\_LAX.aspx?id=804](http://www.lawa.org/welcome_LAX.aspx?id=804)  
 Statistics — Ten Year Summary—Air Mail

YEAR TONS OF AIRMAIL

1994 186,878  
 1995 193,747  
 1996 194,081  
 1997 212,410  
 1998 264,473  
 1999 253,695  
 2000 246,538

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2001 162,629  
 2002 92,422  
 2003 97,193  
 2004 92,402  
 2005 88,371  
 2006 80,395  
 2007 66,707  
 2008 73,505  
 2009 64,073  
 2010 74,034  
 2011 80,442

Comments and Questions concerning Lincoln Boulevard Re-Alignment in Alternatives 1, 5, and 6.

In addition to these questions, there are further detail and more questions in the attached Letter from Bureau of Sanitation and the ARSAC White Paper: PROGRAM LEVEL VS PROJECT LEVEL EIR ANALYSIS RE: THE LINCOLN BLVD. TUNNEL PROJECT

1. Based upon the attached Bureau of Sanitation letter dated September 14, 2012, will LAWA be impacting any sewer lines? Which sewer lines will be impacted? How will LAWA mitigate these sewer lines? Considering that the three outfall lines running under LAX to the Hyperion Treatment Plant provide almost all of the sewage treatment capacity for the City of Los Angeles and some adjoining cities, is the risk of realigning Lincoln Blvd by LAWA too great as to prevent Angelenos from flushing their toilets?
2. Is the proposed Lincoln Blvd realignment in Alternatives 1, 5 and 6 a Program Level EIR or a Project Level EIR? Please see the White Paper for a detailed analysis. Please explain your answer with relevant citations from CEQA.
3. Which agencies has LAWA consulted with regarding the proposed Lincoln Blvd realignment?
  - a. Was CalTrans consulted? What was their response? Who at CalTrans was contacted and who from CalTrans replied?
  - b. Was the Los Angeles Department of Water & Power consulted? Who was contacted and who from LADWP replied?
  - c. Was the Bureau of Sanitation contacted? Who was contacted and who from LADWP replied?
  - d. Were oil pipeline operators contacted? Who was contacted and who from

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- e. the oil pipelines replied?
- e. Were fiber operators contacted? Who was contacted and who from the oil fiber operators replied?
- f. Were other underground utilities or right of way users contacted? Who was contacted and who from the oil fiber operators replied?
4. Does LAWA face any challenges with regards to outfall sewers or abandoned sewer lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
5. Does LAWA face any challenges with regards to water lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
6. Does LAWA face any challenges with regards to storm drains in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
7. Does LAWA face any challenges with regards to electrical lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
8. Does LAWA face any challenges with regards to fiber lines in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
9. Does LAWA face any challenges with regards to other subsurface users of the road or right-of-way in relation to a proposed realignment of Lincoln Blvd? How will LAWA mitigate those challenges?
10. Is the proposed Lincoln Blvd realignment considered to be a minor street modification, an improvement or something else? Please explain your answer.
11. In the Light and Glare section, why does LAWA discount the significance of possible light and glare problems by proposing to move Lincoln Blvd 350 feet closer to homes, schools, churches and businesses.
12. In the Air Quality Section 4.2 (beginning page 4-88), why is the proposed Lincoln Blvd realignment not listed as a construction area?
13. In the Cultural Resources Section 4.5 (beginning page 4-337), the memorial marker for LAWA Police Officer Tommy Scott on Lincoln Blvd is not listed. On April 29, 2005, Officer Scott was the first LAWA officer killed in the line of duty. Since LAWA has not listed the memorial marker on the maps, it is not clear if the proposed Lincoln Blvd realignment would affect access to this location. What mitigation measures does LAWA propose to preserve access to the Tommy Scott memorial marker?
14. In the Green House Gases Section 4.6, why did not LAWA study old petroleum lines? Why did not LAWA study old sewer lines that in some cases date back to the 1920's?
15. In the Hydrology Section 4.8, the intersection of Lincoln and Sepulveda was not studied as a hazard? Why in Section 2.3.1.1, Acquisition, did not LAWA list Lincoln and Sepulveda as a potential acquisition?
16. On page 4-988, why is there no impact measured for transit vibration? Lincoln Boulevard is a major highway and carries significant transit, public and private.
17. In the Utilities Section 4.13, why are the utilities underneath Lincoln and Sepulveda discussed and examined?
18. Creating a new tunnel brings all kinds of new and interesting problems, not just from construction, but also operation. This series of questions relates to the proposed tunneling of Lincoln Blvd.
  - a. Will the tunnel height restrict certain vehicles from entering?
  - b. If there are height restrictions where will trucks go to get around the tunnel? (Probably Sepulveda and Manchester)
  - c. Will there be hazardous materials restrictions for the tunnel?
  - d. How will the tunnel be ventilated? Who will operate and maintain the ventilation system?
  - e. Will there be emergency evacuation areas or exits? How many and

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where? Will there be call boxes?

- f. Which agency or agencies will respond to accidents and emergencies in the tunnel?
- g. Will there be traffic controls such as stoplights and electronic signage to warn drivers not to enter the tunnel? Will the electronic signage offer alternate routes? What will those alternate routes be?
- h. Will LAWA consult with LAWA Police Department, LAPD, LAFD, CHP, the FAA, TSA and other relevant agencies for preventing the tunnel from becoming a terrorist target?
- i. The Sepulveda Tunnel is dirty from automobile pollution and graffiti. What are the plans to clean the proposed Lincoln Boulevard tunnel on a regular basis?

ARSAC WHITE PAPERPROGRAM  
 LEVEL VS PROJECT LEVEL EIR ANALYSIS  
 RE: THE LINCOLN BLVD. TUNNEL PROJECT  
 INTRODUCTION AND SUMMARY

The SPAS Report and DEIR recently released by LAWA purports to be a Program Level EIR, not a Project Level EIR, despite the fact that numerous specific projects are identified including an automated people mover, consolidated rental car facility, movement of taxiways and runways on the airfield and modernization of terminals. This white paper is written to examine one of the projects specifically identified in the documents in the context of the Program versus Project Level EIR debate.

The specific project considered herein is the realignment of Lincoln Boulevard to accommodate the move northward of the outboard runway of LAX. This project will in effect swing Lincoln Boulevard, California State Route 1, on a wider arc around the airfield, bringing it much closer to homes, businesses, churches, schools and other sensitive uses in the Westchester community. It will also require that Lincoln be depressed below grade into a tunnel of a length that will depend on the extent of the runway move. A cost estimate in the SPAS Report puts the cost of this project in excess of \$1billion with many elements admittedly not included. A cost figure three or four times larger would be more realistic.

This white paper does not undertake to study all aspects of the runway move. A similar white paper could be written about the implications of converting the Argo Trench to a box culvert or the elimination of the old tunnel that still exists under the north airfield. Three of the alternatives proposed by LAWA would involve extending the perimeter fence of LAX hundreds of feet into the community and realigning and tunneling Lincoln Boulevard, California State Route 1. All would involve realigning and tunneling Lincoln Blvd.

Alternative 1 relocates runway 6L/24R, the outboard runway of the north airfield, 260 feet to the north; Alternative 5 relocates this runway 350 feet to the north; and Alternative 6 relocates this runway 100 feet to the north. Each of these alternatives requires that 6080 feet of Lincoln Blvd. be realigned and each would require that it be depressed into a tunnel. In the case Alternative 1, the tunnel would be 252 linear feet; Alternative 5 would require a 765-foot tunnel; and Alternative 6 would require a 540-foot tunnel.

In contrast to Alternatives 1, 5 and 6, Alternative 2 would not require moving the LAX perimeter fence or realigning and tunneling Lincoln Blvd.

The subject of Program Level versus Project Level EIR's is dealt with the California's CEQA Guidelines. Under the regulations stated therein, a Program Level EIR may be used to adopt a general plan for the conceptual planning of a district or area. It is designed to provide some level of analysis of "future and unspecified development" (CEQA Guideline 15146(b)).

In summary, this white paper demonstrates that the realignment and tunneling of Lincoln Blvd. is a specific, tangible, identified project, not a "future and unspecified" project. A high level of technical analysis has been performed on the project, far more than the "conceptual planning" sanctioned by the Guidelines for a Program Level EIR. The DEIR and SPAS Report analyze the Lincoln Blvd. project in significant detail including its alignment, length of tunneling and sloping, and cost. Doing so reveals that a

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"project", not a "program" is being proposed. Having opened the door of technical analysis, LAWA is obligated to perform the analysis completely and accurately. LAWA cannot escape the effects of faulty, incomplete, misleading and inaccurate analysis by claiming only a "program level" analysis is required.

The opinion expressed herein is that LAWA cannot have its cake and eat it too. It cannot disclose innocuous or general details and conceal specific details that reveal serious flaws. It cannot calculate and state the costs of a project without including all of the costs. And it cannot identify some of the impacts of the project without revealing all of the impacts.

One does not need to be a civil engineer to discern that if LAWA is able to calculate the exact length of the tunnel required for the realigned Lincoln Blvd., then it must know Lincoln's proposed path including how much closer it will be to residences, businesses, schools, churches and other sensitive uses. It must also know how deep below surface level the tunnel must be placed including the extensive web of oil and gas pipelines, outfall sewers, water, electrical, fiber optic and other subsurface facilities which will have to be identified, located, and relocated as a result of the project. None of these factors are addressed in the DEIR or SPAS Report.

Having clearly revealed that it has taken the Lincoln Boulevard realignment project past conceptual planning and into preliminary engineering, LAWA must be forced by either community outcry or by court decree to treat the outward expansion of the LAX perimeter fence and the realignment and tunneling of Lincoln Boulevard as a project which can only be entitled by means of a project level EIR.

During the scoping phase of the SPAS process, numerous comments were offered asking that the subsurface structures below Lincoln and Sepulveda boulevards be studied. The failure to do so, or the failure to disclose the result of doing so, constitutes a fatal flaw in the DEIR.

A word about the real-world context of this program versus project level debate: Gina Marie Lindsey and other advocates for moving the north runway 24 Right to the north are openly and repeatedly refusing to defer the issue of the movement of the runway to a later time when more is known about LAX's passenger levels and the success or failure of the New Large Aircraft which the runway move is designed to accommodate. They are declaring that no other projects at LAX can be planned or implemented until the location of the runway is established. Clearly, this statement reveals that a program level EIR is simply not what LAWA needs at this time. At this time LAWA needs and should produce a Project Level EIR to move the runways. If LAWA has determined that the runway move and the attendant realignment and tunneling of Lincoln Blvd. is the lynchpin for all other LAWA projects, then it should withdraw the Program Level EIR, isolate the runway/Lincoln Blvd. project, study it thoroughly and circulate a project level DEIR which discloses and adequately studies all elements of the project.

WHITE PAPER METHODOLOGY

At page 4-3 of the DEIR LAWA quotes CEQA Guideline 15146(b) to the effect that a program level EIR should "provide an effective means of delineating and comparing and contrasting the overall characteristics, performance levels and environmental impacts of each alternative."

With respect to the runway relocation proposed for the LAX north airfield, this means that sufficient information must be given to compare and contrast Alternatives 1, 5 and 6 which would move the runway to Alternative 2 that would not.

This whitepaper will review both the SPAS Report and the DEIR on this issue. It will identify both what LAWA has disclosed and what it has not disclosed about the Lincoln Blvd. realignment and tunnel project.

The SPAS Report will be considered first. The SPAS Report states the study requirements agreed to by LAWA in the settlement agreement and gives background information and data which are a useful as a starting point for the consideration of the legally mandated and court enforced Environmental Impact Report.

The DEIR is organized, as required by the Guidelines, in terms of thirteen categories of environmental impact such as Aesthetics, Air Quality, etc. Within each such category the DEIR gives general background followed by a specific discussion of each of the nine

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326 alternatives. Within the discussion of each alternative there is a heading "Northern Boundary" within which the Lincoln Blvd. realignment is discussed. Within the "Northern Boundary" discussion is a section dealing with impact during operation and impact during construction. Hence each of the thirteen areas of environmental impact is outlined as follows:

- Environmental Impact category
- o General background
- o Specific alternative
  - Northern Boundary issues
  - Operational impacts
  - Construction impacts

The balance of this white paper will review and discuss LAWA's treatment of the Lincoln Blvd. realignment and tunnel project.

#### REVIEW OF THE "PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT"

At pages 1-4 through 1-16 SPAS Report basic descriptions of the nine alternatives are given together with diagrams of each. For Alternatives 1, 5 and 6, the "distinguishing airfield improvement feature" is said to be the northward movement of runway 6L/24R 260 feet, 350 feet and 100 feet respectively.

The narrative description of these three alternatives gives no indication that a necessary element of the runway move is the expansion of the airfield and the realignment and tunneling of Lincoln Blvd. Only in a small note on the diagrams is this revealed. A member of the public trying to understand LAWA's intentions would reasonably believe that the narrative would accurately describe the project and would not omit such a significant component as the complete realignment of Lincoln Boulevard, California State Highway 1.

After an extended review of the history of the LAX Master Plan and the SPAS process, Section 5.5 of the Report begins the discussion of the current, on-the-ground situation as LAX. This section, which begins at page 5-79, is entitled Refinement Of Second Iteration of SPAS Concepts.

At page 5-105 the following passage concerning Lincoln Boulevard appears:  
Lincoln Boulevard

Similar to the Argo Drainage Channel, relocation of Runway 6L/24R to the north would place portions of Lincoln Boulevard within the RSA and/or OFA.

Consequently, new alignments of Lincoln Boulevard were developed (including covered and below grade sections) in order to comply with FAA standards. Concepts with greater runway separation would require portions of the alignment to be covered and below grade.

The conceptual alignments are provided in Section 5.6 beginning at page 5-110. Major elements of each of the nine alternatives are placed into one of three categories: "airfield improvements," "terminal improvements" or "ground access improvements." The Lincoln Blvd. realignment is placed in the "airfield improvements" category and the issue is framed thus:

The extent to which the Lincoln Boulevard and the Argo Drainage Channel would have to be modified in order to accommodate a northerly shift in the alignment of Runway 6L/24R;

A strong argument can be made that it is highly misleading to characterize tunneling and realigning more than a mile of Lincoln Blvd. thereby taking it hundreds of feet closer to sensitive uses as a "modification."

Section 5.7 of the Report sets forth numerous alternatives that were "rejected" and not carried forward in SPAS. The fact that many of those alternatives had great potential for achieving the purposes of SPAS with less community impact than expanding the LAX fence line and realigning Lincoln is not the subject of this whitepaper, but should be noted.

Section 6, SPAS ALTERNATIVE PROJECTS, constitutes the real substance of the Report.

The three goals of SPAS are recited at page 6-1, one of which is to achieve 78.9 million

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annual passengers. At page 6-3 passenger counts for the years 2007 through 2011 are given.

Discussion of Alternative 1 begins at page 6-12. At page 6-13 the following appears: Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway, and depress the eastern portion of the road segment to be compatible with the object free area requirements for the east end of Runway 6L/24R, which would require approximately 540 linear feet of the road segment to be tunneled.

Discussion of Alternative 5 begins at page 6-51, and the following appears at page 6-52: Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 765 linear feet of the eastern portion of the road segment to be tunneled.

The following appears at page 6-52:

With the combination of the runway improvements (including the easterly extension of Runway 6R/24L and improvements to 6L/24R), associated improvements to Lincoln Boulevard and the Argo Drainage Channel, and establishment of displaced thresholds, the Alternative 5 north airfield configuration would be fully compliant with FAA RSA standards for Runways 6L/24R and 6R/24L, addressing hazards relating to the potential for aircraft to overshoot, undershoot, or experience excursions from the runways. Just as it is a misrepresentation for LAWA to characterize realigning Lincoln Blvd. for more than a mile and tunneling it for more than 750' as a "modification," so too is characterizing this very large project as a mere "improvement."

A serious question will be whether Caltrans will consider the conversion to a tunnel and the realignment of California State Route 1 by more than a mile to be a minor street "modification" or "improvement." Apparently LAWA considers the permitting of the "Lincoln Boulevard Realignment and Tunnel Project" to be a mere detail to be handled by staff at a later date.

Discussion of Alternative 6 begins at page 6-57, and the following appears at page 6-58: Relocate Lincoln Boulevard northward between Sepulveda Boulevard and Westchester Parkway and depress the eastern and western portions of the road segment to be compatible with the object free area requirements for Runway 6L/24R, which would require approximately 252 linear feet of the eastern portion of the road segment to be tunneled.

As was the case in its discussion of Alternative 1 and 5, the realignment and tunneling of Lincoln Blvd. is labeled "an improvement."

In stark and simple contrast to the expand-the-airfield, tunnel-and-realign-Lincoln approach of Alternatives 1, 5 and 6, the following is stated about Alternative 2 at page 6-34:

Improvements associated with Runway 6L/24R under this alternative, including connecting taxiways, are different than Alternative 1. Because there would be no northerly relocation of Runway 6L/24R under Alternative 2, it does not require the modifications to the Argo Drainage Channel (other than those required under existing conditions to meet federal RSA requirements) and Lincoln Boulevard described above for Alternative 1.

For purposes of this whitepaper this ends the relevant narrative discussion of the SPAS alternatives (although Report Chapter 8 on dollar costs awaits), and the question can be posed, has LAWA fairly described the alternatives and allowed a member of the public who simply wants to understand this important infrastructure project to compare and contrast the alternatives? Asked in another fashion, does characterizing the realignment of Lincoln Boulevard by hundreds of feet and its depression into a tunnel for as much as 765 linear feet as a "modification" or an "improvement" accurately portray what LAWA intends to do? The question answers itself.

The financial underpinnings of LAWA's much desired expansion is strategically placed where LAWA obviously wants it, at the very end before which most members of the

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public will long since have given up. In fact, Chapter 8, Financial Analysis, is exceptionally informative and, not surprisingly, misleading.

Sections 8.1 through 8.3 provide discussion of LAWA's governance structure, accounting and cost center structure, governing bond documents, and key business agreements. Section 8.4 sets forth key assumptions. All make for interesting reading. However it is Section 8.5, Estimated Alternative Costs, Section 8.6, Approximation of Funding Sources", and their associated Table 8-1 that are of interest herein.

Section 8.5 incorporates an earlier discussion about the dollar cost of other, non-SPAS planned projects at LAX. A total of \$6.5 billion is planned to be spent at LAX on non-SPAS projects. Of this amount \$2.1 billion is currently in construction with \$4.4 billion in the planning phase. Examples of projects in planning are the Midfield Satellite Concourse, renovations to existing terminals and the ongoing soundproofing program. Now, on to the cost of SPAS and the Lincoln Blvd. Realignment and Tunnel Project: To review the Report's analysis of the cost of SPAS one must turn his or her laptop a quarter turn clockwise and rest it on its right side because Table 8-1 is in landscape, not portrait, format and LAWA has made precious few hard copies available. For one reviewing the report on a desktop computer, you will need to rest your left ear on your desk and just do the best you can. The fact the font is nearly invisible and the size is in the 2 to 3 range does not help.

Table 8.1 is a summary of costs associated with each of the SPAS alternatives. Directing attention to the table for Alternative 5, one learns the following. The cost of the airfield component of Alternative 5, which is the component that includes expanding the airfield and realigning and tunneling Lincoln is said to be \$808,660,000 in 2010 dollars or \$1,099,792,000 in escalated dollars. Rounded that is \$800 million if the projects had been built two years ago and \$1.1 billion if the projects broke ground this year. Of course it is impossible to predict what it will cost if the work commences in 2025, the earliest year it is predicted LAX will actually reach 78.9 MAP, so we will work with \$1.1 billion.

Table 8.1 states that the total escalated cost of Alternative 5 including terminal and ground access improvements to be \$9,091,629,000 and the total identified funds available to be \$3,601,629. The wisdom of undertaking a program that is underfunded by two-thirds is beyond the scope of this whitepaper, but is alarming.

In clear contrast to the cost estimates for Alternative 5, airfield improvements for Alternative 2 are estimated to be \$205,200,000 in 2010 dollars and \$279,760,000 in escalated dollars. Thus, the cost of Alternative 2 is approximately three percent (3%) of Alternative 5.

What follows in Chapter 8 is a number of charts and graphs that provide visual representations of the costs of various alternatives with and without various other alternatives concluded. Each is based on the specific dollar figures previously stated. Where did these specific dollar figures come from? The answer to that question is buried even deeper in the Report in Appendix G, Preliminary Rough Order of Magnitude Cost Estimates. (On your way to Appendix G be sure and stop off at Appendix F that shows that LAWA achieves NO significant operational efficiencies by any of its proposed airfield modifications.)

Table AF-1 of Appendix G purports to summarize cost of the airfield improvements of the various alternatives. The cost of realigning and tunneling Lincoln is explicitly not included but the cost of removing the abandoned tunnel under the north runway and the cost of converting the unlined Argo Trench to a concrete box culvert are included. The cost of airfield improvements for Alternative 5 is placed at \$716,700,000. The cost of airfield improvements for Alternative 2 is stated to be \$205,200,000.

Parenthetically it can be noted that in addition to the cost of realigning and tunneling Lincoln, the following costs are identified in a footnote as not included in these estimates: site clearing, roadway work and facility demolition in support of Taxiway D and E work; security fence and guard post costs; right-of-way and land acquisition costs; costs of the Community Benefit Agreement or costs for the Mitigation Monitoring Plan; project phasing costs; tenant relocation costs; off-airport property acquisition and relocation costs; or mitigation costs of for the Lincoln (Park West) Apartments or 8939 S.

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Sepulveda office building. Cost of these items is left to the public's imagination.

Following summary Table AF-1 is seven pages of tightly constructed and very detailed estimates of the cost of moving runway 6L/24R. Examples of the level of detail achieved in the underlying cost estimate are "Removal of runway concrete pavement 19" thick", "Removal of shoulder asphalt 4" thick" and "Removal of Concrete 12" thick". Following the detailed seven page estimates to move the runway is our target prize: The estimated costs to realign and tunnel Lincoln Blvd.

Table AF-3 summarizes the cost to realign and tunnel Lincoln Blvd. as follows:

- Alternative 1 - \$61,210,000
- Alternative 5 - \$89,960,000
- Alternative 6 - \$45,290,000

The cost to realign and tunnel Lincoln Blvd. for Alternative 2 is zero of course.

Following summary Table AF-3 are five pages of detailed estimates for the specific cost items of realigning Lincoln Blvd. including such items as "water for compaction" (\$15,000), "base course 8" thick" (\$208,000), and "subbase course 12" thick" (\$216,000).

At this point the question posed at the very top of this whitepaper can be restated: Can it be fairly said that LAWA is only engaged in "conceptual planning" when it has obtained an estimate for 8" thick course base at \$208,000 and for 12" thick subbase at \$216,000. It is a remarkable "program level" EIR which includes an estimate for the precise amount of subbase required.

Table AF-4 is similarly illuminating of the level or project work completed by LAWA to date. This table states quite precisely the exact number of feet that will be flat, sloped, depressed and in a tunnel for all of the potential runway moves. For example, Table AF-4 indicates that if runway 6L/24R is moved 300 feet, then 6080 feet (more than a mile) of Lincoln Blvd. will be rerouted of which 350' will be in a tunnel, 600' will be "sloped" and 280' will be depressed and 4,850' will be flat. (It might be noted that the tunnel lengths listed in Exhibit G, Table AF-4 seems to be far off from the tunnel lengths listed in the body of the Report).

Is LAWA simply engaged in "conceptual planning"? Hardly.

Exhibit G in total is 56 pages of tightly constructed estimates for very specific projects pertaining to airfield modifications, terminal improvements, and ground access improvements including the Automated People Mover (APM) and the Consolidated Rental Car Facility (CONRAC).

"Conceptual planning" for a master plan involves favoring bike paths and housing near transit stations. It does not include a calculation the cost of concrete subbase 12" thick.

#### CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Simply stated, LAWA has placed itself uncomfortably on the horns of a dilemma. Otherwise stated, it has hoisted itself on its own petard.

It has claimed that what it seeks is a "Program Level" EIR such as would occur in a community's broad general or zoning plan at the "conceptual planning" stage. And yet it is quite clear that it has gone far, far past "conceptual planning" and is deeply into preliminary engineering on a specific, project-by-project basis.

In recent conversations with Westchester and Playa del Rey community members, LAWA Executive Director Gina Marie Lindsey has been asked whether she would be willing to move forward with the terminal modernization projects and the ground access projects before LAWA proceeds with the airfield projects. Considering the limited acceptance and safety problems faced by the New Large Aircraft (NLA), the sluggish world economy and the "restrained" at best growth in traffic at LAX, such a question is justified.

Ms. Lindsey's response has been clear, unambiguous and simple: No, we can't move forward without knowing what is going to happen with the north airfield.

The community's response to Ms. Lindsey should be equally clear, unambiguous and simple. We believe it is the same answer she will receive in Court: If you want a specific project such as moving the runway and realigning and tunneling Lincoln Boulevard, then do a Project Level EIR. If the world of LAX revolves around one

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project, that being moving the runway, then all other projects should be put aside and the runway project should be resolved. Don't try to obtain a backdoor approval or confuse the public by throwing in community-serving projects which you have no intention of delivering. Withdraw the "program level" DEIR and prepare a "project level" EIR forthrightly stating that you seek to move the runway and realign and tunnel Lincoln. Perhaps the expression that should be used in characterizing the Report should not refer to dilemmas or petards. What it is, is "neither fish nor fowl." It is far too detailed and advanced to be considered as a program level EIR and yet it falls far short of what would be necessary to be approved as a project level EIR.

POSTSCRIPT TO CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE PRELIMINARY LAX SPECIFIC PLAN AMENDMENT STUDY REPORT

Back to Exhibit G, Table AF-3, the cost breakdown to reroute Lincoln.

The Sepulveda Boulevard right of way is an old and historic one in Los Angeles. It was not always as urbanized as it is now. For many years it was the main route for subsurface pipelines to transport oil from the oilfields in the Baldwin Hills to the refineries in the South Bay including the Chevron refinery in El Segundo and the Mobil refinery in Torrance. It is still in use today for that purpose.

In more recent years one of the City of Los Angeles most important facilities was constructed and recently modernized, that being the Hyperion waste treatment plant in Playa del Rey immediately south and west of LAX. Fed by outfall sewers as much as 20' in diameter, Hyperion treats and disposes of tons of raw and treated sewage daily. The path of the outfall sewers: through Culver City and Westchester intersecting Sepulveda and Lincoln boulevards around LAX.

The major underground pipelines are all in addition to the innumerable public utility and private entity cables and pipes under the Sepulveda corridor at its intersection with Lincoln.

The spider web of pipes under Sepulveda Boulevard has been well known to the community for many years. Longtime Sepulveda property owner and civic activist Howard Drollinger knew it well and spoke of it often.

LAWA steps onto a very slippery slope when it undertakes to expand its campus and depress Lincoln Blvd. into a tunnel in this area, particularly considering that when it moved the southernmost runway it discovered a runway ON ITS OWN CAMPUS that it had no record of. This runway was a north-south runway that had existed behind the west side of the Tom Bradley International Terminal. Westchester Golf Course was the Runway Protection Zone (RPZ) for this former runway.

Not one word in the SPAS Report concerning the realignment and tunneling of Lincoln indicates that the underground situation around the Lincoln/Sepulveda intersection has been carefully studied. And the estimates to reroute Lincoln set forth in Exhibit G, Table AF-3 give no comfort, it appearing that the estimate contains no allowance for the discovery or relocation of such facilities. Third-party agreements are a major cost item for such projects and yet Table AF-1 specifically indicates that costs for right of way and land acquisition are NOT included in the cost estimates.

The fundamental purpose of the Scoping process is to advise the project sponsor of items which must be carefully studied. If by some stretch of the imagination LAWA didn't know that it needed to study facilities under Lincoln and Sepulveda boulevards, it was certainly advised to do so in many comments and written correspondence during the Scoping process.

During the scoping phase of the CEQA effort numerous individuals and entities, including ARSAC requested that the subsurface conditions and structures in the Lincoln/Sepulveda intersection area should be carefully studied. The SPAS Report fails to show that this has been done. Nevertheless, Appendix G purports to give a cost estimate to realign and tunnel Lincoln Blvd. Having opened the door to a consideration of cost, LAWA cannot omit from consideration an element so important and costly and utility identification and relocation. To fail to study and/or disclose this cost item is to mislead and indeed deceive the public and public policy officials. While the question of whether this misrepresentation is intentional or inadvertent may be open to debate, the

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FACT that it IS a misrepresentation is not.

LAWA has either not studied a significant environmental issue or it has intentionally withheld the results of the study from the public. In either case, the DEIR should be withdrawn, re-scoped, properly prepared and re-circulated.

#### REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

The preceding sections of this white paper, with a few digressions, dealt with two questions:

First, can the mistakes and omissions in the two documents LAWA is currently circulating be overlooked because it is only a "program level" efforts. As demonstrated, LAWA is pursuing a very specific project, namely the movement of the northernmost runway 350' north and the realignment and tunneling of Lincoln Boulevard. For this project precise dimensions and costs have been calculated. A project level EIR should and must be done for this project.

Second, has LAWA met its obligations to study all relevant and significant issues raised in the Scoping sessions for the project? Using as a test case the issue of subsurface structures under Lincoln and Sepulveda boulevards where LAX would be tunneling, this obligation has not been met and LAWA's effort is flawed at least based on a review of the Preliminary LAX SPAS Report. Having failed to consider the cost of identifying and relocating major subsurface facilities and structures, LAWA's cost estimates, already gruesomely underfunded, become laughably worthless.

The question now presented is simple: Having failed in the Report to show that this significant topic was studied, does the DEIR go further or otherwise indicate that the issue has been considered by LAWA? The answer is no, and as a result the DEIR itself is fatally flawed.

If the challenge in this section of the white paper is to determine whether LAWA has studied the subject of subsurface structures and facilities below Sepulveda and Lincoln boulevards, then perhaps the most direct approach would be to do a word search for such terms as "oil and gas," "petroleum pipelines," "outfall sewer," "Hyperion," "fiber optic cable," and "Dig Alert (811 service or Underground Service to locate underline pipelines and cables before digging into the ground)." This was not possible because LAWA did not enable the public to word searches on the online or disk versions of the Draft EIR and SPAS Report.

CEQA requires the EIR sponsor to specifically consider each of thirteen designated topics for each project alternative presented. Chapter 4 of the DEIR is LAWA's effort to meet this requirement. For each of the thirteen areas LAWA gives an Introduction, discussions of Methodology, Existing Conditions, Thresholds of Significance, and Master Plan Commitments and Mitigations followed by a review of each of the nine alternatives. The DEIR further divides each topic into a discussion of construction impacts and operational impacts once the project is completed.

If LAWA studied and reported on the impact of subsurface structures under the Lincoln/Sepulveda intersection then one would certainly think that it would be revealed in its comments about Alternative 5 which would relocate runway 6L/24R 350' north. Hence, the methodology used herein is to review LAWA's discussion of each of the thirteen study areas focusing on the Alternative 5 portion of the discussion. Particular attention is given to the Transportation (4.12) and Utilities (4.13) sections that would seem to be the logical locations for consideration rerouting and tunneling Lincoln Blvd. REVIEW OF ALTERNATIVE 5 DISCUSSION IN DEIR

#### AESTHETICS, Section 4.1 of the DEIR

The discussion of the impact of the nine alternatives on area Aesthetics commences on page 4-6 and limits itself to consideration of "aesthetic qualities, views and lighting conditions at LAX and surrounding areas." Certainly one would assume that Caltrans would require Lincoln Blvd., California State Route 1, to have very bright overhead lighting at all times. Further, impacts of a major construction site including staging and laydown areas could be expected to be significant. Hence, one would assume moving Lincoln Blvd. 350' closer to the residential community would have significant implications for light and glare.

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Discussion of the impacts of Alternative 5 begins at page 4-63 with the light and glare impacts beginning at page 4-65. At page 4-66 the following appears:

Therefore, these improvements would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare, and thus associated light and glare impacts along the northern boundary would be less than significant. Increases in light and glare from rerouting more than a mile of Lincoln Blvd. and constructing a tunnel are similarly brushed off with:

Construction Fencing, impacts associated with light and glare during construction would not result in a change in lighting or lighting intensity such that light would spill off and affect light-sensitive areas, and would not result in a substantial new source of glare which would adversely affect nighttime views in adjacent areas sensitive to glare. Therefore, construction light and glare impacts would be less than significant.

Thus, the Aesthetic impact, including light and glare impacts of rerouting more than a mile of Lincoln Blvd. including relocating oil and gas pipelines, utilities and a major sewer structure are viewed as less than significant.

#### AIR QUALITY, Section 4.2 of the DEIR.

The discussion of Air Quality impacts begins at page 4-83 of the DEIR. Two Air Quality impacts seem obvious for study, those being (1) the impact of routing Lincoln Blvd. 350' or more closer to homes, business, schools and churches, and (2) the impact of using very heavy construction equipment to unearth and expose oil and gas pipelines, utilities and sewer facilities.

The complete failure of the DEIR to study and report on the implications of realigning Lincoln for more than a mile and tunneling for 765' can be seen at page 4-88 where the following elements of the program are identified as studied:

Construction activities were assumed to be located on the north airfield and at the north terminals, in the Central Terminal Area (CTA), at Manchester Square, in the current Parking Lot C, at the proposed Intermodal Transportation Facility (ITF) site just south of Lot C, on the east side of Aviation Boulevard south of Century Boulevard, on the Automated People Mover (APM) routes along Century Boulevard and 98th Street, and on the west side where batch plant operations permitted by the SCAQMD and USEPA and project support activities could occur. The analysis was conducted using normalized emissions rates (1 gram per second) for each construction source area to determine the concentration-to-emission ratio (X/Q) at each receptor for each source or source group. This X/Q ratio for a given source or source group were multiplied by the estimated emissions for a specific pollutant to obtain that pollutant's concentration at each receptor for the given source or group. The results for all sources in a given alternative were summed for each pollutant to obtain the project's construction activity contribution to ambient concentrations.

Quite apparently the large, high risk rerouting of Lincoln and extensive subsurface work in an area known to include high volume sewer lines and oil and gas transport lines in addition to large amount of standard subsurface utilities in a street in use for decades has not been studied in terms of Air Quality.

The discussions of Air Quality implications of Alternative 5, the most significant in terms of displacement of Lincoln and subsurface work appears at age 4-112 for postconstruction air pollution and at page 4-118 for construction air pollution. In neither are the Air Quality implications of rerouting Lincoln for more than a mile even mentioned in passing.

#### BIOLOGICAL RESOURCES, Section 4.3 of the DEIR.

Discussion of the impact of the nine alternatives on Biological Resources begins on page 4-163, and the discussion of Alternative 5 on page 4-250.

While the DEIR discussion of the impacts of Alternative 5 at the west end of the airfield adjacent to Pershing Drive, no significant discussion appears about the impacts at the east end of the airfield near the Lincoln/Sepulveda intersection.

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#### COASTAL RESOURCES, Section 4.4 of the DEIR.

Discussion of the impact of the nine alternatives on Coastal Resources begins at page 4-299, and the discussion of Alternative 5 on page 4-325.

While there could be storm water runoff impacts or other impacts on Coastal Resources from major construction at Lincoln and Sepulveda, other impacts are certainly far greater. CULTURAL RESOURCES, Section 4.5 of the DEIR.

Discussion of the impact of the nine alternatives on Cultural Resources begins at page 4-337. Impacts of Alternative 5 with Historic implications appear on page 4-370. Impacts with Archeological implications appear on page 4-376.

As is the case in so many other sections of the DEIR, the Cultural Resource issue is dealt with as if the rerouting of Lincoln Blvd. swinging it further north towards many sensitive uses is ignored. It is as if LAWA failed to advise its CEQA consultants it was part of the project. Buildings older than 45 years must at minimum be inventoried. While the report makes mention of the Union Savings and Loan Building at 9800 Sepulveda, it makes no mention of numerous buildings along Sepulveda that are older than 45 years. If such nearby buildings are outside the technical boundaries of the study area such could be noted. Simply failing to even make mention of such buildings adds to the implication that LAWA is seeking to conceal the impacts of its massive, billion dollar-plus Lincoln/Sepulveda realignment and tunneling project.

#### GREENHOUSE GAS EMISSIONS, Section 4.6 of the DEIR.

Discussion of Greenhouse Gas impacts begins on page 4-385, and the discussion of impacts of Alternative 5 appears on page 4-407.

Because the methodology used to calculate Greenhouse Gas Emissions in the DEIR combines the impact of operations with the impact of construction and further combines airfield modifications with terminal and ground access impacts, isolating the effects of the Lincoln Blvd. realignment and tunneling project is virtually impossible.

Still, it would seem unearthing, opening and relocation of decades old petroleum lines would release significant greenhouse gas, both by the heavy equipment used in the process and by the pipeline and surrounding contaminated soil. Though not as old of construction, the same can be said for the major sewer lines in the area running to the Hyperion treatment plant.

This is a subject which LAWA should have studied, was asked to study, but apparently didn't study.

#### HAZARDS AND HAZARDOUS MATERIALS, section 4.7 of the DEIR.

Discussion of Hazards and Hazardous Materials begins on page 4-423, and the discussion of impacts of Alternative 5 appear on page 4-452.

The discussion in this section of the DEIR focuses primarily on the production of Toxic Air Contaminants (TAC) and the rate of cancer that results. This section of the DEIR uses two tricks used throughout to conceal and explain away the impact of locating, opening and relocating major petroleum, sewer and other underground facilities despite the apparent risk of release of toxic substances including explosive gases.

The first trick used is to hide behind the screen that "this is only a program level EIR."

Construction of any SPAS alternative is projected to take about 11 years. A detailed evaluation of TAC emissions during the construction phase cannot be accomplished until project-level information on construction staging is available.

For purposes of the program-level evaluation in this EIR, possible construction emissions are estimated generically based on projected costs for the various alternatives. This approach provides sufficient information on the relative impact of construction emissions to analyze how important these emissions might be to incremental impacts of the SPAS alternatives. Detailed evaluation of construction impacts at the project level will be completed to help judge how construction impacts might vary from year-to-year as construction starts and moves through different phases across the airport.

If then LAWA is contending it can predict risk of exposure to cancer based on the "projected costs for the various alternatives", then those cost projections must be accurate. Refer to the sections of this white paper on the cost of the Lincoln Blvd. realignment and tunnel project in which numerous cost factors were declared to have

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been omitted intentionally and with other apparently simply "missed."

The second trick used is to combine cancel out the deleterious effects of air pollution caused by projects which LAWA intends to construct at any cost with the beneficial effects of ground transportation projects which LAWA has little if any intention or funds to construct.

In the discussion of health risks caused by Alternative 5, at page 4-452 it is claimed that the health risks constructing and operating State Route 1, Lincoln Blvd., 350 feet or more closer to residences, business, churches and schools is overcome by purported efficiencies in airfield operation, vehicle mix and transit facilities that are unfunded and probably will not be constructed.

And the public certainly should not ask for more information or detail. Recall, this is a program level, not a project level EIR.

Section 4.7.3 beginning at page 4-574 deals with Hazardous Materials, especially those that pose a risk to the personal safety of workers or the public or which risk groundwater contamination. At page 4-575 the following appears:

There are 32 sites at LAX where hazardous materials releases have resulted, or may have resulted, in groundwater and/or soil contamination. Of these 32 sites, seven have significant soil and/or groundwater contamination and are undergoing remediation activities under LAFD or RWQCB supervision.

This passage represents further proof, that while LAWA may have studied environmental issues on its own airfield in support of SPAS, it has not put forth a similar level of effort to study environmental issues, including hazardous materials, on the property that will be used for the realignment and tunneling of Lincoln. For this DEIR to be credible LAWA must have as much knowledge about subsurface problems under Lincoln Blvd. and Sepulveda Blvd. as it knows about subsurface problems under the Central Terminal Area. LAWA has either not studied such subsurface conditions or it has studied them but is withholding the information. In either event, this DEIR is fatally flawed as a result.

Proof positive for this proposition appears at pages 4-592 and 4-593 where Hazardous Materials is discussed in the context of Alternative 5. While there is discussion of the construction in and around Terminals 1 and 2 and Taxilanes O and D, there is not one word about Lincoln and Sepulveda Blvds. and yet the construction in that area is the lynchpin of Alternative 5 and has a far higher cost factor than the taxilane work.

HYDROLOGY AND WATER, section 4.8 of the DEIR.

Discussion of Hydrology and Water begins on page 4-599. This introduction to the Hydrology section states its purpose as follows:

The hydrology analysis below addresses the potential for flooding to occur as a result of actions under any of the SPAS alternatives. The water quality analysis below addresses impacts to the quality of storm water runoff and dry weather flows as a result of actions under any of the SPAS alternatives.

Surely this is an excellent topic to study. What areas are then studied to learn this important information?

To compare baseline conditions with conditions under the SPAS alternatives, a single HWQSA was used. The HWQSA for this analysis includes the existing LAX property, the Manchester Square area, which is part of a voluntary property acquisition under LAWA's Aircraft Noise Mitigation Program, 413 and areas adjacent to LAX that would be acquired under certain of the SPAS alternatives (see Section 2.3.1.11 for description of acquisition areas).

By LAWA's own admission then the areas studied on the important subject of worker safety and groundwater contamination are the existing airport property, Manchester Square and properties identified in 2.3.1.11 which reads in full:

2.3.1.11 Acquisition

The alternatives would require the acquisition of properties located east of the airport. The parcels to be acquired vary with the different alternatives. Table 2-4 lists the properties that may be affected and provides information pertaining to each parcel. A composite map of all of the acquisition properties is provided in Figure 2-11. The parcels that would be acquired under each alternative are identified in Table 2-5 and illustrated in Figures 2-12 through 2-14. Following

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acquisition, the uses would be demolished and replaced with SPAS-related improvements.

The intersection of Lincoln and Sepulveda Blvds. is not on Figure 2-11, is not to be acquired by LAWA, and hence was not studied on the subject of Hazards. In fact it was pushed under the rug and ignored in preparation of the DEIR.

LAND USE/ PLANNING, section 4.9 of the DEIR.

Discussion of Discussion of Land Use/Planning begins on page 4-641.

Discussion of Alternative 5 begins at page 4-738. An extended discussion of the numerous land use and planning maps in the LAX area is beyond the scope of this white paper. One sentence on page 4-739 is worth noting. It simply states:

Alternative 5 only includes airfield and terminal improvements.

A multi-billion dollar project to reroute and tunnel Lincoln Blvd. is dismissed as "only an airfield improvement."

NOISE, section 4.10 of the DEIR.

Discussion of the Noise component of CEQA begins at page 4-779.

Discussion of Road Traffic Noise impacts begins on page 4-935. Much technical data is presented. Alternative 5 is not even commented upon. Whatever technical processes and evaluations were performed, they apparently did not include the impact of having Lincoln Blvd. 350' or more closer to homes, business, school or church.

Construction Noise is discussed beginning at page 4-945. The impact of construction noise under Alternative 5 is discussed at page 4-963. Here it is acknowledged that at various sound receptors in West Westchester, the impact of Alternative 5 would be significant including at St. Bernard's High School, along the 91st St. community border and at Park West Apartments.

It is telling that in the sole area where the impact of the Lincoln Blvd. project is considered, a finding of significant impact has been made. The question that needs to be asked and answered by LAWA is what other impacts would be revealed if the Lincoln Blvd. project had been thoroughly studied in all CEQA areas?

Truer to form, the DEIR did not measure the impact of Alternative 5 for Transit Vibration at page 4-988.

PUBLIC SERVICES, section 4.11 of the DEIR.

Discussion of the impact of the SPAS projects on Public Services begins on page 4-993.

Impact on Fire Services and Law Enforcement Services.

As can be clearly seen throughout the SPAS Report and the DEIR, the magnitude of the billion dollar-plus Lincoln Blvd. project simply is not appreciated or understood by LAWA. It is California State Route 1 that is being moved. Massive disruption around one of the busiest intersections in Los Angeles will occur. The Lincoln/Sepulveda intersection is the pivot point between the South Bay and the Westside of Los Angeles.

At page 4-1013 it is admitted that construction of the project has "the potential to hamper or delay emergency response". This delay in emergency response is shrugged off however by saying a "coordination office" will be established. This is a serious risk to the public and deserves more study than saying an office will be created in the future.

The impact of SPAS on Law Enforcement is discussed beginning at page 4-1019. At page 4-1035 the DEIR states:

As with Alternative 1, traffic congestion from construction activities would have the potential to hamper or delay response times and increase traffic patrol and other law enforcement activities.

This serious negative impact of Alternative 5 construction is similarly dismissed by the recitation of certain numbered "LAX Master Plan Commitments."

TRANSPORTATION, section 4.12 of the DEIR.

Perhaps nowhere in the DEIR is the failure to study the realignment of Lincoln Blvd. for more than a mile, more than 2000' feet of which would be depressed below surface grade and 765' of which would be in a tunnel more glaring than in the treatment of "Off Airport Transportation at page 4-1281 of the DEIR.

Treating it as if it were a curb and gutter project, the DEIR state shrugs of the realignment of California State Route 1 at page 4-1282 with the following:

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In addition to potential disruption of local traffic conditions due to the addition of construction-related vehicle trips, there is the potential for additional disruption in the event a project-related improvement requires temporary closure of at least one lane adjacent to its site. Closures of key roadways and intersections could cause delays, except if done for short durations during periods of very low vehicular volumes.

One marvels at the naiveté of LAWA to think it can accomplish the realignment of Lincoln Blvd. by single-lane closures on off-peak hours.

The treatment of Off-Airport Transportation reveals LAWA's strategy for gaming the CEQA process and obtaining the backdoor approval of rerouting Lincoln. At page 4-1281 the DEIR states:

The nine alternatives currently being considered for the SPAS project are only at a conceptual level of planning. No construction plans, programs, or schedules have been formulated for any of the alternatives. As such, it would be speculative to estimate construction-related vehicle trip generation and distribution onto the local roadway network in order to evaluate traffic impacts on specific streets and intersections during peak and non-peak traffic periods.

As appears throughout the DEIR and SPAS Report, it is clear LAWA is currently hiding behind the skirts of the "Program Level DEIR" to prevent a full and complete disclosure to the public and to the elected officials who will be voting on the DEIR by saying that only "conceptual planning" need be done.

UTILITIES, section 4.13 of the DEIR.

Discussion of the impact on Utilities begins at page 4-1327. Despite what could be significant disruption from relocating utilities currently under Lincoln and Sepulveda Blvd. this section deals with energy use at the airport. The impact of the Lincoln Blvd. realignment and tunneling project is not discussed.

CONCLUSIONS TO BE DRAWN FROM CONSIDERATION OF THE

DRAFT ENVIRONMENTAL IMPACT REPORT

Simply stated, the Lincoln Boulevard realignment and tunnel project is not adequately studied in the Draft Environmental Impact Report. In view of the fact that moving runway 6L/24R northward by up to 350' is LAWA's most important project and realigning Lincoln Blvd. is non-negotiable and critical to moving the runway, this failure must be viewed as fatal.

The DEIR must be withdrawn from circulation, the Lincoln Blvd. realignment project must be adequately studied and the DEIR circulated, preferably as a project level EIR that can receive full, detailed public scrutiny.

LAX SPAS DEIR COMMENTS – ECONOMIC BENEFITS OF THE PROJECTS  
THE DEIR AND SPAS REPORT STATES THE IMPORTANCE OF LAX AS AN ECONOMIC GENERATOR FOR THE  
REGION. THE ATTACHED CHARTS PRESENT AN ARSAC ASSESSMENT OF HOWTHE  
VARIOUS  
ALTERNATIVES RELATE TO JOB CREATION AND ECONOMIC BENEFITS.

Where in the DEIR has LAWA prepared an assessment of economic benefits and job creation to back up the statements made in the document? What are the benefits and job creation factors determined by LAWA?

LAX SPAS DEIR Comments on topic of center-line taxiways...

Question: Why is operation with a center-line taxiway as conceived for the north complex safer since it results in operation of aircraft closer together and it introduces a new failure mode of errant landings on the taxiway?

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Below are data sources showing problems with these taxiways:

Taxiway Takeoffs and Landings

By Robert Acherman, Vice President, Alliance for a Regional Solution to Airport Congestion  
October 3, 2012

Commercial airplanes landing and taking off on taxiways is a major worldwide problem. Causes include lack of situational awareness by pilots, complex airport geometry and poorly marked taxiways. In 2004, the issue became so pronounced that the US National Transportation Safety Board (NTSB) issued a Safety Recommendation on how to contain the taxiway landing and takeoff problem. The taxiway incidents in Seattle were the tipping point for a call to action. The NTSB Safety Recommendation also recaps other taxiway landings and takeoffs at Palm Springs, CA; Las Vegas McCarran, NV; and Tucson, AZ.

<http://seattletimes.nwsource.com/news/business/links/ntsb06-24-04.pdf>

FAA response to NTSB

<http://seattletimes.nwsource.com/news/business/links/faa03-09-05.pdf>

NTSB response to FAA

<http://seattletimes.nwsource.com/news/business/links/ntsb08-08-05.pdf>

The FAA performed research and produced the following report. Several other US airports had taxiway operation problems including Palm Beach, FL; Lincoln, NE and Memphis, TN.

<http://www.airporttech.tc.faa.gov/safety/downloads/TN07-54.pdf>

In 2010, the FAA issued guidelines in 2010 on how airports can mark taxiways for increased pilot visibility.

[http://www.faa.gov/airports/resources/advisory\\_circulars/index.cfm/go/document/current/docu mentNumber/150\\_5340-1](http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document/current/docu mentNumber/150_5340-1)

Aviation safety requires eternal vigilance. It requires the active participation of pilots, controllers, airport operators and the general public. Good taxiway design and technology can help resolve part of the taxiway landing and takeoff problem. Ultimately, though, the burden falls upon the pilot with the oversight of controllers to not land or takeoff on taxiways.

ARTICLES ABOUT AIRCRAFT LANDING ON TAXIWAYS

Seattle-Tacoma Airport (SEA)

1999-2004 various incidents

[http://seattletimes.com/html/business/technology/2002621198\\_seatac13.html](http://seattletimes.com/html/business/technology/2002621198_seatac13.html)

Newark, NJ (EWR)

October 26, 2006, Continental Airlines Boeing 757 lands on taxiway

[http://www.nj.com/news/index.ssf/2008/04/lighting\\_a\\_factor\\_in\\_newark\\_ta.html](http://www.nj.com/news/index.ssf/2008/04/lighting_a_factor_in_newark_ta.html)

Palembang, Indonesia

October 2008, Garuda Boeing 737-400 lands on taxiway

<http://news.aviation-safety.net/2011/05/09/report-misaligned-vor-track-factor-in-indonesiantaxiway-landing/>

Cagliari, Italy

April 21, 2009, Ryanair Boeing 737 lands on taxiway

<http://www.flightglobal.com/news/articles/inquiry-as-ryanair-flight-lands-on-taxiway-at-cagliari-325060/>

Atlanta Hartsfield-Jackson International Airport (ATL)

October 2009, Delta Boeing 767 from Rio de Janeiro lands on taxiway

[http://articles.cnn.com/2009-10-21/us/taxiway.landing\\_1\\_taxiway-approach-lights-mainrunway?\\_s=PM:US](http://articles.cnn.com/2009-10-21/us/taxiway.landing_1_taxiway-approach-lights-mainrunway?_s=PM:US)

Paphos, Cyprus

September 21, 2011, Thomson Airways Boeing 737-800 lands on taxiway

<http://www.avherald.com/h?article=44355a86&opt=0>

ARTICLES ABOUT AIRCRAFT TAKING OFF ON TAXIWAYS

Anchorage, Alaska (ANC)

January 25, 2002, China Airlines Airbus A340-300 takes off on taxiway

[http://www.asc.gov.tw/asc\\_en/accident\\_list\\_2.asp?accident\\_no=126](http://www.asc.gov.tw/asc_en/accident_list_2.asp?accident_no=126)

November 16, 2005, EVA Airways McDonnell Douglas MD-11 takes off on taxiway

<http://news.aviation-safety.net/2005/11/16/md-11-cargo-plane-takes-off-on-taxiway-instead->

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of runway-at-anchorage/  
Oslo-Gardermoen Airport, Norway  
LAX SPAS DEIR Comments on topic of center-line taxiways page 3  
October 23, 2005, Pegasus Airlines Boeing 737-800 takes off on taxiway  
[http://www.asc.gov.tw/asc\\_en/accident\\_list\\_2.asp?accident\\_no=126](http://www.asc.gov.tw/asc_en/accident_list_2.asp?accident_no=126)  
February 25, 2010, Aeroflot Airbus A320 takes off on taxiway  
<http://aviationsafetynetwork.wordpress.com/2010/12/14/report-airline-airport-and-controller-were-factors-in-a320-taxiway-takeoff-at-oslo-gardermoen/>  
Hong Kong International Airport (HKG)  
September 13, 2008, Hong Kong Airlines Boeing 737 attempts takeoff on taxiway  
<http://www.topnews.in/pilots-suspended-trying-take-taxiway-hong-kong-269191>  
November 27, 2010, Finnair Airbus A340 aborts takeoff on taxiway  
<http://news.aviation-safety.net/2012/01/14/hong-kong-cad-issues-final-report-on-a340-attempted-taxiway-takeoff/>  
Amsterdam, The Netherlands  
February 10, 2012, KLM 737-300 takes off on taxiway  
<http://www.flightglobal.com/news/articles/klm-737-crew-lost-position-awareness-before-taxiway-take-off-366475/>  
Question: Why is the NASS study response to FAA questions not included in the DEIR or SPAS report?  
From the Academic Panel's responses to the FAA which was neglected to be included in the DEIR.  
This is on PDF page 17 (print out page 15) (the hard copy pages of 8, 9, and 14-18):  
"Note that only the 3 Runway (3R) configuration (one runway on the north complex) would meet FAA Group VI standards! This one would also eliminate runway incursions caused by runway crossing. There would be no runway crossing here as the same runway would be used for takeoffs and landings. ARSAC recommended the 3R configuration to be studied in the NASS."  
Page 15 (hard copy)  
"The Panel was asked to estimate the safety of operating the North Airfield under certain configurations and levels of demand, and not to assess the consistency of these operations with FAA design standards. The AP Panel recognizes that all the North Airfield configurations studied except 3R (a three-runway airport) would fall short of at least one FAA design standard. For example, the recommended lateral separation between parallel runways (for VFR Operations) for ADG V and VI is 1,200 feet (FAA AC 150/5300-13 Paragraph 208). This implies configurations Baseline, Baseline-S, LAX SPAS DEIR Comments on topic of center-line taxiways page 4  
100-N, 340-N and 340-S all fail to meet the recommended standard. A second recommended standard for simultaneous approaches and departures recommends 1,200 feet of runway separation for ADG V and ADG VI. Again, only 3R would meet such a standard (as there is no parallel runway under this alternative). The South Airfield, as modified with the new centerline taxiway, does not meet that standard either.  
In short, if deviations from recommended FAA design standards were enough to invalidate a configuration, there would have been no point in conducting the study.  
Babbitt did say that runway incursions decreased 50% between 2009 and 2010 (25 to 12). He highlighted the Runway Status Lights technology. He did not say explicitly that RWSL contributed to the decline in runway incursions. RWSL are a tool in reducing incursions- see Fact Sheet below.  
2010 Press release from Randy Babbitt at Boston Logan where RWSL was installed.  
[http://www.faa.gov/news/press\\_releases/news\\_story.cfm?newsId=11959](http://www.faa.gov/news/press_releases/news_story.cfm?newsId=11959)  
FACT SHEET on Runway Incursions  
2010 to 2011, 50% drop of incursions from 12 to 6.  
[http://www.faa.gov/news/fact\\_sheets/news\\_story.cfm?newsId=12783](http://www.faa.gov/news/fact_sheets/news_story.cfm?newsId=12783)

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## Appendix F-2 – North Runway Alternatives Simulation Analysis

Table 16  
Peak Hour Throughput – 2025 SPAS Alternative 4  
3,653 Daily Operations

Configuration	Annual Use	Peak Arrivals		Peak Departures		Peak Operations	
		Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour	Daily Total	Peak Throughput Hour
OP Visual Flight							
Flow	69.2%	1,022	72	1,031	74	2,285	146
VFR ILS West	24.8%	1,022	72	1,031	73	2,285	144
Flow							
VFR ILS East	2.1%	1,022	59	1,031	78	2,285	134
Flow							
IFR West Flow	4.1%	1,022	51	1,031	66	2,285	123
Average All-Weather Throughput	100.0%	1,022	72	1,031	73	2,083	133

ILS = Instrument Landing System  
IMC = Instrument Meteorological Conditions  
VFR = Visual Flight Rules

Source: Ricardo Associates, Inc., October 2011, based on SIMMOO simulation results (daily and hourly throughput operations).

## 4. CONCLUSIONS

The variation in average all-weather unimpeded taxi times and delays between the 2009 Baseline Scenario operating conditions and each of the four 2025 alternatives is listed in Table 17.

Compared to the Baseline Scenario, all alternatives would result in higher delays, which would be attributable to the increase in the number of operations per day.

SPAS Alternative 1 would result in the lowest delay (5.20 minutes of delay per operation) while SPAS Alternative 3 would result in the highest delay (6.14 minutes of delay per operation). SPAS Alternative 2 would yield the lowest unimpeded taxi times of the four alternatives (7.86 minutes per operations).

Based on the activity level selected for the analysis, none of the alternatives is expected to result in significant operating efficiency gains. SPAS Alternative 1 would result in the least departure delay, as arriving aircraft may hold on the parallel taxiway between the outer arrival runway and the inner departure runway; this ability to hold would lead to fewer runway crossings during peak departure times.

While under SPAS Alternative 3, a parallel taxiway would be located between the north runways, the imbalance of gates would result in many aircraft parked on the south CTA to depart from the north, leading to congestion on the north/south taxiways and reducing the benefits associated with the parallel taxiway. SPAS Alternative 2 would yield better results than SPAS Alternative 4, as additional exits would be provided for arriving ADG IV, V, and VI (heavy) aircraft. Under SPAS Alternative 4, the existing airfield exits would allow for only one high speed exit for heavy aircraft, while under SPAS Alternative 2, three high speed exits may be used by heavy aircraft. The simulated unimpeded taxi time is slightly higher for the alternatives with a center parallel taxiway on the north runway complex, as pilots are required to taxi on the taxiway prior to crossing the inbound runway, whereas under the alternatives without a center parallel taxiway, aircraft would be allowed to cross the inbound runway directly.

Los Angeles International Airport 107 LAX Specific Plan Amendment Study Report  
July 2012

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Runway 24R in 340-N would often have a better view of departing traffic on Runway 24L before crossing that runway.

The capacity results for the three-runway configuration were less encouraging: the reduction in arrivals and departures observed at FFC could have adverse direct and indirect consequences. Given that mixed operations would occur on the North Airfield (i.e., landings and takeoffs on the same runway), arranging for departures in the face of frequent arrivals would be challenging. It is also true that unexpected conditions – such as the temporary shutdown of a runway – can cause considerably more disruption when there are only three runways rather than four. The AP fears, therefore, that the capacity limitations in the three-runway case would be unduly constraining in peak conditions, which would prevail for nine hours of the day under the 2020 forecast.

## 17.6. Caveats

The various estimates summarized above and presented in more detail elsewhere in this report should be interpreted as plausible approximations, rather than exact results. Among the reasons for caution are:

- The 2020 forecasts about traffic levels at LAX, and about the fraction of traffic involving Group VI aircraft, are subject to considerable uncertainty.
- The experiments at FFC were sophisticated and well conducted, but they can only provide an approximate indication of what might happen under various configurations of the North Airfield.
- Data about historical experience are valuable, but there are issues in generalizing from other airports to LAX, and from past patterns to those that might prevail in the future under new arrangements; moreover, many of the data are subject to the high random variability associated with rare events, a circumstance that poses real challenges for statistical estimation.

## 17.7. Main Conclusions

The AP is unanimous on all of the following points:

*For projected 2020 traffic levels and traffic mix, the LAX North Airfield is extremely safe under the current configuration.*

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The AP estimates that, at 2020 traffic levels, fatal runway collisions would occur on the North Airfield at an expected rate of one every 200 years, and that such fatal collisions would cause approximately one death for every 150 million LAX passengers. That level of risk is low even relative to the exceptional safety of US passenger aviation.

All the proposals to create new configurations on the North Airfield would reduce by a substantial percentage the risk of a runway collision.

More specifically, the evidence from the NASA-Ames simulation and numerous kinds of historical data suggest that:

*Moving Runway 24R 100 feet North and creating a centerline taxiway could reduce collision risk on the North by about 40% relative to the baseline.*

*Moving Runway 24R 340 feet North and creating a centerline taxiway could reduce collision risk on the North by about 55% relative to the baseline.*

*Moving Runway 24L 340 feet South and creating a centerline taxiway could reduce collision risk on the North by about 50% relative to the baseline.*

*Creating a single Runway 24 to replace 24L and 24R could reduce collision risk by about 50% relative to the baseline.*

However, because the baseline level of collision risk is so low, reducing that risk by a substantial percentage will have a limited practical effect.

Aviation at LAX is exceedingly safe. Of the 750 million passengers who would use the LAX North Airfield per decade at 2020 traffic levels, only about 80 might be expected to perish in air disasters from all causes in the Baseline case. Of these 80 deaths, five might occur in runway collisions on the North Airfield. Reconfiguration of the North runways might be expected to reduce total deaths to about 78.

In terms of capacity, changes in the configuration could have major effects.

*Moving to a three-runway configuration could cause major difficulties, in terms of flight schedule reliability and congestion, even under visual flight conditions.*

*Moving to the 340-N configuration, on the other hand, might significantly reduce airport congestion during peak hours and could provide appreciable capacity benefits.*

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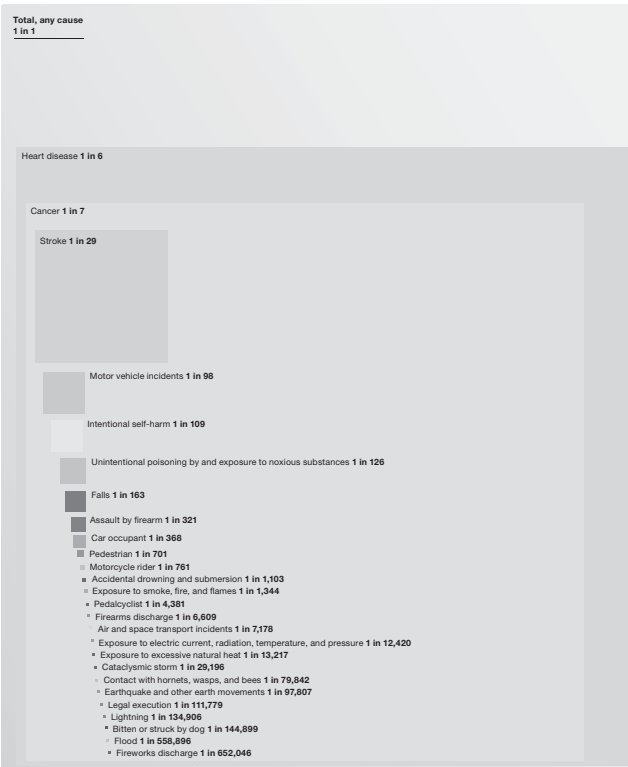


Indeed, a serious case could be made for building 340-N based on its capacity benefits. This would also improve safety. But these safety benefits would essentially be a “side benefit”, not the principal one.

However, the North Airfield Safety Study was, as the name implies, primarily about safety. All things considered, the Panel cannot construct a compelling argument for reconfiguring the North Airfield on safety grounds alone.

The Odds of Dying from...(cont.)

Lifetime odds of death for selected causes, United States, 2008\*



Source: National Safety Council estimates based on data from National Center for Health Statistics—Mortality Data for 2008 as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Population and life expectancy data are from the U.S. Census Bureau. For mortality figures, estimated one-year and lifetime odds, and external cause classification codes based on the Tenth Revision of the World Health Organization's "The International Classification of Diseases" (ICD) for the causes illustrated, see table on pages 41-42.

Appendix F-2 – North Runway Alternatives Simulation Analysis

Table 17  
Average All-Weather Delays, Unimpeded Taxi Times and Variations from 2008 Baseline

Alternative	Average All-Weather (Minutes per Operation)			Variation from Baseline (Minutes per Operation)		
	Delay	Unimpeded Taxi Time	Totals	Delay Variation	Unimpeded Taxi Time Variation	Totals
Baseline	2.38	7.80	10.18	-	-	-
Alternative 1	5.20	8.10	13.29	2.82	0.30	3.12
Alternative 2	5.38	7.86	13.24	3.00	0.06	3.06
Alternative 3	6.14	8.64	14.78	3.76	0.84	4.60
Alternative 4	5.98	7.88	13.86	3.60	0.08	3.68

Note: Totals may not add due rounding.

Source: Ricord & Associates, Inc., May 2012, based on SIMMOD simulation results (average all-weather delay and unimpeded taxi times).



Table B-1  
Estimated Costs and Funding Sources for SPAS Alternatives <sup>1</sup>

Key Elements of Alternative Improvements	Alternative 1			Alt. 1 With Alt.8 Ground Access			Alt. 1 With Alt.8 Ground Access		
	Estimated Costs (2010 Dollars) <sup>2</sup>	Escalated Costs (2010 Dollars) <sup>3</sup>	Estimated Costs (2010 Dollars) <sup>4</sup>	Estimated Costs (2010 Dollars) <sup>5</sup>	Escalated Costs (2010 Dollars) <sup>6</sup>	Estimated Costs (2010 Dollars) <sup>7</sup>	Estimated Costs (2010 Dollars) <sup>8</sup>	Escalated Costs (2010 Dollars) <sup>9</sup>	Estimated Costs (2010 Dollars) <sup>10</sup>
Airfield	New 61.48 Afters 200 ft. North			Same			Same		
	North Center Field Taxiway			Same			Same		
Terminal	Two D/E extensions & improvements			Same			Same		
	Two D/E extensions & improvements			Same			Same		
Ground Access	New Entry Roadway			Same			Same		
	New Intermodal Trm. Facility			Same			Same		
Land Acquisition (Assumed Costs)	New Entry Roadway			Same			Same		
	New Intermodal Trm. Facility			Same			Same		
Total Estimated SPAS Alternative Funding Sources									
Airfield									
Terminal									
Ground Access									
Land Acquisition (Assumed Costs)									
Total Estimated SPAS Alternative Funding Sources									

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Table B-1  
Estimated Costs and Funding Sources for SPAS Alternatives <sup>1</sup>

Key Elements of Alternative Improvements	Alternative 2			Alt. 2 With Alt.8 Ground Access			Alt. 2 With Alt.8 Ground Access		
	Estimated Costs (2010 Dollars) <sup>2</sup>	Escalated Costs (2010 Dollars) <sup>3</sup>	Estimated Costs (2010 Dollars) <sup>4</sup>	Estimated Costs (2010 Dollars) <sup>5</sup>	Escalated Costs (2010 Dollars) <sup>6</sup>	Estimated Costs (2010 Dollars) <sup>7</sup>	Estimated Costs (2010 Dollars) <sup>8</sup>	Escalated Costs (2010 Dollars) <sup>9</sup>	Estimated Costs (2010 Dollars) <sup>10</sup>
Airfield	No movement of Runways			Same			Same		
	Two D/E extensions & improvements			Same			Same		
Terminal	New Terminal (T1) Gates			Same			Same		
	Modifications to T1 T3B,AWC			Same			Same		
Ground Access	New Entry Roadway			Same			Same		
	New Intermodal Trm. Facility			Same			Same		
Land Acquisition (Assumed Costs)	New Entry Roadway			Same			Same		
	New Intermodal Trm. Facility			Same			Same		
Total Estimated SPAS Alternative Funding Sources									
Airfield									
Terminal									
Ground Access									
Land Acquisition (Assumed Costs)									
Total Estimated SPAS Alternative Funding Sources									

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1. Introduction and Executive Summary

Evaluation of Amendments to the LAX Specific Plan

In conjunction with the physical and operational improvements proposed under each of the nine SPAS alternatives, Chapter 7, *LAX Specific Plan Amendments*, of the SPAS Report identifies administrative amendments to the LAX Specific Plan that might be needed depending on the SPAS Alternative. These administrative amendments would not have any environmental impacts beyond those resulting from the physical improvements that would occur as a result of the SPAS alternatives analyzed in Chapters 4 and 5 of this Draft EIR. Chapter 7, *LAX Specific Plan Amendments*, of the SPAS Report also identifies an amendment to Section 7.H of the LAX Specific Plan that would require LAWA to conduct passenger and airline surveys and studies when LAX reaches 75 MAP, the results of which would help inform LAWA as to potential actions that could be taken to encourage airlines to provide increased domestic passenger service at other airports in the region, particularly those owned or operated by LAWA. The actualization of those actions could result in environmental impacts in the form of reduced operational impacts at LAX and increased impacts at the other affected airports if, and to the extent, there is a shift in aircraft and passenger activity from LAX to other airports. Such operational impacts would include air pollutant emissions, including greenhouse gas emissions, from aircraft and motor vehicles, noise from aircraft and vehicles, surface traffic, and demands on public services and utilities. Detailed evaluation of the exact nature and extent of these shifts in impacts, as well as other environmental impacts, would be speculative at this time, but Chapter 6, *Evaluation of Amendments to the LAX Specific Plan*, provides a programmatic description of the types of impacts that would occur.

1.5 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines requires an EIR to identify an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must identify an environmentally superior alternative among the other alternatives. Based on the analyses in Chapter 4, *Environmental Impact Analysis*, and Chapter 5, *Cumulative Impacts*, of this EIR, Alternative 2 is considered to be the Environmentally Superior Alternative of the nine alternatives evaluated in detail throughout this document.<sup>21</sup>

As described in more detail in Chapter 2, *Project Description*, Alternative 2 proposes very limited airfield improvements that do not involve any runway relocation or development of a centerfield taxiway. As such, Alternative 2 would require less construction than all of the other alternatives, except for Alternative 4, and would result in reduced/fewer significant construction-related impacts. This would include construction-related air quality impacts (see Table 1-7 above), construction-related GHG emissions (see Table 4.6-6 in Section 4.6, *Greenhouse Gases*), and construction equipment noise impacts (see Table 1-23 above). Although the temporary construction-related air quality impacts, GHG emissions, and construction equipment noise impacts of Alternative 4 would be less than those of Alternative 2, the longer-term operations-related air quality, GHG emissions, and noise impacts of Alternative 4 would be greater than those of Alternative 2, as further described below.

Operations-related air quality impacts, particularly from aircraft emissions, which generally constitute the majority of gaseous air pollutants at the airport, would be the lowest under Alternative 2, compared to the other alternatives including Alternative 4, for Visual Flight Rules (VFR) conditions that occur approximately 96 percent of the year (see Table 4.2-13 in Section 4.2, *Air Quality*). This is also the case

<sup>21</sup> As further described in Chapter 2, *Project Description*, nine alternatives are addressed throughout the EIR, four of which are "fully integrated alternatives" (Alternatives 1 through 4), each of which includes a combination of airfield, terminal, and ground access improvements, and five of which are "focused alternatives," including three alternatives that focus on airfield and associated terminal improvements (Alternatives 5 through 7) and two alternatives that focus on ground access improvements (Alternatives 8 and 9). Selection and implementation of any one of the focused alternatives is assumed to be "paired" with complementary elements of another alternative in order to effectively be an integrated alternative. For example, the airfield/terminal improvements of Alternatives 5 through 7 could be paired with the ground access improvements proposed in Alternatives 1, 2, 4, and 9, and the ground access improvements in Alternatives 8 and 9 could be paired with the airfield/terminal improvements proposed in Alternatives 1, 2, 5, 6, and 7. The comparison of environmental impacts between the nine alternatives and selection of the environmentally superior alternative assumes each of the nine alternatives includes a full complement of airfield, terminal, and ground access improvements.

LAX hopes to dominate the Western skies once again - latimes.com

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latimes.com/news/la-me-lax-restoration-20110703,0,7352614.story

latimes.com

LAX hopes to dominate the Western skies once again

At least \$4 billion is being spent on additions to the Bradley International Terminal, improvements to several domestic terminals and upgraded utilities and taxiways to handle the latest generation of super-sized jumbo jets.

By Dan Weikel, Los Angeles Times

4:24 PM PDT, July 2, 2011

Barring another terrorist attack or recession that disrupts air travel, Los Angeles International Airport — long ranked among the nation's worst aviation hubs — is on a path that could restore its reputation as the West Coast's dominant international gateway.

Modernization projects now underway mark the first major expansion of passenger facilities since the Tom Bradley International Terminal was built for the Summer Olympics 27 years ago.

Since then, LAX has steadily fallen behind the modernization efforts of other big-city airports. Aging terminals and a lack of amenities have undercut passenger satisfaction and the airport's share of overseas travelers, some of whom fly into San Francisco, which opened a stunning international terminal in 2000.

Now airport officials, including those beyond Los Angeles, say LAX's stature is on the rise. At least \$4 billion is being spent on additions to the Bradley terminal, improvements to several domestic terminals and upgraded utilities and taxiways to handle the latest generation of super-sized jumbo jets.

"We want to do in three years what other airports have done in seven or eight," said Los Angeles airport chief Gina Marie Lindsey, who was hired four years ago to get languishing modernization efforts moving.

John L. Martin, the veteran airport director hailed for remodeling San Francisco's airport, says that "any competitive advantage we had in terms of facilities on the international side will be going away" with the Bradley West project, now being built. It is to house a grand hall filled with upscale restaurants, posh lounges and luxury boutiques.

The addition's massive steel skeleton is visible and will include new concourses, gates, 1 million additional square feet of floor space and an expanded customs area. It will eliminate the hassle that international travelers encounter when flights stop short of the Bradley terminal and passengers are bused to the immigration processing area.

Other pending projects include a giant passenger processing center and a new concourse west of the Bradley terminal that would add more gates. It would be linked to the main terminal area by a steel-and-glass sky bridge, and an elevated tram would whisk passengers to other remodeled terminals. A new station would link the entire airport to the growing regional rail network.

Lindsey acknowledged that the ambitious modernization schedule will rely on meeting upbeat passenger

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http://www.latimes.com/news/la-me-lax-restoration-20110703,0,7244765.print.story

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projections and avoiding another economic downturn, a terrorist attack on the nation or hikes in fuel costs and ticket prices.

"The other projects will depend on how much the airport grows," she said, "and how much we can pay down our debt."

Half a century ago, LAX was conceived as a futuristic, cutting-edge reflection of the jet age, a vision still projected at the airport by the historic Theme Building, which looks like a flying saucer suspended on curved concrete legs.

For decades, the airport that ushered in its first jetliner in 1959 prided itself on operating a no-frills facility that stressed low costs for airlines and the efficient movement of passengers.

In the terminals, travelers could buy little more than the basics: a newspaper, a cup of coffee, cafeteria fare and a preflight libation. The mantra was: "We are an airport, not a shopping mall."

The utilitarian philosophy served the airport well. Attracted by low costs and the emergence of Los Angeles as a huge market for air travel, foreign and domestic carriers steadily added service, fueling the region's economy.

But by the 1990s, the terminals were dated and falling into disrepair. Modernization schemes were proposed by Mayors Richard Riordan and James K. Hahn to greatly expand the airport's footprint and add new terminals.

Both plans met stiff opposition from residents and neighboring cities worried about traffic congestion, noise, pollution and the likelihood that homes and businesses would be demolished to make way for improvements.

As politicians and airport neighbors fought over how best to revitalize LAX, the terminals deteriorated further. Water mains broke, escalators failed, concrete fell from the legs of the Theme Building and passenger areas grew more crowded.

Officials realized too that the old gates could not accommodate the latest wide-bodied aircraft, including the giant Airbus A380 now in service.

Research showed that the worsening conditions contributed to passenger declines even before air travel was slammed by the terrorist attacks of Sept. 11, 2001. LAX lost about 12% of the airline seats on its weekly international departures from 2000 to 2006, while many other U.S. gateways posted gains.

The stakes were particularly high for the local economy. A 2006 study found that a single international flight traveling roundtrip daily from LAX generated \$623 million a year in business activity for the region and supported 3,120 jobs.

The threat of a downward spiral sparked a new commitment — and a new approach — to reviving LAX under Mayor Antonio Villaraigosa.

Within months of his election, Villaraigosa settled a major lawsuit and compromised with neighbors so certain airport projects could proceed, as long as some projected passenger growth was pushed to other airports in the region. The deal limited the capacity to 78 million passengers a year, about 11 million fewer than Riordan had sought.

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Aviation officials say LAX's development also has been hampered by a high turnover of airport directors. Over a 30-year period, eight leaders came and went, including interim chiefs and one who served twice. San Francisco by contrast, had just two in that time.

Villaraigosa put Lindsey in the top job, where she has remained for four years, longer than the combined tenure of the two directors who preceded her.

Lindsey got the Bradley West project moving, cleared the way for improvements to domestic terminals and helped to bring a more passenger-centric view to LAX planning. "We are looking at the most innovative things at sports venues, shopping malls and convention centers," she said. "We want to create an environment that is soothing, welcoming and alive."

To help finance the current renovations, the airport sold \$2 billion in bonds. The debt will be paid with fees charged to airlines, revenue from concessions and charges added to the cost of tickets.

Officials hope passenger volumes will grow so the debt can be paid down and more money can be borrowed to keep improvements coming.

The latest five-year forecasts from a top industry analyst and the Federal Aviation Administration indicate that the number of passengers at LAX will increase from 59.1 million to between 62 million and 68 million by 2014.

But some FAA and LAX forecasts have been unreliable — wildly so — partly because of unforeseen events. LAX had been expected to grow over the last decade, but the number of passengers actually declined by 8.2 million.

Contributing to the downward pressure were the Sept. 11 attacks, the outbreak of a highly contagious illness in Asia, dramatically higher fuel prices in 2008 and the recession.

In 2010, LAX handled 15.9 million international passengers, a 5.5% increase over 2009, but 1.6 million below the peak in 2005. The growth rate was slower than San Francisco's.

In addition to uncertainties about future revenue related to passenger growth, LAX has to balance the pace of improvements with the rising costs it is imposing on airlines, industry analysts say.

If fees become too high, carriers, particularly discount airlines, might be discouraged from operating at LAX or adding flights there.

"At about \$11 per enplaned passenger, LAX has had some of the lowest rates for years. Now they are talking about \$20 per passenger or more," said Jack Keady, an airline industry consultant based in Playa del Rey. LAX officials had "better pay attention to their costs."

Despite the new modernization efforts, local business leaders remain concerned that LAX still lags behind its competitors, which also are looking to upgrade and compete for lucrative international travelers.

"There has been some progress, but we still have a 1984 airport competing in a 2011 world," said Russell Goldsmith, chief executive of City National Bank and chairman of a business coalition that views the improvement of LAX as vital to boosting local commerce.

Goldsmith says airport officials must move faster to remake domestic terminals, connect LAX to transit

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lines and further separate the two northern runways, a proposal that might improve the safety and efficiency of flight operations.

But the runway proposal is rekindling the political fires surrounding airport improvements. One watchdog group that helped sink earlier master plans, the Alliance for a Regional Solution to Airport Congestion, contends the proposal is unnecessary and will harm communities to the north of LAX.

The alliance recently made the north runways an issue in the race to represent the 36th Congressional District, which includes LAX. It obtained a pledge not to expand the airport from one of the two primary election winners, Los Angeles City Councilwoman Janice Hahn.

[dan.weikel@latimes.com](mailto:dan.weikel@latimes.com)

Times staff writer Maria L. LaGanga in San Francisco contributed to this report.

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7/6/2011

**From:** karim shahabi [cameron90230@yahoo.com]  
**Sent:** Wednesday, October 10, 2012 8:25 PM  
**To:** SPASEIR Comments  
**Subject:** Adopt Alternatives 2 and 9--Thank You

Dear Mr. Alvarez,

My neighbors of 89<sup>th</sup> Street and Stanmore would like for LAX to adopt a combination of Alternatives 2 and 9 and NOT move the north runway further north into our neighborhoods.

Why is there an assumption that the airport has to allow those new Airbus mega-jetliners landing and taking off even closer to our homes. Your plan to move the runway north and allow bigger planes to use them, will create a more unbearable situation for the residents of Westchester and Playa Del Rey.

If you bring the runway closer to Westchester/Playa Del Rey there will be a tremendous amount of noise pollution thrust upon these communities. Moreover, with this extension northward of the runway toward Westchester/Playa Del Rey, this northernmost runway will be able to accommodate those GIANT Airbus airplanes which make even more noise than regular airplanes.

Thus, by adopting any Alternative that moves the runway north, you will make the family oriented communities of Westchester and Playa Del Rey unbearable due to the foreseeable excessive runway noise.

Another concern is that if you move the runway further north there will be irreparable damage done to Neilson Park. Neilson Park is a family focus in our Westchester/Playa communities. Our children play soccer and baseball there all week long. It's one of our community's many gems. As it stands the planes descend over the edge of the park. Moving the runway north ANY NUMBER OF FEET will have devastating effects on our park. Rather than descending on the southern edge of the park, as currently is the case, planes will, with a northward move of the runway, now be flying at a low altitude directly OVERHEAD. This will have devastating effects for this park as it will not only be intimidating to have planes descend directly overhead but also be deafening for the children and the adults having the jets descend so close to our children and families. The park will be ruined and parents won't let their kids play there for health reasons. The Westchester/Playa Del Rey Little League Baseball and AYSO Youth Soccer programs will be decimated all because of your decision to move the runway further north. Please don't do it.

Please make the right choice and be the good neighbor that you've promised to be and do not move any runways north closer to our communities of Westchester and Playa Del Rey. Don't further encroach on our communities and make them less livable than they already. Take care of the communities, Westchester and Playa Del Rey, which have taken care of LAX.

Sincerely,

Karim Shahabi

SPAS-PC00152



Attachments: ARSAC News Release--SPAS DEIR and Costing Report .pdf; ARSAC News Release--SPAS DEIR and Costing Report .doc

From: racherman [racherman@netvip.com]  
Sent: Wednesday, October 10, 2012 3:58 PM  
To: SPAS-IR Comments  
Cc: Denny@WestLiveFree.com  
Subject: Additional Comments from ARSAC: ARSAC STATEMENT ON LAX SPECIFIC PLAN AMENDMENT STUDY DRAFTENVIRONMENTAL IMPACT REPORT

October 10, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

via email: [spasircomments@lawa.org](mailto:spasircomments@lawa.org)

Dear Mr. Alvarez

Please group these comments with the others submitted by the Alliance for a Regional Solution to Airport Congestion (ARSAC).

Thank you in advance for your assistance.

Sincerely,  
Robert Acherman  
Vice President  
ARSAC

cc: Denny Schneider, President, ARSAC

## News Release

For More Information, Call:  
Denny Schneider (310) 641-4199 voice For Release 4 PM PST  
(310) 338-1150 voice/voice mail/fax Date July 26, 2012

### ARSAC STATEMENT ON LAX SPECIFIC PLAN AMENDMENT STUDY DRAFTENVIRONMENTAL IMPACT REPORT

ARSAC, the Alliance for a Regional Solution to Airport Congestion, reaffirms its opposition to moving the north runway, 24 Right, closer to the communities of Westchester/Playa del Rey.

SPAS-PC00153



**ARSAC Alliance for a Regional Solution to Airport Congestion**  
322 Culver Blvd., #231 Playa del Rey, CA 90293  
[www.regionalsolution.org](http://www.regionalsolution.org)

## News Release

For More Information, Call:

Denny Schneider (310) 641-4199 voice  
(310) 338-1150 voice/voice mail/fax

For Release 4 PM PST  
Date July 26, 2012

### ARSAC STATEMENT ON LAX SPECIFIC PLAN AMENDMENT STUDY DRAFTENVIRONMENTAL IMPACT REPORT

ARSAC, the Alliance for a Regional Solution to Airport Congestion, reaffirms its opposition to moving the north runway, 24 Right, closer to the communities of Westchester/Playa del Rey.

"Moving Runway 24 Right closer to homes and businesses is unsafe, unnecessary, unacceptable and probably illegal under the Stipulated Settlement Agreement" said Denny Schneider, President of ARSAC. "We will vigorously fight efforts to move the runway to the north, especially when there are better alternatives available to increase safety, security and passenger convenience that would not require destroying homes and businesses in Westchester/Playa del Rey. Furthermore, any movement of the runway to the north will permanently alter flight patterns over Southern California, newly exposing millions of residents to aircraft noise, pollution and safety issues who have not been impacted by LAX operations in the past. If necessary, we will go back to court to protect our communities and to force LAX to reconsider other runway configurations which do not move aircraft closer to Westchester/Playa del Rey."

Schneider continued, "We all want an airport that we can be proud of, but it does not mean that LAX adjacent communities have to be sacrificed for the greater good. When the north runway was built in the late 1960's, thousands of Westchester/Playa del Rey residents lost their homes. In addition, many businesses were dislocated from the Westchester Central Business District along Sepulveda Boulevard. It took more than 25 years for the business district to recover from the decimation of the community by LAX expansion. LAX officials promised then that future airport expansion would occur in Palmdale. LAX officials have reneged on their promises. We will hold them to their promises this time."

ARSAC supports a safe, secure and convenient LAX which does not expand into the surrounding communities. ARSAC also strongly backs expanding capacity at Palmdale and Ontario airports to meet Southern California's air capacity needs. As a part of the EIR process, ARSAC submitted several runway, taxiway, terminal and ground access concepts that can transform LAX into a world-class airport without expanding into the surrounding communities. These concepts can be seen on ARSAC's website at [www.regionalsolution.org](http://www.regionalsolution.org). "We strongly

*LAX Specific Plan Amendment DEIR Release Statement*

SPAS-PC00153

## ARSAC Alliance for a Regional Solution to Airport Congestion

### Attachment to July 26 News Release

encourage LAX officials and expansion proponents to study and champion our ideas to avoid costly and time-consuming litigation," Schneider concluded.

ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders to promote a regional solution to the future commercial aviation demands of the entire Southern California region.

\*This statement is one day ahead of the anticipated LAWA release of the DEIR and SPAS costing report on Friday, July 27. We have not seen the draft EIR.

###

"Moving Runway 24 Right closer to homes and businesses is unsafe, unnecessary, unacceptable and probably illegal under the Stipulated Settlement Agreement" said Denny Schneider, President of ARSAC. "We will vigorously fight efforts to move the runway to the north, especially when there are better alternatives available to increase safety, security and passenger convenience that would not require destroying homes and businesses in Westchester/Playa del Rey. Furthermore, any movement of the runway to the north will permanently alter flight patterns over Southern California, newly exposing millions of residents to aircraft noise, pollution and safety issues who have not been impacted by LAX operations in the past. If necessary, we will go back to court to protect our communities and to force LAX to reconsider other runway configurations which do not move aircraft closer to Westchester/Playa del Rey."

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ARSAC is a grass roots organization formed in 1995. ARSAC's mission is to establish a powerful, unified voice of elected officials and business and community leaders to promote a regional solution to the future commercial aviation demands of the entire Southern California region.

\*This statement is one day ahead of the anticipated LAWA release of the DEIR and SPAS costing report on Friday, July 27. We have not seen the draft EIR.

###

Denny Schneider 310 641-4199 voice 213 675-1817 mobile

Denny Schneider 310 641-4199 voice 213 675-1817 mobile

SPAS-PC00153

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Attachments: Sierra Club LAX DEIR 121010.doc

**From:** Darrell Clarke [darclarke@gmail.com]  
**Sent:** Wednesday, October 10, 2012 4:47 PM  
**To:** SPASEIR Comments  
**Cc:** Jerard Wright  
**Subject:** Sierra Club comments on the Draft EIR for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS)

Please find the attached Sierra Club comments on the Draft EIR for the LAX SPAS.

Darrell Clarke

SPAS-PC00154

2435 Wilshire Boulevard  
 Suite 320  
 Los Angeles, CA 90010-1904



(213) 387-4287 phone  
 (313) 387-5583 fax  
 www.angeles.sierracub.org

October 10, 2012.

To Diego Alvarez, via e-mail [spasircomments@lawa.org](mailto:spasircomments@lawa.org)

#### Comments on the Draft EIR for the Los Angeles International Airport (LAX) Specific Plan Amendment Study (SPAS)

The Sierra Club Angeles Chapter Transportation Committee is submitting the following comments on the Specific Plan Amendment Study Draft EIR, primarily about ground access to LAX. Good mass transit access to LAX is critical to its future functionality and will require close planning coordination between Los Angeles World Airports and Metro.

#### Automated People Mover

\* Considering that LAX is one of the busiest airports in the U.S. and sees itself competing on passenger amenities with other major U.S. airport hubs, it is absurd to consider the 1970s-era concept of buses looping the Central Terminal Area as competitive with the Automated People Mover (APM) systems installed at most other major airports. California's second-busiest, SFO, is a close model of an APM with stations at each of its three domestic terminals as well as two international terminals, BART, and the rental car facility.

\* An APM should have at least two stations (not one) on each side plus the international terminal – if not a station for each terminal, like the current buses do.

\* No discussion at the planning level has been made of vertical and horizontal circulation within the airport terminals via pathways and horizontal escalators to connect travelers and their luggage from the mass transit stations into the airport terminals.

\* Routing of an APM should include interface with a potential future Metro rail branch line up the I-405 or Lincoln corridor. A station in the Lot C area would save people arriving on this coastal route from going out of their way to Aviation Boulevard and retracing to LAX.

\* Operating costs of an APM must be compared with operating costs of the bus / BRT proposals, not just capital costs, for a complete financial analysis.

\* The costs and benefits of operations/infrastructure sharing between agencies similar to airline operation co-sharing between airlines is precedent for funding ground transportation like APM or LRT.

SPAS-PC00154

#### Traffic Measurement

\* Current mode share (drive, transit, etc.) of both LAX passengers and employees should be documented and compared with similar major airports.

\* How is traffic in the Central Terminal Area loop measured? The stated LOS "B" sounds like an average of light times with jammed times, not a true measure of peak periods.

\* There are a number of simple low-cost fixes to improve pedestrian and vehicle movements that should also be explored.

Sincerely,

Jerard Wright and Darrell Clarke  
 Angeles Chapter Transportation Committee Co-Chairs

SPAS-PC00154

**From:** Joyce Dillard [dillardjoyce@yahoo.com]  
**Sent:** Wednesday, October 10, 2012 4:46 PM  
**To:** SPASEIR Comments  
**Subject:** Comments to LAWA Draft EIR LAX SPAS due 10.10.2012 5PM

In Biological Resources 5.5.3 you mention that Ballona is mitigated to a "level less than significant by an extensive restoration program."

With that, do you refer to the US Army Corps of Engineers and the California Department of Fish and Game Joint Draft EIS/EIR for Ballona Wetlands Restoration Project?

Your use of the word "were" means past tense.

What are the impacts of the different alternatives on this current Draft EIS/EIR?

The El Segundo butterfly may be affected by the proposal for the use of 600,000 cubic feet of off-shore beach sand at Dockweiler State Beach for City of Malibu's Beach Replenishment Program.

How would this affect your alternatives?

For the Hydrology issues, how does mitigation for the TMDLs Total Daily Maximum Load pollutants in the watersheds affect the Proposition O capital project?

Storm drain improvements will reduce TMDLs by what amount.

How is the Operations and Maintenance budget being addressed for this?

How will the alternatives affect Beneficial Uses of the Basin Plan?

What is the testing and analysis timeline for water quality?

Joyce Dillard  
 P.O. Box 31377  
 Los Angeles, CA 90031

SPAS-PC00155



**From:** Danna Cope [dannacope@gmail.com]  
**Sent:** Wednesday, October 10, 2012 4:19 PM  
**To:** SPASEIR Comments  
**Cc:** Bill Rosendahl  
**Subject:** LAX SPAS DEIR Comments

Mr. Diego Alvarez,

Below are some additional comments on the document:

The DEIR fails to address the stipulations of the agreement following the lawsuit. Under these stipulations LAWA agreed to accomplish several projects, such as:

- Green Light Projects, e.g., the Consolidated Car Rental Facility (even the location is still undecided)
- Establishing eight new Flyaway Bus lines (only two new Flyaway lines have been established)

I fervently hope that the next lawsuit (if one is necessary due to LAWA ignoring or inadequately addressing concerns raised about the DEIR) will result in court orders, not a stipulated agreement which LAWA has chosen to ignore.

It is truly regrettable that LAWA does not realize and seize the opportunity it has right now to build Ontario (and/or Palmdale) into an airport that could handle air traffic without having a hugely detrimental effect on established residential communities so close to runways.

The DEIR does mention expanding other airports (especially those owned by LAWA), but postpones such development until LAX reaches 75 MAP. By that time, the opportunities that now exist at other sites will have evaporated, and we would all be stuck with a woefully inadequate and unsafe airport (LAX) which would clog the surface traffic for miles while it tries to handle far too much of the greater LA basin's air traffic. The stipulated agreement stated that LAWA should focus on regionalization, but did not give LAWA an extended time to do so.

Thank you.

-- Danna Cope, 8219 Reading Ave, Westchester, CA 90045 310 641-2503

[dannacope@gmail.com](mailto:dannacope@gmail.com)

SPAS-PC00156

**Attachments:** AirQuality.pdf

**From:** Hans Huth [bhod101@gmail.com]  
**Sent:** Wednesday, October 10, 2012 3:55 PM  
**To:** SPASEIR Comments  
**Subject:** Comments Submitted on SPAS DEIR

Dear Mr. Diego Alvarez,

Please find attached comments in response to the SPAS DEIR.

Thanks in advance.

Hans Huth  
 8732 El Manor Avenue  
 Los Angeles, CA 90045  
 310-649-4273  
[bhod101@gmail.com](mailto:bhod101@gmail.com)

Attachment and message forwarded to:

Attention: Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way, Room 218  
 Los Angeles, CA 90045  
[spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

October 10, 3:57 PM

SPAS-PC00157

Hans Huth  
 8732 El Manor Avenue  
 Los Angeles, CA 90045  
 Email: [bhod101@gmail.com](mailto:bhod101@gmail.com)  
 310-649-4273

Attention: Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 1 World Way, Room 218  
 Los Angeles, CA 90045  
[spaseircomments@lawa.org](mailto:spaseircomments@lawa.org)

Dear Mr. Alvarez,

Thank you for this opportunity to submit comments on the Specific Plan Amendment Study Draft Environmental Impact Report (SPAS DEIR). Please note that the DEIR is over 12,000 pages long, for which the public has been given less than three months to review. At three months, a comprehensive review would require reviewing over 4000 pages per month. On this note, I would appreciate the review period for the DEIR being extended to next year, so that adjacent communities have a fair opportunity to consider the full impact of the proposed alternatives. In the interim, I will focus my comments on Chapter 4.2 focused on expected Air Quality impacts, particularly in regards to PM10, PM2.5 and lead for which the area in question is designated in non-attainment of federal air quality standards. I have many concerns, but will focus on three important points:

**(1) Baseline data is not inclusive of the LAX Air Quality and Source Apportionment Study:**

As noted in the DEIR chapter 4.2.1.2, the scope of the analysis associated with construction activities requires that the consultant obtain background concentration data from the SCAQMD and estimate future concentrations with construction of each alternative. However, the chapter includes no reference to the LAX Air Quality and Source Apportionment Study, due for release on January 31, 2013. As per LAWA's own comments regarding the Source Apportionment Study:

"It is important to note that this study is focused solely on identifying and properly allocating airport and other emissions affecting the neighborhoods around LAX. However, the results of this study and its documented methodology may be used to guide the approach of future studies attempting to analyze health impacts in surrounding communities."

In light of LAWA's comments, the Apportionment Study and its associated data should be an essential component of a DEIR, especially given its scope of leveraging "future studies attempting to analyze health impacts in surrounding communities." This is critical for evaluating baseline conditions. However, the DEIR completely ignores this

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study. Instead, the DEIR considers regional air quality monitoring data which, in some cases, is not even in the same municipality. To make this point clear, please note that in section 4.2.3.3, the DEIR is using baseline data for PM 2.5 from an air quality monitoring station located at 3648 North Long Beach Boulevard, in North Long Beach. This is no where near the area that will be impacted by the proposed alternatives. On these grounds, modeling associated with the DEIR is based on an incomplete dataset in that it ignores the Source Apportionment Study, and the potential to use locally available data for PM2.5.

Please note that LAWA acknowledges that the Source Apportionment Study is expected to be released on January 31, 2013. As such, why is the DEIR publication and comment period being rushed in advance of the Source Apportionment Study publication? Why would LAWA ignore this important decade-long study? Couldn't LAWA and its consultant mine this study for the data needed to more accurately predict baseline conditions and model impacts from proposed alternatives, particularly for PM2.5?

**(2) Fugitive dust from proposed construction staging sites not adequately modeled:**

Chapter 2, Section 2.3.1.12 discusses Construction Staging Areas. As noted:

Figure 2-15 represent areas that are, or will be, generally vacant, are located outside of aircraft operation, and are generally suitable for the placement of construction trailers/offices, storage of construction materials, and staging of construction activities. They are considered to be equally available to all of the alternatives.

Seven potential construction staging areas have been identified. Of these, areas "C" and "D" are located directly adjacent to residences within the community of Westchester. In this context, Section 4.2.2.1 notes that:

Fugitive dust emissions resulting from excavation, dirt transfer operations, wind erosion of storage pile, and particle entrainment from vehicle travel on paved and unpaved roadways were quantified as part of the construction emissions inventories.

However, the inventory analysis is flawed in the context of LAWA's existing practices. Specifically, note the following assumption in the DEIR:

An additional source of PM10 and PM2.5 emissions associated with construction activities is fugitive dust. Fugitive dust includes resuspended road dust from both off- and on-road vehicles, as well as dust from grading, loading, and unloading activities.

Watering, as required under LAWA construction contracts and also being one of the main dust suppression measures recognized in SCAQMD Rule 403, was assumed to reduce fugitive dust emissions by 50 percent.

Please note that LAWA is currently using area "C", directly adjacent to Westchester residents as an LAWA site for storing construction material stockpiles and fill dirt

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without any kind of dust suppression measures. Local residents have witnessed and voiced concerns about these activities to LAWA for years, and yet the activity has recently increased with no mitigation.

As evidence, I have included a photo (collected August 11, 2012) summarizing the activities exercised by LAWA on Area "C". Please take note of the homes and Catholic Middle School (Visitation) plainly visible in the background. Note that there are no dust suppression technologies in place, nor have any been witnessed by the local



community over the past three years. Additional photos are included in the following section.

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In this context, baseline characterizations for PM 2.5 and PM10, and/or predicted impacts from the associated alternatives should model stockpiling of fill dirt as an unmitigated activity, rather than one that considers dust suppression measures. In addition, the DEIR must include a discussion of what impact moving the existing tons of fill dirt will have if the associated site will be used for other construction-staging activities associated with the proposed alternatives.

(3) Assumptions regarding adherence to historical agreements must be revisited in any modeling.

As noted in section 4.2.5 summarizing LAX Master Plan Community Benefits Agreement: X.L., Rock-Crushing Operations and Construction Materials Stockpiles:

This provision requires LAWA to locate rock-crushing operations and construction material stockpiles for all construction related to the LAX Master Plan in areas away from LAX-adjacent residents to reduce impacts from emissions of fugitive dust. This requirement would be included in specifications for any SPAS alternative requiring on-site construction.

However, the activities currently taking place in Area C demonstrate that LAWA is not abiding by this community agreement. As such, any assumptions that LAWA will adhere to this or any other community agreements as a foundation for any modeling of predicted impacts is questionable. The violation of trust is demonstrated by the following photos collected in Area C, directly adjacent to the Westchester community:

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In this context, predicted impacts to adjacent communities from ongoing unmitigated activities must reflect what is being witnessed rather than rely on idealistic assumptions that LAWA will begin adhering to historical agreements. Specifically, DEIR modeling must consider that Area C will in fact be used for storage of construction-related fill materials as is currently taking place.

In closing, I am concerned that the air-quality section of the DEIR is based on incomplete information and idealistic assumptions not based on observed facts. Air Quality modeling associated with DEIR must be revisited in the context of locally and readily available data (i.e. LAX Air Quality and Source Apportionment Study), and must reflect current practices by LAWA rather than assume idealistic adherence to historical community agreements which are being broken. Given that the foundation of the modeling is in question, a revised DEIR is necessary to accurately assess the impacts of the associated alternatives on air quality, particularly PM10, PM2.5 and lead for which the area is already federally designated as impaired.

Please take note of the DEIR section that discusses fine particulate matter:

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PM10 and PM2.5 can accumulate in the respiratory system and are associated with a variety of negative health effects. Exposure to particulate matter can aggravate existing respiratory conditions, increase respiratory symptoms and disease, decrease long term lung function, and possibly cause premature death. The segments of the population that are most sensitive to the negative effects of particulate matter in the air are elderly, individuals with cardiopulmonary disease, and children. Aside from adverse health effects, particulate matter in the air causes a reduction of visibility and damage to paints and building materials.

As you know, there are elderly families that have lived in Westchester for over a generation. These families purchased their homes and built their lives in Westchester decades before any proposed expansion of LAX. In this context, I would hope that LAWA take into consideration a complete and accurate evaluation of expected air quality impacts on their health and well being rather than rush an incomplete DEIR. LAWA should be just concerned about accurately predicting air quality impacts on the health of residents in adjacent communities as much as it is concerned about airport safety and traffic. As it now stands, the rushed nature of the DEIR suggests otherwise, and yet lives are in the balance on both sides of the equation.

Thank you for your consideration,

Hans Huth  
October 10, 2012

SPAS-PC00157



Attachments: Spas EIR comments 10-10-12.PDF

**From:** Tammy Branham [Tammy.Branham@DTAG.Com]  
**Sent:** Wednesday, October 10, 2012 2:28 PM  
**To:** SPASEIR Comments  
**Cc:** MARTIN, STEVE; BOWERS, DEBBIE  
**Subject:** SPAS comments from DTG Operations, Inc.

Please see attached.

Thank you.

**Tammy Branham**  
 Executive Director, Properties & Concessions  
 Dollar Thrifty Automotive Group, Inc.  
 5330 E 31st Street  
 Tulsa, OK 74135

Tammy.Branham@DTAG.com  
 Office: 918.669.2471  
 Cell: 918.625.2456

SPAS-PC00158



Sent via email to spaseircomments@lawa.org

October 10, 2012

Mr. Diego Alvarez  
 Facilities Planning Division  
 Los Angeles World Airports  
 One World Way  
 Los Angeles, CA 90045-5803

**RE: Specific Plan Amendment Study 2012**

Dear Mr. Alvarez:

DTG Operations, Inc. has reviewed the above study and we would like to comment on options that include a consolidated facility on Lot C. The rental car industry worked with staff at LAWA and a team of consultants to develop a consolidated rental car facility at Lot C. Due to height restrictions, we were not able to find a solution that worked on that property.

The Manchester Square option would allow for a multiple level facility that is not restricted by the height limitations at Lot C. We urge you to only consider a consolidated rental car facility at Manchester Square, or another parcel of land that would allow for multiple levels.

Lot C does not meet the current needs of the rental car industry and would not meet the future needs. Manchester Square meets the current needs and allows for future growth. If we are going to build a consolidated facility that improves the rental car experience for our mutual customers, we cannot do it on Lot C.

I can be reached at 918-669-2471, should you have any questions.

Sincerely,

Tammy Branham  
 Executive Director, Properties & Concessions

Cc: Steve Martin via email  
 Debbie Bowers via email

Dollar Thrifty Automotive Group, Inc.  
 5330 E. 31st Street  
 Tulsa, OK 74135  
 Phone: (918) 669-2471  
 Fax: (918) 669-2456

SPAS-PC00158

Attachments: LAWA SPAS-DEIR Comments - Ouellet - 2012-10-10.pdf

**From:** Jim Ouellet [jim\_ouellet@yahoo.com]  
**Sent:** Wednesday, October 10, 2012 2:21 PM  
**To:** SPASEIR Comments  
**Subject:** LAWA SPAS-DEIR Comments

Dear Mr. Rivera,

I have attached a PDF copy of a letter with my comments and questions regarding LAWA's SPAS-DEIR issued in late July, 2012.

JAMES V. OUELLET

SPAS-PC00159

James V. Ouellet  
 8117 Manchester Avenue, #668  
 Playa del Rey, CA 90293

Mr. Diego Alvarez  
 SPAS Program Director  
 Los Angeles World Airports  
 Los Angeles, CA 90045

Dear Mr. Alvarez:

After reviewing what I could of the Specific Plan Amendment Study and Draft Environmental Impact Report, I have some questions which are listed below.

1. In making its long-term forecast of airfield safety, please state whether LAWA is making the assumption that no new technology that would improve on ASDE-X and Runway Status Lights will ever be introduced to improve airfield safety? The SPAS-DEIR makes no mention of the possibility that a new technology could come along to further improve airfield safety. LAWA certainly includes a forecast of lower automobile emissions (owing to improving technology) when it discusses 2025 air quality.
2. Page 4-502 (3<sup>rd</sup> bullet) says that LAWA and FAA agreed to expanded, improved Runway Status Lights. Then in May, 2011 FAA balked due to budget constraints. Then "Based on discussions between LAWA and the FAA in December 2011, the FAA is re-evaluating the scope and budget with the goal of initiating the implementation in 2012. In order for the safety benefit of this technology to be fully realized, an airfield geometry designed to accommodate modern aircraft is needed." Is this saying FAA is refusing to provide funding for safety upgrades unless LAX redesigns the North Airfield to fully comply with FAA design standards for ADG V and ADG VI aircraft? The sentence quoted above sounds as if the FAA is trying to force LAWA to undertake a redesign the North Airfield before FAA will release funds for RWSL. Is that a correct interpretation of the sentence? Are LAWA and the FAA cooperating in this delay in order to force adoption of Alternatives 1, 5 or 6? State what progress has been made in fully implementing Runway Status Lights on the North Airfield since this paragraph was written.
3. Identify which North Airfield safety studies were done: 1) before the installation of ASDE-X and Runway Status Lights, 2) which were done after and 3) which took into consideration improved safety benefits of runway status lights and ASDE-X.

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4. The SPAS-DEIR summary of the various North Airfield safety studies unfairly lumps them together, for example, by saying that all agree that North Airfield safety would be improved by moving Runway 24R further north. For each study, please identify: 1) the total cost of the study, 2) the man-hours involved in actually studying North Airfield safety in each study, 3) whether the study attempted to quantify the likely risk of disastrous runway crash and loss of life versus merely evaluating North Airfield compliance with FAA standards, 4) Whether the study addressed the issue of the whether the cost of moving Runway 24R north is worth the benefit in improved safety.
5. Page 4-505 describes the FAA criticism of the North Airfield Safety Study (NASS) performed by the Academic Panel in cooperation with NASA. It is shameful that the SPAS-DEIR does not even mention that the Academic Panel studied the FAA critique and issued a lengthy and detailed response.  
  
Please amend the SPAS-DEIR to include a fair description of the Academic Panel's response to the criticisms brought against their report. The following quotes taken from the Academic Panel's response should be included in any LAWA document that describes the FAA critique and the Panel's response:  
  
*"After reviewing the FAA critique of our study, we see no reason to amend our estimates. We disagree with the assessment that our work suffered from 'several critical flaws in the study's assumptions, methodology and conclusions.' We continue to believe that our analysis was logical, accurate, and conservative." "If the FAA critique had presented valid criticisms of our analysis, then we would have hastened to make full corrections: never would concerns about 'saving face' have meant anything to us compared to the imperative of saving lives." (Italics in the original.)*
6. Table 4.7.2-9 (p. 4-516) lists 10 off-airport commercial parcels in the RPZ at the west end of the outboard runway, 24R. Google satellite views show zero structures in that area. Please list those structures and GPS coordinates of each.
7. Table 4.2-13: LAWA computes into its 2025 forecast a decrease in pollution produced by on-road vehicles – people coming to the airport in cars. Those changes will be almost entirely due to new vehicle fuel economy rules passed by Congress, not by any changes at LAX. Why is it appropriate to calculate those changes into forecasts of total pollutant counts? In effect, LAX will generate more pollution by increased air traffic but gives itself a "freebie" reduction in car-generated pollution.
8. Emissions due to construction are reported in peak emissions (in lbs/day) or peak concentration. Nothing in the Main document mentions total emissions, which would vary considerably, depending on which alternative is pursued. Please provide ROM estimates of total construction emissions for Alternatives 1-7 in a single table.

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9. Page 4-451 which discusses human health impacts of the various alternatives, says this: "In addition, Alternative 2 would have lower aircraft emissions than Alternatives 1, 3, 4, 5, 6, and 7." In contrast, page 4-130 says this: "In comparison to the other alternatives, Alternative 1 peak daily aircraft emissions for all criteria pollutants (CO, VOC, NOx, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) would be lower than aircraft emissions under Alternatives 2, 3, 4, and 7. Alternative 1 aircraft emissions would be the same or greater than aircraft emissions under Alternatives 5 and 6."

Which is it? Are emissions higher lower under Alt 1 or under Alt 2?

10. Table 4.2-13 (pp. 4-122 to 4-125) reports "Incremental Project Operational Emissions Compared to Baseline (2009) Conditions" Does Table 4.2-13 report the predicted TOTAL aircraft emissions in 2025? Or does Table 4.2-13 report the amount of predicted emissions that would be added to the 2009 baseline conditions?
11. Noise: Please identify the variables used to calculate current and predicted CNEL. For each variable, identify the value or range of values that was used in the calculations of CNEL. Do the calculations of CNEL include variables for the topography of the land, such as the hill at the west end of Playa del Rey and the sort of "valley" at the north end of Pershing Drive?
12. Define how LAWA calculated the mix of ADG VI aircraft in its 2025 forecast.

Do LAWA's calculations of the 2025 aircraft group mix assume that sales forecasts of ADG VI aircraft such as the Airbus A380 and Boeing 747-8 are accurate? So far, sales of both are far below their manufacturers' projections. If it weren't for a single airline (Dubai-based Emirates, which flies to LAX once daily in a Boeing 777) that has ordered 90 A380s, the A380 would be a financial disaster. Are LAWA's predictions of ADG VI aircraft based on sales to date? On manufacturer forecasts? On declining sales and possible early phasing out of ADG VI aircraft? Currently, only Qantas, Korean Air, Singapore and Air France fly A380s into LAX. Which airlines, if any, have notified LAWA they intend to begin flying the A380 to LAX?

Sincerely,



JAMES V. OUELLET

SPAS-PC00159

## Drollinger

P R O P E R T I E S

October 5, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

RE: SPECIFIC PLAN AMENDMENT STUDY DRAFT EIR FOR LOS ANGELES INTERNATIONAL AIRPORT ("SPAS")

Dear Mr. Alvarez:

On behalf Drollinger Properties I have reviewed the Draft Environmental Impact Report and have included my comments herein.

As property and business owners in the Westchester/Playa del Rey community for over 65 years Drollinger Properties has a long standing relationship with the airport and this community. Drollinger Properties owns and operates properties which support more than 60 businesses and over 1,000 daily workers, as well as our own offices. No single private entity will be affected more by a northward expansion of LAX than Drollinger Properties. Drollinger Properties and related entities objects to the approval of the proposed project or projects included in the Draft Environmental Impact Report for the reasons stated below. Drollinger Properties also includes by reference the objections raised in the comment letter submitted by the Alliance for Regional Solutions to Airport Congestion.

Drollinger Properties is committed to the preservation of the Westchester Business District which contains the vast majority of the company's assets and the preservation of the broader Westchester/Playa del Rey community which supports the business district.

Drollinger Properties has been instrumental in the formation of the Westchester Business Improvement District and the Westchester Street Improvement Association which have transformed the area which was nearly destroyed by the expansion of LAX in the 1970's.

Drollinger Properties has invested millions of dollars into Westchester/Playa del Rey both in private investment in business and properties and in charitable donations to our local community and educational institutions.

It would be safe to say that Drollinger Properties will be a strong advocate for that which promotes a better quality of life for the people and businesses of Westchester and Playa del Rey.

SPAS-PC00160

The modernization of LAX is long overdue and Drollinger Properties supports the efforts of LAWA to upgrade the terminals, create a more efficient ground transportation system and to improve airplane safety at the airport without moving north.

The Draft EIR has modeled nine alternatives for the community to review and LAWA has indicated that a preferred alternative could be a combination of any of the nine.

In our review of the alternatives it appears to us that several of the alternatives will make the needed improvements to the terminal areas and ground transportation facilities. It seems that the relocation and configuration of the north airfield is the most contentious aspect of the alternatives.

It is our understanding that the north airfield has been deemed "safe" by the standards employed by the NASA study. The airfield could operate more efficiently with additional runway and/or taxiway modifications although it is our belief that the data does not justify the movement of the north runway for safety reasons. The Draft EIR noted that not moving the runway provided the most efficient movement of aircraft off runways to gates.

The Draft EIR presented several alternatives to the north airfield in order to address "safe and efficient" movement of aircraft.

We have reviewed the integrated alternatives in an effort to assess the environmental impacts of noise, traffic, safety and air quality on our properties. But we aren't able to choose an acceptable alternative based upon the information within the Draft EIR documents. In general we contend that the community is best served with alternatives which do not expand the perimeter of the airport to the North nor move the runways on the North airfield further North than their existing location.

Of the other alternatives it appears that alternative 2 if coupled with alternative 9 would address airfield safety issues, include efficiency features and would upgrade terminal and ground transportation facilities without moving the airfield to the North. It is critical for Drollinger Properties that the preferred alternative will provide clear and definitive plans showing how properties around the North side of the airport will be affected in terms of all environmental impacts, safety within Runway Protection Zones, waivers from the FAA and any and all requirements for private and/or public property acquisition. With the information provided we support alternatives 2 and 9.

Drollinger Properties is faced with years of uncertainty for its business partners and tenants if a northward movement of the north airfield is part of the approved plan for LAX. Even now we are inundated with concerns from tenants who are not willing to invest in Westchester for the fear their businesses may be required to move in the future. This is a very real cost to our business and affects the entire business district. The approval of a "program" narrows the uncertainty but until decisions are made on a "project" basis our economic future will remain in limbo. It is our contention that the "program" EIR is far too broad to have any real significance. This program EIR cannot possibly detail what is needed in a project EIR simply because no one

SPAS-PC00160



knows the magnitude of each project within the program. We suggest that an individual project EIR be required for each element of work and that the community be allowed to comment on each project EIR.

Any alternative which includes the relocation of Lincoln Boulevard will have a significant impact on our business district and this is inadequately addressed in the DEIR. Traffic re-routing, utility disruptions, construction noise and dust will affect our local businesses for prolonged periods of time. We have high technology tenants who must receive continuous connectivity to broadband services and disruptions are very costly.

This is our outline of the prime issues that Drollinger Properties has regarding the Draft EIR.

1. The Draft EIR does not address what will happen to specific properties in each of the alternatives. Please provide a detailed assessment of what properties will remain and what properties will be demolished in each of the alternatives.
  - a. For properties that will remain please describe the environmental impacts for interior and exterior noise impacts versus current conditions for each alternative.
  - b. For properties that will remain please describe the environmental impacts for air quality compared to current conditions for each alternative.
  - c. For properties that will be demolished please provide a plan for business relocation in the event of property condemnation.
  - d. For properties that will be demolished please provide a detailed analysis of what uses and restrictions will apply to the affected properties after the expansion for each alternative and what will the airport do with any properties it condemns?
2. Please provide detailed analysis of the potential safety considerations for properties that are currently or will be in the Runway Protection Zone in each of the alternatives.
3. Please provide detailed analysis for utility service impacts, disruptions and capacities for each of the alternatives. Specifically, the area in and around the intersections of Lincoln Blvd. and Sepulveda and Westchester Parkway and Sepulveda Westway.
4. Please show which of the alternatives best minimizes, avoids or reduces the environmental impacts to surrounding communities. Please outline this analysis for each of the alternatives and each of the surrounding communities.
5. Please provide a landscape improvement and maintenance plan for all parcels acquired due to airport expansion for each alternative.
6. What aircraft noise mitigation measures will be employed on which properties for each of the alternatives?
7. Please outline how the Alternative proposal's level of mitigation is comparable to that described in the LAX Master Plan Program EIR as described on page 1-9 paragraph number 3.

SPAS-PC00160

8. The effects of Lincoln Blvd. tunneling or re-alignment has not been adequately analyzed or explored. What are the effects on surrounding traffic patterns with a modification of Lincoln Boulevard, particularly Sepulveda Boulevard?
9. Any re-alignment of Lincoln Boulevard will have significant impacts on the community during construction. Please outline those impacts and the mitigation methods in terms of traffic, noise, air pollution, temporary and permanent drainage.
10. Any re-alignment of Lincoln Boulevard could also affect other utilities. Please outline the impacts on other utilities, water, power, cable, telephone etc and provide mitigation solutions.
11. There are currently major drainage issues in Westchester as even mild rain events result in flooding every year. Any changes to drainage facilities on the northside of the airport should be studied and analyzed for the 100 year storm event. If drainage facilities are modified all facilities should be upgraded for the 100 year storm event.
12. The West Maintenance Facility should be included in this draft EIR as a cumulative impact part of LAWA's project. Please provide an impact analysis that includes environmental impacts of the West Maintenance Facility as part of this EIR as it relates to construction and ongoing noise, air pollution and traffic impacts. This facility could have a major impact on our community and should be included.
13. We would like a detailed timeline as part of the final EIR which outlines the timing for all improvements included in the approved plan.
14. General impacts on the community and businesses such as routing of equipment, noise, times of operation, temporary closures, etc. in addition to staging area A?

We have reviewed the comments submitted by the Alliance for a Regional Solution to Airport Congestion (ARSAC). In addition to the comments included herein we want to make it clear that Drollinger Properties supports, agrees and hereby incorporates the comments from ARSAC in its comments to the SPAS Draft EIR.

Drollinger Properties is vested in Westchester unlike any other private property owner. Again, we have invested millions of dollars in our community over a period of 65 years. We support the efforts of LAWA in upgrading LAX. We support the upgrades to the terminal areas and we support the efforts of LAWA to improve ground transportation in and around the airport. As property owners and members of the Westchester BID we support an attractive "gateway" to LAX and to the City of Los Angeles. We support the efforts of LAWA to improve the safety of airport operations and to increase the efficient movement of aircraft around the airfields.

We support Alternative 9 and we support Alternative 2. We cannot support any alternative that moves the North airfield to the North.

SPAS-PC00160

Please consider these our comments to the SPAS DRAFT EIR.

Thank you.



Karen Dial  
President

CC: Mayor Antonio Villaraigosa, City of Los Angeles  
City Councilman Bill Rosendahl, 11<sup>th</sup> District, City of Los Angeles  
Supervisor Don Knabe, 4<sup>th</sup> District, County of Los Angeles  
Congresswoman Janice Hahn  
Congresswoman Maxine Walters  
Congressman Henry Waxman  
Senator Barbara Boxer  
Senator Diane Feinstein

SPAS-PC00160

WALTER ZIFKIN

October 2, 2012

Mr. Diego Alvarez  
Los Angeles World Airports, Facilities Planning Division  
One World Way  
Los Angeles, CA 90045

RE: LAX SPAS DRAFT EIR – Public Comment

Dear Mr. Alvarez:

My name is Walter Zifkin, and I was privileged to serve as a member of the Board of Airport Commissioners for seven years – from 2004 to 2011. I was originally appointed by Mayor James Hahn and re-appointed by Mayor Antonio Villaraigosa. My tenure on the Board spanned two mayors, three commission presidents and three airport directors.

The common thread shared by all who were involved with Los Angeles International Airport during those seven years was the commitment to modernize our aging airport. I joined the Commission in the midst of the City Council's consideration of the LAX Master Plan. Following its adoption in 2004, and the settlement of the lawsuit early in 2006, we began work on the so-called green-lighted projects which kicked off the modernization efforts.

Today we are witnessing unprecedented construction, thousands of jobs and millions of dollars infused daily into our economy. Next year, we will see the grand opening of the new Bradley West, which will re-shape the Tom Bradley International Terminal and change the way we serve our international passengers. This work is vital to improving the way our passengers experience this airport and this City. However, we stand at the threshold of all that yet needs to be accomplished. We are at one of the most critical times in this massive endeavor – deciding whether the modernization of LAX should continue to full completion, or whether we stop now and find satisfaction with a partial fix.

I believe that a partial fix is simply not enough. How can we truly believe we have modernized LAX without addressing key improvements to its North Airfield? How can we proclaim "mission accomplished" without forging ahead with a Consolidated Rental Car Facility? How can we claim victory before we find a way to connect the airport to public transportation? Obviously, we can't. That is why this Specific Plan Amendment Study is so important.

I know firsthand there remain contentious issues. I lived it for seven years – I heard the testimony, read the reports, met with stakeholders. But I remain completely convinced that our North Airfield must be reconfigured to accommodate today's aircraft fleet. It's vital we separate the runways and construct a centerline taxiway. We cannot continue with an airfield which was not designed and built for Group 5 and Group 6 aircraft. Air Traffic Control modifications have been stretched to accommodate this new generation of aircraft. How can we find it acceptable to shut down all North Airfield operations when an A380 aircraft is in operation? LAX must have a 21<sup>st</sup> century airfield.

The North Airfield is not as safe as it could or should be. During my time on the commission, we reviewed several safety studies and heard from experts relative to the condition of the North Airfield. While the conclusions varied, each of the studies indicated that a reconfigured North Airfield would

SPAS-PC00161




result in a safer airport. Most noteworthy, the FAA and the airline pilots have consistently and strongly recommended the two northern runways be separated by at least 350 additional feet and that a centerline taxiway be added between them.

I have carefully reviewed each of the alternatives considered in the Draft EIR document. Recognizing that a reconfigured North Airfield can result in a safer airport while improving operational efficiency, I believe that only Alternative 5 contained in the Draft EIR can achieve these objectives. None of the other alternatives present a separation of runways at the level requested by the FAA (i.e. 350 feet). Alternative 5, however, demonstrates a significant improvement to the existing condition and would enable the construction of a much-needed centerline taxiway.

This is probably one of the most important times in the history of this airport. Like the 1961 opening of the central terminal area or the 1984 renovation, we are faced with a decision which will shape the way the aviation industry views LAX for the next generation. Will airlines choose LAX for new routes using newer and cleaner aircraft, or will we continue to be eclipsed by competing airports eager for the business? Will we truly transform LAX to a 21<sup>st</sup> century facility or simply remain satisfied with a memory of its former glory? In addition to the safety issues discussed above, the answers to these questions will have a substantial impact on industries and jobs that are dependent on having a safer, vibrant and attractive airport. We must continue to improve the airport so that it continues to be a major economic engine for our city.

I urge, therefore, that you choose the appropriate option of Alternative 5 so that the North Airfield can be reconfigured for safety and operational improvements. For the decision makers, it will take courage to do what is right and the vision that we act today not just for us, but for future generations of the citizens of Los Angeles. I urge the Board of Airport Commissioners and the City Council to take the courageous and responsible action.

Sincerely,



Walter Zilkin

3907 Ocean Front Walk, Marina Del Rey, CA 90237

SPAS-PC00161

Russell A. Lund, Ph.D., P.E.  
Metallurgical and Engineering Consultant

8406 Loyola Boulevard  
Los Angeles, CA 90045

phone (310) 670-7970  
facsimile (310) 645-5831

October 8, 2012

Mr. Diego Alvarez  
SPAS Program Director  
Los Angeles World Airports  
1 World Way, Room 218  
Los Angeles, CA 90045

Re: LAX Specific Plan Amendment Study  
Comments on Draft FIR

Mr. Alvarez:

Thank you for taking the time to address our community at September 27's NCWP town hall meeting. You had little time to cover a great deal of information, and I think you used your time effectively. I was also impressed by the unanimity of views expressed by community organizations and political representatives. I agree with them that important improvements must be made at LAX. As outlined in part below, I am convinced that moving the north runway is NOT a cost effective or efficient approach to improve LAX and the flying experience for Los Angeles residents. The best information available does NOT support moving the runways for reasons of safety.

I was particularly struck by the comments of Mr. Voss of the LAX Coastal Area Chamber of Commerce. As I understood him, he was involved with determining the objectives for the LAX NASS. He described the researchers selected as experts who would provide the "gold standard" report on north runway safety. Nevertheless, the DEIR seems to denigrate the findings of these blue ribbon experts. The LAWA report seems instead to favor disagreements such as those expressed by the FAA, without emphasizing the fact that the NASS response to the FAA "review" largely debunks their criticisms. It is unfortunate that the important NASS response is largely relegated to the end of an appendix and is not given the prominence it deserves.

If flight safety is of paramount concern, LAWA could - in short order and at relatively little cost - reduce the risk of aircraft incursions on the north runways by simply eliminating exits along the length of north runway 6L/24R, thereby requiring all landing aircraft to cross runway 6R/24L at the far end of the runway. Although this would increase taxi time for some operations, many airports have taxi distances and times far longer than those presently at LAX, and this increase

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Diego Alvarez  
LAX SPAS DEIR Comments  
October 8, 2012 Page 2

would only marginally increase total gate-to-gate times (of course, any alternative that involves moving the runways farther from the terminals may also increase taxi time). Taxi time is a very minor issue when compared to capital project costs, quality of life in the neighborhoods north of LAX, and even the misleading safety arguments. If large equipment (e.g. the A-380) needs more space, simply use the south runways for these few flights.

That this option was not included in the current set of Alternatives can only be viewed as part of the ongoing LAWA strategy to push one plan down the throats of Los Angeles residents, and its absence effectively constrained the work performed by the NASS (who nevertheless found that safety concerns do NOT support moving the north runways). Time and time again LAWA has proposed airport expansion through relocation of the north runways (only to have that proposal rejected), with the apparent hope that one day the heretofore strong opposition will be caught napping.

Usefulness of LAX is limited by ground transportation. Users of LAX (air travelers and freight from the southland) must reach the airport by car, truck, or bus. The nearby freeway and road infrastructure is overloaded. LAWA should focus its expansion desires on the regional airports (including Palmdale), not on shoe-horning more people into the constrained area of LAX. It is reprehensible that flight safety is being used to try and "justify" the misguided goals of LAWA.

Meanwhile, improvements to transportation local to the airport can and should be implemented. Furthermore, our terminals show their age, and are woefully inadequate to handle passenger loads. I notice this particularly in Terminals 1 and 3 (despite recent improvements made to the Terminal 1 arrival/bag claim area).

Of the options offered in the SPAS DEIR, I endorse Alternative 2 as being the closest to the approach described above.

Sincerely,



Russell A. Lund, Ph.D., P.E.  
Metallurgical and Mechanical Engineer

LAXSPAS 20121008.doc

Russell A. Lund, Ph.D., P.E.

SPAS-PC00162

October 8, 2012

Diego Alvarez  
SPAS Program Director  
LAWA  
1 World Way, Room 218  
Los Angeles, CA 90045

Dear Mr. Alvarez  
I am a Pilot and I fly  
domestic and international  
to attend the recent meeting on LAX  
Expansion plan.  
I want to add my "joint"  
objections to another letter  
by LAX. I support only the Plan (2)  
by LAX. I support only the Plan (2)  
possible please God by our  
Angels and Commune. Thank you  
you big,  
John M. Deaf

SPAS-PC00163





# Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



## Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: P.R. Geerligs

Organization:

Address: 4602 Pacific Coast Highway

City: Torrance

State: CA

Zip: 90505

Phone:

E-mail: paul.geerligs@mac.com

Comment:

I currently have three residences; my main residence is in The Netherlands with two more in the US and UK. Naturally I often compare airports to my main hub of Schiphol. And let me say that LAX is terrible--worse than Heathrow. I support any improvements done to the airport not only for passengers but for economic concerns as well. The airport is vital for the city's economy. However the only modification I would make to the plan is the light rail station. Why not build an underground station similar to Schiphol? As I currently understand the plan there will be bus transfers to the airport but this is cumbersome especially when travellers have more than one piece of luggage. An underground station would speed trips and prove extremely convenient whilst providing a real alternative to driving to the airport.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

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10-8-2012

Diego Alvarez

I could not attend 9-27-12 meeting  
as my wife has Alzheimer's Disease and I take  
care of her.

We have lived here since 1958, with children  
Tiara-Lake-Russel-Gabriel and now Rosemary.  
The airport has raised havoc with an area which  
is south of Manchester, now they tamper with the  
area north of Manchester.

We sleep the city and wait the cars after  
a long struggle, appeals etc etc.

Again the airport under the guise of  
studies, meetings etc they wish to destroy the  
area north of Manchester with all the dogs  
going on air study etc.

The answer should be a flat no to any map  
and a huge lawsuit is resolved.

Respectfully  
Michael Davis  
1310-649-0776  
9608 Aviation Blvd  
LA 90045

SPAS-PC00164



# Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



## Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Luis O. Toledo

Organization:

Address: 7406 Earldom Avenue

City: Playa Del Rey

State: CA

Zip: 90293

Phone:

E-mail: toledo\_luis@yahoo.com

Comment:

I think the LAX SPAS Open House/Public Meeting Board information is deceptive when it answers "no" to the question will "more" people be affected by noise with the northfield expansion...especially when they then provide a representation that moves the noise line north for EVERY proposal. Even if it was accurate that you aren't affecting "more" people...you are affecting the "same" people in a worse way. In other words the people that were already affected by noise will now be MORE affected by it. As someone that just bought a home in Playa Del Rey and already deals with noise at all times of the day and night I think this is unacceptable. I sent an application for soundproofing to the appropriate department and was told that this plan has expired...so LAWA isn't even helping current residents with the lower noise problem now...so how can we expect cooperation in the future? I also think that it's NOT true that in the future the noise level will increase anyway because of more planes...the frequency of the noise might increase but NOT the individual noise level (unless the traffic is directed further north as in all these expansion plans). I think there is a lot of information that downplays how this will affect the residents in Playa Del Rey. As someone who deals with this noise on a daily basis I want to have the whole commission out on our street and do some "fly overs" based on current traffic patterns and then based on the "new" proposed flight patterns...and let's see them argue that there isn't a problem with the northfield expansion!!

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00166



# Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



## Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Jordann Turner

Organization:

Address: 500 N. Willowbrook Avenue #H6

City: Compton

State: CA

Zip: 90220

Phone:

E-mail: jordann213@gmail.com

Comment:

movement of runway north 100 feet in conjunction with runway improvements and extensions

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00167





#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Jordann Turner

Organization:

Address: 500 N. Willowbrook Avenue #H6

City: Compton

State: CA

Zip: 90220

Phone:

E-mail: jordann213@gmail.com

Comment:

First comment was sent in error as it was not complete. My main comment is follows. The changes to the specific plan should include moving the runway 100 feet north to accommodate a center taxiway. Also include related runway and taxiway extensions as well as the rapid transit options to the airport as contemplated in various alternatives. Two questions: how are the alternatives that include runway shifts north evaluated with the Northside Plan? How is Metro's airport access study handled during the LAWA's study to do the same? Hopefully they are not redundant.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00168



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Michael s. Mitchell

Organization:

Address: P.O. Box 8903

City: anaheim

State: ca

Zip: 92812

Phone:

E-mail: mickeysss@me.com

Comment:

I cannot comment on the virtual meeting site? it will not open i have put the needed info in my computer

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00169



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: David Steinbach

Organization:

Address: 7740 Redlands St Unit G2090

City: Playa Del Rey

State: CA

Zip:

Phone:

E-mail:

Comment:

Please do everything you can to reduce noise in our community. Install sound walls if it would help. This is my only concern. Thank you.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00170



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Janis Davis

Organization:

Address: 1800 So. PCH Unit 89

City:

State:

Zip:

Phone:

E-mail:

Comment:

In order for LAX to provide exemplary service far into the future and create the unique gateway to the city of Los Angeles I look forward to the update to the airport that will take place in the near future.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00171





### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Pamela Stacey  
 Organization:  
 Address: 7528 Whitlock Avenue  
 City: Playa del Rey  
 State: CA  
 Zip: 90293  
 Phone:  
 E-mail: pamstacey@gmail.com

#### Comment:

My name is Pamela Stacey and i have lived in Playa del Rey for the past 27 years and love my community. I am here to advocate for the adoption of Alternative 2 combined with transportation features of Alternative 9. I oppose and will work to obstruct adoption of any other plan most especially any plan to move the north runway. Concerning the expansion people often ask us--What did you expect when you moved near the airport? We all did our homework. We expected an improvement in technology and proper management and governance. For the most part as evidenced by how many of us have stayed so long the airport has been a decent neighbor. Only Alternative 2 allows that to continue. Everybody in our neighborhoods wants to see LAX revitalized and improved--we too use the airport and know its low ranking--but we want it to be done to 21st century standards which include green technology the promotion of clean air and minimal vehicle traffic. Other plans risk turning LAX into a lumbering over-sized over-capitalized small-brained dinosaur. The people of Southern California and travelers to LAX deserve better. Most important to me only Alternative 2 states that there will be minimal or no increase in pollution. Moving the runway north will spew more toxins over more homes that are even now relatively compromised. It doesn't improve safety or air traffic to move the north runway. It does harm people. In only the two blocks where I live there are six cases of cancer. In only two blocks. I know the complications legitimate ones to proving cause and effect with cancer clusters. But you all know including our elected officials Council Members and LAWA power brokers that increased noise and air pollution put people at greater risk of cancer and other problems. There comes a time when common sense has to rule while science weighs in. That time is now. That decision has to be Alternative 2. Thank you. Pamela Stacey.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00172



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Vicki Vaughn  
 Organization:  
 Address: 8433 Holy Cross Pl  
 City: Westchester  
 State: CA  
 Zip: 90045  
 Phone:  
 E-mail: vicki@vickivaughn.com

#### Comment:

The options presented in recent community meetings of pushing the north runway further north by 50' 350 feet are not acceptable. THE CURRENT CONFIGURATION OF THE NORTH RUNWAYS ARE SAFE ACCORDING TO THE 2010 NASA AMES STUDY RELEASED IN FEBRUARY 2010. It is unbelievable that the Los Angeles city council could ignore the report of 'rocket scientists' in terms of safety at our airport. I'm not into accusing anyone of unethical dealings but the mere fact that these options are still on the table tells me that someone is going to benefit enormously and it won't be the local residents! We'll be left with sleepless nights from the noise increased air pollution and increased traffic. The mellow-dramatic act by Mr. Rothenberg at a recent meeting was ridiculous and highlights the fact that the committee whom he represented could care less about the residents of the area. His only concern was that one air conditioning unit on a business building might have to be moved. Never did he mention the degradation in the quality of life that the local neighborhood would suffer with the proposed changes to push further north. Just because the airport OWNS the land does not mean that it is OK for LAX to impose its presence on the neighborhoods. THERE IS LEGAL PRECEDENCE IN THE CITY OF LOS ANGELES THAT DEMANDS COMPENSATION OF HOMEOWNERS WHO SUFFER PROPERTY VALUE DEPRECIATION DUE TO NEARBY DEVELOPMENT AND EMINENT DOMAIN TAKINGS (West Hills Property Owners circa 1990) I don't know all the details which homes will be taken because of eminent domain but those of us who are left and are exposed to increased noise/pollution/traffic should be compensated for the loss in property value. I recently moved to the Westchester area thinking that the threat of pushing the airport runways further north was over because of the NASA report. While house hunting a local relator pointed out to me that homes south of Manchester around Emerson were 50-100k cheaper than north of Manchester. I bought north of Manchester and paid the extra amount expecting a quieter existence. My property value will drop \$100k or more because of someone else's greediness (it is well documented that this is NOT being done for safety reasons.) IT WILL MATTER IN TERMS OF THE VALUE OF MY HOUSE. Back in the early '90s I lived in an area of Los Angeles called West Hills located in the western edge of the San Fernando valley. A developer came in the city approved their plans they created 50 foot

SPAS-PC00173

high hills behind many homeowners who had a "view" Pushing the runways further north will cause me to LOSE ALL OF THE EQUITY IN MY HOUSE. How do you plan to compensate me and my neighbors? THE REDUCTION IN AIRPORT NOISE LEVELS FROM THE MOST EXTREME PLAN (PUSH 350' NORTH) IS ERRONEOUSLY BEING APPLIED TO THE WESTCHESTER/PLAYA AREAS. THAT REFERS TO EL SEGUNDO BECAUSE THE SOUTHERN RUNWAYS WILL HAVE FEWER INTERNATIONAL FLIGHTS. NOISE LEVEL WILL BE INCREASED FOR RESIDENTS NORTH OF THE AIRPORT. Currently my house is violently shaken EVERY TIME that a 747 long haul jet takes off from the north runway. The vibrations are so strong that my closet doors on the north side of the house rattle! I asked one of your "engineers" at the meeting at the Proud Bird about where sensors were placed when the study was done concerning the noise because I can't believe I'm outside of the 65 decibel area. Turns out it was mathematically calculated without taking into account the terrain of my house. My house sits up on a small knoll exposed to the sound waves as they travel across Westchester park. I'm 100 feet (my best guess) outside the area that had windows replaced by the airport. I've had to replace the windows myself. However it does NOTHING to abate the vibrations of those 747s. I'm at the corner of 85th and Holy Cross Pl 90045 Plus unless and until you force airlines to not use their reverse thrusters on their 757s and 737s and just use the turn out further down the runway there will be no peace. I just can't imagine THAT noise 350' closer to my house as well. Thank you for your consideration. Vicki Vaughn

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00173



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Bill Barry  
 Organization:  
 Address: PO Box 91015  
 City: Los Angeles  
 State: CA  
 Zip: 90009  
 Phone:  
 E-mail:

#### Comment:

This family is strongly opposed to Alternatives 15 or 6. I cannot believe that our local state and federal agencies would even consider much less decide to move a pollutant source closer to a densely populated residential area with schools parks and playgrounds. "Fine" particulates and the other toxic emissions from jet engines even new generation engines are a known problem. What can you be thinking of? You even recognize that the pollution is a concern because Alternate 5 has an "SU" label which I understand to mean that the pollution issues are significant and NOT CAPABLE OF BEING MITIGATED. Please adopt alternative 2 which leaves the North runway where it is.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00174





### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Joseph D Haythorn  
 Organization:  
 Address: 7530 West 88th St  
 City: Los Angeles  
 State: CA  
 Zip: 90045  
 Phone:  
 E-mail: dhaythorn@law.whittier.edu  
 Comment:

From the outset of the process to explore development of the facility at LAX it appears that LAWA has been acting in a duplicitous manner toward the citizens of Westchester and Playa del Rey. Inglewood has been treated in similar way. The idea that the if LAWA were to pursue moving the runway an additional group of houses condominiums apartments schools and businesses would need to be condemned. Any remaining outside the condemned area would surely bring actions for diminished value. The violation of the consent decree from the last condemnation would serve as the basis of the action but even without that the property owners would be successful in stopping the development resulting in no activity or at worst delaying any construction for years and ultimately receiving compensation forcing the costs of the project far beyond LAWA's predictions. The recent charade of the Northside development project meetings and "negotiations" are a further indication that LAWA is either not serious about the alternatives which involve or intending to lull the neighbors into a false sense of security. Neither reflects well as to whether LAWA is a trustworthy party in this project. As LAWA proves again inept and it is difficult to understand whether the entire process of proposing alternatives is a sham. Community partners have demonstrated that the safety claims are so exaggerated they may be dismissed. The statement that noise would not be worse if the runways are moved may be technically true but the noise would be closer to the residences schools and businesses so louder there. To actually claim otherwise again demonstrates that LAWA is not dealing seriously. So I am left to speculate as to whether LAWA is lying or inept. In either case my only alternative at this point is to seek counsel unless LAWA begins to address this business honestly with a clear understanding of the consequences of their actions. I still believe that the best alternative has not been considered to close the interior parking and access roads construct two or three north-south terminals with access by passengers from a subterranean mall as at the airports in Atlanta or Denver. Passengers would enter the facility east of the airport at Manchester Square or the area now with derelict warehouses between the two points. Otherwise I agree with the Neighborhood Council of Westchester Playa that alternatives 2 and 9 appear to be the only reasonable ones. The other would receive such opposition as to block all construction. If LAWA is actually intent on ignoring their prior consent

SPAS-PC00175

agreements there is really no reason to bother negotiating. I further agree with the Neighborhood Council of Westchester Playa that we do support intelligent development of LAX it is a shame any development is relegated to the abilities of the existing management of LAWA.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00175



### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Andrew Montealegre  
 Organization:  
 Address: 3854 Cazador Street  
 City: Los Angeles  
 State: CA  
 Zip: 90065  
 Phone:  
 E-mail: montana.alegre@yahoo.com  
 Comment:

Two ideas for accessing LAX: 1) create a transfer station where people transfer from their cars to a pod-type self-driving car; 2) run the train to the Theme Bldg and create walkways from there to all the terminals. See my website drawings: [www.accesslax.blogspot.com](http://www.accesslax.blogspot.com)

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00176



### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Erica Harrell  
 Organization:  
 Address: 6527 W 86th Place  
 City:  
 State:  
 Zip:  
 Phone:  
 E-mail:  
 Comment:

Alternative 2 seems to be the best option for those of us who live south of Manchester west of Sepulveda. If any other proposals go through do you plan to purchase any properties in this area? I can assure you the airport noise is really a nuisance already here. With all of these alternative what would the sound impact be on those in my area? If alternative 2 is passed are there any incentives that could be done for the neighbors in this area? Specifically we have these horrible power poles on 86th that do not even power our neighborhood. Having more trees would be nice around this area as well. Are there any neighborhood incentives planned with any of these proposals? If so what are they? Thank you!

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00177





#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: michael mitchell  
 Organization:  
 Address: 8982 shoreham dr.  
 City: west hollywood  
 State: ca  
 Zip: 90069  
 Phone:  
 E-mail: syntrivity@earthlink.net

Comment: The city is broke the state is broke to think you have the money to do any of this is a scam to take city money that we do not have and the bond market is a bubble. This is a scam and the design of the international terminal should be the end of the new work on the airport the rest will not work any way the one mile loop works great if you move off this area everyone will go to other airports for it will be torture to come to lax and get out of it. the truth is spas is made to make money from a plan 15 years ago that is out of date will not work and a sin if you do. when the mayor leaves next year the secret that the city is really broke will come out the bond market will crash and the city will not be able to sell the lax bonds. It will go bankrupt and have to be sold to the highest bidder especially if you spend all this needless money for spas.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00178



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: chris smith  
 Organization:  
 Address: 211 waterview street  
 City: playa del rey  
 State: ca  
 Zip: 90293  
 Phone:  
 E-mail: chsmith@bdo.com

Comment: It was very difficult to find this space on your website. I am in favor of all efforts to modernize LAX. It is evident that it has been allowed to go for far too long with making the improvements necessary to keep it a world class airport. That said I also think that LAWA needs to speak in a more neutral fashion about the safety studies that have been commissioned and completed - there is no sense of balance in how you portray the findings.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00179



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Jim Wiles  
 Organization:  
 Address: 7824 Goddard Ave.  
 City: los angeles  
 State: ca  
 Zip: 90045  
 Phone:  
 E-mail: jwiles55@ca.rr.com

Comment: The only alternatives that make sense for LAX and the surrounding community are alternatives 2 & 9. I have lived in Westchester for over 30 years. Please desist from ruining this great community. If you choose an alternative that moves the runway north there will be many more years of litigation. Do the right thing.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00180



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Marilyn M. Allen  
 Organization:  
 Address: 8601 Falmouth Ave. nbr 209  
 City: Playa Del Rey  
 State: Ca.  
 Zip: 90293  
 Phone:  
 E-mail: mspdr@ca.rr.com

Comment: I am a life long resident of the LAX area. We do not need LAX to be expanded... we need it to be modernized... tearing up streets and moving the runway are not necessary... alternatives 2 and 9 are the only way to go...if I could I would vote for them. thank you

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00181





### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Julie Lund

Organization:

Address: 8406 Loyola Blvd

City: Los Angeles

State: CA

Zip: 90045

Phone:

E-mail:

Comment:

I do understand that improvements need to be made to the airport but as a Westchester neighbor and a airport employee I do not want the north runway moved. The best options in my view are either option 2 or 9.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00182



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Linda Peterson

Organization:

Address: 7053 Vista del Mar Lane

City: Playa del Rey

State: CA

Zip: 90293

Phone:

E-mail: lspeterson7053@ca.rr.com

Comment:

As homeowners near LAX and frequent users of the airport we are disappointed that the expressed Project Objectives for the SPAS do not include the goal of regionalizing Southern California air traffic. Regionalization should have been one of the enumerated Project Objectives and the DEIR should have discussed how much each alternative would help to accomplish that objective. It is short-sighted of the City to put all of its eggs into the LAX basket. In addition although LAX brings economic benefits to all of Southern California the burdens of the airport are unfairly shouldered by the communities surrounding it. It is time to take a serious regional approach to air transportation to mitigate the safety concerns noise congestion and air pollution currently impacting those who live work and travel the roads near LAX. As to the specific alternatives included in the SPAS we favor a combination of Alternatives 2 and 9 which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming nearby communities. Not only is Alternative 2 the "environmentally superior alternative" (page 1-103) it appears to be the most affordable option and the one that could be accomplished with the least delay. Many of the other alternatives in the SPAS are prohibitively expensive and there is no indication of how they will be funded. We support the airfield improvements in Alternative 2 which does not relocate the north runways but instead lengthens the left runway and improves taxiways. Alternative 2 is preferable given that these modifications to the airfield would mean that the larger Group 5 and 6 aircraft could be acceptably handled with no additional runway separation (pages 4-514-515). The expert safety study conducted by the North Airfield Safety Advisory Committee considered the "gold standard" when it was commissioned unanimously concluded that the North Runway Complex is extremely safe even with future projected traffic levels. In addition Alternative 2 would have the least impact on road traffic (page 4-942). Alternative 2 would not require the very expensive modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under the options that would move the runway so the modernization in Alternative 2 should not take as long or be as expensive as the alternatives that would move the runways. We support Alternative 9 as well because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the automated people mover from

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Alternative 9 would improve traffic by taking rental car shuttles off the road. The people mover in Alternative 9 would be easier for travelers than would the elevated bus way proposed in Alternative 8 simply because stepping onto a tram with luggage is more convenient than climbing into a bus with luggage. However the drawings of the people mover suggest that it dead-ends at Terminal 7 which would be a bad design. Why not have a circular design that does not end at any one terminal but instead goes to them all? We oppose the three alternatives that propose to move the right runway north (Alternative 1: 260 feet north Alternative 5: 350 feet north Alternative 6: 100 feet north). The NASA study demonstrated that further runway separation is unnecessary for safety (page 4-505). In removing the safety rationale for further separating the north runways that study also destroyed any legitimate argument that the communities near LAX must be required to bear all the adverse effects of runway movement so the airport will be safe. The airport is safe now. The DEIR predicts increases in the size of the noise contour over nearby communities from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)) which would negatively affect the quality of life in the communities near the airport. It appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Although LAWA needs to modernize we do not favor expansion. We do not understand how it can be as the DEIR states that the impacts of these runway movements to businesses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77). It is clear that businesses which we rely upon in the Westchester business district not currently located within an RPZ would be located within it and may need to be destroyed (for example page 4-516). LAWA appears to assume that it would have to purchase very little of the existing Westchester business district even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on the right runway. However where is the guarantee that all pilots will land mid-runway or that the FAA will agree that telling them to do so is sufficient protection for the businesses within the RPZ? If the FAA insists that these businesses be removed not only from the Runway Safety Area but also from the RPZ then the airport will again need to destroy significant parts of Westchester which currently provide both jobs and services to local residents and furnish significant tax dollars to the City. Even assuming that these businesses would not have to be moved it is not at all clear that these businesses should remain in the RPZ. Please explain how these nearby businesses would be safe if they remain in the RPZ. We also oppose Alternative 3 because it unnecessarily proposes to move the left runway 340 feet south at what would necessarily be an extraordinary expense including demolition of three terminals and extensive central terminal construction because again the separation of the north runways by this amount of distance is not necessary for either airfield safety or efficiency. Alternative 7 which proposes a 100 foot southward movement for the left runway does not seem as expensive as Alternative 3. However given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives there is no reason for the additional costs that Alternative 7 would be likely to entail. As frequent travelers through LAX we appreciate the need to modernize it. However we believe the travelling public would appreciate things like on-airport mass transit better signage repairs to roadways more efficient baggage screening better elevators and modernized restrooms more than moving the north runway. Further it is time the City recognizes that regardless of what it does at LAX it will not give LA a first-rate airport. Because of its geographic constraints LAX is simply not the location for a world-class airport. The best alternative is to develop an airport where there is open space for such an airport as other cities such as Denver and Houston have done and at the same time build a mass transportation system that actually goes into that airport.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00183



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Eugene White

Organization:

Address: 7053 Vista del Mar Lane

City: Playa del Rey

State: CA

Zip: 90293

Phone:

E-mail: lspeterson7053@ca.rr.com

Comment:

As homeowners near LAX and frequent users of the airport we are disappointed that the expressed Project Objectives for the SPAS do not include the goal of regionalizing Southern California air traffic. Regionalization should have been one of the enumerated Project Objectives and the DEIR should have discussed how much each alternative would help to accomplish that objective. It is short-sighted of the City to put all of its eggs into the LAX basket. In addition although LAX brings economic benefits to all of Southern California the burdens of the airport are unfairly shouldered by the communities surrounding it. It is time to take a serious regional approach to air transportation to mitigate the safety concerns noise congestion and air pollution currently impacting those who live work and travel the roads near LAX. As to the specific alternatives included in the SPAS we favor a combination of Alternatives 2 and 9 which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming nearby communities. Not only is Alternative 2 the "environmentally superior alternative" (page 1-103) it appears to be the most affordable option and the one that could be accomplished with the least delay. Many of the other alternatives in the SPAS are prohibitively expensive and there is no indication of how they will be funded. We support the airfield improvements in Alternative 2 which does not relocate the north runways but instead lengthens the left runway and improves taxiways. Alternative 2 is preferable given that these modifications to the airfield would mean that the larger Group 5 and 6 aircraft could be acceptably handled with no additional runway separation (pages 4-514-515). The expert safety study conducted by the North Airfield Safety Advisory Committee considered the "gold standard" when it was commissioned unanimously concluded that the North Runway Complex is extremely safe even with future projected traffic levels. In addition Alternative 2 would have the least impact on road traffic (page 4-942). Alternative 2 would not require the very expensive modifications to Lincoln Boulevard or the Argo Drainage Channel that would be required under the options that would move the runway so the modernization in Alternative 2 should not take as long or be as expensive as the alternatives that would move the runways. We support Alternative 9 as well because we believe that the Consolidated Rental Car center project in Alternative 2 combined with the automated people mover from

SPAS-PC00184



Alternative 9 would improve traffic by taking rental car shuttles off the road. The people mover in Alternative 9 would be easier for travelers than would the elevated bus way proposed in Alternative 8 simply because stepping onto a tram with luggage is more convenient than climbing into a bus with luggage. However the drawings of the people mover suggest that it dead-ends at Terminal 7 which would be a bad design. Why not have a circular design that does not end at any one terminal but instead goes to them all? We oppose the three alternatives that propose to move the right runway north (Alternative 1: 200 feet north, Alternative 5: 350 feet north, Alternative 6: 100 feet north). The NASA study demonstrated that further runway separation is unnecessary for safety (page 4-505). In removing the safety rationale for further separating the north runways that study also destroyed any legitimate argument that the communities near LAX must be required to bear all the adverse effects of runway movement so the airport will be safe. The airport is safe now. The DEIR predicts increases in the size of the noise contour over nearby communities from these runway movements (page 4-829 (Alt. 1); page 4-881-2 (Alt. 5); page 4-897 (Alt. 6)) which would negatively affect the quality of life in the communities near the airport. It appears that the primary reason to expand LAX in these ways would be to increase the capacity of the airport. Although LAWA needs to modernize we do not favor expansion. We do not understand how it can be as the DEIR states that the impacts of these runway movements to businesses within the Runway Protection Zones (RPZ) under these three alternatives can be considered "less than significant" (page 1-77). It is clear that businesses which we rely upon in the Westchester business district not currently located within an RPZ would be located within it and may need to be destroyed (for example page 4-516). LAWA appears to assume that it would have to purchase very little of the existing Westchester business district even though much of it would fall into the RPZ because it is assumed that pilots will land mid-runway on the right runway. However where is the guarantee that all pilots will land mid-runway or that the FAA will agree that telling them to do so is sufficient protection for the businesses within the RPZ? If the FAA insists that these businesses be removed not only from the Runway Safety Area but also from the RPZ then the airport will again need to destroy significant parts of Westchester which currently provide both jobs and services to local residents and furnish significant tax dollars to the City. Even assuming that these businesses would not have to be moved it is not at all clear that these businesses should remain in the RPZ. Please explain how these nearby businesses would be safe if they remain in the RPZ. We also oppose Alternative 3 because it unnecessarily proposes to move the left runway 340 feet south at what would necessarily be an extraordinary expense including demolition of three terminals and extensive central terminal construction because again the separation of the north runways by this amount of distance is not necessary for either airfield safety or efficiency. Alternative 7 which proposes a 100 foot southward movement for the left runway does not seem as expensive as Alternative 3. However given that Alternative 2 is the "environmentally superior" alternative and accomplishes the project objectives there is no reason for the additional costs that Alternative 7 would be likely to entail. As frequent travelers through LAX we appreciate the need to modernize it. However we believe the travelling public would appreciate things like on-airport mass transit better signage repairs to roadways more efficient baggage screening better elevators and modernized restrooms more than moving the north runway. Further it is time the City recognizes that regardless of what it does at LAX it will not give LA a first-rate airport. Because of its geographic constraints LAX is simply not the location for a world-class airport. The best alternative is to develop an airport where there is open space for such an airport as other cities such as Denver and Houston have done and at the same time build a mass transportation system that actually goes into that airport.

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SPAS-PC00184



## Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Christopher McKinnon

Organization:

Address: 11837 North Park Avenue

City: Los Angeles

State: CA

Zip: 90066

Phone:

E-mail:

Comment:

I support the Consolidated Rental Car facility with a people mover to access it. Same people mover to Metro as well if green line does not go to the terminal area. All vehicle parking lots should be accessed by people mover. Any remaining hotels or vehicle lots should have a central pickup accessed from the people mover. In other words the only vehicles allowed in the horseshoe would be passenger vehicles.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00185



## Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Russell Lund

Organization:

Address: 8406 Loyola Blvd

City: Los Angeles

State: CA

Zip: 90045

Phone:

E-mail: lundr4@asme.org

Comment:

I mailed a letter with comments yesterday thinking that two days would be enough to meet the Oct 10 deadline. I failed to recognize that yesterday was a USPS holiday so my letter would not be picked up until today. To make sure my comments are timely I'm submitting them in this format as well -- I am not trying to stuff the ballot box. Thanks... Mr. Alvarez: Thank you for taking the time to address our community at September 27<sup>th</sup>'s NCWP town hall meeting. You had little time to cover a great deal of information and I think you used your time effectively. I was also impressed by the unanimity of views expressed by community organizations and political representatives. I agree with them that important improvements must be made at LAX. As outlined in part below I am convinced that moving the north runway is NOT a cost effective or efficient approach to improve LAX and the flying experience for Los Angeles residents. The best information available does NOT support moving the runways for reasons of safety. I was particularly struck by the comments of Mr. Voss of the LAX Coastal Area Chamber of Commerce. As I understood him he was involved with determining the objectives for the LAX NASS. He described the researchers selected as experts who would provide the "gold standard" report on north runway safety. Nevertheless the DEIR seems to denigrate the findings of these blue ribbon experts. The LAWA report seems instead to favor disagreements such as those expressed by the FAA without emphasizing the fact that the NASS response to the FAA "review" largely debunks their criticisms. It is unfortunate that the important NASS response is largely relegated to the end of an appendix and is not given the prominence it deserves. If flight safety is of paramount concern LAWA could "" in short order and at relatively little cost "" reduce the risk of aircraft incursions on the north runways by simply eliminating exits along the length of north runway 6L/24R thereby requiring all landing aircraft to cross runway 6R/24L at the far end of the runway. Although this would increase taxi time for some operations many airports have taxi distances and times far longer than those presently at LAX and this increase would only marginally increase total gate-to-gate times (of course any alternative that involves moving the runways farther from the terminals may also increase taxi time). Taxi time is a very minor issue when compared to capital project costs quality of life in the neighborhoods north of LAX and even the misleading safety arguments. If large equipment (e.g. the A-380) needs more space simply use the south runways for these few flights. That this option was not included in the current set of Alternatives can only be viewed as part of the ongoing LAWA strategy to push one plan down the throats of Los Angeles residents and its absence effectively constrained the work performed by the NASS (who nevertheless found that safety concerns do NOT support moving the north runways). Time and time again LAWA has proposed airport expansion through relocation of the north

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runways (only to have that proposal rejected) with the apparent hope that one day the heretofore strong opposition will be caught napping. Usefulness of LAX is limited by ground transportation. Users of LAX (air travelers and freight from the southland) must reach the airport by car truck or bus. The nearby freeway and road infrastructure is overloaded. LAWA should focus its expansion desires on the regional airports (including Palmdale) not on shoehorning more people into the constrained area of LAX. It is reprehensible that flight safety is being used to try and "justify" the misguided goals of LAWA. Meanwhile improvements to transportation local to the airport can and should be implemented. Furthermore our terminals show their age and are woefully inadequate to handle passenger loads. I notice this particularly in Terminals 1 and 3 (despite recent improvements made to the Terminal 1 arrival/bag claim area). Of the options offered in the SPAS DEIR I endorse Alternative 2 as being the closest to the approach described above.

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SPAS-PC00186





### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Betty C. Fletcher M.D.

Organization:

Address: 8180 Manitoba st

City: Playa Del Rey

State: Ca

Zip: 90293

Phone:

E-mail: betty\_fletcher@verizon.net

Comment:

After careful review of the plans to extend the runway at LAX I think #2 or #9 is the best choice for our community in Playa Del Rey

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

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### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: James Redner

Organization:

Address: 6851 W. 85th Place

City: Los Angeles

State: CA

Zip: 90045

Phone:

E-mail: jim.redner@gmail.com

Comment:

To Whom It May Concern We have reviewed the nine alternatives currently being suggested for LAX. Based on where we live (85th Place between Georgetown and McConnell) across Manchester from the golf course. As it is the flights coming in and out are fairly loud and depending on the direction of the wind we can smell jet fuel. The idea that runways may move up to 350/300 ft closer to where we live is very troubling. The movement will negatively impact our lives with unwanted and potentially harmful pollution (noise and air). If this movement were to occur it will have undesired repercussions. With that in mind we support Alternative 2 and Alternative 9. The improvement of transportation in and out of LAX would help elevate current congestion. Alternative 9 would improve the airport helping to make it a top destination which it is current not.

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SPAS-PC00188



### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Erin Wallace

Organization:

Address: 8227 Redlands Street #8

City: Playa del Rey

State: CA

Zip: 90293

Phone:

E-mail: emwcc@aol.com

Comment:

I am a resident and homeowner in Playa del Rey. I have lived here for three years and in the surrounding area for my entire life. I am very disappointed by the push to move the north runways 350 feet closer to my neighborhood. The following issues illustrate the fault with this plan: 1. The "safety" issues in the report which I have read cover-to-cover are either unimportant or minimal (when compared to both other airports and the south runways). This is expressed in the report and in several analyses done of the report. 2. Air Force One takes off from the north runways. I assume the President of the United States would not do so if it was unsafe. 3. Most of the air traffic at LAX comes in and out of the south runways which since recently renovated should continue to provide excellent service. 4. Many of the industrial flights that come through LAX are transporting products through hangars and warehouses on the south side of the airport. 5. There are many schools parks and residences close to the airport that already experience noise and air pollution that need not be furthered by decreasing the distance between them and the airport. 6. The illustration of the plan shows the runway starting on Lincoln Boulevard. Are we to assume that this important street will now be a dead end? 7. Westchester Parkway has been a place for recreation for many years. Many people use it for running walking their dogs and riding their bicycles. This relocation will make it less likely to be used for such purposes. 8. This will most certainly decrease property values in my neighborhood. This will mean that my neighbors and I will experience further hardships than those already placed on us by this dreadful economy. For years we have been adding lanes to our freeways in an attempt to decrease traffic and we have done nothing but increase it. While traffic through our airports can help our community as a whole through tourism and consumerism it also increases pollution and decreases property values in the surrounding areas. Does it really make sense to spend taxpayer dollars on this project when it could potentially cause decreased revenues in both property taxes and sales taxes? Is this project the best use of taxpayer dollars? Please look at the big picture and see that this will do more harm than good to this community. Thank you Erin Wallace CPA Playa del Rey Resident and Homeowner

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SPAS-PC00189



### Specific Plan Amendment Study

Help Los Angeles World Airports (LAWA) better serve you by making your voice heard in an official process to consider airfield, terminal and ground access improvements to LAX.



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Homer Worf

Organization:

Address: 2542 Barry Ave

City: Los Angeles

State: ca

Zip: 90064

Phone:

E-mail: hmrw@verizon.net

Comment:

Moving ahead..how far ahead ? In 20 to 30 years we might have other than petroleum powered jets.. Fortunately LAX IS A huge property..Should be build in any plans now.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00190





#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Greg Melton

Organization:

Address: 6862 85th Place

City: Los Angeles

State: ca

Zip: 90045

Phone:

E-mail: greg.melton@ca.rr.com

Comment:

As a long time resident of Westchester I fully support "Alternative 2" (modernization with NO runway movement) and "Alternative 9" addressing transportation. We all want a world class airport but we object to moving any runway that would grossly impact our community with noise pollution and the loss of any more of our business district. Please take into account any plan that would disrupt the lives of people and property values in one of the best communities in the city of Los Angeles. Be a good neighbor.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00192



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: Linda Kokelaar

Organization:

Address: 7721 McConnell Avenue

City: Westchester

State: CA

Zip: 90045

Phone:

E-mail: lindakokelaar@sbcglobal.net

Comment:

I support a combination of Alternatives 2 and 9. Improvements are needed on the ground in the terminals and on the air field. I oppose moving the runways further north. The current configuration of the runways is safe. The quality of life for the residents in the surrounding communities is equally important and must be preserved. LAX has already disrupted the lives of thousands with previous expansions. More existing homes do not need to be destroyed.

Note: Only comments submitted between July 27, 2012 to October 10, 2012 will be considered in the official environmental record.

SPAS-PC00193



#### Tell us what you think.

Once you have reviewed the study information, submit a comment on the Draft Environmental Impact Report by using the form below:

Name: The Allen Family

Organization:

Address: 8437 Truxton Avenue

City: Los Angeles

State: CA

Zip: 90045

Phone:

E-mail:

Comment:

Our family purchased our home in Westchester in 1947. As long time residents we have witnessed many and various changes in our community over the years. In recent decades however LAX issues have become foremost to the residents of Westchester and the surrounding communities. We are writing to express our support of the LAWA draft EIR Alternatives 2 and 9. We are opposed to all the other Alternatives. Thank you for the opportunity to express our opinion on this extremely important issue. The Allen Family

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SPAS-PC00194

#### Video Comment #1

My name is Jonathon Gat. I live in West LA. I'm a business person. I use the airport, a business person. I use the airport about once a month and about one in every four trips is an international trip. The airport is old in many ways, it needs to be modernized. The safety needs to be enhanced which means realigning the runways. I am very much for the idea of a consolidated car rental facility. I think that works well in other cities where it has been tried. And in general we have to get this airport out of the sixties it was designed for the 707 and they're not around anymore. So thank you for this opportunity.

SPAS-PC00195



Video Comment #2

Hello my name is Gregory Livers and I'm a homeowner here in the Westchester LAX area and I'm here today to discuss with you about the importance of MTA connecting the airport as soon as possible. We need this service as soon as possible in order to deal with our economy. I just came back from places like New York, Chicago where they have infrastructure, where unemployment is low due to that because they move people. In order for us to be a first class city we have to be able to move people as they do in New York, Chicago, in San Francisco. What we fail to do it here and with all this MTA expansion right now with connecting Culver City the priority should the airport, LAX, especially with the expansion of Tom Bradley going on right now. That is the first entrance of people to our city and we need to move them as soon as they get here. The time of LA being landlocked is over with. The days of Firestone, the days of Exxon-Mobil are behind us. We now have to immediately get involved with mass transit and move people for our economy's sake so that people can be able to afford good jobs and be able to have access and be able to use what they are able to receive from working but not have to pay enormous traffic costs in the car repairs, cars the way that LA actually was set up to be if you don't have a car in Los Angeles you are landlocked. This is not a major city to be landlocked without a vehicle. In order to produce and have for our children to have opportunities we have to have a better transit system, one that we can all be proud of. Thank you very much.

SPAS-PC00196

Video Comment #3

Hi, good afternoon, my name is Sean Saifi, I am a representative of Central Coast Shuttle Services. We're a local transportation company located in Santa Maria Airport. First off I wanted to commend you guys leave you guys open meeting trying to have everybody involved we do really appreciate that especially us small business owners and I would like to propose this, to just leave it the way it is. If anything I'm ok with alternative route 4 because of the car rental situation but I would really like to leave it the way it is. Couple of reasons why is, first off I think it's public or private you know we're all trying here to serve the public, what's in their best interest and I have dealt with a lot of customers in the past and you know for them to even get to the bus is a long distance sign is even a difficult task sometimes to convey to foreign customers or to even domestic customers it is a little bit hard to pass that message along and it's just it's hardly a huge inconvenience just to move everybody outside the line. And I think it is a very efficient system that we have right now at LAX and I am actually proud to say that we come from LAX when we compare to DFW, compare to JFK which is a nightmare and any most other airports, even Denver where they have the long train system set up it's just really inconvenient that this whole another cost of fuel, busses, massport and the construction so I really would like to leave it the way it is. I think you guys did a great job the way it circles is really efficient and I just want to thank you for that. Have good day.

SPAS-PC00197

Video Comment #4

I'm Michael Mitchel with Mickey's Space Ship Shuttle I represent eight companies that drop 35 miles out as their first stop out from LAX Airport and we are scheduled bus services. We think that you should leave the CTA the way it is, the way Clifton Moore designed it, it's perfect now. If you get a million and a half people on a Christmas the weekend to take them to the transportation intermodal facility it'd be ridiculous so we'd rather you wouldn't do it at all to build that. But if you do build it please let us stay in the CTA because we drop 35 miles out of town for a first stop. Also you're building it where airplanes could hit it and get air damage from the people out there. But to load them and take them all the way out there it's ridiculous, we think and we are going to get a lawyer if we have to, the companies I talked to this morning so we will sue the airport if you force us to go out there. At least let us stay inside because we go 35 miles for our first stop. It's totally wrong to take people, it will be a fiasco to take a million people out there and try to load with all our companies. Now we pay loop fees, we're not a concession, we've been doing it 22 years, we've done millions of people and our companies are well respected and we feel it's discriminating if you try to push us out of the way and give it all to a Fortune 500 company. We want you to support local LA companies and we feel you've discriminated us already, you've taken the courtesy phones away and pushing Super Shuttle to the inside which is owned out of France and Mr. Biar is actually on the commissioners. He actually worked for the bank that owns Viola so we think he should be recused from the commission. But we think we should leave the loop, the CTA, the way it is right now.

SPAS-PC00198

**From:** Schuelein1946@aol.com [Schuelein1946@aol.com]  
**Sent:** Thursday, October 11, 2012 10:40 PM  
**To:** SPASEIR Comments  
**Subject:** LAX

Reports of LAX expansion plans are frightening. It is ill-conceived to move the runways further north for dubious gains at the expense of established area neighborhoods. This insanity must be stopped.  
Steve Schuelein  
Playa del Rey

SPAS-PC00199

## BARRY SCHNEIDER

7520 ENCLWOOD AVENUE, PLAYA DEL REY, CALIFORNIA 90305 / TEL: 6 (310) 508-6477 / FAX: (310) 508-6477 / BARRY@BARRYSCHEIDT.COM

October 10, 2012

Dear Mr. Alvarez,

About twelve years ago, realizing a lifelong dream to retire near the ocean, my wife and I bought what was basically a tear down house in Playa del Rey, about one block from the airport owned land, affectionately known in the neighborhood as "the dead lands". As I started to lovingly remodel this drab old house inch by inch, I realized that we had very noisy neighbors who obviously had plenty of money, because in a few years they had bought up the property even closer to our home. It was tolerable at first because we installed what was touted as sound proof windows. But our wealthy neighbors bought up even more property closer to our home and the partying increased to all hours of the day and night seven days a week without let-up. No amount of sound proofing, complaining, telling them that our health was affected, would quiet them. They had the money and, it seemed, the law on their side.

It appears our lifelong dream has turned into a lifelong nightmare. Our noisy neighbors only continue to get noisier even later into the night; not even the early AM hours allow any respite. They just love to party and have their way pushing us to near insanity with the constant wall of noise. We have learned to live with our windows closed, doors sealed up, and the beautiful scent of the ocean drifting out of our reach. Watching television is a joke -- we have to tape everything so we can stop the picture and sound until our neighbors decide to quiet down enough for us to enjoy even the simplest of pleasures.

Frankly, Mr. Alvarez, I don't think our neighbors will ever move and sometimes I wish they would just buy my lovely hand-built house and let me live my life in peace elsewhere. But I do love it here, and perhaps if my neighbors would just stop getting closer and closer to us, carrying on in whatever fashion they want, we will learn to live with them, and maybe they will learn to live with us in a more respectable and sympathetic manner.

Thank you,

Barry and Arleen Schneider

SPAS-PC00200

Diane Sambrano  
3640 W 111th Place  
Inglewood, CA 90303  
October 10, 2012

Diego Alvarez  
SPAS Program Director  
LAWA  
One World Way room 218  
Los Angeles CA 90045

The Draft Environment Impact Report for the Los Angeles International Airport Specific Plan Amendment Study fails to address many of the concerns that the community surrounding the airport has expressed in the past with regard to health impacts. The DEIR does not discuss what the airport will do to mitigate or minimize health impact for the long term increase of pollutants or what the residents can expect that their health issues may be with those increases. If in fact, the general population does not purchase new low-emission-automobiles or for some reason the better-mileage-vehicles after time do not maintain as low emissions as anticipated, will the airport decrease its increase in direct proportion? Or will LAWA staff blame automobiles for the air pollution it hoped the vehicles would reduce so it could increase the Toxic Air Contaminants released by the increased air traffic?

The airport long term impact study relies on non-airport operations to reduce impact created by the increase by the airport! A classic "someone else did it" response fails to accept responsibility for airport action. The focus on mitigation appears to be on the short-term-construction contaminants crossing the fence-line rather than on the long term falling and drifting contaminants from the aircraft emissions. While construction issues are important operational issues seem to be discounted.

The Exposure assessment states that "pathways other than inhalation were not assessed in this HHRA". Therefore any exposure to settled contaminants, not directly inhaled, as on the skin, ground, sidewalk or the cumulative effect of small particulates that we all know do not simply disappear, but will or may be absorbed or even later may be inhaled when the area where the contaminants landed are disturbed, is not even evaluated! Does no one remember the smoking --cancer long term effect? This non-assessment fails to mitigate and does not provide solutions for the non-inhalation methods of exposure! Where is the evaluation of skin exposure, we often see the black fall-out on surfaces in our neighborhood?! -- page 4-433

The assessment "assumes that exposure concentrations of TAC are constant" yet everyone ever exposed to smog knows that there are times of higher concentration and lesser concentration. Temperature, and lack-of-wind do cause a much different impact on the human body and the reaction not seen in an "average period". Over time these high intensity exposures cause distressing hours not displayed in the "averaging". Pollen exposure and asthma attacks would be an example of the variant body response to irritants. While a bad asthma attack might kill someone occasionally, I guess "It's okay" as long as they patient can usually breathe!

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If evaluations are based upon "duration of 70 years" rather than "quality of life," many will not survive the study in good health, but will continue to exist in a state of painfully impacted non-death. (Page 4-434) Clearly a study of life-span and illness during living years of those in surrounding communities should have been conducted. What were the results of the analysis of the several hundred Inglewood residents "Chronic Health forms" which were submitted for the earlier draft EIR? (The prior "Comments noted" response does not suffice.)

The Airport concept that Aircraft Toxic Air Contaminant Pollution should be offset by others reducing their emissions is an insult.

That LAWA should be permitted to increase pollution while others are expected to reduce pollution is a concept far more consistent to the words of a bully on a playground than a public transportation agency, which should be setting an example, rather than thinking it is an island unto itself, with the right to disregard the local population's health, simply because it will feed someone's ego or increase financial reward for a few not physically impacted. "Cancer risk impacts...would be less than significant and would be beneficial" when based on the anticipated offset of reduction of motor vehicle emissions is straight from a reading of Grimm's -- here my pretty, the apple is delicious the poison inside is only a teeny tiny syringe-full! (See Page 4-446-451).

Using the word beneficial? really! Is that like ... well does the author of that statement want to join us for a nice little cup of...botox.... rumor has it you won't feel.... well anything!

Really!! again really!!! "adult+child resident receptor was not evaluated" (Page 4-456)

How does Acrolein and formaldehyde NOT IMPACT to a greater extent children who are exposed when every pediatrician and healthcare professional expresses that even the intake of sugar or other "good" consumables have lasting impacts on young developing bodies? Maybe the "must be 21 years old" alcohol laws should be repealed! Perhaps medical prescriptions "dosage" guidelines for children or those underweight should be eliminate if one size fits all. Did a healthcare professional sign off on the Formaldehyde Isn't all that bad statement???

Now that the "Human Health Risk Assessment" portion of the study is found seriously lacking I will shift to the "Cultural Resources" section! This will be as gentle as I can muster!!!

Seriously!! Really! Are you kidding? This is all you have on Cultural Historic Background? How much was spent on this Section? Clearly this contract scope was not well written or funds should be returned!

Perhaps the Consultants should have driven around the local area rather than going to Fullerton for information about which Historic significant buildings/sites would be impacted by anything LAX related!

Had the Consultant firm been researchers with a background in local area history they might have wanted to clarify that the original home of the Centinela Rancho, built in 1834, received National Historic Status from the Department of the Interior in 1939 rather than referencing only the then newly formed National Register status recognition of 1974. (But what's a mere 35 years?)

Amazingly, the entire History of the Airport itself is skeletal at best! The complete disregard for the post War years that created the commercial airline service and cargo service that have become the majority users and reason for "needed expansion" is startling to those who have watched the area change from the days of P-

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51's and North American pre-Rockwell. The failure to acknowledge the role played by significant contributors to aerospace and commercial air service is significant. The comments regarding the "historical setting" leave the casual reader with no awareness that a terminal even existed at the south end of "Airport Blvd."

There is only a passing mention of the subterranean passenger tunnels to the satellites which are approaching the magical 50 in historical age. Has the Los Angeles Conservancy or any other preservation group been provided the opportunity to see the possibly restorable tunnels with their then futuristic art walks? The filling-in of the passenger-way tunnels, as planned by the North Runway Relocation, would be counterproductive to appreciating the innovative mid-century solution to moving so many people to the air-gates, not to mention a tragic end to what was considered a great expression of futuristic transportation art.

Within the area covered in the study of Area of Potential Effect there seems to be a major lack of recognition of buildings in close proximity with significant roles because of architectural significance or historical role. That the Academy Theatre on Manchester near Crenshaw Boulevard is mentioned yet there is no mention of the Fox Theatre on Market just north of Manchester, which is much closer to LAX, is baffling.

How is it that there is no mention or inclusion of concern regarding the former IBM (designed to look like a key punch card) building now occupied by Otis Parsons College? Located just outside the acquisition area this building stands as a reminder of technological change, without the transitional computer capabilities there would still be handwritten passenger ticketing and terminal arrival/departure update boards would still be changed with individual letters kept in boxes under the gate desks. (Lincoln south of Manchester close to oh yes the airport). Not far away, but close in proximity also are several Loyola University buildings, the Magee building, among the first business buildings in Inglewood, the 1924 building of Peoples Savings and Loan -- the second institution in the United States to receive FDIC approval, and it's 1960's newer building across the street, Olmeh's Restaurant, The first Foster's Freeze (home of the first soft serve ice cream cone) and of course Panin's of Google architecture fame, all of which are closer to the impact area than the Academy Theatre. Also left off the list but closer than the Academy is the Transportation Mural which in mosaic stone (terrazzo) depicts the transition from foot traffic to flying machines as the largest art work remaining of the WPA years! Not only is this a significant and eligible work, it also is listed by that National Register that took so much discussion space!

While it appears a great deal of explanation about "Historic" was essentially cut and pasted to create pages, a serious shortcoming is the looking about the community to see what or who impacted the local area .... There is no mention of the Maddox home (largest airline of the early years -- later renamed Trans World Airlines) also located closer to LAX than the Academy Theatre. How is it the home of what was the nation's greatest library collection on aviation does not even merit mention!! Does the name Howard Hughes only conjure up a movie theatre complex to the writers of the EIR? With very little effort they should have been able to discover that the Northrop Institute of Technology is a stones-throw from the cultural resources study area and at a minimum worthy of mention.

Moving on though I could go on about what was left out....

While today's LAX traveler's experience is less than delightful, expanding the footprint and intruding into the neighboring communities is not the best solution.

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The complete disregard for the actual history of the area, health of the community that still occupy the area, and the complete lack of sincerity in interacting with the truth of impact on the "CIMBY'S" who will suffer significant impacts, leaves this writer absolutely convinced that the most important factor in decisions regarding the "modernization" of LAX is not how well it serves or fits into the community. Very few genuinely believe that the concept of "destination airport" is truly a realistic desire for any resident or business in the general area. As a long term business traveler with more air travel miles than the majority of United States residents, a multitude of car-rental experiences and over 1800 hotel nights in my background, I have never encountered anyone who has chosen to go somewhere based on the joys of spending quality time on airport property. It is more likely passengers select airports for the ease in getting off the property rather than leisurely spending the afternoon or evening surrounded by jet fumes and sound levels requiring mitigation.

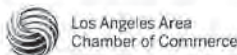
Countless suggestions for improving the guest experience given by local residents who also are regular air travelers seem to be often pushed aside. The multitude of local community members who have made the recommendations and who have offered their expertise are in fact often the very individuals who helped design, implement, and build the very intricate inner workings of the equipment that flies both onto runways and into outer-space. It is unfortunate that many of these very skilled engineers, chemists, physicists, geo-thermal scientists and other aero-aware have been disregarded by those who have as their goal the bigger-is-better mindset which often leads to soon obsolescence.

I would hope that the collection of other comments regarding the inadequacies of the EIR will focus some of those in positions to make final decisions, that the alternatives presented which impact the community to do their best to limit construction to improve within the footprint and truly make the airport better rather than focus on making it bigger. Regionalization would meet the need for transportation of more passengers and cargo without destroying the LAX community.

More than any other group of people in Los Angeles County those who live close to the airport believe in Safety. Unfortunately the concepts presented in the EIR provide limited understanding that we will be those most impacted or dead and our concerns are not just a bunch of "Nimblicks" but are based on experience, knowledge and commitment that the place we call home is safe, functional, and healthy.

Sincerely,  
  
 Diane Sambrano

SPAS-PC00201



October 8, 2012

Mr. Diego Alvarez  
 Los Angeles World Airports, Facilities Planning Division  
 One World Way  
 Los Angeles, CA 90045

RE: Comments by the Los Angeles Area Chamber of Commerce relative to the Draft Environmental Impact Report (DEIR) – Los Angeles International Airport Specific Plan Amendment Study (SPAS)

Dear Mr. Alvarez:

The Los Angeles Area Chamber of Commerce (Chamber) is on record in full support for the complete modernization of Los Angeles International Airport (LAX), and the efforts of Los Angeles World Airports (LAWA) to provide state-of-the-art facilities, including its airfield, terminals and ground transportation access modes. We believe the Specific Plan Amendment Study (SPAS) has the potential to result in a complete renovation of LAX, ensuring we have an airport worthy of our world class city.

We commend Mayor Antonio Villaraigosa, the Board of Airport Commissioners and the LAWA staff for the important work already begun, such as the renovated South Airfield, the construction of a new cross field taxiway, significant improvements to Terminal 6, the selection and approval of new concessionaires and Duty Free shopping opportunities and the current construction of a new Central Utility Plant. We also eagerly anticipate further capital improvements not directly related to SPAS, including more renovations to passenger terminals and the construction of the Midfield Satellite Concourse.

At the heart of the current modernization of LAX is the renovation of the Tom Bradley International Terminal. We believe Bradley West will be the finest international passenger terminal of any U.S. airport, which will further solidify the airport's current role as the premier gateway for the Asian and Australian markets.

At the same time, despite economic uncertainties and recovery from the Great Recession, LAWA has successfully recruited new air carriers and routes to its schedules. In the last two years, LAX has added direct, non-stop flights to such new destinations as Madrid, Rome, Istanbul, Dubai and Melbourne. Some of these international flights are serviced with the new generation of quieter and cleaner aircraft. The A380 and 747-8 are now daily fixtures at LAX as international carriers such as Qantas, Singapore, Korean, Cathay and Air France have included these aircraft as part of their local fleets.

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As the region's largest business organization, we recognize the tremendous impact of LAX to our local economy. Last year, 61 million passengers were served at LAX and nearly two million tons of air freight and mail were handled by 22 domestic and 58 international airlines. Several recent reports published by the Los Angeles County Economic Development Corporation have well documented the value LAX provides to our region:

- LAX impacts, directly and indirectly, 294,000 jobs in Los Angeles County;
- LAX generates over \$39 billion into our county's economy;
- Current construction projects generate nearly \$7 billion to the local economy and employ 39,900 jobs;
- Each daily, non-stop international flight generates \$623 million in economic value each year.

Simply put, LAX is one of the region's most significant job generators and it is a major driver of our continued economic recovery. Objective 3 of the SPAS Draft EIR most accurately describes the airport's importance in the goal to "maintain LAX's position as the Premier International Gateway supporting and advancing economic growth and vitality of the Los Angeles Region."

This objective is one reason for the Chamber's recent efforts in forming the *Coalition to Fix LAX Now*, a collaboration co-chaired by this Chamber, the Los Angeles County Federation of Labor and the Los Angeles and Orange Counties Building and Trades Council. While we commend LAWA for the construction already completed and / or underway, we believe it is just the beginning towards a full restoration of LAX's identity as a premier airport. There is much work to be done, and SPAS is the road map to get us there.

#### The Specific Plan Amendment Study (SPAS)

The SPAS process is conducted under strict consistency with the provisions of the 2006 Stipulated Settlement Agreement. In particular, the designs and configurations that provide alternatives to the so-called yellow-lighted projects are all compliant to the practical capacity of 78.9 million annual passengers.

This restriction has therefore provided us with a short-sided analysis of actual airside and landside impacts as passenger levels continue to grow during the 21<sup>st</sup> Century – with or without SPAS approval. Had the airport been allowed to study alternatives that would more fully address the practical growth of the airport, we feel a more justified, long-range planning process would have been achieved.

The limiting boundaries upon which this study is based concerns those of us who believe in modernizing LAX as a 21<sup>st</sup> Century aviation facility. The report cannot accurately demonstrate long-range air emission improvements resulting from the increased use of the new generation of aircraft over the long term. Without the limitations to annual passenger count mandated by the Stipulated Settlement Agreement, would LAWA have provided a more long-range analysis as it searched for alternatives to challenges relative to the yellow-lighted projects?

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This constrained analysis may compel some to advocate for "quick-fix" options for the North Airfield, such as Alternative 2. In the short term, Alternative 2 could be viewed as an attractive solution for alleviating some of the North Airfield's existing challenges. However, when addressing the complete and comprehensive improvement of the North Airfield, the alternative selected must include a realignment of the runways which would accommodate the construction of a centerfield taxiway.

Despite the constraints placed upon the study, we once again commend the LAWA management and staff for its thorough and exhaustive process which has resulted in this draft report. We submit the following analyses and endorsements for the alternatives defined in the DEIR.

#### Ground Transportation Access

Alternatives 8 and 9 outline two options for connecting the airport to three key arterial locations: (1) an Intermodal Transportation Facility, (2) a future Light Rail Station to be constructed by the Metropolitan Transportation Authority (MTA), and (3) a Consolidated Rental Car facility plus remote parking at Manchester Square. Alternative 8 would utilize an *elevated and dedicated busway* connecting these remote locations to the Central Terminal Area (CTA). Alternative 9 would access the CTA by use of an *Automated People Mover (APM)* system.

Both alternatives, with the corresponding projects described, would greatly enhance the passenger experience and encourage travelers to access LAX via public transportation. This would reduce vehicular traffic in and around the airport alleviating congested intersections and potentially providing an improved quality of life for neighboring residents.

The Chamber of Commerce views both alternatives as acceptable, with an Automated People Mover system as optimal. However, we recognize the cost implications of such a project and whether an APM offers the most benefit when compared to other modernization projects. Significant issues must also be resolved between LAWA, the MTA, the Federal Aviation Administration (FAA) and the airlines before such a project is funded. The Chamber encourages ongoing and fruitful negotiations among the parties so that the project remains on a timeline consistent with the completion of the Light Rail Station, which is a Measure R-funded MTA project. It is, therefore, the Chamber's position that an *elevated and dedicated busway* would be an acceptable alternative as an immediate first step, and that the project be constructed to accommodate a future APM.

#### North Airfield Realignment

The Chamber strongly supports the realignment of LAX's North Airfield for safety and operational efficiency. Designed in the 1960s, the North Airfield was built to accommodate a fleet of aircraft that is now nearly mothballed.

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Operational Efficiency is of paramount importance. We are now witnessing the arrival of yet another generation of new aircraft which cannot be accommodated on LAX's North Airfield without significant Air Traffic Control modifications. We know when an A380 lands or departs from the North Airfield, virtually all operations stop for several minutes. In fact, on a recent return trip from Paris, I was a passenger of an Air France A380 and we were delayed by nearly one hour waiting for the runway to be cleared and a gate to be assigned. This results in a poorly efficient airfield with passenger delays and the real potential of further negative air emissions. How can we settle for a modernization of LAX's aging facilities and not address our North Airfield once and for all?

The Chamber is aware of neighborhood anxiety and fear of an increased intrusion by airfield operations. However, none of the alternatives considered will result in the taking of homes. We support efforts to reduce the impact to the Westchester business community due to North Airfield realignment, particularly the runway protection zone. We are confident a solution can be achieved which alleviates the concerns of Downtown Westchester businesses without compromising North Airfield improvements. We urge LAX to continue its dialogue with the FAA to find a solution to this challenge.

Safety is everyone's concern. There is no doubt safety will be improved as a result of runway realignment. All recent safety studies conducted relative to the North Airfield have reached that same conclusion. In fact, the most recent study released by an academic panel with modeling performed by NASA / Ames concluded that North Airfield runway separation would result in as much as 55% improvement to safety. While some make an effort to portray safety as an issue of percentages, it's more than that; it's the one thing where no margin for error can be afforded. LAX must make every effort to protect the safety of its passengers and the neighboring communities. It is paramount that the North Airfield realignment must proceed to reduce any possible risk to passenger safety, especially in this day and age of larger aircraft.

#### Alternatives 1 and 6

These options would separate the north runways by moving Runway 24R 240 feet north (Alternative 1) or 100 feet north (Alternative 6). While we see the merits to furthering these alternatives and commend LAX for producing alternatives which address separation of runways, we are concerned that these alternatives are still inadequate to accommodate aircraft in all weather conditions and factors. Additionally, the separation of 100 or 240 feet north does not achieve the maximum level of increased safety for passengers. Therefore, the Chamber does not endorse these alternatives.

#### Alternatives 2 and 4

These options reflect no further separation of the runways, but do modify the North Airfield with improvements to runways and reconfiguration of certain taxiways. Only Alternative 2 addresses terminal and Ground Transportation enhancements. Because these alternatives provide no additional separation to the runways and prohibit the construction of a centerfield taxiway, they do not improve operational efficiency and safety. They do not fully address terminal and Ground Transportation issues and the Chamber does not endorse these alternatives.

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#### Alternative 3

This option identifies projects in accordance with LAX's currently approved Master Plan (also known as Alternative D). While some of these projects had merit when originally designed to reflect an immediate post 9/11 security-conscious environment (e.g. the closure of the CTA to all private vehicles), many of these projects are now obsolete and should be scrapped. Additionally, the movement of Runway 24L 340 feet south would mean the demolition of Terminals 1, 2 and 3 and the elimination of the northernmost gates in the Bradley Terminal. This severe renovation of LAX was designed ten years ago and does not make sense today. Therefore, the Chamber does not endorse this alternative.

#### Alternative 5

This option provides the most responsible solution to the North Airfield's limitations. By relocating Runway 24R 350 feet north, LAX can construct a new centerline taxiway. Other important runway and taxiway improvements can also be completed. The North Airfield would be fully operational in all weather conditions and the northern terminals would be enhanced. While not specifically addressing Ground Transportation issues, this alternative, combined with Alternatives 8 or 9, provides the best solution for a full modernization of LAX.

Alternative 5 will also include significant improvements to the Lincoln Boulevard / Sepulveda Boulevard intersection. Other mitigation measures to improve traffic flow at key intersections should be a component of the final EIR. These improvements will enhance the ground transportation access for passengers using LAX. It would also benefit local traffic flow for residents surrounding the airport.

Again, it is most unfortunate that LAX was mandated to conduct an analysis of impacts not based on projected 21<sup>st</sup> Century passenger levels, but rather under the constraints of the Stipulated Settlement Agreement (i.e. 78.9 million annual passengers). However, there is no question that Alternative 5 provides the most promise towards full modernization. The Chamber views this alternative as the best and most responsible path towards completing LAX's long-awaited modernization and therefore fully endorses Alternative 5.

#### Conclusion


A World Class City deserves a World Class Airport. Tourism is our region's leading industry and LAX is our front door for the traveler's experience. The approval of SPAS by the Board of Airport Commissioners, the County's Airport Land Use Commission and the City Council will clear the way for important projects to enhance passenger experience – generate thousands of more jobs and pumping billions more into our economy with no expense to the taxpayer.

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The Chamber strongly supports the modernization of LAX and commends the Mayor, City Council, Board of Airport Commissioners and airport management for the significant progress already underway. But the process is far from complete and will result in a "lopsided" airport without resolving several important long-term development issues. We therefore strongly endorse Alternatives 5, 8 and 9 as reasonable and preferred options towards fully modernizing our airport.

We thank you for the opportunity to provide comments and we look forward to actively participating during the approval process once the final report is published.

Sincerely,

  
Gary Toebben  
President & CEO

SPAS-PC00202

#### PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY

Alternative 6 is the "Environmentally Superior Alternative" (that achieves) "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 6 "without requiring additional runway spacing (= runway relocation). Alt. 6 provides higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion (ARSAC) president Denny Schneider. But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX with Public Transportation & High Speed Rail. Some of these neighbors now back big commercial development plans north of LAX, hoping to make land use expensive for further runway expansion; NOW SELF-DEFEATING! Construction trades want any construction, however misguided... but it's TRANSIT CONSTRUCTION WE NEED to fix LAX & regional airports' worst problems! It's MOVING PEOPLE NOT CARS, NOT RUNWAYS; that's the focus MISSING or DONE WRONG in all 9 SPAS Alternatives.

Alternative 6 would move north side Runway "6L / 24R" 260 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation professionals say they don't need center taxiways- UNACCEPTABLE!

Alternative 6 would implement the changes described in LAX Master Plan B- including "Yellow Light projects": A. unneeded "center field" taxiways; B. demolition of existing Air Terminals 1, 2, & 3, and C. a Ground Transportation Center (GTC) plus an Automated People Mover (APM)!! UNACCEPTABLE WASTEFUL RIDICULOUS! And Mayor Villaraigosa promised NOT to build the "Yellow Light Projects"!

Alternative 6 would implement changes described in LAX Master Plan B. without the "Yellow Light projects." "SUCH UNACCEPTABLE WASTEFUL AND RIDICULOUS!

Alternative 6 would move the northernmost Runway "6L / 24R" a whopping 350 feet north of its present location toward Westchester... This is NOT ACCEPTABLE! Will Lincoln Bk. go thru the WallyPark garage?

Alternative 6 would move north Runway "6L / 24R" 100 feet north... and is UNACCEPTABLE.

Alternative 6 would move the other north Runway "6R / 24L" 100 feet south... also UNACCEPTABLE.

Alternative 6 addresses ground access improvements, yet favors inefficient car traffic over transit... this is UNACCEPTABLE. TRANSIT IS 21<sup>ST</sup> CENTURY TRANSPORTATION!

Alternative 6 concentrating rental cars (or any cars) in a single facility (CONIAC) = a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE! -- "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" - Gil Maltby 1996, 2001, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 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2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 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2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 2681, 2682, 2683, 2684, 2685, 2686, 2687, 2688, 2689, 2690, 2691, 2692, 2693, 2694, 2695, 2696, 2697, 2698, 2699, 2700, 2701, 2702, 2703, 2704, 2705, 2706, 2707, 2708, 2709, 2710, 2711, 2712, 2713, 2714, 2715, 2716, 2717, 2718, 2719, 2720, 2721, 2722, 2723, 2724, 2725, 2726, 2727, 2728, 2729, 2730, 2731, 2732, 2733, 2734, 2735, 2736, 2737, 2738, 2739, 2740, 2741, 2742, 2743, 2744, 2745, 2746, 2747, 2748, 2749, 2750, 2751, 2752, 2753, 2754, 2755, 2756, 2757, 2758, 2759, 2760, 2761, 2762, 2763, 2764, 2765, 2766, 2767, 2768, 2769, 2770, 2771, 2772, 2773, 2774, 2775, 2776, 2777, 2778, 2779, 2780, 2781, 2782, 2783, 2784, 2785, 2786, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 2795, 2796, 2797, 2798, 2799, 2800, 2801, 2802, 2803, 2804, 2805, 2806, 2807, 2808, 2809, 2810, 2811, 2812, 2813, 2814, 2815, 2816, 2817, 2818, 2819, 2820, 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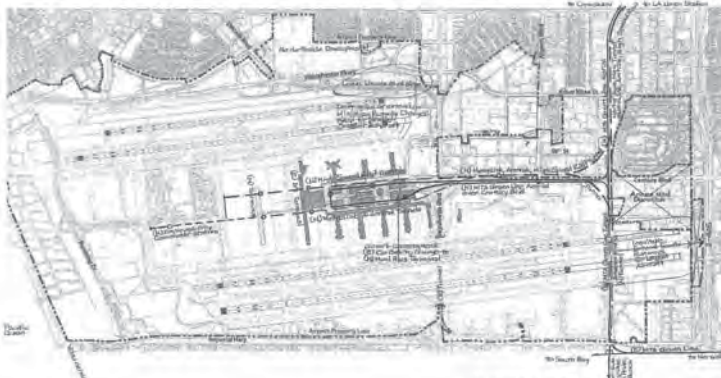
LOS ANGELES, CA 90045  
1 WORLD WAY, ROOM 210  
LOS ANGELES WORLD AIRPORTS  
TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR

**"PEOPLEMOVERS ARE A SIGN OF FAILURE!"**  
**MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!**  
**FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS**

From: JIMMY K. [REDACTED]  
Date: 25 SEP 2012 4:04 PM  
To: [REDACTED]  
Subject: [REDACTED]



**Start building transit until it becomes the #1 Way to connect our airports with the world!**



SPAS-PFA00001  
**Build transit INTO airports now.**

**PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY**

Alternative 6 is the "Environmentally Superior Alternative," achieves "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by AL 6," without requiring additional runway spacing (= runway relocation). AL 6 does provide higher-speed taxiway exits for aircraft, lengthens the north runway, & "should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion (ARSAC) president Denny Schneider. But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW" -UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA & LAC MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation & High Speed Rail. Some neighbors back commercial development north of LAX, hoping to make land too expensive for further runway expansion; how self-defeating! Construction trades want construction work, however foolish...but IT'S TRANSIT CONSTRUCTION WE NEED TO FIX LAX!

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FORM. 3807 FEDERAL RAILROAD ADMINISTRATION, FORMING CHAIR OF SENATE, FORM. 38, U.S. DEPARTMENT OF TRANSPORTATION

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build transit INTO airports now; don't screw up LAX!

SPAS-PFA00002

LOS ANGELES, CA 90045  
1 WORLD WAY, ROOM 210  
LOS ANGELES WORLD AIRPORTS  
TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR

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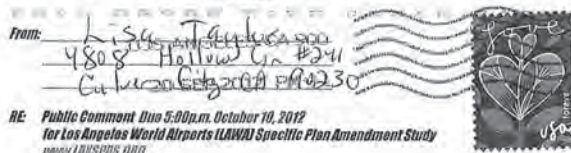
SPAS-PFA00003



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From: Diego Alvarez  
4808 Hollow Ln #241  
Culver City, CA 90230

RE: Public Comment Due 5:00pm, October 10, 2012  
 For Los Angeles World Airports (LAWA) Specific Plan Amendment Study  
 www.LANSPAS.org

**DON'T MOVE LAX NORTH RUNWAYS AROUND!  
 FIX LAX GROUND TRANSPORT CRISIS 1ST.  
 BUILD TRANSIT TO+INTO OUR AIRPORTS!**

TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR  
 LOS ANGELES WORLD AIRPORTS  
 1 WORLD WAY, ROOM 210  
 LOS ANGELES, CA 90045

SPAS-PFA00003

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SPAS-PFA00004

PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY

Alternative 6 is the "Environmentally Superior Alternative", (technically) "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by AL 6", "without requiring additional runway spacing (= runway relocation). It provides higher-speed taxiway exits for aircraft, lengthens the north runway, "Should be a no-brainer," according to Alliance for a Regional Solution to Airport Congestion (ARSAC) president Denny Schneider. But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA + LAG MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation + High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; NOW SELF-DEFEATING! Construction trades want construction work, however foolish... BUT IT'S TRANSIT CONSTRUCTION WE NEED TO FIX LAX!

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Alternative 6 would implement changes described in LAX Master Plan B, without the "Yellow Light projects" STILL UNACCEPTABLE, WASTEFUL, and RIDICULOUS!

Alternative 6 would move the North Runway "6L / 24R" a whopping 350 feet north of its present location. This is UNACCEPTABLE!

Alternative 6 would move Runway "6L / 24R" 100 feet north... and is UNACCEPTABLE.

Alternative 6 would move Runway "6R / 24L" 100 feet south... also UNACCEPTABLE.

Alternative 6 addresses ground access improvements, but favors low-capability car traffic over transit. This is UNACCEPTABLE. TRANSIT IS 21ST CENTURY TRANSPORTATION!

Alternative 6 concentrating rental cars for any cars in a single facility (CONRAC) - a traffic jam, not an improvement! Concentrating on cars & People Mover transfers curses transit riders! UNACCEPTABLE! "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" - Gil Maltby, FORM. CHIEF FEDERAL RAILROAD ADMINISTRATION, FOUNDED CHAIR OF SENATE, FORM. SEN. U.S. SENATOR ROBERT DODD.

Quit moving runways; that's for aircraft carriers! KILL the People-Movers! AFTER 20 YEARS WASTED ON STUDYING & FOOLING AROUND, why on earth is LAWA talking People-Mover Nonsense? We should be taking the excess capacity in Green Line trains aerial to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop!

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Build transit INTO airports; don't screw up LAX!

SPAS-PFA00005

RE: Public Comments Due 5:00pm, October 10, 2012  
 For Los Angeles World Airports (LAWA) Specific Plan Amendment Study  
 www.LANSPAS.org

From: Diego Alvarez  
P.O. Box 811  
Venice, CA 90299

**"PEOPLEMOVERS ARE A SIGN OF FAILURE!" Gil Maltby  
 MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!**

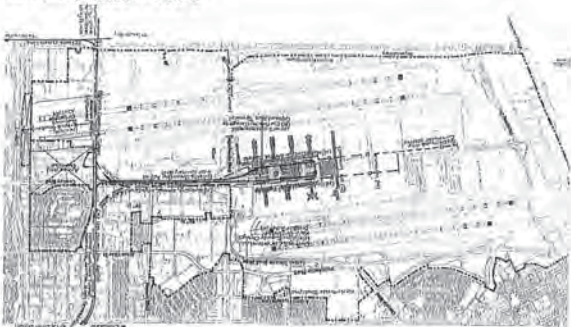
**FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!**

TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR  
 LOS ANGELES WORLD AIRPORTS  
 1 WORLD WAY, ROOM 210  
 LOS ANGELES, CA 90045

SPAS-PFA00004



Build transit INTO airports now!



Start building transit until it becomes the #1 Way to connect our airports with the world!

RE: Public Comments Due 5:00p.m. October 10, 2012  
for Los Angeles World Airports (LAWA) Specific Plan Amendment Study  
www.LAWA.org

From: Mike Chavez

5831 Tipton Way

Los Angeles, CA 90042

NO Runway Relocation.

**CONNECT OUR AIRPORTS WITH TRANSIT!**

**LEAVE THE LAX NORTH RUNWAYS ALONE~**

**FIX LAX GROUND TRANSPORTATION 1st!**

TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR  
LOS ANGELES WORLD AIRPORTS  
1 WORLD WAY, ROOM 210  
LOS ANGELES, CA 90045

SPAS-PFA00005

# **PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY**

Alternative 0 is the "Environmentally Superior Alternative", (achieves) "compliance with FAA Airport Design Standards, the larger aircraft are more acceptably handled by Alt. 0" without requiring additional runway spacing (= runway relocation). Alt. 0 also provides higher-speed taxiway exits for aircraft, lengthens the north runway, and "should be a no-brainer," says Alliance for a Regional Solution to Airport Congestion (ARSAC) president Denny Schneider. But Schneider points out: "NONE OF THESE OPTIONS CREATE SIGNIFICANT CAPACITY INCREASES FOR VEHICLE TRAFFIC FLOW!" UNACCEPTABLE! For years, ARSAC + other LAX neighbors have been pressing LAWA + LAG MTA to meet airport traffic demand by distributing it away from LAX, with Public Transportation + High Speed Rail. Some neighbors back commercial developing north of LAX, hoping to make land too expensive for further runway expansion; NOW SELF-DEFEATING! Construction trades want construction work, however foolish... but TRANSIT IS WHAT WE NEED BUILT to fix LAX now!

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Alternative 0 concentrating rental cars (or any cars) in a single facility (CONRAC) - a traffic jam, not an improvement! Concentrating on cars + People Mover transfers curses transit riders! UNACCEPTABLE! "PEOPLE-MOVERS ARE A SIGN OF FAILURE!" - GM Mallory.

TRANS. U.S. DEPT. FEDERAL RAILROAD ADMINISTRATION, JOURNAL CHAIR OF TRANS. JOURN. CO. U.P. NORTHERN RAILROAD CORP.

Quit moving runways; that's for aircraft carriers! Kill the People-Movers! AFTER 20 YEARS WASTED ON STUDYING + FOOLING AROUND, why on earth is LAWA proposing People-Mover Nonsense- we should be taking the extra capacity in Green Line trains aerial- to 3rd floor Airtel stations over Century Blvd., then straight inside LAX's inner airport loop!

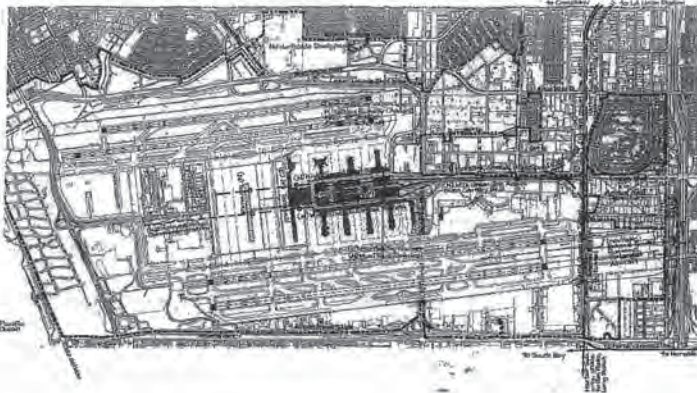
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SPAS-PFA00006



RE: Public Comments Due 5:00p.m. October 10, 2012  
Los Angeles World Airports (LAWA) Specific Plan Amendment Study  
www.LAWA.org

From: Robert Torres

P.O. Box 50839

Los Angeles, CA 90050

Public Transportation into LAX!

**"PEOPLEMOVERS ARE A SIGN OF FAILURE!"** Ed Mallory

**MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!**

**FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!**

TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR  
LOS ANGELES WORLD AIRPORTS  
1 WORLD WAY, ROOM 210  
LOS ANGELES, CA 90045

SPAS-PFA00006

# **PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY**

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SPAS-PFA00007







**PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY**

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Alternative 9 would move north side Runway "6L / 24R" 200 feet north of its present location, add "center field" taxiways, & require significant grading changes to airport drainage channels. Aviation professionals say they don't need center taxiways- UNACCEPTABLE!

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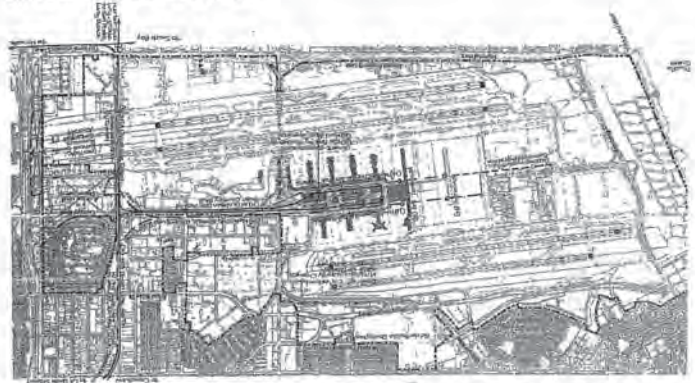
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SPAS-PFA00009

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RE: Public Comments Due 5:00pm, October 10, 2012

Los Angeles World Airports (LAWA) Specific Plan Amendment Study  
www.LAWA.PFA.org

From:

J. R. Drummond  
945 W. 9th St., Apt. 304  
San Pedro, CA 90731

SPAS-PFA00009-050

15 OCT 2012 PM 3:1

**"PEOPLEMOVERS ARE A SIGN OF FAILURE!"**  
MOVING RUNWAYS IS FOR AIRCRAFT CARRIERS!  
FIX LAX GROUND TRANSPORTATION FIRST: BUILD TRANSIT TO & INTO OUR AIRPORTS!

TO: DIEGO ALVAREZ, SPAS PROGRAM DIRECTOR  
LOS ANGELES WORLD AIRPORTS  
1 WORLD WAY, ROOM 210  
LOS ANGELES, CA 90045

SPAS-PFA00010

**PUBLIC COMMENT: LOS ANGELES WORLD AIRPORTS (LAWA) SPECIFIC PLAN AMENDMENT STUDY**

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SPAS-PFA00010

BEFORE THE LOS ANGELES WORLD AIRPORTS  
SPECIFIC PLAN AMENDMENT STUDY PROJECT TEAM

Open House/Public Hearing in the )  
Matter of: )

DRAFT EIR FOR THE LOS ANGELES )  
INTERNATIONAL AIRPORT SPECIFIC PLAN )  
AMENDMENT STUDY )

TRANSCRIPT OF PROCEEDINGS  
Los Angeles, California  
Saturday, August 25, 2012

Reported by:

MARCENA M. MUNGUIA,  
CSR No. 10420

Job No.:  
B8698CATLAWA

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800-231-2682

SPAS-PH100001-32



BEFORE THE LOS ANGELES WORLD AIRPORTS  
SPECIFIC PLAN AMENDMENT STUDY PROJECT TEAM

Open House/Public Hearing in the )  
Matter of: )  
 )  
DRAFT EIR FOR THE LOS ANGELES )  
INTERNATIONAL AIRPORT SPECIFIC PLAN )  
AMENDMENT STUDY )  
 )

TRANSCRIPT OF PROCEEDINGS, taken at  
Proud Bird Restaurant, 11022 Aviation Boulevard,  
Los Angeles, California, commencing at 10:00 a.m.  
on Saturday, August 25, 2012, heard before the  
LOS ANGELES WORLD AIRPORTS SPAS PROJECT TEAM,  
reported by MARCENA M. MUNGUIA, CSR No. 10420,  
a Certified Shorthand Reporter in and for the  
State of California.

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800-231-2682

SPAS-PH100001-32

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## APPEARANCES:

LAWA Panel Members: HERBERT GLASGOW  
DIEGO ALVAREZ  
CYNTHIA GUIDRY

Facilitator: JIM OSWALD

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Los Angeles, California, Saturday, August 25, 2012

10:00 a.m.

MR. OSWALD: Good morning, everybody. We're going to begin our program. I'm going to ask our consultant team and our members of the public who are still looking at the information boards just to try to lower their voices.

There are still some chairs available for those of you who would like to come over here. I feel like I'm in church saying, "Come over here."

My name is Jim Oswald. I'm working with the airport to help organize and certainly facilitate these meetings. I am not engaged in the actual study process. I consider myself outside the sphere, somebody who just does this as a living to come and help organizations have a chance to make their comments known.

So I do want to say thank you very much for coming out. What we're going to be doing now -- well, I should say what we just did was you were a part of our open house, an opportunity to review the information graphics that we have set about the room. They are the team's attempt to boil down some of the key elements from the Draft EIR so that you can more accessibly look at them and understand them.

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SPAS-PH100001-32

Our primary purpose here today is to gather public comment on the Draft EIR. Those are the questions, the issues -- pardon me -- the issues that you might have. We have multiple channels to do that today. We have the comment sheets which were located at the corners of the room. I'm hoping that you received one or two of these. You're welcome to fill these out and capture those comments and questions that you want to see addressed in the Draft EIR that will then be responded to in the Final Environmental Impact Report.

We also have a video camera in the back. Byron was video recording your comments. We had a couple people take us up on that option. We also have an audio recording table. If you want to give us your two minutes' audio recording, we can also do that. But I do want to emphasize that I want to be sure that you have an opportunity to give us your comments and questions and that they become part of the formal record. If they are on video, they will still be part of our record as well as the audio.

When you came in today, you picked up a couple of items. You picked up this one-sheeter and on this one sheet that has the multiple colors is just an outline of the open house so you have an idea of what the graphics were. You have an idea of how they were organized. I

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SPAS-PH100001-32

also want to call your attention to the big part of the page which is below the colored part. There are pdf versions of all of these graphics on the website, so you're welcome to access those, download them, take a look at the very same information that you saw today.

We also want to note that we've got -- today is our first of the three Draft EIR public hearings. I'm excited about it, too, yes.

Today -- this coming Tuesday, August 28th, from 5:30 to 8:00 o'clock over at the Central Library, Mark Taper Auditorium at 630 West Fifth, we have our number two public meeting/hearing we'll have just like this, organized over there. And then on Wednesday, next week, August 29th, we're right back here. So you're welcome to come back if you like and be a part of this. This is part of the effort to get feedback and comment on the Draft EIR.

The way we're going to proceed now for the next hour plus -- we end at 12:30 so I will hold us accountable to that end time, but the way we're going to proceed is to -- many of you have filled out a comment card, a request to speak. I will be picking those up from my colleague, Maria, and calling you up one by one. I'll identify who is the primary speaker, who's on deck, and who's our number third person, just so you're ready.

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Each of us will have two minutes today. We have an obnoxious countdown clock, just to remind us to really respect each other. I think today can be very successful if you all respect one another's right to share their comments and questions. So that countdown clock will count down from two minutes down. I am a little bit of a stickler because I do want to be sure that we can hear from everybody who would like to chat today in the time frame that we have. So when you see that clock getting down to 10 or 15 seconds, I would ask that you try to wrap up just in deference to everybody else who wants to have the same number of minutes.

In addition to the way of proceeding, I would just hope that everybody affords each of us the same respect that we would want to be treated. I know that there are some contentious issues, but I would hope that we can treat each other with the greatest amount of respectability. It enables me to do my job and it enables us to hear all the comments so that we can understand what our community's issues and concerns are.

There won't be any responses today to any of the comments or the questions, so that truly is the public comment period. We will be having a court reporter who will be capturing those comments as they are made known by you, so that is our way of capturing that, and I'll be

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1 keeping some of my notes, too, as we go through.

2 The last thing, my third way of proceeding, is  
3 we will end at 12:30. I will give us a little bit of a  
4 warning before that so that in case people still want to  
5 speak and they might not have a chance, we know that we  
6 will finish our day at 12:30, we will stick around a few  
7 minutes afterwards if people would like to do an audio or  
8 a video recording if they still would like to make  
9 comments. But my big emphasis today is to really ask you  
10 to fill out the comment sheet. This is a written record  
11 that becomes part of our proceedings today.

12 We have a microphone here (indicating). I would  
13 ask when I call you up, to come on up here. You can  
14 adjust this if you need to. The microphone is affixed.  
15 I would ask that you not pull it out of its sleeve, and  
16 then you can address our group. We'll have a two-minute  
17 countdown and then we'll have a very constructive  
18 opportunity to hear your comments and questions on the  
19 Draft EIR.

20 Does that sound good? Everybody, sound good?  
21 Excellent. Let me get the first three.

22 Okay. I have -- first up is Micah -- Micah Ali  
23 and on deck is Gary Toebben, followed by Jose Lobera. If  
24 we do have somebody who will be speaking Spanish, I would  
25 ask our translator to come up and be prepared to, after

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1 those comments are made, offer the translation into  
2 English.

3 MR. ALI: Good morning. My name is Micah Ali and I  
4 serve as a member of the Compton Unified School District  
5 Board of Education and I'm also a member of -- the  
6 president of the Los Angeles County School Trustees  
7 Association.

8 All would agree that the Los Angeles  
9 International Airport is an extremely vital economic  
10 engine to this entire region. Last year, LAX generated  
11 nearly 40 billion dollars in economic output and created  
12 300,000 jobs within our voluminous county.

13 So what does that mean? That means that LAX  
14 cannot operate without service workers. What does that  
15 mean? That workers must be included and must be valued  
16 as an element with respect to airport expansion. We  
17 believe that airport expansion is important because this  
18 is not just Los Angeles' airport. This is the airport  
19 for our entire region.

20 What it also means is that we must make certain  
21 that if there are contractors who are not holding their  
22 end of the bargain, who are not being responsible  
23 stewards with respect to the public's trust, then they  
24 should not have a place at the airport.

25 And last but not least, we must make certain

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1 that we are very diligent in making sure that workers are  
2 treated fairly and equitable and that whether it's a  
3 tradesman or whether it's a service worker, the same  
4 level of respect is yielded, because all of us utilize  
5 this airport as a mode of transportation within our  
6 region.

7 Thank you.

8 MR. OSWALD: Just one more reminder is that today we  
9 are here to try to identify those comments and questions  
10 that you have that are a part of the Draft EIR, so please  
11 also give us some of that feedback as well.

12 Next up I have Gary Toebben.

13 MR. TOEBBEN: My name is Gary Toebben. I'm the  
14 president of the Los Angeles Area Chamber of Commerce and  
15 the co-chair of the Fix LAX Now coalition of businesses,  
16 labor unions and individual citizens.

17 Our economic future depends on LAX. As the  
18 previous speaker just said, the airport pours nearly  
19 40 billion dollars into our economy each year and  
20 generates direct and indirect employment of 300,000 jobs.  
21 When you add the current and future construction  
22 projects, LAX will generate another 15 billion dollars in  
23 economic impact.

24 It is not an exaggeration to say that improving  
25 LAX is the single-most important infrastructure project

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1 in our region today. Modernization is long overdue and  
2 our inaction is a source of embarrassment for Los  
3 Angeles.

4 The Coalition to Fix LAX Now is advocating for a  
5 full and complete modernization of LAX, which means the  
6 successful passage of the Specific Plan Amendment Study  
7 and its corresponding EIR. LAX needs three things:  
8 state-of-the-art terminals, a safe and efficient North  
9 Airfield, and appropriate ground transportation access.  
10 Only when all three areas are improved will we be able to  
11 say that we are a 21st century airport for our  
12 world-class city.

13 We urge the Airport Board to diligently but  
14 aggressively proceed through the SPAS EIR process. Our  
15 Coalition pledges to provide strong support and advocacy.  
16 Business and labor are unanimous in our view that now is  
17 the time to approve a full and complete modernization of  
18 LAX. Our airport is an incredible asset for Southern  
19 California and its modernization is essential to the  
20 improvement of our city.

21 MR. OSWALD: Thank you, Gary.

22 Well, in some instances our high-tech  
23 technology might fail us, in which case we'll go to our  
24 cards. Nothing wrong with good old-fashioned cards.

25 So our next speaker is Jose Lobera.

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Jose, will you be speaking in Spanish or English? Spanish?

So at the conclusion of Jose's comments, we will have a translator who will give us the English version of that. Thank you very much, Jose.

MR. LOBERA: My name is Jose Lobera and I've been working for LAX for 30 years to support my family.

My name is Jose Lobera. I've been working at LAX for 30 years to take care of my family. That includes my lovely wife and my three kids.

I am proud of working at LAX. I work hard at Aviation Safeguards, but yet it is difficult to take care of my family economically. Like all workers at LAX, I believe expansion is a good thing and it can be positive. I say that it could be positive, but I'm worried that the struggle to modernize the airport does not consider the health, safety, and the living wage of workers. That's why I am here this morning to express my support for the expansion, but only if it includes the prosperity of the LAX workers.

As long as we have irresponsible contractors at LAX that make a mockery of the living wage and the laws at LAX, there's no way that we can seriously talk about progress.

Thank you very much. The communities, the

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companies, the workers, and their families can progress together. Thank you.

MR. OSWALD: Thank you.

Our next three: Kristin Reeg, Michael Kelly, followed by Maria Elena Durazo.

Kristin Reeg. There you are.

MS. REEG: Hi. My name is Kristin Reeg and I'm the Director of Airports for Unite Here, Local 11. We represent -- over 3,000 of our members live very close to the airport. They work in the hotels along Century Boulevard and they also work inside the airport itself in concessions, both food and beverage and retail, and we also represent about 500 members who work behind the airport in more of a factory setting, making the food that goes on the airlines.

So our members are mostly, you know, working class. They live right in the area. They live in Lennox, they live in Hawthorne, and our union supports the expansion of the airport, making sure that we have decent jobs and more good jobs that provide benefits and provide good and decent wages for working folks in the neighborhood.

So we support the expansion. Thank you.

MR. OSWALD: Thank you, Kristin.

Can you guys hear me okay?

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Okay. Next up I have Michael Kelly, followed by Maria Elena Durazo.

MR. KELLY: Good morning. Michael Kelly. I'm the Executive Director of the L.A. Coalition for the Economy and Jobs. We're a bipartisan alliance of business, labor, academia and nonprofit and are committed to working with policy makers to advance initiatives that are going to produce economic and job growth throughout this region.

We are particularly focused on this region's bigger economic assets such as the port, LAX, and our transportation network because they are going to be most directly linked to economic growth in a global marketplace.

You know, a growing economy just doesn't happen. It requires vision, collaboration, and political will. L.A.'s founders were not afraid of being ambitious, decisive, and boisterous when it came to promoting the region's image as one full of opportunity.

Because of the foundation they laid, L.A. County from 1949 to 1990 experienced a 208 percent growth in jobs, outpacing the entire United States by 58 percent. Since then, the population of L.A. County has grown by 19 percent, yet the number of jobs in the region has decreased by 9 percent. The most staggering fact is that

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the City of Los Angeles that actually owns the region's top economic assets mentioned above disproportionately represented the most jobs lost.

That is why we strongly support LAWA's vision to maintain and modernize LAX and to amass the economic realities of today's rising consumer demands, travel and trade units from around the world. The proposals to realign the North Airfield, build a consolidated rental car facility and an automatic people mover are all economically justified product and they will create tens of thousands of jobs, open trade and tourism, improve the air quality throughout the region, and connect all of us to family and friends throughout the world.

That's why the L.A. Coalition encourages everyone involved to demonstrate prudent leadership by moving this process forward with all deliberate speed in order to achieve the necessary competence as well as meet the expectations of L.A.'s customers and the residents most impacted by these changes.

Thank you.

MR. OSWALD: Thank you very much.

Next I have Maria Elena Durazo. On deck is Marisol Cruz, followed by Nancy Schneider. Thanks again for identifying those comments, questions, and issues that you've got so far with the results of the Draft EIR.

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1 We appreciate that.

2 MS. DURAZO: Thank you. Good morning. I am  
3 secretary-treasurer of the Los Angeles Federation of  
4 Labor. We represent hundreds of thousands of men and  
5 women throughout Los Angeles County that work hard every  
6 day throughout our region.

7 As passengers travel through LAX, there are  
8 thousands of people who work hard to make sure that their  
9 experience is safe, that it's comfortable, and it's  
10 reliable. From flight attendants to baggage screeners,  
11 food and retail, construction workers, cabin cleaners,  
12 and customer service representatives, all of these  
13 employees deserve to have a voice on the job. They work  
14 very hard. They need the tools, the training and the  
15 working conditions. Some of them are here today, not  
16 only as employees of LAX but also as residents of the  
17 immediate area.

18 You know, LAX is an asset for all of us.  
19 300,000 people raise their families through the jobs  
20 directly or indirectly related to LAX. Our airport  
21 generates 40 billion dollars. Those men and women spend  
22 their paychecks buying groceries, shopping in their  
23 stores, and reinvesting back into their local  
24 neighborhoods. Jobs at LAX are divided throughout L.A.  
25 city, all the districts, all the supervisorial. There is

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1 not a corner of our county that isn't touched by the  
2 economic vitality of the airport.

3 We have an opportunity here to put another  
4 incredible shot in the arm to our economic recovery that  
5 is the issue nationally. So we -- the sooner we approve  
6 and we finalize the approval process, which by the way  
7 has been going on for the past eight years, then we're  
8 going to be able to get another 8 billion dollars in  
9 projects and thousands of people back to work.

10 Thank you all very much.

11 MR. OSWALD: Thank you very much.

12 Marisol Cruz, followed by Nancy Schneider and  
13 then Robbie Hunter.

14 MS. SCHNEIDER: Hi. I'm Nan Schneider. I'm with  
15 ARSAC.

16 MR. OSWALD: I'm sorry. I'm looking for  
17 Marisol Cruz. Is Marisol here?

18 MS. CRUZ: Yes.

19 MR. OSWALD: I'm just going by the order that I got  
20 them. Excuse me. Go ahead, Marisol.

21 MS. CRUZ: Yes. My name is Marisol Cruz, Lennox  
22 School Board president, but most importantly, I'm a  
23 long-life Lennox resident and I'm here to support the  
24 service worker. We need dignant jobs, benefits, salaries  
25 that justify the working class, and to increase our

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1 benefits as a community, giving us the jobs that we need  
2 to uplift our communities, our families. Given that  
3 Lennox is right at the runway of LAX and if LAWA will be  
4 expanding the runway north of LAX, it will heavily impact  
5 our community with pollution, with more traffic, and we  
6 want to make sure that we are serving the needs of the  
7 workers, the community, the students, the parents of the  
8 community that we are the labor force of LAX, like my  
9 parents, my brother and many of my neighbors.

10 So I want to make sure that we are providing  
11 those services, those salaries, those benefits that will  
12 really benefit our community, our parents, our students,  
13 and our teachers as a community.

14 Thank you so much and I have high hopes that you  
15 will provide the needs of our community. Thank you.

16 MR. OSWALD: Thank you.

17 Now Nancy Schneider, followed by Robbie Hunter.

18 MS. SCHNEIDER: I want to just say that I've lived  
19 near LAX since I was five years old. I think that it is  
20 time to improve LAX grossly. I think we should start  
21 with the biggest jobs, the most permanent jobs that you  
22 have. We need to improve the passenger experience and we  
23 need to clean up the surrounding areas and get some mass  
24 transit into LAX in order to make this airport operable  
25 and, you know, a much better neighbor.

20

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1 The only way you can make it a better neighbor  
2 is to get all these loose cars off the road. We approved  
3 the CONRAC, the consolidated rental car, six years ago.  
4 Where is it? Thank you.

5 MR. OSWALD: Thank you very much.

6 I've got Robbie Hunter.

7 Maria. Thank you.

8 Robbie?

9 MR. HUNTER: Robbie Hunter. I represent the  
10 Los Angeles and Orange County Building and Construction  
11 Trades Council. We represent 140,000 construction  
12 workers. We live in this community as well. We want  
13 this airport to be friendly to the neighbors. We want it  
14 to be a better environmental neighbor and we supported  
15 Measure R for a transit system in Los Angeles, not only  
16 for jobs but because we live in this city and we want a  
17 better place to live.

18 This modernization will improve the  
19 environmental footprint, will improve the traffic for the  
20 neighbors. The transit systems that we hope will be  
21 built here, people will be getting on transit systems to  
22 get to the airport from the neighborhoods that they live  
23 on and will have no impact in this area, and that's what  
24 we would like to see and we believe that this is the  
25 first step in this modernization.

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1 We do believe that the airport as it exists  
2 today needs to be improved as far as being a neighbor and  
3 we believe today that this is the plan to do it. So it  
4 will provide jobs, but we have to look at the effect on  
5 the neighbors on the long term and we believe this will  
6 improve the environment.

7 Thank you.

8 MR. OSWALD: I have now David Mishelevich, followed  
9 by Maria Mendoza and then Joe Lopez. Maria -- our second  
10 speaker up, Maria, is going to need a simultaneous  
11 translation. I'd like to do that a couple sentences,  
12 translate, couple sentences, translate.

13 First up, David Mishelevich.

14 DR. MISHELEVICH: Good morning. I'd like to thank  
15 the work that the staff put together and the consulting  
16 firms to produce the Draft EIR. I am a member of the  
17 Board of ARSAC, the Alliance for a Regional Solution to  
18 Airport Congestion.

19 All of the alternatives have different economic  
20 impacts. In Section 8 of the main volume, it talks about  
21 the costs of the different alternatives, but it would be  
22 extremely important to have the basis for what those  
23 estimates were. The reality is that each of them has a  
24 different jobs profile and economic impact in terms of  
25 customer satisfaction.

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1 LAX is, as I understand, the largest origins and  
2 destinations airport in the U.S., so we have more  
3 opportunities if we improve the customer satisfaction to  
4 increase the dollars that will remain in the community,  
5 as opposed to airports like Hartsfield in Atlanta or  
6 O'Hare in Chicago that are mainly transfer airports and  
7 the dollars do not stay there.

8 Jobs are absolutely critical and the reality is  
9 that if you build runways, you get fewer jobs and less  
10 diverse jobs for the various trades than if you improve  
11 the terminals; and it isn't an infinite load of money  
12 that we have available and I would encourage those  
13 estimates and the basis for those estimates to be made  
14 available so we can consider the alternatives in that  
15 economic light.

16 Thank you.

17 MR. OSWALD: Thank you very much.

18 Maria Mendoza, and if we could have our Spanish  
19 translator. After a couple sentences, please translate  
20 for us.

21 THE INTERPRETER: We'll try to do this simultaneous  
22 here.

23 MS. MENDOZA: My name is Maria Mendoza. I am a  
24 resident of Los Angeles in the airport area and I have  
25 been working at LAX for 16 years.

23

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1 I have two children and I work as a janitor for  
2 the company Air Serv where I work proudly and honestly;  
3 and even though I put in all this hard work, it's really  
4 tough to maintain my family. I'm here as a member of the  
5 communities that surround LAX, as a worker of LAX, and as  
6 a mother and as a working mother.

7 I'm here to express my support for the  
8 modernization of LAX. I think that the modernization of  
9 LAX is good for the workers if it means that we will have  
10 new jobs and new opportunities. However, the prosperity  
11 of LAX and its communities cannot move forward if you  
12 forget the workers that make this airport work without  
13 any problems.

14 The modernization of LAX has to include respect  
15 for workers, respect for living wage ordinances, and  
16 respect for unions. So that's why I'm here today, so  
17 that the effort to modernize LAX also includes health,  
18 safety, and prosperity for the workers who do the job.

19 So do what you can to police these contractors  
20 in LAX for violating the laws of the city and/or not  
21 following living wages. We can't have prosperity for  
22 everyone at LAX if you keep these contractors who are not  
23 following the laws at LAX. Yes to modernization, but no  
24 to some of these contractors that are responsible.

25 MR. OSWALD: Obviously when we have Spanish

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1 translation, we'll allow a little bit over the two  
2 minutes.

3 I've got Joe Lopez, Edward Callahan, and then  
4 Stefan Freeman.

5 Joe Lopez.

6 MR. LOPEZ: Good morning. My name is Joe Lopez. I'm  
7 with Local 105, Sheet Metal Workers, longtime resident of  
8 this area, and I support this project.

9 In California, we face over 10 percent  
10 unemployment and I ask that we approve this modernization  
11 of this project, if we could. It would give me a chance  
12 to go back to work after so many years of hard times.  
13 I'm not asking for handout. I'm just asking for an  
14 opportunity to give me and my family -- give me a chance  
15 to put food on the table for my two kids. So let's  
16 support this project.

17 I also -- since I am in the sheet metal  
18 industry, we will be modern -- a modernization of this  
19 airport will -- we will be modernizing the roads of the  
20 surrounding areas and pollution that our local deals  
21 with. We will be modernizing all this, so thank you very  
22 much. Thank you.

23 MR. OSWALD: Thank you. Can you guys hear me at all?

24 Okay. Edward Callahan. Again, we have  
25 Stefan Freeman and then Mirella Ferrer.

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MR. CALLAHAN: Hi. I'm just a homeowner in Playa del Rey and it sort of feels like we're being steamrollered by all the great powers. The unions are not our enemy. We can't fly anywhere without them, but this all seems to be about expansion and moving the north runway. That's what people are talking about and the head of the Chamber of Commerce talks about safety, that was an issue, which it's been proven that it's not. So there's some sort of steamrolling process here that's probably going to roll over the union as well as the homeowners.

MR. OSWALD: Thank you.

And you are?

MR. FREEMAN: Stefan Freeman.

MR. OSWALD: Thank you. Go ahead.

MR. FREEMAN: Hello everybody. Stefan Freeman.

I live in Playa del Rey as well and what I'll tell you is LAX, you know, we're your neighbors; right? And it's our responsibility as a neighbor to take care of the other neighbors around us, and for all the different labor organizations that are represented here right now, you guys do an unbelievable job. You do world-class work and I will tell you that our concern is not with you. We know that when you're in there, the work's going to get accomplished and it's going to be the best that it

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possibly can.

You know, our concern is really around the how and the what that's about to be done. Our concern is that LAX is going to come in there and do what they want without any sensitivity around the neighbors. Okay? And we wouldn't do that to you and all I ask is that you go back and try to figure out a way to even potentially move that runway further south. Now, it might mean more work, right, in terms of what you have to do to the terminals, but at the end of the day, that would be more work for the employees that you see here as well.

So that's what we're asking for right now is really just the how and what you're going to do and make sure that you have these employees included.

Thank you.

MR. OSWALD: I have now Mirella Ferrer and I also need my Spanish translation. We'll do it the same way we just did it. So this is Mirella -- how do I say it? Spanish translation, simultaneous.

THE INTERPRETER: Mirella Ferrer.

MR. OSWALD: Thank you. So we'll do a couple of sentences and then translate.

MS. FERRER: Good morning. My name is Mirella Ferrer. I live at 416 West 105th, L.A. and I work for El Camacho's Cantina, LAX. I am a cook and I am

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backing up the project for the modernization of the airport because with this, it's going to benefit. It's going to create more work and we're going to better the economy of the city and the country.

This expansion is going to benefit everybody. Like, for example, me, that I am a worker, a middle-class worker, and this is going to benefit myself and my family and, therefore, we do not have to depend on any public service. I would like to state again that I approve of this project to 100 percent.

Thank you.

MR. OSWALD: Now I have Teresa Lemus, who also requires Spanish translation. I also -- then followed by Marlene Mendoza and then Sinia Chavez, Sinia, Sinia Chavez.

MS. LEMUS: Good morning. I would like to thank all of you for being present here this morning and, God willing, I hope you put your hands to your heart and think about us, the poor people. We need work.

My name is Maria Teresa Lemus and I live in South Central Los Angeles and I've worked for Sky Chef for 13 years. I prepare the meals and the drinks that are for the airplanes. I approve of the project of the airport because this is going to benefit all of us. It's going to create more work for the -- it's going to create

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more work and it's going to better the economy.

I am alone and I depend on my job and, like me, there is many others. I would like to state again that I approve the modernization project to 100 percent.

Thank you for being here present and please, kindly, I request that you think about this. We need those jobs so we can continue to live in this world.

Thank you. Thank you. May God bless you.

MR. OSWALD: Marlene Mendoza. Sinia Chavez.

MS. MENDOZA: Good morning. My name is Marlene Mendoza. I'm a proud member of Unite Here, Local 11, but I'm more proud of being a single mom and I have two children, Frankie and Valerie. My son is -- has cerebral palsy as well as dysphagia. I want to share that with you because I want you to think about what I have say.

I worked for HMS Host for 24 years and at Gladstone's at Terminal 3 and I'm very proud to serve you when you come through LAX, and I also want to say that I have a union job that gives me all the benefits that I need and I feel that no, it just can't be Marlene, Valerie, and Frankie who can have these benefits.

There are so many kids. I live in the city of Lawndale. There are so many families, so many single moms like me that deserve the rights to have these jobs.

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1 We have the right that LAX creates more jobs, and good  
2 jobs, and we also have the right to have a beautiful  
3 airport and we have the right of the modern- -- I support  
4 the modernization because of what it gives me and it  
5 gives my family, and the most important thing that I get,  
6 even though sometimes I have to work the jobs, just --  
7 having a job at LAX gives me more time to be with my kids  
8 and I want you to think about it because this is our  
9 future and it's our future. These are our kids.

10 This is our family and in order for us to create  
11 the communities, we need to have this modernization to  
12 have a better city, to have a better L.A., to have a  
13 better country. So keep that in mind that we are here.  
14 We are at the airport every single day supporting you. I  
15 say, "Hi. My name is Marlene. Welcome to Gladstone's."

16 MR. OSWALD: Thank you.

17 Next up I have Sinia Chavez, Stephen Hinson,  
18 Nancy-Gene Morrison, and then Denny Schneider.

19 MS. CHAVEZ: Good morning. My name is Sinia Chavez.  
20 I work for HMS Host as a chief supervisor of the Food  
21 Court. I've been working there in the airport for eight  
22 years, which has given me the opportunity to have a good  
23 living-wage job, which helps me to support my kids. I'm  
24 a single mom of six. And also, my older daughter is  
25 working at the airport, too, and she's getting the

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1 opportunity that -- the job is giving her by -- giving  
2 her the chance to go to a university. She's 23 years old  
3 and I support this expansion at the airport because I  
4 know it's going to give us better jobs each day, which we  
5 will have the opportunity to support our families the  
6 best we can and give my kids the opportunity to keep  
7 going to school while I work at the LAX. So I support  
8 100 percent this project.

9 Thank you.

10 MR. OSWALD: Thank you very much.

11 Stephen Hinson, Nancy-Gene Morrison,  
12 Denny Schneider.

13 MR. HINSON: Good morning, ladies and gentlemen. My  
14 name is Steve Hinson. I'm the Business Representative  
15 for Local 105 Sheet Metal Workers. We represent over  
16 6,000 sheet metal workers, active and retirees, roughly  
17 about 3500 active members.

18 At the height of our unemployment, we were about  
19 1100 members out of work. Now we're roughly about 600,  
20 which is still kind of high, but this expansion that  
21 we've had so far in the modernization of Tom Bradley,  
22 we've been able to put over 200 sheet metal workers to  
23 work on-site, not to mention countless members that are  
24 working off-site, project management, everything that's  
25 included within the construction.

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1 Thousands of members -- thousands of good  
2 construction jobs have been created because of the Tom  
3 Bradley expansion. It's given our members a sense of  
4 hope, a sense of pride. It's helped them keep their  
5 houses, helped them keep their health care. It's done a  
6 great thing. This next modernization at LAX will not  
7 only enhance the community, but it will also be able to  
8 put our members back to work and, you know, I hope we can  
9 do this and get this thing passed.

10 Thank you.

11 MR. OSWALD: Nancy-Gene Morrison. Denny Schneider.

12 MS. MORRISON: I'm Nancy-Gene Morrison. I live in  
13 Westchester and have for 30 years.

14 I am all for modernizing the airport. I am  
15 opposed to moving the runways and moving -- expanding  
16 LAX. I feel that it is very important that we not have  
17 all our eggs in one basket and our only major airport  
18 here being LAX. We have Ontario. There's Palmdale.  
19 Those areas need to be used and we are in an area that  
20 has geographic problems, geological problems with  
21 earthquake faults here. The ocean here is subject to  
22 tsunami and only this week we have had two major  
23 incidents at LAX where traffic has been halted on the  
24 roadways. A plane had to be unloaded the other day.  
25 There are constantly helicopters overhead.

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1 There have been enough emergencies in this  
2 country in the last month that we cannot have everything  
3 all at LAX. We need to use other areas around. If  
4 there's any emergency in this area, there will be nothing  
5 here as far as air transportation.

6 I'm all for workers having jobs and being  
7 respected, but they can also have jobs in building at  
8 Palmdale and at Ontario.

9 MR. OSWALD: Thank you very much.

10 Denny Schneider is up next. Danna Cope and then  
11 Joe Czyzyk.

12 MR. SCHNEIDER: I'm Denny Schneider, president of  
13 ARSAC, and we want to see the airport fixed for four  
14 reasons: It's difficult and impossible to get to it, get  
15 through it, get out, and navigate among the terminals.  
16 Other than that, it's great.

17 The Master Plan is like a jigsaw puzzle with  
18 several key pieces that are still missing and it needs to  
19 be solved. Traffic gridlock, getting to and out of the  
20 airport, and besides that, it also short-changes the  
21 people who are traveling domestically because so far all  
22 we've done is work for the international passengers. All  
23 those other terminals need to be fixed, badly.

24 We know there's a lot of conflicts in the 6,000  
25 pages that was written in the EIR and the other 6,000 in

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1 the SPAS report. We haven't had more than a month to  
2 look through all of those pages yet, but you will get  
3 lots of written comments.

4 We want to make sure that we do the alternative  
5 that the EIR suggests is best. That's Alternative 2.  
6 It's the lowest cost, provides the most efficient  
7 movement of aircraft on the ground, and is the best  
8 environmentally. Taxiways are moved. They make it safer  
9 so that you can move around. It extends 24R -- or 24L, I  
10 mean, to the east so that we have the runway safety area  
11 protected and it provides for balance among the airport,  
12 and it's just a good idea. Add number 9 and overall the  
13 key here is jobs, jobs, jobs, but what we need is jobs  
14 that are sustainable and that's what we really need here.

15 So thank you. I just want to make sure that you  
16 understand I have not talked about the local impacts  
17 because those aren't important to most of the people  
18 listening. It's what happens in the whole region.

19 MR. OSWALD: Thank you very much.

20 Danna Cope, Joe Czyzyk, and then next up is  
21 Patricia Lestz.

22 MS. COPE: I'm Danna Cope, resident of Westchester  
23 for a long time.

24 Why does the Draft EIR present so many very,  
25 very expensive alternatives? Alternative 2, which does

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1 not include moving the runway north, plus the CONRAC, the  
2 consolidated rental car complex, plus train access into  
3 the airport meets the safety requirements. It does not  
4 disrupt the North Airfield and, therefore, impact our  
5 neighbors to the south, because the South Airfield would  
6 be terribly impacted. It meets environmental  
7 requirements with much less impact and it does create  
8 jobs.

9 There is a lot of modernization that needs to be  
10 done at this airport that does not involve moving the  
11 runway. Why doesn't the -- why, when development of  
12 other LAWA-owned airports is a Draft EIR goal, does LAWA  
13 want to wait until LAX meets 75 MAP? We should be  
14 immediately developing Ontario for the safety reasons  
15 that previous speakers mentioned and that would create  
16 many, many more jobs.

17 LAWA projects must include fair wages for all  
18 workers, including subcontractors. Is that included in  
19 the Draft EIR? Why not go right now to developing  
20 Ontario? It would increase jobs in this area  
21 incrementally -- I mean, immeasurably and we need it.

22 Thank you.

23 MR. OSWALD: Thank you very much.

24 Joe Czyzyk, Patricia Lestz, and then  
25 Bill Widener.

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1 MR. CZYZYK: Good morning. My name is Joe Czyzyk and  
2 I'm chairman and CEO of Mercury Air Group and the  
3 immediate past chair of the Los Angeles Area Chamber of  
4 Commerce.

5 I've been a Playa del Rey resident since 1984  
6 and my company has continuously operated among other  
7 airports and LAX since 1955. My company will not profit  
8 or benefit from any decision made on these SPAS.

9 I am here today to speak in support of SPAS and  
10 specifically Alternatives 1 or 5 to ensure that the North  
11 Airfield is finally configured in such a way as to  
12 accommodate the next generation of longer and wider  
13 aircraft. It's hard to believe that LAX doesn't operate  
14 as a fully functional and approved Group V airport under  
15 FAA guidelines when there are Group VI aircraft landing  
16 here today.

17 LAX modernization, not expansion, not what  
18 you've been hearing. People have been saying  
19 "expansion." There's no expansion contemplated in  
20 Alternative 1 or 5. It's important to point out that  
21 even if the North Runway is moved 350 feet, which is  
22 Alternative 5, it stays within LAX's existing fence line.  
23 I repeat, it is not an expansion; just modernization. If  
24 there is an expansion, it's only for safety and jobs.

25 I have lived in this community for nearly 30

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1 years. I don't want to see our community hurt by this  
2 airport, but at the same time I don't want to see the  
3 airport's future hurt by a lack of action on undertaking  
4 a complete modernization, including the North Airfield.  
5 The airport provides growing and massive economic support  
6 to the City of Los Angeles and its surrounding  
7 communities, including my community of Playa del Rey and  
8 Westchester. Inaction will cause us to have a  
9 dangerous-to-use, noncompliant airport.

10 Thank you.

11 MR. OSWALD: Thank you very much.

12 Not necessary. We're here today to listen to  
13 one another.

14 Patricia Lestz, Bill Widener and then Stefan --  
15 Patricia Lestz.

16 MS. LESTZ: Hi. I live in Playa del Rey. My name is  
17 Patricia Lestz and I've only lived been there for seven  
18 years, so obviously the airport was here when I moved  
19 here. I was not aware -- I lived in Los Angeles for  
20 30-some-odd years. I was not aware of really what was  
21 happening in Playa del Rey.

22 The first thing that I want to say is that I  
23 think that anyone who was involved in whatever we want to  
24 call it, you know, expansion, modernization, et cetera,  
25 that whether it's a subcontractor or a contractor, that

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1 they ought to pay them a living wage. That I think is  
2 number one. That's the most important thing. We should  
3 not live in a city where that is not the case.

4 Number two, I think that all of these things on  
5 the wall should show the economic impact. Money is  
6 certainly not easy to come by, especially in this state  
7 and in the city and yes, we need the jobs, but we also  
8 need to know how we're going to compensate the businesses  
9 that are affected outside of the airport, the homeowners  
10 that are affected -- and obviously I'm concerned about  
11 that. I mean, all of our values have already dropped.  
12 How much more is it going to drop with runways being  
13 closer to us?

14 So those are the points that I want to make. I  
15 think that, once again, the economic impact of everything  
16 that is in this community -- is it going to affect Otis?  
17 Is it going to affect Loyola? We have to think about  
18 those things because those are the things that really  
19 make us special as a community.

20 Thank you.

21 MR. OSWALD: Thank you.

22 Bill Widener?

23 MR. WIDENER: Yes. I'm Bill Widener and I'm a  
24 resident of the city of Inglewood. I've lived in the  
25 airport area for 70 years, since I was almost a baby, and

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1 so I've seen a lot of changes in everything and that's  
2 good, but I'm speaking for the residents east of the  
3 airport. If they expand, fine. Just don't move that  
4 runway north any more because it's too far north as far  
5 as I'm concerned already. But, you know, I live in  
6 Inglewood and they've done sound insulation on all these  
7 apartment buildings and stuff and they haven't done it on  
8 single-residence homes. See, I hear about all these jobs  
9 and everything here and no one's defending the residents  
10 east of here.

11 You know, now, there was -- during some  
12 expansion period of the airport, a lot of my relatives  
13 and everything relocated in Atlanta because that's where  
14 all the jobs went at one time and so, you know, I realize  
15 that as these things happen and the expansion goes on  
16 that there's evolution and there will be more jobs  
17 automatically, you know, but let's just don't create any  
18 hardships for people. That's the whole trick, as far as  
19 I'm concerned, because we lost one house in Westchester  
20 at one time and -- you know, to the airport and it's part  
21 of a parking lot today.

22 Inglewood -- Westchester Elementary School I  
23 went to and it's gone completely because of being part of  
24 a parking lot.

25 So these are necessary things and I hope we can

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1 proceed and not hurt anybody. Thank you.

2 MR. OSWALD: Thank you. Stefan Freeman -- have you  
3 spoken once already? Are you still here?

4 Then let's go to Gloria Gray and then  
5 Robin Wilson. On deck, Patricia Orellana. I think I got  
6 that right.

7 MS. GRAY: Good morning to the audience and folks in  
8 front. I want -- well, first of all, my name is  
9 Gloria Gray and I'm a resident of the city of Inglewood.  
10 I've lived in Inglewood for over 30 years and I want to  
11 acknowledge the fact that it's a good thing to have  
12 community meetings and so forth, so I know it's a  
13 requirement when you do an EIR and so forth.

14 I know that we're here to hear results and also  
15 to talk about the modernization proposal for the airport.  
16 It's always a good thing to upgrade any particular  
17 facility and certainly the airport is one that -- where  
18 it needs to happen and certainly that modernization will  
19 create jobs, I assume, for this community and so that's a  
20 good thing, because job -- increasing jobs in our  
21 community is very positive.

22 But I'm here also to address another issue which  
23 is very important and it should be important to the  
24 airport because it is important to our community and that  
25 is the issue of supporting the service workers at LAX.

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1 You're probably aware of different  
2 demonstrations that have been going on. I have been a  
3 member of the union for many years so I do support  
4 organized labor and working family issues and so I beg to  
5 ask you to please consider the plight of the service  
6 workers. They have a right to benefits. They certainly  
7 have a right to health care. They have a right to jobs  
8 that will support them and their families and so I think,  
9 you know, looking at the issue of contracting out is very  
10 important. It's an issue throughout the state of  
11 California for local cities and municipalities.

12 And so I beg you to please look at protecting  
13 the service workers because they are the nuts and bolts  
14 of the airport. So, again, I encourage you to look at  
15 those issues and support their efforts, and I am here to  
16 support their efforts and will continue to do that.

17 So thank you.

18 MR. OSWALD: Thank you.

19 Robin Wilson and then Patricia Orellana.

20 Robin Wilson?

21 UNIDENTIFIED SPEAKER: She's gone.

22 MR. OSWALD: Next up is Patricia Orellana and we need  
23 Spanish translation.

24 MS. ORELLANA: My name is Patricia Orellana from  
25 Inglewood. I have two kids. I have worked at LAX for 14

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1 years.

2 I'm here to support a modernization today, but  
3 it's not unconditional. I'm here to say that it's  
4 important if the airport and the community want to move  
5 forward together, that the airport needs to take more at  
6 hand in protecting workers against some of these  
7 contractors that work at the airport, like Aviation  
8 Safeguards.

9 What I am here to say is that both the workers  
10 and their families also have to progress in this  
11 modernization process. LAX can make new terminals, can  
12 build new routes for planes to land, but it is the  
13 workers who work in it every day that make this airport  
14 function. If you want to make a nicer looking airport, a  
15 more functioning airport, you still have to address the  
16 issue of contractors. If not, you're going to get a  
17 beautiful, shiny airport on the outside, shiny and clean  
18 airport on the outside, but the dirt will be inside.

19 Thank you.

20 MR. OSWALD: Jacqueline Hamilton, Craig Eggers,  
21 followed by Richard Cavalier -- Cavalier.

22 Jacqueline Hamilton.

23 MS. HAMILTON: I'm Jacqueline Hamilton with the  
24 Tuskegee Airmen organization. I lived in this area, the  
25 Manchester Square area, from 2001 to 2006, and one of the

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1 things we experienced in living in this area was a lot of  
2 fumes and a lot of problems with air quality. So I'm  
3 checking and reading your information here and also  
4 talking to the staff.

5 Another thing that I experienced was repeat  
6 crime victimization. Now, we're talking about jobs here  
7 and different organizations. One of the things that  
8 needs to be done is having safety for those of us who are  
9 in this area.

10 I'm still being repeatedly victimized by crime.  
11 My father's picture and information was displayed at LAX  
12 in a mural during the time that I lived in this area. I  
13 was victimized by stalking, illegal harassment, mail  
14 fraud, identity theft, theft, a lot of crimes, and I  
15 lived in the area of the Manchester Square area.

16 The address was 93112 Glasgow Place, a complex  
17 owned by Jesus Lozano, managed by Lillian Fogelback and  
18 also Maria Estrada. They all lied to me about receiving  
19 a relocation award, staying, prolonging my stay here in  
20 this area, continued to lie to me about receiving the  
21 award, and did nothing about the crime victimization and  
22 also the problems we had in living in this area with the  
23 fumes and other problems.

24 So one of the things I'm requesting is public  
25 community safety. We have information here about air

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1 quality and traffic control, all the other issues. We  
2 have received information that LAX is one of the most  
3 dangerous airports.

4 One of the things I'm also experiencing is  
5 repeat illegal corruption of my clear background record.  
6 It also includes harassment by officers, which is  
7 illegal.

8 Thank you.

9 MR. OSWALD: Thank you very much.

10 We have -- thank you. We have Craig Eggers,  
11 Richard Cavalier, and then Diane Sambrano.

12 MR. EGGERS: My name is Craig Eggers. I represent  
13 the Neighborhood Council Westchester Playa del Rey and I  
14 chair the Airport Relations Committee and I wanted to  
15 dispel a few myths that seem to be floating around  
16 concerning our community.

17 The first myth is that we do not support  
18 modernization. That is absolutely incorrect. I agree  
19 with previous statements that the airport currently is an  
20 eyesore and a bit of an embarrassment. When you think  
21 about the passenger traveler experience, with the amount  
22 of money that's being invested in downtown Los Angeles  
23 and the revitalization there, I would think we'd really  
24 want to modernize this place within an inch of its life.

25 The second myth is that we do not support --

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1 excuse me. We do support the environmentally superior  
2 alternative and the issues concerning the operational  
3 efficiency. There is no justification in operational  
4 efficiency or in safety as it's associated with the  
5 Runway Separation Plan that's currently there.

6 And most importantly, we're going to be hosting  
7 a town hall meeting for our Neighborhood Council on  
8 September 25th and we'd like to invite everyone to come  
9 out for that as well. We hope to have several high-level  
10 elected officials, including Councilman Rosendahl, join  
11 us and we welcome the opportunity to get your input and  
12 perceptions and feedback.

13 Thank you.

14 MR. OSWALD: Thank you very much.

15 Richard Cavalier, Diane Sambrano, and Daniel  
16 Juarez.

17 MR. CAVALIER: My name is Richard Cavalier and I live  
18 in Inglewood. I want to say that for modernization, yes;  
19 to move the runways north, no. We're talking about jobs.  
20 Nobody's talking about closing the airport. The jobs are  
21 already there. Many of the jobs for the modernization  
22 are temporary jobs, but the impact on the community is  
23 permanent and the way this airport operates, forever and  
24 ever, far outlasting me, I'm sure.

25 There are a couple of major problems. One is

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1 that the airlines right now stack everything over the  
2 city. All of the airplanes are dropping pollution over  
3 the city. There's an ocean to the west, and I don't know  
4 whether anyone has noticed it. Yes, sound carries over  
5 the ocean.

6 Share the wealth. The important things after  
7 our medical problems from what's being done and because  
8 the runways already let planes come in from the west,  
9 there's very, very little of a problem here.

10 Now, what we're not talking about is  
11 grandfathering. There was one time a small airport for  
12 propeller planes. The jets arrived. That's fine.

13 The important thing is that I've also heard that  
14 someone said longer, wider aircraft. Yes, these aircraft  
15 are not here by the demands of the traveler. They're  
16 here by the demands of the bean counters who don't care  
17 what happens to anybody on the ground. Okay.

18 I have traveled in more than 40 countries. I've  
19 been in a lot of airports and they all around the world  
20 do more to take care of the people who are near the  
21 airport than is done here. People are being molested,  
22 and this is a matter of unilateral taking of the quiet  
23 enjoyment of home for everybody if the runway is moved  
24 north.

25 Okay? So modernization, yes; north runways, no.

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1 And now let's make sense out of the airport that is here.  
2 They don't have unlimited rights.

3 MR. OSWALD: Thank you.

4 Diane Sambrano?

5 MS. SAMBRANO: Good afternoon. I've been here for a  
6 very long time. I've attended so many of these meetings,  
7 it's impossible to count them, and one thing is  
8 consistent. There seems to be a lack of understanding of  
9 the genuine impact that this airport has on the people  
10 who live around it. We're constantly hearing about those  
11 people who come in for a couple of months and get a job  
12 and then they leave and go back way far away.

13 We are always hearing about how important it is  
14 for the traveler who's here maybe four whole hours, but  
15 you know what? There are people who actually try to  
16 continue to live here and what we have experienced is not  
17 just horrific noise but all that black goo that lands on  
18 top of our lemons, our cars, on our mini blinds, and  
19 here's the surprise. We actually breathe the stuff.

20 And you know what? No matter how much I look at  
21 charts, wherever they are, there doesn't seem to be that  
22 adequate resultant determination about what's happening  
23 to our lives and yet I can tell you that this year, I've  
24 had to write six obituaries.

25 There are definite cancer clusters in the areas

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1 of Inglewood. Most of the women, roughly 65 in certain  
2 areas, are now either without breasts or dead. That's  
3 pretty significant, but we don't see that anywhere, and  
4 then there's those other pesky little cancers that leave  
5 your breasts but just eat you away everywhere else and we  
6 don't hear about that because either someone wants a job,  
7 someone wants an aircraft, somebody wants to sell another  
8 trinket. And I've got to tell you somewhere along the  
9 line, people's lives should outweigh that dollar bill.  
10 By the way, we're still impacted, even when those dollars  
11 actually go way far away to downtown L.A.

12 MR. OSWALD: Thank you.

13 Daniel Juarez. Daniel Juarez, are you still  
14 here?

15 That's all of the comment sheets we have or I  
16 should say requests to speak.

17 I'd like to offer a couple of thoughts. One is  
18 please take us up on the offer. Write these comments  
19 down. Be detailed. Give us the richness of your  
20 concerns and issues so that we can make the public record  
21 and be responded to as part of the EIR. We will continue  
22 our open house until 12:30, so I would invite our staff,  
23 if you can, to please reposition yourselves to --

24 MR. OUELLET: Before you end, can I --

25 MR. OSWALD: Just fill out a card.

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1 We can continue the open house until 12:30 and  
2 staff will still be available to answer your questions.

3 Fill out a card and we can have one more comment  
4 and I think we'll wrap up the public comment section.

5 If you are going to leave, I just want to say  
6 thank you for being a part of this. I do have one  
7 correction on the handout. The address for the Central  
8 Library on the press release that went out says Sixth  
9 Street. It is actually as printed on this piece of paper  
10 as Fifth Street, so be sure. I know many of us know  
11 where that is, but it is on Fifth Street.

12 Thank you.

13 Our final speaker, Jim -- help me, Jim.

14 MR. OUELLET: Ouellet, yeah.

15 MR. OSWALD: Last speaker.

16 MR. OUELLET: Yeah. One of the information that's up  
17 on some of these bulletin boards says that LAX North  
18 Airfield was designed in the 1960s for 1960s aircraft.  
19 The Boeing 747 was also designed in the 1960s and began  
20 flying in 1970, just about the time that the North  
21 Airfield opened, so it was plainly designed to  
22 accommodate the 747.

23 Now, that 747 had a wingspan of 197 feet.  
24 Boeing's latest large jet, the 787-9, has a wingspan of  
25 exactly the same, 197 feet. The 747, the largest 747 has

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1 a wingspan of roughly 25 feet taller.

2 In terms of flying Airbus, which is the largest  
3 aircraft in and out, so far Airbus has something like  
4 about 240 orders for that jet, one-third of them from  
5 Emirates Airlines which flies, as far as I know, one  
6 flight in and out of LAX a day on a Boeing 777.

7 By contrast, the Boeing 787 has 824 orders.  
8 There will not be that many category VI jets flying in  
9 and out of LAX to justify moving all those runways.

10 The data in the EIR also suggests that moving  
11 the runways -- Runway 24R north either 260 feet or 340  
12 feet will result in minimal efficiency gains. So it will  
13 create -- well, basically, it will create an awful lot of  
14 noise around the area, additional noise around the area  
15 with minimal gains in efficiency and a horrible expense  
16 in digging up a runway and moving it a few feet north.

17 That's all. Thank you.

18 MR. OSWALD: Thank you very much.

19 So thank you again. The open house will  
20 continue for another 20 minutes or so until 12:30. Thank  
21 you for your patience, thank you for your respect for  
22 each other, and, please, we'll see you next time around.  
23 That will be this Tuesday at the Central Library,  
24 Mark Taper Auditorium, from 5:30 to 8:00. Also, we're  
25 back here on Wednesday at the Proud Bird from 5:30 to

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1 8:00.

2 Thank you, all the staff and the team, for  
3 helping us with the program.

4 Thank you to you for coming out.

5 (Public comment ended at 12:10 p.m.)

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BEFORE THE LOS ANGELES WORLD AIRPORTS  
SPECIFIC PLAN AMENDMENT STUDY PROJECT TEAM

Open House/Public Hearing in the )  
Matter of: )  
)  
DRAFT EIR FOR THE LOS ANGELES )  
INTERNATIONAL AIRPORT SPECIFIC PLAN )  
AMENDMENT STUDY )  
\_\_\_\_\_ )

TRANSCRIPT OF PROCEEDINGS  
Los Angeles, California  
Tuesday, August 28, 2012

Reported by:

MARCENA M. MUNGUIA,  
CSR No. 10420

Job No.:  
B8707CATLAWA

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TRANSCRIPT OF PROCEEDINGS, taken at  
Los Angeles Central Library, Mark Taper  
Auditorium, 630 West 5th Street, Los Angeles,  
California, commencing at 6:30 p.m. on Tuesday,  
August 28, 2012, heard before the LOS ANGELES  
WORLD AIRPORTS SPAS PROJECT TEAM, reported by  
MARCENA M. MUNGUIA, CSR No. 10420, a Certified  
Shorthand Reporter in and for the State of  
California.

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APPEARANCES:

LAWA Panel Members:	HERBERT GLASGOW DIEGO ALVAREZ CYNTHIA GUIDRY
Facilitator:	JIM OSWALD

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1 Los Angeles, California, Tuesday, August 28, 2012  
2 6:30 p.m.  
3  
4  
5 MR. OSWALD: Good evening and welcome to the LAX SPAS  
6 Draft EIR open house and public meeting. Many of you who  
7 have just arrived. For the first hour of our program, we  
8 had an open house, an opportunity to view a series of  
9 information graphics produced by the consultant team and  
10 staff. These boards are intended to provide an overview  
11 of the open house -- pardon me -- of the process, the EIR  
12 process, giving you a flavor of the objectives and the  
13 alternatives that have been studied as a part of the  
14 Draft EIR and also then to go into several key areas,  
15 aviation safety, aircraft noise, air quality and traffic,  
16 to provide some of the insights that are in the Draft  
17 EIR.  
18 Our purpose here this evening truly, both in  
19 terms of the open house as well as in the public comment  
20 period, is to identify those comments, questions, issues  
21 that you have specifically related to the Draft EIR so  
22 that we can be sure that those are addressed in the Final  
23 EIR document.  
24 So tonight, our program now for the next hour,  
25 hour and a half, depending on the numbers of cards we

6

1 have, will be focused on hearing from you about some of  
2 those key issues, comments, and concerns.

3 So the way we're proceeding, I think as I  
4 mentioned earlier, if you would like to speak this  
5 evening, you do need to fill out a request-to-speak card.  
6 Those are found just outside in the reception area. We  
7 will collect those and I will read those off in the order  
8 that we receive them this evening.

9 I would request a couple of things, just in  
10 terms of the way we're proceeding. We are a large crowd  
11 this evening. I would appreciate everybody to give the  
12 speakers your undivided attention, to also be very  
13 respectful and extraordinarily sensitive to the fact that  
14 we want to hear all the comments. So I would ask that we  
15 refrain from lots of cheering, yelling, and hollering,  
16 'cause tonight we really are here to try to capture and  
17 understand what are these comments and questions that  
18 people have.

19 I wanted to point out that during the course of  
20 this evening, you're also welcome to go back out to the  
21 open house. You're welcome to continue to walk around,  
22 fill out any of the comment forms that we have there. We  
23 also have a videographer stationed just outside this  
24 room. He, too, can take your two-minute testimony or  
25 public comments. We also have an audio recorder, someone

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1 who can take your comment if you prefer not to be  
2 videoed. You can also type your comments if you like,  
3 but we are really trying to build all of the comments and  
4 questions that you might have regarding the Draft EIR.

5 I think what I'll do this evening is I will call  
6 up our speakers in order that we received the speaker  
7 request-to-speak cards. I'll call three people at a  
8 time, so you guys know that you should be ready to go.  
9 If you would just, however, walk up to the mike one at a  
10 time, I would appreciate it. You can use either  
11 microphones we have on other side. If you require  
12 something that doesn't require steps, you may also walk  
13 over here (indicating) or if you have a wheelchair or a  
14 cane, you're welcome to come here and we'll help you use  
15 that microphone so you don't have to come down any steps.

16 Sound good? Okay. So why don't we begin.

17 We've got Maria Elena Durazo, followed by  
18 Karen Hathaway and then on deck is David Simon.

19 MS. DURAZO: Good evening. Yes, Maria Elena Durazo  
20 and I am secretary-treasurer of the L.A. Federation of  
21 Labor.

22 You know, as passengers travel through LAX,  
23 there are thousands of very dedicated men and women who  
24 work hard to make sure that the experience of the  
25 passengers is safe, it's comfortable, and it's reliable,

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1 and I mean everyone from the flight attendants to the  
2 baggage screeners to the food, retail workers, the  
3 concession workers, cabin cleaners, customer service  
4 reps. The workers at LAX deserve to have a voice on the  
5 job. That's what we strive for and we want to ensure  
6 also that they have the tools, the training, and good,  
7 safe working conditions that they need to carry out their  
8 jobs.

9 LAX is a treasured asset for all of us. 300,000  
10 people raise their families through the jobs, directly  
11 and indirectly, related to LAX. Every corner of the city  
12 and county is touched by economic vitality from this  
13 airport. So for us, the sooner we finalize a process  
14 that has been going on for over eight years, then an  
15 additional 8 and a half billion dollars in projects can  
16 begin and another 10,000 more good-paying jobs are  
17 created.

18 So in addition to the economic impact, we are  
19 glad that modernization will also address the safety  
20 issues on the runway that affect workers. So this time,  
21 let's refer to LAX as not as "the airport" but as "our  
22 airport" because it belongs to all of us. Our airport is  
23 long overdue for modernization. Therefore, alongside a  
24 coalition of LAX workers, residents, community and  
25 business allies, we urge a swift delivery of the Final

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1 EIR.

2 Thank you very much.

3 MR. OSWALD: Thank you very much.

4 I should also point out obviously that we do  
5 have a two-minute clock. I would appreciate everybody to  
6 abide by that time. I'll give you a 10- or 15-second  
7 warning so we can ensure that everybody here has a  
8 chance to speak.

9 Our next speaker is, thank you, Karen Hathaway.

10 MS. HATHAWAY: Thank you. My name is Karen Hathaway  
11 and I am the President of LAACO, Ltd./Los Angeles  
12 Athletic Club. I'm also the chairman of the Board of  
13 Los Angeles Area Chamber of Commerce.

14 Modernization of LAX is long overdue. In fact,  
15 LAX modernization is essential to the future of our city  
16 and now is the time to do it.

17 The economic impact of LAX on L.A. County is  
18 very well documented. It generates tens of billions of  
19 dollars and hundreds of thousands of jobs annually. It's  
20 not just an economic asset. Actually, it's an essential  
21 component in the financial stability of our entire  
22 region.

23 The citizens of our region have a huge stake in  
24 the global economy. Growing our tourism and exports are  
25 key to L.A.'s long-term economic health. A modern, safe,

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1 and efficient LAX is essential to keep visitor and  
2 business travelers coming here and to keep commerce  
3 flowing. Therefore, improving LAX is the most important  
4 economic project in our region today.

5 Significant improvements are under way; however,  
6 the Los Angeles Chamber of Commerce has partnered with  
7 labor and citizens to form the Coalition to Fix LAX Now  
8 because we see the financial implications of the job  
9 that's only half done. In these troubled times, our  
10 region faces many intractable problems with no obvious  
11 solutions and this is not one of them. The path is very  
12 clear.

13 LAX needs a complete package, a state-of-the-art  
14 terminal, a safe and efficient North Airfield, and good  
15 ground transportation access. All three elements are  
16 absolutely required and we are calling for the passage of  
17 the Specific Plan Amendment Study and its corresponding  
18 EIR.

19 We urge the Board to aggressively proceed through the  
20 SPAS EIR process and move us forward into the 21st  
21 century.

22 Thank you.

23 MR. OSWALD: Thank you very much.

24 Next up I have David Simon, followed by Kevin  
25 Norton, I think, and Aaron Broderick.

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1 MR. SIMON: Thank you.

2 I am here representing the Southern California  
3 Committee for the Olympic Games, of which I serve as  
4 president of.

5 When the London Olympics ended two weeks ago,  
6 City Councilman Tom LeBonge introduced a motion in  
7 Council inviting our organization to recommend to the  
8 City whether Los Angeles might be able to bid again for  
9 the Olympic games in the near future. And while that has  
10 not worked its way through Council, I can tell you the  
11 answer is yes, there is an opportunity.

12 The 2016 games have been awarded to Rio. 2020  
13 will be awarded next year to either Madrid, Tokyo, or  
14 Istanbul; and the 2024 games will be after that and the  
15 United States Olympic Committee will have to decide  
16 whether Los Angeles is the candidate to advance  
17 internationally to put that bid forward. But we could be  
18 on the verge of the best opportunity Los Angeles has had  
19 for 40 years to have a successful bid for the Olympic  
20 games. And just as the last Olympic games in 1984 was a  
21 tremendous catalyst for a major overhaul of the airport,  
22 so could a bid for the Olympic games in 2024 be a  
23 catalyst for the airport again.

24 So I am here just to let you know that this is  
25 being talked about. It's not yet broken into the news,

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1 but if it does and if we're successful, this could be  
2 something very significant for the airport.

3 I would invite you to consider in your planning  
4 the date of 2024 as a deadline. If there is an Olympic  
5 bid, an improved airport would obviously enhance it; but  
6 just as important, if there is an Olympic bid, it could  
7 be a tremendous catalyst for you and that deadline could  
8 be something that we could work together on.

9 Thank you very much.

10 MR. OSWALD: Thank you very much.

11 Kevin Norton?

12 MR. NORTON: Norton, with bad penmanship apparently.

13 Kevin Norton, IBEW Local 11, Electrical Workers  
14 Union. We represent about 500 workers who work at the  
15 airport on construction, as well as permanent employees  
16 of the airport. We're also a community stakeholder and  
17 have an office at 8333 Airport Boulevard, right down the  
18 street in Westchester.

19 LAX -- the modernization of LAX is critical.  
20 Anybody who does any air travel whatsoever would be  
21 hard-pressed to find an airport that is less impressive  
22 to a visitor than LAX, certainly not because of their  
23 lack of effort of the folks that run the airport, but  
24 because it's been very difficult to get any kind of  
25 modernization program under way with all of the

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1 considerable lawsuits and opposition.

2 The modernization program needs to move forward.  
3 We need to have jobs. About several hundred thousand  
4 people rely on the airport, whether it's from cargo jobs,  
5 airport-related jobs, whatnot, construction jobs,  
6 permanent jobs at the airport. It's critical for the  
7 area, for the region, and we really need a world-class  
8 airport.

9 Los Angeles is one of the greatest cities in the  
10 world, but you would never know it if you flew into LAX.  
11 You'd -- again, you'd be hard-pressed to find a less  
12 impressive airport, less modern. There's no connection  
13 to transit. There needs to be a connection to the  
14 light-rail line and we need a modern LAX. That's it.

15 MR. OSWALD: Thank you very much.

16 So I've got Aaron Broderick, followed by  
17 Maria Sanchez -- and I'll need a Spanish translator for  
18 that, please -- as well as Jose Lobera, who's also  
19 requested a translation, please.

20 Aaron?

21 MR. BRODERICK: Hello. Aaron Broderick, IBEW,  
22 Local 11. An apprenticeship just started for me. My  
23 previous career, I did a lot of traveling with  
24 rock-and-roll bands and I traveled the world, five  
25 continents, 112 countries. I've seen a lot of airports

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1 and Los Angeles alone is a brilliant city, but to fly  
2 into it, it's somewhat tragic.

3 I think modernization of Los Angeles Local  
4 International Airport would be great for the community,  
5 bring us up to date with the rest of the world and  
6 actually give us competitive value. It's fairly  
7 difficult to look at it in its current state and see its  
8 value on an international level. It's really just behind  
9 the times and modernization is key.

10 Thank you.

11 MR. OSWALD: Thank you very much.

12 Maria Sanchez. We'll do simultaneous, three  
13 sentences or so. Thank you, Maria.

14 MS. SANCHEZ: Good evening. My name is  
15 Maria Sanchez. I have two children -- boys and two  
16 girls.

17 MR. OSWALD: Let her translate.

18 MS. SANCHEZ: Good evening. My name is Maria Sanchez  
19 and I am the mother of two boys and two girls. I have  
20 been working for more than six years at the airport for  
21 the company SASIG (sic) and I've lived in the city of  
22 Compton for more than ten years.

23 I am here to support the modernization of the  
24 airport and to let them know that hardworking people like  
25 myself could escape poverty thanks to contractors from

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1 the airport --

2 UNIDENTIFIED SPEAKER: No. Cannot.

3 MS. SANCHEZ: -- people like myself that will not be  
4 able to escape poverty thanks to contractors, the airport  
5 contractors that are violating the law.

6 MR. OSWALD: So if I can just interrupt for a second,  
7 what I'd like to do, since this gentleman knows the  
8 content, maybe he can go ahead and do that, translate for  
9 her. Thank you very much. I'm so sorry.

10 UNIDENTIFIED SPEAKER: It's okay. I'll do it.

11 MR. OSWALD: Thank you. Go ahead.

12 MS. SANCHEZ: Good evening. My name is  
13 Maria Sanchez. I am a mother of two -- two sons and two  
14 daughters. I have more than six years working at the  
15 airport for the company ASIG and I have worked -- I lived  
16 and worked in the LAX area for ten years.

17 I am here to support the modernization of LAX  
18 but to also let you know that there are many of us who  
19 can not escape poverty because of companies like Aviation  
20 Safeguards.

21 It's important to know that -- so that everybody  
22 at the airport can prosper that LAWA needs to do  
23 something to protect the workers against some of these  
24 dirty and irresponsible contractors. I only ask you this  
25 so that everybody can progress, workers and their

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1 families as well.

2 LAX could make new terminals. LAX could fix the  
3 runways, but it is the workers that make the airport  
4 work. If you want to, you could fix the outside and have  
5 a very nice-looking airport, but if you don't fix the  
6 issues with the contractors inside the airport, it will  
7 look beautiful on the outside, but it will be dirty on  
8 the inside.

9 Thank you very much.

10 MR. OSWALD: My next speaker is Jose Lobera, followed  
11 by Brenda Underwood and Robbie Hunter.

12 The upcoming speakers don't need to stand up.  
13 You guys can just wait in your chairs and approach the  
14 mike after the speakers. Thank you.

15 MR. LOBERA: I am Jose Lobera. I am 77 years old. I  
16 have worked at LAX for 32 years and I have done this for  
17 many years to support my family, my children, my wife,  
18 and my grandchildren, who I'm very proud of.

19 I am a resident of the area of LAX and I work  
20 for a company called Aviation Safeguards, but it is  
21 difficult to sustain myself economically. Like all the  
22 workers at the airport, I feel that the modernization of  
23 the airport could be something very positive. I say that  
24 it could be something positive because I am worried that  
25 in the modernization of our airport, there is not enough

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1 consideration to the health and safety and to the  
2 well-being of the workers in the airport.

3 Nonetheless, I am here very faithfully saying  
4 that I am here to -- I am here to express support for the  
5 modernization of LAX, but only if it includes the thought  
6 to the prosperity of us, the workers at the airport.

7 Part of the modernization of LAX should be the  
8 removal of irresponsible contractors who are currently  
9 operating at the airport. Just such is the case of  
10 Aviation Safeguards, which owes 2.5 million dollars to  
11 our medical care. They keep violating the living wage  
12 and they do not listen to federal agents that supervise  
13 work at the airport. As long as you have contractors  
14 like this treating our contract like a joke, we can't  
15 talk about full prosperity.

16 Thank you for your attention. Together,  
17 employers, communities and workers can prosper.

18 Thank you.

19 MR. OSWALD: Thank you very much.

20 Brenda Underwood, followed by Robbie Hunter and  
21 then Michael Mitchell.

22 Just to point out while our speakers are coming  
23 down, I'm sure you picked up this handout up in the  
24 front. It gives you an overview of the open house  
25 stations, but beneath that it also provides information

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1 where you can find the graphics that were in the open  
2 house. You can go to the website underneath the tab  
3 "Resources" and you'll find pdf versions of all the  
4 graphics that were outside in our open house.

5 I just also wanted to point out that we've got  
6 our final open house meeting tomorrow evening back at The  
7 Proud Bird, 5:30 to 8:00 p.m. Again, that address is on  
8 the bottom of our sheet. Tonight is our second of three.

9 Okay. Thank you very much.

10 Brenda?

11 MS. UNDERWOOD: I'm mike shy, but it sounds like  
12 everybody is kind of thinking it's a good thing and it  
13 probably is, but I live in Manchester Square so I'll be  
14 uprooted and that's a scary thing.

15 But in the meantime, I live there and the  
16 airport promised to water the place and I need it to be  
17 rehooked up and watered because it's been three years and  
18 they have not watered it.

19 Also, we have a problem with -- there is 30  
20 people living in vehicles there, which is kind of getting  
21 a little out of control, and we'll see what's going to  
22 happen. Okay. Bye.

23 MR. OSWALD: Thank you very much.

24 Our next speaker is Robbie Hunter, followed by  
25 Michael Mitchell and then I've got Greg Bashem. I hope

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1 that's correct. Thank you.

2 MR. HUNTER: My name is Robbie Hunter. I'm the  
3 Executive Secretary of the Los Angeles and Orange County  
4 Construction Trades Council, and some of the comments are  
5 like to me sad. It's not just about the construction  
6 jobs. It's really the airport itself.

7 LAX as it exists today is dysfunctional,  
8 antiquated. It's unfriendly to the neighbors who  
9 surround it. It's also unfriendly to the aviation  
10 industry.

11 An LAX modernization program will cut congestion  
12 and pollution, runway work will make a safer airport for  
13 aviation, the central location of all the rental cars  
14 will relieve traffic and is a very welcome new fixture to  
15 the airport itself.

16 Eventually, passengers will arrive at LAX by  
17 mass transit instead of automobile. This will make the  
18 neighborhood around LAX more liveable. We would like to  
19 see the transit lines go directly into the airport itself  
20 and we hope that that's going to be added to the plan.

21 The environmental footprint of LAX will greatly  
22 be reduced by the new heating and air-conditioning and  
23 electrical systems that's being installed and we're glad  
24 to see that both from environmental aspects and for  
25 saving on electricity and water.

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1 Thank you.

2 MR. OSWALD: Thank you very much.

3 Next up --

4 MR. MITCHELL: Hello. I'm Michael Mitchell. I own  
5 Mickey's Spaceship Shuttle. We're a small scheduled  
6 service company in LAX.

7 I represent like eight small companies, and we  
8 are very -- we go 35 miles before our first stop out of  
9 LAX. The FlyAway has come in and it's lost 40 million  
10 dollars. It's a complete failure except for the Valley,  
11 and they spent 6 million to make about \$100,000 since  
12 2006 to come downtown, but this is owned really by an  
13 overseas company and that 60 million that actually went  
14 to the company and people paying that could have gone to  
15 local people here that are minorities, Super Shuttle and  
16 Prime Time and taxis and stuff. The FlyAway's a  
17 completely ridiculous thing to have done in the first  
18 place, but everybody says it's losing 40 million and all  
19 this stuff but they can't stop it because it's all agreed  
20 to, which is -- Mr. Lawson says why we shouldn't keep  
21 doing something that's failing and that we have to keep  
22 doing this is ridiculous.

23 But anyway, with the Plan, I'm for Plan  
24 Number 4. Clifton Moore designed that airport  
25 exceptional. He worked in the sewer all the way up to

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1 where he drained the Richter and that's the best design  
2 you've got is Number 4. And even -- see, those big  
3 companies from overseas, they've constantly tried to kick  
4 the little companies out that are local so that they  
5 don't have any competition and this intermodal facility  
6 outside is really part of that. So if you do put the  
7 FlyAway and the Super Shuttle outside, let the small  
8 scheduled companies stay in the CTA and go around because  
9 we go 35 miles out, but the intermodal thing is a  
10 completely ridiculous design in the first place and it's  
11 in order to monopolize it for the overseas Fortune 500  
12 company that's come in here -- that calls itself Coach  
13 USA -- which is actually going to Bay State Worth,  
14 Limited (phonetic) overseas to Ireland, and it's hidden  
15 from you all.

16 Thank you very much.

17 MR. OSWALD: Thank you very much.

18 MR. MITCHELL: Sorry to intrude when you said my  
19 name.

20 MR. OSWALD: No worries.

21 Greg -- I'm hoping I'm getting it right. Greg  
22 Bashem, followed by Michael Kelly and then Elsa  
23 O'Callaghan.

24 MR. BASHEM: And you did pronounce that correct.  
25 Thank you.

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My name is Greg Bashem. I'm with Teamsters Local 986 and our Local represents several hundred workers directly in LAX or at least around the LAX area doing business with LAX. We represent airline pilots. We represent the jet mechanics. We represent the customer service reps. We represent jet refuelers. We represent the shuttle drivers that take customers in and out of the airport, out to the remote parking lots and hotels and stuff. We also represent the people that bring in the food for the flights, so -- and I'm sure I'm forgetting some others. But we also represent construction workers, ready-mix drivers, people that would benefit by this modernization of the airport.

The airline pilots are flying bigger and bigger jets and so those runways need to be expanded. I'm not saying to, you know, encroach on housing and stuff like that. I'm sure it can be done within the boundaries of LAX right now. But they do need to make those runways bigger to support those larger jets. That's a safety concern.

The rental area would help in the congestion that's surrounding LAX by having people go to several different places to drop off cars.

So you want to modernize LAX. That builds jobs. Those jobs will improve the economy in Los Angeles, and

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I'd like to see the Olympics here in 2024. So please do whatever you can to start green-lighting these yellow-lighted projects.

Thank you.

MR. OSWALD: Thank you very much.

Next is Michael Kelly. Again, Elsa O'Callaghan and then Liz Hosmer, please.

MR. KELLY: Good evening. Michael Kelly. I'm the Executive Director for the L.A. Coalition for the Economy and Jobs.

We're strongly committed to working with regional policy makers to produce economic and income growth for this region and we're particularly focused on our cities' chief economic assets such as LAX, the ports, and our transportation network because they are most closely linked to economic growth in today's 21st century economy.

We're strongly supportive of L.A.'s current proposals to maintain and modernize LAX because, first and foremost, they're going to create a better environment with the airport's tens of thousands employees. They can work more safely and efficiently in meeting demands of a rising consumer demand to travel and trade goods and services around the world.

You know, secondly and more specifically, a

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realignment of the North Airfield, the building of the consolidated rental car facility and an automated people mover are all economically justified projects that are going to create tens of thousands of jobs. They're going to support new trade and tourism opportunities, improve the air quality in surrounding communities and throughout the region.

Most importantly, these projects are going to create a safer airport that's going to connect all of us to our family and friends around the world.

As we all know, the majority of the time, LAX is the very first impression of L.A. that California travelers see and experience.

Since roughly three-fourths of the world's purchasing power and almost 95 percent of the world's consumers are outside of the United States, L.A. should be our region's global business card that truly symbolizes our standing as a leading economic opportunity in the 21st century.

Thank you.

MR. OSWALD: Thank you very much.

Next up, Elsa O'Callaghan, Liz Hosmer, and then Kathryn Evans.

MS. O'CALLAGHAN: Hi, everyone. My name is Elsa and I love L.A. except that our airport is super depressing.

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I'm really excited to be here tonight to talk about modernization but specifically to support Alternatives 2 and 9.

An independent study from NASA has shown that no increased separation of the runways in the North Airfield is needed for safety and also maintains that there is no compelling case on safety grounds alone for reconfiguring the airfield. The North Airfield should instead be adjusted, combining Alternative 2 and Alternative 9.

Appendix F2 of the Specific Plan Amendment Study shows that Alternative 2 will reduce delays more than any other alternative. The same appendix displays Alternative 2 creating the highest operational efficiency. The Draft Environmental Impact Study additionally concludes that Alternative 2 would have the lowest environmental impact. These two alternatives will further provide long-term, sustainable and diverse job growth, which is super important, to the residents of the city. Other alternatives do not provide the same investment in long-term jobs.

So, listen, we're all really excited to make these changes to LAX to make it more functional for Los Angeles residents and our visitors. We should really make this change that we are proud of that serves the community the best, creates jobs, and is super awesome.

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1 Alternative 2 and Alternative 9 are the best ways to make  
2 this happen.

3 Thank you.

4 MR. OSWALD: Thank you, Elsa.

5 Liz Hosmer, Scott Evans and then Robert Amano.

6 MS. HOSMER: Hi. My name is Liz and I'm a resident  
7 of Los Angeles.

8 This community wants a modernized, revitalized  
9 LAX that it can be proud of. Alternative 2 combined with  
10 Alternative 9 meets the SPAS goals by combining airfield,  
11 terminal, and transportation improvements.

12 Alternative 2 is a superior alternative in regard to  
13 operational efficiency and it also has the least  
14 environmental impact.

15 An independent study conducted by NASA has shown  
16 that no increased separation of the runways in the North  
17 Airfield is needed for safety.

18 Jobs are very important and LAX is a huge engine  
19 of economic growth in the Los Angeles region. It is  
20 important that the alternatives show and support  
21 long-term, sustainable and diverse job growth.

22 Honestly, an alternative that is too focused on  
23 airfield improvements alone will only create short-term,  
24 construction-focused jobs, not what we need to support in  
25 long-range planning. Please consider Alternative 2

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1 combined with Alternative 9.

2 Thank you.

3 MR. OSWALD: Thank you.

4 Kathryn Evans, followed by Scott Evans and then  
5 Robert Amano, please.

6 Kathryn Evans?

7 While we have a slight pause, I just wanted to  
8 once again remind you tonight is our second of three.  
9 Tomorrow night we're back at the Proud Bird, 5:30 to  
10 8:00 p.m., and we hope that if you need to come back, you  
11 can join us tomorrow night.

12 MS. EVANS: Hello. My name is Kathryn Evans. I'm a  
13 resident of Westchester and I'm a local leader also of  
14 the Neighborhood Council of Westchester/Playa, and a  
15 member of the Airport Relations Committee.

16 I am very excited about the possibility of  
17 modernization and improvement at LAX. After considering  
18 the possible options for improvements, I'm excited to  
19 support a combination of Alternative 2 and Alternative 9  
20 for the following reasons: The combination of  
21 Alternative 2 and Alternative 9 fulfills SPAS goals to  
22 have airfield, terminal, and transportation improvements.

23 The analysis in the DEIR and supporting  
24 documents show Alternative 2 to be superior to all others  
25 in airport operational efficiency. Appendix F2 of the

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1 LAX SPAS report shows that Alternative 2 reduces delays  
2 by 1.7 hours each day compared to the next most efficient  
3 alternative.

4 Analysis in the DEIR also shows Alternative 2 to  
5 be the superior alternative when air quality and  
6 environmental impacts are considered. Only Alternative 4  
7 gets minimal improvements with lower conceptual emissions  
8 than Alternative 2, and Alternative 2 would have lower  
9 aircraft emissions than Alternatives 1, 3, 4, 5, 6 and 7.

10 In addition, Alternative 2 has less than half  
11 the amortized total greenhouse gas emissions than any  
12 other alternative that includes airfield improvements.

13 An independent evaluation by NASA has shown that  
14 no increased separation of the runways is needed to allow  
15 for safe operation of all aircraft at LAX.

16 The review panel said that it does not see a  
17 compelling reason on safety grounds alone for  
18 reconfiguring the North Airfield and that because the  
19 baseline will only pose a risk that is so low, they said  
20 reducing the risk further is of limited practical  
21 importance.

22 Jobs are very important and LAX is a huge engine  
23 of economic growth in the Los Angeles region and it is  
24 important that the alternatives chosen support long-term,  
25 sustainable and diverse job growth. Alternatives 2 and 9

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1 do this.

2 As the first line of welcome to travelers of  
3 Los Angeles, I want to see a modern, state-of-the-art LAX  
4 connected to a leading transportation system so that we  
5 can reclaim the title of the nation's number one  
6 origination/destination and third-busiest airport in the  
7 country. Selecting Alternative 2 and Alternative 9 will  
8 be a solid investment in the Los Angeles regional economy  
9 and result in an airport that we can all be proud of.

10 MR. OSWALD: Thank you very much.

11 Scott Evans, followed by Robert Amano and then  
12 Jonathan Gaat.

13 MR. EVANS: Good evening. My name is Scott Evans and  
14 I am a member of the Westchester LAX community.

15 In my line of work, I travel through LAX at  
16 least once a month. I've seen what works at the best  
17 airports around the world and, frankly, LAX is an  
18 embarrassment. I wholeheartedly support LAWA's efforts  
19 to improve the airport and passenger experience.

20 As a taxpayer and a frequent customer of the  
21 airport, however, I believe improvements should be  
22 efficient and effective use of funds. Alternatives 2 and  
23 9 in the SPAS report will provide the greatest benefit  
24 per dollar spent. According to LAWA's own studies,  
25 moving the North Runway is an unnecessary expense.

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A NASA study Commissioned by LAWA found that the North Airfield is, quote, "extremely safe in its current configuration." Alternative 2's taxiway improvements will make it even safer. LAWA recently released the Environmental Impact Report, which reaches similar conclusions. They found Alternative 2 will have lower aircraft emissions than all other airfield-including alternatives and lower construction emissions than all but Alternative 4, which does simply nothing.

Alternative 2 would even lower aircraft emissions from today's levels, something that no other alternative does. The SPAS report, likewise, shows that Alternative 2, without moving the runways, is the most operational and efficient option, reducing delays more than any other alternative.

We've heard a lot about jobs this evening. Let's be clear. All of these alternatives will create jobs. The question we must ask is, "Which will provide good and sustainable jobs and not just temporary work?" Alternatives 2 and 9 create both short-term and long-term jobs that will better benefit the community and regional economy.

Everybody agrees that LAX needs to be fixed. Doing so will cost billions of dollars and that money needs to be spent wisely. Alternatives 2 and 9 are the

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most operationally efficient and environmentally friendly. They improve safety, they improve the passenger experience, and they create good, sustainable jobs. They are the most effective use of funds and will provide the greatest benefit to the airport, the customer, the community, and the economy.

Thank you.

MR. OSWALD: Thank you.

Robert Amano. Jonathan Gaat.

MR. AMANO: Robert Amano, Executive Director for Hotel Association of Los Angeles, representing the lodging industry here in the Greater Los Angeles region.

How do hotels tie into this formula? The statistics are staggering or sometimes hard to define at least, but what is easily obvious and easy to understand is that our primary facilities at LAX serves as a gateway to the world.

Tourism is a global industry. Not only does the airport provide accommodations to our national and domestic travelers, but we are the doormat, welcome mat for millions of tourists and visitors from around the globe annually, not to mention the tons of air, freight, and cargo which passes through our terminals.

Our hotels remain competitive and rely heavily on major meetings and conventions to fill our rooms;

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hence, the competitive infrastructure required for that is the Convention Center. LAX is no exception to the avid competition, which currently airport facilities locally, nationally, and globally are remodeling or remodeling. Other airports are being constantly upgraded, enhanced facilities off of rebranded strategies and state-of-the-art technology and trend-setting services to attract not only the airline services, but to provide the ambient hospitality experience to the travelers.

It's been almost, I would say, three decades until the recent TBIT changes of modernization. So within that time, you know, LAX has never seen a meaningful upgrade. It's about time. The time is now. Otherwise, we're going to miss the flight into sustaining the City's visibility and vitality as an attractive building and tourism destination.

Thank you.

MR. OSWALD: Thank you.

Jonathan Gaat, followed by Ruben Gonzalez, Richard Lambres.

MR. GAAT: Good evening. My name is Jonathan Gatt. I live in West L.A. and I'm here tonight representing no one other than myself. I use the airport every month and one in every four or five trips is an international trip,

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but I usually come in through the Bradley building. I think obviously there's consensus here tonight -- I think there's a consensus with anyone who's ever used the airport even once that it is time to do something and just about anything from the user perspective would be welcome.

Looking at some of these alternatives, I'm not going to try and say that I'm an expert on these sort of things, but I have seen consolidated rental facilities pop up at airports around the country and around the world. Again, as someone who rents cars at airports, that seems to work pretty well and the hodgepodge of facilities that we have near LAX is not particularly functional. I would welcome more mass transit links to the airport, although I doubt that many of my fellow Angelinos actually know what a bus is.

Now, just in closing, let me just say this: I picked up my mother, who came here from New York last week, at the airport and as we were turning onto Sepulveda heading towards where I live in West L.A., my mother looks over at me and says just out of the blue, "You know, Jon, Kennedy isn't so bad these days." Now, if that's not a wake-up calls, ladies and gentlemen, I don't know what is.

Thank you.

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MR. OSWALD: Thank you very much.

Ruben Gonzalez, Richard Lambres, and then  
Robert Rodine --

MR. RODINE: R-o-d-i-n-e. Rodine.

MR. OSWALD: Rodine. Thank you very much.

I apologize.

Go ahead, Ruben Gonzalez. Excuse me. Proceed.

MR. GONZALEZ: Thank you very much. My name is  
Ruben Gonzalez. I'm with the L.A. Area Chamber of  
Commerce. I am going to read into the record a letter on  
behalf of The Boeing Company.

"Boeing's Commercial Airplane Division  
manufactures the 747-800, the largest  
commercial aircraft built in the  
United States and the longest passenger  
aircraft in the world. The 747-800 has a  
wingspan of 224 feet, 7 inches, and is 250  
feet, 2 inches, in length. This aircraft  
requires a Group VI airfield.

"Currently, Boeing customers have begun  
flying 747-800s into Los Angeles  
International Airport, which is not a  
Group VI airfield, nor is it even a Group V  
airfield in all weather conditions.  
Operating a 747-800 today at LAX requires

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special airfield operational accommodations.  
LAX will continue to see more and more  
747-800s, as Boeing has had a robust sale of  
these aircraft worldwide; and as a major  
international hub, we anticipate a number of  
these aircraft transiting through LAX.

"We recently reviewed a report which  
stated that the Los Angeles International  
Airport generated 37.9 billion dollars in  
direct economic impact to the Southern  
California economy. This underlines the  
importance of commercial aviation from  
international trade to passenger spending.  
Given this background, we have a significant  
interest in the current Specific Plan  
Amendment Study process under way at LAX and  
specifically the reconfiguration of the  
North Airfield.

"Boeing urges Los Angeles Airport and  
City officials to select the necessary  
alternatives under SPAS to make LAX a  
Group V and Group VI airfield in all weather  
conditions. We understand that to do this  
requires moving the northern runway closer  
to existing businesses and residents. We

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trust that the City will work to find a  
balance with these interests while ensuring  
that LAX doesn't lose its position as a  
major international airport able to  
accommodate the world's newest aircraft.

"Sincerely, Shaunta Hyde, Director,  
Global Aviation Policy, Boeing Commercial  
Airplanes."  
Thank you.

MR. OSWALD: Thank you very much.

Richard Lambres, Robert Rodine, and then  
Denny Schneider.

MR. LAMBRES: Thank you. Good evening. Richard  
Lambres. I'm the Managing Director of the Southern  
California Leadership Council. It's a pleasure to be  
here tonight.

Our organization includes membership -- our  
membership includes three former California governors,  
Governors Davis, Deukmejian, and Wilson, and our  
organization is a nonpartisan, nonprofit partnership  
focused on the long-term issues of Southern California,  
specifically issues that affect our economic development,  
job creation, and quality of life. And we have the  
pleasure often that other organizations don't, to be able  
to look at the long term and when you look at the long

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term for our region, it's essential that we have a  
modernized LAX. It's critical.

In fact, there is no business -- it would be  
hard to find a business in our region that is not  
benefited by a highly-effective, well-functioning  
Los Angeles International Airport.

The economic impacts have already been stated  
well by both the labor and business community. I would  
just add a couple thoughts. One is competitiveness. We  
sometimes think in Southern California that certain  
industries are sort of insulated from competitiveness.  
We thought that about film and television and now we find  
production moving throughout the world.

We're currently challenged in the same way with  
our ports. You know, we've had a new challenge because  
of the expansion of the Panama Canal and now we're seeing  
the same thing with air travel and goods movement and  
what is going on with our international airport. So it's  
critically important that we never lose sight of  
competitiveness, and that's where the long-term vision  
comes in. You've embarked on a long-term planning  
process. To your credit, you've done it well. You've  
taken your time. We support your process and we  
encourage you to move rapidly to completion of the  
process and move forward with the modernization that LAX

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1 needs. We know it will be critically important for the  
2 long-term benefit of our region, so thank you.

3 MR. OSWALD: Thank you.

4 Robert Rodine, followed by Denny Schneider and  
5 then David Herbst.

6 MR. RODINE: I'm Robert Rodine. My firm is The  
7 Polaris Group. I'm speaking on behalf of myself and the  
8 Valley Industry and Commerce Association tonight.

9 In an April 2012 survey performed by Travel and  
10 Leisure Magazine, LAX ranked one above the anchor in the  
11 survey for La Guardia Airport. In this ranking of 22  
12 airports, LAX was ranked at the bottom of the list for  
13 impression of safety standards, 21st in terms of security  
14 and check-in and cleanliness, and was generally  
15 characterized as worn out, having outdated  
16 infrastructure, and being overcrowded and subject to  
17 delays. We need to step up and make LAX modernization  
18 our mantra, not just in appearance, but in functionality  
19 as well.

20 In the words of Commissioner Torres-Gil, we  
21 can't forget that we are not just serving the community  
22 and stakeholders around the airport. LAX is serving  
23 20-million-plus residents in Southern California as well  
24 as uncounted millions that depend on us internationally  
25 and this airport is critical as an economic engine.

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1 The June 18, 2012 SPAS report to the DOAC  
2 enumerated seven integrated and stand-alone airfield  
3 alternatives. Alternative Number 5 was noted as being  
4 the one that does the most in meeting all planning  
5 objectives to the greatest extent. Alternative 5 -- it  
6 is my request that Alternative 5 be designated as the  
7 preferred alternative in the Final EIR.

8 Thank you.

9 MR. OSWALD: Thank you very much.

10 MR. RODINE: Thank you.

11 MR. OSWALD: Denny Schneider, David Herbst, and then  
12 Tim McOsker.

13 MR. SCHNEIDER: I'm Denny Schneider speaking to you  
14 as president of ARSAC and we've been working to have the  
15 airport fixed for years. LAX is unfriendly on several  
16 levels: getting to it, getting through it, getting out  
17 of it, and navigating the terminals in between. This  
18 Master Plan is a failure in fully solving those issues.  
19 It does help and we need to get moving, many years ago  
20 and now.

21 Now, I support and we support Alternative 2 for  
22 three reasons: It's the lowest cost, it results in the  
23 most efficient aircraft ground movement, and it is  
24 labeled the environmentally superior. And I can go on  
25 into all the other issues, including the fact that you

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1 need to make sure that the train goes into the airport,  
2 that you have mass transit in general to support this and  
3 avoid gridlock; but most of all, we need the most bang  
4 for our buck and there is never going to be enough money  
5 to do everything and you need to set your priorities.

6 The priorities must be as shown in Number 2,  
7 that you're going to fix the taxiways, that you're going  
8 to fix the terminals, and economic studies show that 80  
9 percent -- I'm sorry -- 8 times better jobs and  
10 improvements by doing those land-side projects.

11 Now, there's no reason why some of those  
12 couldn't have been started many years ago and I just want  
13 to urge you to get going and do it already.

14 I'm not going to harp on the issues of what it  
15 does to the local communities, because it really is a  
16 regional issue and if you do the wrong choices, it's  
17 going to affect everybody and that's why I'm so strongly  
18 telling you that we've dodged a bullet before. With the  
19 earthquakes a couple weeks ago, they were small ones. If  
20 it's a big one, we're in trouble. So, please, get on  
21 with it.

22 MR. OSWALD: Thank you.

23 David Herbst, followed by Tim McOsker and then  
24 Craig Eggers.

25 MR. HERBST: Good evening. My name is David Herbst.

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1 I'm Chief Corporate Officer of Mercury Air Group and the  
2 past chairman of the Board of Westchester LAX Chamber of  
3 Commerce, which is now the LAX Coastal Chamber.

4 I have been a Westchester/Playa del Rey resident  
5 since 1987. Mercury has continually operated at LAX  
6 since 1955. My company will not profit from any decision  
7 that follows the SPAS.

8 I'm here today to speak in support of SPAS and  
9 specifically to ensure that the North Airfield is finally  
10 configured in such a way as to accommodate the next  
11 generation of longer and wider aircraft. It's hard to  
12 believe that LAX doesn't operate as a fully functional,  
13 approved Group V airport under FAA guidelines when there  
14 are Group VI aircraft landing there today. LAX  
15 modernization needs to include its North Airfield.

16 My family and I live in Westchester. We bought  
17 our home. We remodeled it there, knowing we're next to  
18 one of the nation's largest airports. If the North  
19 Airway is moved 350 feet, it stays within the existing  
20 fence line. LAX is not talking about moving a runway to  
21 Manchester Boulevard, and moving a runway within LAX's  
22 footprint to me is not expansion. It's part of  
23 modernization.

24 I have worked hard to make Westchester a great  
25 place to live. I don't want to see LAX stomp out our

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community and I can support SPAS including moving the runway because I know it will not have the devastating effects some claim; and by making a decision, we can finally move on with our lives and allow LAX to have an airport that works for the next 50 years.

Thank you.

MR. OSWALD: Thank you.

Tim McOsker, followed by Craig Eggers and then Stephen Jackson.

MR. MC OSKER: Good evening. Tim McOsker, Mayer Brown law firm. I am an attorney here at downtown. I have no clients or financial interest or business related to this topic. I'm actually here as the past chair of the Central City Association and one of the members of the Coalition, one of the charter members of the Coalition urging you to move forward with modernization of the airport.

I also have had a small role over the years in City government, in that I had the pleasure of serving Mayor Hahn; and before serving Mayor Hahn, I had the pleasure of being in the City Attorney's office being an attorney to Mayor Riordan, and another story here is that the great Mayor Riordan worked very hard on this issue. My boss and friend, Mayor Hahn, worked very hard on this issue, and I really commend you and everyone working with

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Gina Marie Lindsey and with Mayor Villaraigosa to bring this modernization to a reality. It's really, really very important.

Not only from my CCA perspective is this important for economic development and for jobs and to bring our airport and our region forward and to remain, you know, on the cutting edge and on the rim of this -- of the Pacific; but this is also very, very important environmentally. I mean, you are going to be creating, you know, safety with separation of the airport. We're going to be creating opportunities to deal with traffic and congestion and I really commend everyone involved in this effort on behalf of CCA.

I thank you and I urge you to move forward.

MR. OSWALD: Thank you.

Craig Eggers, Stephen Jackson, and then Karen Kanter.

I'll point out that these are the last five speakers for the evening. Those of you who would still like to make a comment, we still have additional comment cards outside at the comments station. If we do finish early, we will resume the open house, allowing you all to go back out, take a look at the information graphics if you like.

So with that, Craig Eggers.

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MR. EGGERS: Thank you. My name is Craig Eggers. I'm a 30-year resident of Playa del Rey. I serve on the Neighborhood Council of Westchester/Playa and I chair our Airport Relations Committee. I'm speaking here today to support both Alternatives 2 and 9. These alternatives will bring billions of dollars in investment to LAX and the surrounding areas of the City of Los Angeles.

Alts 2 and 9 combined are the most affordable, cost-effective design option that ensures the capacity needs of the airport are ready to serve both the economy and tourism well in the future. Alts 2 and 9 will provide substantial permanent benefit, long-term jobs by modernizing the passenger facilities and transport systems.

Alts 2 and 9 do allow for safe airfield operations at LAX and Alt 2 is superior when it comes to the operational efficiency of the airport, and that's per your EIR, as well as demonstrated as the environmentally superior alternative EIR as well. Alt 9 reduces central terminal traffic and creates a consolidated rental car facility on property that's already owned by LAX.

Our Neighborhood Council is hosting a community town hall meeting on September 27th at 7:00 p.m. It will be held in the auditorium at Westchester Enriched Science

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Magnet School, a.k.a. Westchester High School, and our moderator will be Richard Katz.

So today I want to personally invite Gina Marie Lindsey and her LAX team to join us -- that's all of you guys. I'm also extending an invitation to our electeds, including Councilman Rosendahl; Congresswomen Waters and Hahn, Senators Feinstein and Boxer; Supervisors Knabe and Ridley-Thomas; Representatives Lieu and Bradford, and any other concerned elected that might be interested. And we don't want to forget that we are also inviting our Mayoral candidates for their input as well.

We are the first line of welcome through Bradley to Los Angeles and we want to see a modern, state-of-the-art LAX connected to reenriched transport system so we can reclaim the title as nation's number one origination/destination airport, one that as neighbors we can be proud of.

Thank you.

MR. OSWALD: Thank you.

Stephen Jackson, Karen Kanter, Jacqueline Hamilton, and then so far our last speaker is Jim Ouellet.

MR. JACKSON: Thank you.

Good evening. I'm Stephen Jackson. I'm a citizen of over 30 years of Los Angeles. I continue to

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1 play decent to the continuing stream of visitors of  
2 family and friends who keep visiting me.

3 My comments are basically transit related.

4 Direct, dependable transportation to and from LAX is  
5 imperative for this city and it's long overdue. I love  
6 Los Angeles. We're a world-class city with a very busy  
7 airport that's working toward being first class itself.

8 Cars have long been the dominant mode of  
9 transportation and we all know how minor incident on  
10 the 405, the 105, or any connecting freeway can ruin the  
11 best-laid plans. Even on off hours it's not safe. I  
12 once landed at 12:30 a.m., figured a straight shot on the  
13 405 would get me home, but no. There was an incident and  
14 I didn't get home until the middle of the morning.

15 The existing transit options for getting to and  
16 from LAX are much improved over what they were in years  
17 past. The FlyAway buses are excellent, but they are  
18 susceptible to the vagaries of our famous L.A. traffic.  
19 The Green Line avoids traffic, but it only goes near the  
20 airport and the subsequent shuttle vans have to navigate  
21 the same upper- and lower-level terminal congestion as  
22 everyone else.

23 As well, unless one lives near a Green Line  
24 station, connection from other transit routes is  
25 required, making a rail trip from popular destinations

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1 such as Hollywood a multiple-transfer and time-consuming  
2 affair. I doubt that any of this is news to anyone in  
3 this room, nor is the fact that in most of the  
4 world-class cities, there exist very efficient and  
5 reliable transit from downtown to the airports.  
6 New York, Boston, Washington National, Chicago come to  
7 mind. Even smaller cities such as St. Louis,  
8 Philadelphia, and Baltimore have direct rail access to  
9 their airports.

10 I'm going to cut to the chase because I'm  
11 running out of time. All the options for transit  
12 improvements are valid, but whichever one is chosen must  
13 have direct, dedicated rights-of-way into the airport or  
14 they're going to be stuck in traffic like everyone else.

15 Thank you.

16 MR. OSWALD: Thank you.

17 Karen Kanter, Jacqueline Hamilton and our last  
18 speaker, Jim Ouellet.

19 MS. KANTER: Good evening. My name is Karen Kanter  
20 and I'm a long-time resident of Playa del Rey. I'm  
21 imploring LAWA to improve LAX by using Alternative 2.

22 What I think that we heard here tonight is that  
23 there is many, many areas of agreement of what needs to  
24 be done at LAX and the surrounding communities completely  
25 agree that, as Denny says, it needs to be modernized.

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1 What we are adamantly opposed to, those of us  
2 who live in the Westchester/Playa del Rey area, is moving  
3 the northern runway closer to our business and our  
4 residential community. It has been shown over and over  
5 and over and over again that there is no compelling  
6 safety issue to demand the movement of the northern  
7 runway.

8 By insisting that it be proven that there is no  
9 safety issue, we have been called NIMBYs, those of us who  
10 live in the community. Moving the northern runway will  
11 disrupt the Westchester business community, threaten six  
12 neighboring schools, pose a threat to the health and the  
13 mental well-being of the surrounding communities, as well  
14 as subject an already beleaguered community with  
15 additional congestion and traffic, all of this to  
16 accommodate less than two percent of flights envisioned  
17 for years from now. For pointing this out, people keep  
18 calling us NIMBYs.

19 If anyone wonders why the middle class is being  
20 hollowed out in the City of Los Angeles, this is a prime  
21 example. To insist that the northern runway be moved  
22 closer to business and residential communities is an  
23 attack on a middle class neighborhood by an unholy  
24 alliance. We are being told over and over again that our  
25 neighborhood interests in our health, our safety, and our

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1 quality of life doesn't matter and is a testament to our  
2 selfish and unsophisticated interests.

3 Unlike those who are seeking to move the runway  
4 north, none of us who are here to oppose the movement of  
5 the north runway have a financial interest in doing so.  
6 Are community concerns of less value because we are  
7 middle class neighbors instead of hired guns? It has  
8 often been said that your rights end at my nose. There  
9 is simply no compelling reason to further degrade my  
10 community when there are other acceptable alternatives  
11 like Alternative 2.

12 MR. OSWALD: Thank you very much.

13 Jacqueline Hamilton, followed by Jim Ouellet,  
14 please.

15 MS. HAMILTON: I'm Jacqueline Hamilton of the  
16 Tuskegee Airmen organization and other organizations. I  
17 actually moved to the Manchester Square area of LAX  
18 during 2001 and lived there until 2006. At that time, I  
19 was working for a company called Unicom Systems,  
20 Incorporated and moved to the area -- actually, relocated  
21 to the area -- because we were also doing a time share  
22 with a company called Axiom. And working for Unicom  
23 Systems, Incorporated, I worked as a manager, software  
24 engineer, and also a consultant working on merger and  
25 acquisitions projects.

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1 During this time, there was a mural painted at  
 2 LAX with each of the Tuskegee Airmen, which included my  
 3 father and his military group, and this was painted by  
 4 Stan Stokes, commissioned by the City of Los Angeles  
 5 Cultural Affairs Department. I state this because I know  
 6 there were revenues generated in regards to that mural.

7 The problem was that several of us who lived in  
 8 the Manchester Square area were severely victimized by  
 9 crime, which included illegal stalking, harassment,  
 10 theft, mail fraud, identity theft, criminal identity  
 11 theft, and other crimes.

12 During this time, I was in contact with an  
 13 officer by the name of Thomas Wigs (phonetic). I hear he  
 14 is retired from LAPD, so I am seeking other officers who  
 15 handled some of the crimes that we were victimized by in  
 16 living in the Manchester Square area.

17 As the other woman spoke, there were people  
 18 living in cars, trying to reside in empty vacant  
 19 apartment buildings that are now demolished, and we need  
 20 to know the status of all of that. I also speak because  
 21 I was also falsely accused of having a bomb in one of my  
 22 bags in the downtown area in October of 2007. These are  
 23 ongoing crimes that a lot of us are being victimized by  
 24 in living in the Manchester Square area.

25 I think the airport should be redesigned. We

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1 should go ahead with the project, especially in the  
 2 Manchester Square area, because a lot of us were  
 3 victimized and we don't know why.

4 Thank you.

5 MR. OSWALD: Thank you very much.

6 And our final speaker for the evening is  
 7 Jim Ouellet.

8 MR. OUELLET: Good evening. My name is Jim Ouellet.  
 9 I'm a resident of Playa del Rey. I want to encourage  
 10 L.A. World Airports and the City to pursue Alternative 2,  
 11 which would leave the northernmost runway in place but  
 12 improve the exits from the runway.

13 At an estimated cost of 205 million for airfield  
 14 improvements, Alternative 2 is the most cost-effective  
 15 means of improving the efficiency of airfield operations.  
 16 Pursuing Alternative 2 allows L.A. World Airports to  
 17 focus money where it will get the most bang for the buck  
 18 on improving the terminals and moving passengers quickly  
 19 and comfortably on to their destinations.

20 I've been trying to do a little math to figure  
 21 out how many years it will take before improvements and  
 22 efficiency from the various runway alternatives will pay  
 23 off the cost of the improvements. However, in the 30  
 24 summer days since the proposal was released, I've been  
 25 unable to find any place in the 6,000-page EIR where L.A.

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1 World Airports estimates how much money can be saved each  
 2 year by improvements in efficiency under the various  
 3 alternative proposals.

4 LANA's rough estimate of the cost of moving the  
 5 northernmost runway further north runs from 517 million  
 6 to 717 million. Add in a few hundred million for  
 7 rerouting and tunneling Lincoln Boulevard and you could  
 8 be looking at a tab of a billion dollars.

9 The 2010 North Airfield Safety Study by NASA and  
 10 a team of university professors estimated that LAX might  
 11 save 15 million per year in improved operational  
 12 efficiency by moving the northernmost runway further  
 13 north. Recouping 700 million to 1 billion at the rate of  
 14 15 million per year means that moving the runway could  
 15 take 50 to 65 years just to break even. Folks, we don't  
 16 even invest in our children with that kind of time line.

17 MR. OSWALD: Thank you very much.

18 All right. Well, that brings to a close our  
 19 public comments section. I do want to encourage  
 20 everyone, if you haven't already, to submit your written  
 21 comments outside. We have -- outside at the open house,  
 22 we have four different areas where you can fill these  
 23 out. We still have a videographer outside willing to  
 24 take another two minutes from you if you so choose, as  
 25 well as an audio recorder. We also have a place where

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1 you can type in your comments. We are trying to gather  
 2 all those comments as part of the Draft EIR process.

3 I'll also call your attention to our summary  
 4 booklet. The summary booklet just gives you an overview  
 5 of some of the process as well as the alternatives; and I  
 6 think as I mentioned before, we also have -- it's listed  
 7 here, the URLs for the website that has all -- a pdf of  
 8 all the boards that are in our open house.

9 I want to thank you very much for coming out.  
 10 And for those of you who will be joining us tomorrow,  
 11 we'll see you tomorrow at the Proud Bird.

12 Thank you very much for coming. Good evening.

13 (Proceedings concluded at 7:35 p.m.)

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CITY OF LOS ANGELES  
LOS ANGELES INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY 2012  
DRAFT ENVIRONMENTAL IMPACT REVIEW PUBLIC HEARING  
JIM OSWALD, MODERATOR

In the Matter of: )  
 )  
SPECIFIC PLAN AMENDMENT STUDY 2012 )  
 )  
DRAFT ENVIRONMENTAL IMPACT )  
REVIEW )  
 )

TRANSCRIPT OF PROCEEDINGS  
Los Angeles, California  
Wednesday, August 29, 2012

Reported by:  
MARIANNE HAHN  
Hearing Reporter

Job No.:  
B8713CATLAWA

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CITY OF LOS ANGELES  
LOS ANGELES INTERNATIONAL AIRPORT  
SPECIFIC PLAN AMENDMENT STUDY 2012  
DRAFT ENVIRONMENTAL IMPACT REVIEW PUBLIC HEARING  
JIM OSWALD, MODERATOR

In the Matter of: )  
 )  
SPECIFIC PLAN AMENDMENT STUDY 2012 )  
 )  
DRAFT ENVIRONMENTAL IMPACT )  
REVIEW )  
 )

TRANSCRIPT OF PROCEEDINGS, taken at  
11022 Aviation Boulevard, Los Angeles,  
California, commencing at 6:15 p.m.  
on Wednesday, August 29, 2012, heard before  
LOS ANGELES CITY ATTORNEY, LOS ANGELES  
WORLD AIRPORTS, reported by MARIANNE HAHN,  
Hearing Reporter.

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## APPEARANCES:

MODERATOR: Jim Oswald

## PUBLIC SPEAKERS:

Mike Stevens  
Alan Rothenberg  
David Herbst for Richard Riordan  
Pam Stacey  
Ricardo Andrade  
Dan Billy  
Ron Miller  
Alan Rothenberg for Peter Ueberroth  
Nancy-Gene Morrison  
Christina Machado-Essex  
Danna Cope  
Denny Schneider  
George Ivy  
Titus Papan  
Matthew Fleming  
Cecil Carpio  
Michael Mitchell  
Isidro Solorzano  
Kristin Reeg  
Sean Saifi  
Douglas Marmol  
Marcia Hanscom  
Linda Peterson  
Jack Topal  
Ellen Klein  
Jim Ouellet  
Greg Bashem  
Brenda Underwood  
Rusty Roten  
Craig Eggers  
Donna Singh  
William Widener  
Erik Koefoed  
Mike Stevens  
Gregg Aniolek  
Mark Ryavec  
Marco Leal  
Robert Acherman  
Garrett Smith  
Lynne Paxton  
Diane Sambrano

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Los Angeles, California, Wednesday, August 29, 2012

6:15 p.m.

THE MODERATOR: Good evening, everyone. My name is Jim Oswald. And I'm working with the LAWA staff to help facilitate our open houses, and our public meetings.

This is our third meeting. We had our First one last Saturday here at the Proud Bird. Last evening, we were at Central Library in the Mark Taper Auditorium, for Number 2. And this is our Third and final open house and public meeting associated with the Draft EIR for the LAX SPAS project.

Also, I'm very excited that you're here this evening. We've got a great turnout. Our staff has done a great job this evening giving us information at the open sections.

I wanted just to alert you to a couple of items. Number 1, when you came today, you picked up, I hope, a little overview of the open house and public meeting. This provides just an overview of how the boards are organized.

It also provides a very, very important link to the website. That link is in the middle of the page, just below the colored charts. And that link on the website gives you PDF versions of all of the graphics that you see

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here this evening.

So I would encourage you to go to the website and look under the resources tab, and you can download PDFs of all the boards this evening.

Tonight, as I mentioned at the outset, we're here to collect important insights, comments, questions, statements around the Draft EIR. So we're looking tonight to hear from you about what your thoughts are about the Draft EIR.

Responses to those questions and comments will appear in the final EIR. So I hope we can focus our commentary this evening on the Draft EIR.

We have several ways for you to give us those comments. At each of the corners of the room, you saw that there was a comment form. You're welcome to write your comments, questions, issues that you'd like to be addressed as part of this Draft EIR.

Those will be summarized -- or actually written, transcribes directly into the documentation, and responded to, as will any of our video snippets that we collect over in our corner here, audio snippets that we take from you this evening as well. You're also welcome to type comments directly into the computers in the back. All of these comments that we receive will be transcribed and included in the documentation.

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This evening many of you, it looks like about 33, have signed up to speak this evening. Just a couple of ways of proceeding for us tonight, so that we can get the maximum benefit of public comment period. Number 1, please, when I -- I'll call up names. There will be somebody who will be -- who will be speaking. There will be somebody on deck. And I still can't remember. Who -- in baseball, what do we call the guy who's up third?

THE AUDIENCE: In the hole.

THE MODERATOR: In the hole. My father would kill me if he knew I forgot that. In the hole. So I will call up number 1, on deck, and then in the hole. You don't need to come to the mic until I actually call your name. But just so you know where you are in the list of 33 people that we have this evening.

The second thing is everybody will have 2 minutes. The clock behind me will count down. I would just ask that you respect that clock and begin to wrap up your comments as that clicks down to the final seconds. I would appreciate that.

And then Number 3, I hope that we can all afford each other the same dignity and respect that we would hope to receive from everybody else in the room. So I would appreciate no yelling, hollering, anything outlandish, I really don't want to get this evening. This is in the

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spirit of trying to hear the constructive comments about the project so that we can proceed forward with the Draft EIR. That's my job this evening, to ensure that that happens.

We all amenable to that? Sounds good? Nodding heads. Good. Excellent. Thank you.

Okay. So with that, I just want to call up our first speaker. Thank you very much.

If you do need a seat, we do have some up in the front. Please come sit. We're going to be here for at least an hour together. So we have seats up in front if you'd like to sit. I won't call on you. I promise.

Okay. First up, we have Mike Stevens, Councilman from Inglewood, followed by Alan Rothenberg, and Number 3 is Peter Ueberroth and Alan Rothenberg.

MIKE STEVENS: Hello, ladies and gentlemen.

THE MODERATOR: Turn that on, please. Talk amongst yourselves for just one second. Here we go.

MIKE STEVENS: Thank you very much.

Hello, ladies and gentlemen. My name is Mike Stevens. Many of you probably do not remember me, maybe you do, but back about 1993, we fought together when we fought LAX expansion. We were able to push back, then Mayor, Richard Riordan. People in this room, Westchester residents teamed up with El Segundo and Inglewood. And together, we combined, and we were able to stop that plan.

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1 I'm only here tonight to say that I understand  
2 Labor's position, but I also continue to be very sympathetic  
3 to the resident's position, which is that even if you are a  
4 worker, you have to come home sometime. You have to come  
5 home, and you have to have a certain quality of life.

6 I would suggest, as we learned back in the day,  
7 the reason why they measure traffic by mean annual  
8 passengers, it all has to do with transportation. If you  
9 stop the transportation projects, you stop the project  
10 itself, because they must mitigate traffic. They must  
11 mitigate traffic.

12 They measure it not in number of flights, they  
13 measure according to passengers. So that gets into vehicle  
14 trips. So this is something for you to remember. So when  
15 we start talking that, then what are we really talking  
16 about? Well, you have a light rail line that's being  
17 proposed to come across into the airfield and various  
18 alternatives.

19 And I've only glanced at this. I haven't studied  
20 it as I have in the past, but I am going to once again. But  
21 what I must tell is this, if you stop -- if you stop the  
22 transportation project, you will stop this project. You  
23 have the interchange. You have the Sepulveda Boulevard  
24 Project. All these projects, but they come through a  
25 different entity, MTA, SCAG.

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1 When we stopped Riordan, we had to go to all these  
2 different meetings. You have to become more involved.  
3 Now, Alternative 4, of course, is the no  
4 alternative. And that's where basically they do slight  
5 extension on the runway. It was just pointed to me just a  
6 moment ago by one of LAX's staff people.

7 All I want to say to you is this, in closing, you  
8 can -- we together, the people together, if you -- if you  
9 approach this from the direct dynamic, you can stop it. And  
10 the dynamic is, in fact transportation.

11 You have Madison Square Garden (sic), they now  
12 have a light rail line traveling down Prairie in Inglewood  
13 with the Green Line. You stopped that portion of the  
14 transportation project.

15 With that I'm going to conclude, and I like to see  
16 friendly faces here. And thank you very much.

17 THE MODERATOR: Okay.

18 MIKE STEVENS: Yes, I know, sir. I must say this. The  
19 great thing about it is that now I'm an elected official. I  
20 used to be just like you. And I sat there, and there would  
21 be no one to come forward. And I just want you to know that  
22 my office is here to support you in whatever you need.

23 THE MODERATOR: Thank you very much.

24 MIKE STEVENS: Thank you very much.

25 THE MODERATOR: Alan Rothenberg, followed by Peter

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1 Ueberroth.

2 ALAN ROTHENBERG: I'm Alan Rothenberg, President of the  
3 LAWAC from 2005 to 2010, and incoming chair of the LA  
4 Chamber.

5 Modernizing LAX and separating the north airfield  
6 runways 350 feet to the north is essential for safety,  
7 operational efficiency, and competitive reasons.

8 You heard much last night about the NASA Ames  
9 Study, but what you didn't hear was that that study  
10 concluded that safety could be enhanced 40 to 55 percent by  
11 separating the runways.

12 Those academics gratuitously stated that in their  
13 opinion since LAX was already safe, based on their  
14 statistical probability study, it would not be cost  
15 effective to separate the runways.

16 Today is the 7th anniversary of Katrina.

17 (Microphone stopped.)

18 THE REPORTER: I can't hear you.

19 THE MODERATOR: The mic is down.

20 ALAN ROTHENBERG: Today is the 7th anniversary of  
21 Katrina. Years before that disaster, the Army Corps or  
22 Engineers recommended improving the levees. That  
23 recommendation was rejected because it would take a 100-year  
24 flood to overrun the levees, and therefore would not be cost  
25 effective. We know what happened.

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1 (Microphone stopped.)

2 THE MODERATOR: Back up.

3 THE REPORTER: I can't hear you.

4 THE MODERATOR: You know what, I can handle this.  
5 There you go.

6 ALAN ROTHENBERG: I sure would not want to be a member  
7 of the Board of Airport Commissioner or on the City Council  
8 rejecting a chance to enhance safety of LAX by 40 to 55  
9 percent, later having blood on the hands when a subsequent  
10 crash takes the lives of hundreds, maybe thousands of  
11 people.

12 By the way, upon receiving the NASA Ames Report,  
13 the FAA gave a scathing rebuttal of it, and was so incensed  
14 they sent a letter to Mayor Villaragosa admonishing LA --  
15 LAWA to quote, "Reconfigure the north airfield to address  
16 safety risks and to improve efficiency."

17 Also, we heard last night that Alternative 5 would  
18 not be cost effective. I know you know, but I want to  
19 remind you LAX is financially self-sufficient. It doesn't  
20 take a penny from the taxpayers. It operates entirely on  
21 fees paid by airlines, passengers, concessionaires, and  
22 other non-airline revenues.

23 While the Draft EIR contains many options, there's  
24 only one that totally maximizes safety, efficiency, and  
25 competitiveness. Alternative 5 separates the runways 350

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1 feet. Doing nothing dooms LAX to be less safe, antiquated,  
2 inefficient, and uncompetitive for yet another generation.

3 And make no mistake, Alternative 2 means, do  
4 nothing. In face of the unanimous comments that LAX must be  
5 modernized, doing nothing is simply unacceptable.

6 One last item to clarify from last night.  
7 Alternative 5 does not move the boundaries of LAX an inch.  
8 No home or business will be taken. And initial assessments  
9 by the FAA indicate that the RPZ will not require taking any  
10 homes or businesses with the possible exception an HVAC unit  
11 on the top of one office building.

12 Thank you.

13 THE MODERATOR: Thank you very much. Actually, Alan,  
14 I'm going to ask that -- I've got another speaker, so I'm  
15 going to ask you to come up after that, towards the end,  
16 please, because I want to be sure I hear from new folks.

17 Okay. Next, I have David Herbst, followed by Pam  
18 Stacey. And then in the hole, we have Ricardo Andrade.

19 Again, I think the lesson here that we're learning  
20 is just speak away from the mic so we don't --

21 DAVID HERBST: Yes, sir. Good evening. I'm here to  
22 read a statement on behalf of Former Mayor, Richard Riordan,  
23 who apologizes that he could not be here this evening.

24 Mayor Riordan writes, "I love LA, and I'm proud  
25 what our teamwork accomplished during my two terms in

13

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1 office."

2 "One item I was not able to complete was the  
3 modernization of Los Angeles International Airport. Today,  
4 I am pleased to see the positive progress being made on the  
5 new Tom Bradley International Terminal, adding new gates for  
6 the latest large aircraft as well as other improvements that  
7 will enhance the positive experience for visitors to Los  
8 Angeles, but this is not enough."

9 "The Los Angeles City Council approved the LAX  
10 Master Plan in 2004. Now, 8 years later, the approval  
11 process is just getting under way after a long delay of  
12 critically needed additional improvements to LAX."

13 "During my Administration, I proposed a Master  
14 Plan that would take the Airport to 2015, and the clock  
15 continues to tick for much needed LAX modernization."

16 "We still have yet to address moving the north  
17 airfield to accommodate today's modern aircraft, properly  
18 connecting LAX to our City's mass transit, and further  
19 enhancing overall airport safety and security."

20 "We've planned long enough. The time for action  
21 at LAX is now. As the LAX Specific Plan Amendment study  
22 process winds its way through public hearings and action by  
23 our Airport Commission and City Council, I call on our  
24 leaders to make the tough decisions necessary to ensure that  
25 LAX becomes a world class airport through the 21st Century."

14

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1 "Thank you, Mayor Richard Riordan."

2 THE MODERATOR: Thank you very much.

3 Next up I have Pam Stacey, Ricardo Andrade.

4 PAM STACEY: Thank you. Good evening. My name is Pam  
5 Stacey, and I've lived in the Blind Hill area for the past  
6 27 years. I'm here tonight to advocate for the adoption of  
7 Alternative 2 combined with the transportation features of  
8 Alternative 9.

9 I oppose and will move to obstruct adoption of any  
10 other plans, most especially any plan to move the north  
11 runways. Concerning the expansion, people often ask us,  
12 "What did you expect when you moved near the airport?" We  
13 all did our homework. We expected an improvement in  
14 technology and proper management and governance.

15 For the most part, as evidenced by how many of us  
16 have been here for so long, the Airport has been a decent  
17 neighbor. Only Alternative 2 allows that to continue.

18 Everybody in our neighborhood wants to see LAX  
19 revitalized and improved. We, too, use the Airport and know  
20 its ranking, but want it to be 21st century standards, which  
21 include green technology, the promotion of clean air, and  
22 minimal vehicle traffic.

23 Other plans are turning LA into a lumbering,  
24 oversized dinosaur. The people of Southern California and  
25 travelers to LAX deserve better. Most important to me, only

15

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1 Alternative 2 states that there will be minimal or no  
2 increase in pollution.

3 Making the -- moving the runway north will spew  
4 more toxins over more homes, that are even now compromised.  
5 It doesn't improve safety or air traffic to move the runway  
6 north. It does harm people. In only 2 blocks where I live,  
7 there are six cases of cancer, in only 2 blocks.

8 I know the complications, legitimate ones, to  
9 proving cause and effect of cancer clusters, but you all  
10 know, including our elected officials, Council Members and  
11 LAWA power brokers, that increased noise and pollution put  
12 people at greater harm and risk of cancerous toxins.

13 There comes a time when common sense has to rule  
14 while the science weighs in. That time is now, and that  
15 decision has to be Alternative 2.

16 Thank you.

17 THE MODERATOR: Thank you very much.

18 Ricardo Andrade, followed by Dan Billy, and then  
19 Ron Miller.

20 RICARDO ANDRADE: Good evening. My name is Ricardo  
21 Andrade. I'm a Field Representative for Labor's Local 300.  
22 And I'm here on behalf of our Business Manager, Cesar  
23 Pascal. Our 450 members live in the immediate area of the  
24 Airport. And our 9,000 member utilize this airport or work  
25 at the Airport.

16

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1 We stand firm on modernization of this airport.  
2 It's not expansion, it's modernization, and we support it.

3 Thank you.

4 THE MODERATOR: Thank you.

5 Dan Billy, Ron Miller.

6 DAN BILLY: Good evening, ladies and gentlemen. My  
7 name is Dan Billy. I'm with the Operating Engineer Local  
8 12, but I'm here on behalf of our Business Manager,  
9 William C. Wagner.

10 We represent 20,000 members of men and women, and  
11 operate heavy equipment. We're inspectors and also  
12 surveyors. And I'm here -- we've been in support of the LAX  
13 expansion from the beginning. And we're going to continue  
14 to support the modernization of this airport.

15 Thank you.

16 THE MODERATOR: Thank you very much.

17 Ron Miller.

18 RON MILLER: Good evening. I'm Ron Miller,  
19 Representative of Los Angeles/Orange County Building  
20 Construction Trades Council. We represent 140,000 crafts  
21 men and women, many thousands that live around the Airport  
22 in the surrounding area.

23 We are here today so support the specific plan.  
24 LAX as it exists today is dysfunctional, antiquated, and  
25 unfriendly to the neighbors who surround it.

17

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1 Our goal is to make the neighborhoods around LAX  
2 more livable, not less, and to give Los Angeles a truly  
3 world class airport that serves local, national and  
4 international passengers.

5 This specific plan gives us the ability to do  
6 both. LAX modernization is an efficiency program that will  
7 cut congestion and pollution, and will make the Airport  
8 safer. The central location for all car rentals will  
9 relieve traffic and is a long overdue improvement.

10 Eventually many passengers will arrive at LAX by  
11 mass transit instead of the automobile. And we'd like to  
12 see light rail go into LAX. These are improvements that  
13 will help the neighbors of LAX while serving passengers.

14 We all have a stake in reducing environmental  
15 impact of LAX. Our members are currently on the job at the  
16 Airport doing work that greatly reduces pollution. We are  
17 installing new systems for electricity, for heating and  
18 cooling.

19 We'd like to continue our work in making LAX more  
20 efficient and a good neighbor. We support the specific plan  
21 and urge you to move ahead.

22 Thank you.

23 THE MODERATOR: Thank you. Peter Ueberroth.

24 ALAN ROTHENBERG: Obviously, I'm not Peter Ueberroth.  
25 But Peter asked me to read the following.

18

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1 I enthusiastically support the effort to continue  
2 the overall modernization of LAX. For the millions of  
3 visitors who come to Los Angeles each year, our airport  
4 offers the first, and often lasting, impression of our City  
5 now.

6 As a world class City, we should offer our  
7 visitors a world class, unforgettable experience. This was  
8 our goal in 1984 when Mayor Tom Bradley with the successful  
9 modernization effort at LAX. The Olympic Games in 1984  
10 showcased Los Angeles to the rest of the world.

11 At LAX that meant the construction of a new,  
12 state-of-the-art international terminal, renovation of  
13 existing terminals, and construction of a roadway.

14 Simply put, the Olympic Games provided us a  
15 tremendous and rare opportunity to restore LAX as a show  
16 piece.

17 Nearly 30 years later, Los Angeles has once again  
18 embarked on a massive renovation of our landmark airport.  
19 And I salute Mayor Villaragosa, and the Airport Commission,  
20 and the staff for embarking on a multi-billion dollar  
21 program.

22 While the projects are underway, especially the  
23 rebuilding of the Tom Bradley International Terminal, are  
24 greatly important to restoring the passenger experience, I  
25 know it is only the beginning in your efforts to fully

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1 modernize LAX.

2 It is our sincere hope to return the Olympic Games  
3 to Los Angeles for a third time. Preliminary plans are  
4 already underway for such an endeavor.

5 In the consideration most city's bid, decision  
6 makers will look at a city's airport and other  
7 infrastructure as one of the determining factors for  
8 consideration.

9 I encourage and urge you to continue your efforts  
10 to fully modernize LAX now, keeping the Olympic hopes alive.  
11 Once again, we're provided with a tremendous opportunity as  
12 what happened a generation ago when LAX accommodated those  
13 who came to experience the 1984 Olympics.

14 Like then, it will take the courage and  
15 perseverance of our elected officials and the Airport  
16 Commission to make this dream a reality. Now is that time  
17 again.

18 Best regards, Peter Ueberroth.

19 THE MODERATOR: Thank you.

20 Okay. I have Nancy-Gene Morrison, followed by  
21 Christina Machado-Essex, and then Danna Cope.

22 NANCY-GENE MORRISON: I was here Saturday. And this  
23 past Monday, something occurred that has great concern to  
24 me. That's just 2 days ago. Monday afternoon, at  
25 approximately 1:35 p.m., I was driving south on Sepulveda

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1 Boulevard through the tunnel. And as I approached it, the  
2 sign said, "Danger. Fire in tunnel. Do not enter."

3 There was no warning that it was safe to enter. I  
4 called 911 on my cell phone using speaker. And after  
5 talking to 911, going to LAPD, LA Fire, LAX Fire, who had no  
6 idea that there was any sign saying, "Do not enter the  
7 tunnel," I got to LAX PD, who knew there was a malfunction  
8 with the sign, did not have anybody out there, any sign put  
9 up, any change. There is no place after Century Boulevard  
10 to turn to stop to do anything.

11 I am very concerned that you cannot communicate  
12 within the Airport at this point and are doing more. And if  
13 there were a fire in the tunnel, we need to have another way  
14 of doing things, which leads to needing more  
15 regionalization, and using Ontario and Palmdale, and having  
16 more of a regional system going on here.

17 Thank you.

18 THE MODERATOR: Thank you.

19 Christina Machado-Essex, Danna Cope, followed by  
20 Denny Schneider.

21 CHRISTINA MACHADO-ESSEX: My name is Christina  
22 Machado-Essex. I have been resident of Playa del Rey since  
23 1995. And before that, I was brought up in Manhattan Beach.  
24 I lived there for 45 years, and I'm 65 years old.

25 And my family has been in this region of Southern

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1 California and Santa Barbara since the 1700s. And my  
2 ancestors and I have watched the Airport for a long time.  
3 And it has become a monster, and it should not be here.

4 It was also part of the original rancho of my  
5 family, our land grant. And there is plaque there  
6 designating that. But I'm embarrassed to say that the  
7 Airport has got to stop. We do not need the runway moved  
8 350 feet. We just don't.

9 I do agree on Alternate 2 and 9, but not the  
10 moving of the runway. I live in Playa del Rey, and we have  
11 to have our house power washed. We have to wash off all the  
12 soot that is everywhere. And it's just not healthful in  
13 this area.

14 We will never have the marvelous airport that the  
15 Mayor, the Chamber of Commerce, and everyone here wants us  
16 to have unless we start devoting our resources to putting an  
17 airport where there is space for it.

18 The City should follow the lead of Denver and  
19 Dallas and also Sacramento, which put their airports way out  
20 in the country, but now have popular, efficient, and  
21 thriving airports that are well-used. We should do the same  
22 here.

23 THE MODERATOR: Thank you very much.

24 Danna Cope, Denny Schneider, and George Ivy.

25 DANNA COPE: I'm Danna Cope. I've lived in Westchester

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1 for many, many years. I'd like to speak, first, following  
2 up on what Ms. Morrison said, because it goes to the safety  
3 of the of north airfield. And this incident of having a  
4 warning sign -- warning sign malfunction is just one of the  
5 dangers of having the main LA basin airport in such a  
6 congested area.

7 Why wasn't someone, either Caltrans or LAX, at  
8 the site with signs saying that the tunnel actually was  
9 safe. Why wasn't somebody covering the sign up, so that  
10 more people didn't get confused. Why wasn't the warning  
11 sign connection into the LAX Fire Department? They would  
12 be the first responders if there's a fire. This is  
13 ridiculous.

14 They need to develop other airports. And  
15 actually, it's one of the goals as listed in the Draft EIR.  
16 So where is the discussion and outline of plans for Ontario  
17 included in the Draft EIR. And where is the listing of the  
18 many, many jobs in the multitude of trades that would be  
19 created to benefit all of Southern California.

20 The time to develop an alternative airport is now.  
21 Why does LAX want to wait many years from now when LAX  
22 reaches 75. LAX needs to develop better, clearer  
23 communication with other agencies over a jurisdiction and  
24 corrective action that needs to be taken when a structure or  
25 roadway near or adjacent to LAX is malfunctioning.

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1 Where are these safety plans in the Draft EIR? If  
2 LAX does not receive an immediate response from another  
3 agency during an emergency, then LAX should have an action  
4 plan that is launched. Where is this plan in the Draft EIR?

5 As to the alternatives, Alternative 2, plus the  
6 CONRAC and real train service to the whole central terminal  
7 area is the most economic, environmentally safe, and it is  
8 the most efficient.

9 Thank you.

10 THE MODERATOR: Thank you very much.

11 Denny Schneider.

12 DENNY SCHNEIDER: I'm Denny Schneider, President of  
13 ARSAC. I have spoken before, and I've continued to say,  
14 there are only four things that need to be fixed at LAX:  
15 getting to it, getting around it, getting between the  
16 terminals, and getting out of it.

17 Now, with that said, Alternative 2 is our  
18 preferred, because it's the least costly. It is the  
19 superior environmental, and it also the most efficient on  
20 the airfield.

21 Now, some of my friends would like to see the  
22 airfield changed, and I would question whether it's a safety  
23 issue at this time. They can handle those planes adequately  
24 now. The safety study from NASA was from the top academic  
25 experts in the country, handpicked by LAX. And that is not

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1 the issue that we are faced with right now.

2 The issue that we're faced with is we have an  
3 airport that's falling apart. And it needs to be fixed.  
4 Everybody agrees to that, that it needs to be done now, not  
5 yesterday.

6 So in order to get that done, we don't have an  
7 unlimited supply of money. Regardless of whether most of it  
8 comes from the Airport itself, through various sources of  
9 income, or whether it comes from the community, which it is  
10 impacting as a general rule, the fact is that we have to set  
11 our priorities.

12 And if you don't fix the Airport land side first,  
13 you're not going to have any money left to do that. And  
14 you're going to lose out on all the jobs. And you're going  
15 to be telling the people who come here that they don't  
16 matter. So you need to fix that first.

17 Thank you.

18 THE MODERATOR: Thank you very much.

19 George Ivy, Titus Papanas, followed by Matthew  
20 P. -- Fleming, Matthew Fleming.

21 GEORGE IVY: Good evening. My name is --

22 THE MODERATOR: Step up right here.

23 GEORGE IVY: My name is George Ivy.

24 THE MODERATOR: A little closer.

25 GEORGE IVY: My name is George Ivy, and looking around

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1 the room, I realize that I may be speaking as a relative  
2 new-comer to the LAX area. I've lived in Westchester for  
3 over 30 years. I've owned a home here for 30 years. I've  
4 raised two boys here, who are in their 20s now.

5 I've worked within 2 miles of my home here for the  
6 last 30 years. And I travel to and from LAX at least once a  
7 month, and have for the last 30 years, traveling about  
8 2,000,000 miles. So I spend a lot of time in airports.

9 So given that, I understand the traffic and noise  
10 as a busy local resident, who spends a lot of time outdoors.  
11 I understand LAX access and facility improvements are  
12 necessary because I'm a very frequent user of those  
13 facilities.

14 And given that, and the various alternatives that  
15 have been proposed, I -- I want to support Alternative  
16 Number 2, with some additions from Alternative 9.

17 And I believe that combined they fulfill the SPAS  
18 goal of airfield, terminal, and transportation improvements  
19 for the benefits of the travelers and the residents.

20 Obviously, these alternatives will bring lots of  
21 investment, billions probably, to the LAX area and the City  
22 of Los Angeles. I think they are affordable and cost  
23 effective. I'm sure that they'll provide permanent,  
24 substantial, long-term jobs. And I think that's true of any  
25 of the alternatives.

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1 They do -- I believe they do allow for safe  
2 airfield operations, in spite of some of the things I've  
3 heard. They certainly will help the Airport efficiency. I  
4 think they're environmentally the best.

5 And finally, I think the combined -- centralizing  
6 the rental car facilities will certainly help our traffic  
7 problems here.

8 Thank you.

9 THE MODERATOR: Thank you very much.

10 When our speakers approach the mic, I know it's a  
11 little sensitive, but try to get a little bit closer, so  
12 that we can hear you a little bit better. We've got a  
13 couple -- our Court Reporter is keeping notes, and our  
14 Spanish translator has 20 people that she's trying to  
15 communicate to, so she needs to hear it as well. So try to  
16 get a little bit closer if you can.

17 Titus Papanas, Matthew Fleming, and Cecil Carpio.

18 TITUS PAPANAS: Good evening. My name is Titus Papanas,  
19 and I work for Aviation Safeguards for 19 years now. I  
20 personally, and my employer does as well, support the  
21 modernization efforts at LAX, and the projects presented  
22 tonight.

23 Without the Airport, my quality of life would not  
24 be what it is today. Reinvesting in LAX is the best thing  
25 we could do for working families in the region.

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1 I'm also here tonight because of the many false  
2 statements regarding Aviation Safeguards made by the SEIU at  
3 the public hearings. For the record, Aviation Safeguard is  
4 one of the best and safest employers at LAX, otherwise they  
5 would not have one of the lowest employee turnover, rates as  
6 12 percent in the industry.

7 They also have 30 percent of employees that have  
8 been with them in excess of 10 years. SEIU makes false  
9 statements at your hearings and at LA City Council, and  
10 Airport Commission meetings because they can't get anyone to  
11 listen to them. Why? Also, because the SEIU is not a  
12 certified union at LAX or any airport in California.

13 They have no legal or labor law standing at LAX.

14 So SEIU uses their extensive political influence to pressure  
15 companies at LAX to sign collective bargaining agreements  
16 instead of getting the vote of the workers to authorize this  
17 union -- this union.

18 Since the workers at Aviation Safeguard threw out  
19 SEIU, 93 percent of us have since received a pay increase,  
20 and health care of our choosing. Aviation Safeguard has  
21 spent 2 million more in wages each year for the employees,  
22 instead of forced to give that to the union.

23 All full-time employees level at LAX and Aviation  
24 Safeguards and other companies not represented by SEIU make  
25 a guaranteed living wage of \$32,000 per year, otherwise only

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1 \$18,000. Clearly, we have too much union at LAX.  
 2 Thank you.  
 3 THE MODERATOR: Thank you very much.  
 4 Next up I have Matthew Fleming, Cecil Carpio,  
 5 followed by Michael Mitchell.  
 6 MATTHEW FLEMING: Hi. Good evening. My name is Matt  
 7 Fleming. I'm a 22-year resident of Westchester and Playa  
 8 del Rey. I actually graduated at Loyola Marymount, which  
 9 brought me to the area originally.  
 10 I come at this meeting from a unique perspective.  
 11 I'm a resident of 91st Street, which is the first street  
 12 north of the Airport. I actually overlook the runways.  
 13 I have a view out of my kitchen of abandoned  
 14 streets and light posts from the most recent expansion,  
 15 where the promises at that time were, there's going to be  
 16 green belts, it will be beautiful and all will be well.  
 17 Well, I don't have that. I have a view of  
 18 concrete and abandoned streets, and now, being told a big  
 19 commercial building behind my house. So I'm -- I'm a little  
 20 dubious about hearing about promises with expansion.  
 21 Now, that being said, I also, for a living, I fly  
 22 800,000 miles a year. So I do understand the problems at  
 23 LAX and what needs to be done. We need to have a  
 24 consolidated rental car center. It's an embarrassment that  
 25 when people come to this city, they have to be on shuttles,

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1 and go to Airport Boulevard to these awful rental car sites.  
 2 We need that.  
 3 We need a rail into the Airport. We need to  
 4 connect the terminals. It's embarrassing to be on a flight  
 5 at LAX, and someone asks me for help when we land. And say,  
 6 "Well, you dash and get your bags, and then walk three  
 7 terminals around the horseshoe to go to your international  
 8 flight." That's antiquated. That needs to be fixed.  
 9 But anyone that says that moving the runways north  
 10 is not expanding the blueprint of the Airport is a lie. You  
 11 can't tell me that moving the runway that much closer to my  
 12 kitchen is not going to be louder or more of an eyesore.  
 13 It's just not a possibility.  
 14 So I ask for this. We need to have these jobs.  
 15 We need to modernize the Airport. We need to do the  
 16 projects that make sense, but don't move the runways north  
 17 into Westchester and Playa del Rey, because that is -- that  
 18 really is -- that's expansion of the Airport outside of its  
 19 current boundaries. It is.  
 20 It will never ever withstand a court challenge.  
 21 Let's do the projects we can do. Let's make everyone happy  
 22 and get the thing done.  
 23 Thank you.  
 24 THE MODERATOR: Thank you.  
 25 Cecil Carpio, followed by Michael Mitchell, and

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1 then Isidro Solorzano.  
 2 CECIL CARPIO: My name is Cecil Carpio, C-e-c-i-l,  
 3 C-a-r-p-i-o. I'm from Inglewood, 90302. I've lived in the  
 4 same location in my sacred home since 1973. We've talked  
 5 about 1984 and the improvements that came to the Airport.  
 6 Well, I've been around since '73, so I saw the improvements.  
 7 And I also saw that nearly 30 years later, all of Inglewood  
 8 is now impacted by LAX operations.  
 9 Once upon a time there was an Airport noise  
 10 mitigation plan of the 1990s. And it was written in the  
 11 program to protect the community surrounding LAX, especially  
 12 Inglewood. Well, now that is a farcical and impotent  
 13 document that does nothing to constrain the effects of LAX  
 14 operations.  
 15 Once upon time there was big talk about having a  
 16 regional solution to airport congestion. I'm still waiting  
 17 for that thing to happen. I wonder how long that's going to  
 18 take.  
 19 Considering all of the scare talk that we've had  
 20 over the decades, ever since September 9th -- excuse me,  
 21 September 11, it really seems that nothing has changed.  
 22 Let's talk about earthquakes. Let's talk about  
 23 putting all of our eggs in one basket. There's a lot to be  
 24 said about going regional. I'm still waiting. I'm hoping  
 25 it happens.

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1 I have 30 seconds left, a lot more to say. But at  
 2 this point, I'm disgusted with the process. I continue to  
 3 be part of the process. And hallelujah, here we are. Let's  
 4 keep on coming until we die.  
 5 THE MODERATOR: Michael Mitchell, Isidro Solorzano, and  
 6 Kristin Reeg.  
 7 MICHAEL MITCHELL: Hi. I'm Michael Mitchell. I own a  
 8 bus company here. And we go 35 miles out on our first stop  
 9 down in --  
 10 THE MODERATOR: You need to be a little closer.  
 11 MICHAEL MITCHELL: And 75 miles down to the Marine  
 12 Base. And I represent 8 other companies, smaller companies.  
 13 And we schedule services and we go on the loop and pick up  
 14 people and go long distances.  
 15 Now the 98th Street Intermodal Transportation  
 16 Facility, we're completely against that, because if you have  
 17 a Christmas weekend with a million-and-a-half people  
 18 leaving, to take them to another place outside the Airport  
 19 on a bus for them to load the transportation companies is  
 20 completely ridiculous. It will not work. It's completely  
 21 ridiculous.  
 22 Clifton Moore designed the Airport to be able to  
 23 get in there in 45 seconds at a curb, goes to 8 terminals.  
 24 If you have car bomb, and blow up at one terminal, it's not  
 25 as bad as having this place you take everybody. It will

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1 blow up everybody in one spot, just on the sense of  
2 security.

3 But now, we'd like to see the contracts being  
4 given to local people for all these different things that  
5 the Airport does. But, you know, just -- to if you do have  
6 big money making you somehow put this in to pick up people,  
7 please let us stay in the central area and go around and  
8 pick up, because we're going 75 miles out, you know.

9 If you want to super shuttle and them back there,  
10 go ahead and do that. But, you know, it's ridiculous to  
11 spend all that money for the buses to load your bags on one  
12 bus and go out there and unload and get on another vehicle  
13 versus right now, people can hardly find where to go when  
14 it's outside the baggage area, right now, you know. You  
15 have to get on the phone and tell them, "It's right in front  
16 of you."

17 To force them to do that is like Texas, where you  
18 get on and you spend like an hour going around trying to  
19 find out where you're at, you know. So please leave it like  
20 Clifton did it. He did -- he was a genius.

21 Thank you.

22 THE MODERATOR: Thank you very much.

23 Isidro Solorzano, I'm sorry if I'm not saying that  
24 correctly.

25 ISIDRO SOLORZANO: That's correct.

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1 THE MODERATOR: Correct that I was saying it right, or  
2 correct that I'm --

3 ISIDRO SOLORZANO: The first time, you said it wrong,  
4 and then you got it.

5 THE MODERATOR: Thank you very much.

6 ISIDRO SOLORZANO: Okay. My name is Isidro Solorzano.  
7 I live in the City of Paramount. I have worked for a year  
8 at the Airport at an in-flight catering company called Sky  
9 Chef. My coworkers and I make sure the flights leave on  
10 time with all the foods and liquor.

11 It's very important for me to have more good union  
12 jobs at the Airport. We need a modern airport that will  
13 provide jobs with a living wage. This will help the  
14 community and the many people I know that are out of work.

15 Thank you.

16 THE MODERATOR: Thank you very much.

17 Kristin Reeg, followed by Sean Saifi, and then  
18 Douglas Marmol.

19 KRISTIN REEG: Hi. My name is Kristin Reeg, and I'm  
20 the Director for Airports and Food Service for Unite Here  
21 Local 11. And we have 20,000 members that all work in the  
22 tourism industry in different capacities, either in hotels  
23 or in the Airport, or at stadiums.

24 And so tourism in general is very, very important  
25 to our members. And we've, over -- over the years have

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1 really developed a good relationship with a number of  
2 businesses, concessionaires inside the Airport to really  
3 make sure that our members have a great standard of living.

4 And a lot of our members live right in Lennox,  
5 right in Hawthorne, right extremely close to the Airport.  
6 Some of them, I'll be talking to them in their house, and we  
7 stop for a minute and wait for the airplane to go over  
8 before we continue our conversations. It's just a part of  
9 everyone's lives.

10 And people really stay in these jobs for a long  
11 time, because they do provide a very good standard of  
12 living. There are often times the very first person that  
13 people see when get off their plane. They go straight to  
14 that favorite bartender of theirs. Or they go to the  
15 duty-free shop, you know, for a lot of foreign visitors.

16 We're working on a training program now, that, you  
17 know, now that the new west field, that the terminal has  
18 opened up -- that's going to be opening up in Tom Bradley.  
19 A training program so that our members have the new skills  
20 that they're going to need to succeed at the Airport, like,  
21 specialized kinds of cooking. We're not going to just have  
22 grill cooks anymore. We're going to have fine dining cooks  
23 inside the Airport, and a lot of fancy restaurants.

24 And we want to make sure that our members have  
25 those skills, have the language skills that they need,

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1 Japanese, whatever that is.

2 So, you know, we really do support having a modern  
3 airport that is going to provide many more good, quality  
4 jobs. We think just for our industry alone, including  
5 beverage and retail there will be at least 1,000 new jobs  
6 created. And so it's very important to us, and we support  
7 that.

8 Thank you.

9 THE MODERATOR: Thank you very much.

10 Sean Saifi, Douglas Marmol, followed by Marcia  
11 Hanscom.

12 SEAN SAIFI: Good evening, ladies and gentlemen. My  
13 name is Sean. I'm a representative of Central Coast  
14 Shuttle. We're a long distance transportation company that  
15 picks up underneath the green sign at LAX. It says buses  
16 and long distance trans.

17 We leave 6 times a day, 7 days a week. And first  
18 of all, we're here to commend the Committee for organizing  
19 such an event like this. You know, there's an old saying  
20 called NIMBY, not in my backyard.

21 So obviously, for everyone here, these new rules  
22 affect everyone in a different way. For us, I believe -- I  
23 think that modernization is definitely a correct way to go.  
24 I personally love LAX. I want to leave it the way it is.

25 I mean, I go to Dallas. I go to -- and a lot of

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1 other airports. JFK, I hate that train system, where you  
2 have to go to other terminals. I love how it's just a  
3 simple circle that connects the way it is.

4 If there was anything I would like to propose is  
5 maybe -- the car rental agency, I understand that. They do  
6 have the larger buses. They do cause a little bit more  
7 emission. I'm not too sure about that. I'm not a scientist  
8 or anything.

9 They do take up a lot of room. They can go to a  
10 parking lot. That could save up a lot of room. But as for  
11 long distance transportation companies, for them it's just,  
12 you know, travelers are coming from foreign places. For  
13 them it's really hard to communicate to them, where to  
14 stand. So another improvement could be better signage.  
15 That could also help improve -- address the message -- or  
16 addressing the modernization of LAX.

17 And I just want to thank you for your time.

18 THE MODERATOR: Thank you.

19 Douglas Marmol, Marcia Hanscom, followed by Linda  
20 Peterson.

21 DOUGLAS MARMOL: Good evening. My name is Douglas  
22 Marmol. I work as cook at the Airport. I live in  
23 Hawthorne. I have worked at the Airport for 20 years.

24 Many of my coworkers have 30, 40 years working at  
25 the Airport as a bartender, server, cashier. We live in the

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1 neighborhoods near the Airport. Our good union jobs are  
2 very important to us. We support the modernization at LAX.

3 Thank you.

4 THE MODERATOR: Thank you very much.

5 Marcia Hanscom, Linda Peterson, Jack Topal.

6 MARCIA HANSKOM: Good evening. I'm Marcia Hanscom.  
7 I'm representing the Ballona Institute and Wetlands Defense  
8 Fund. And I guess this is really appropriate here at the  
9 Proud Bird, how wonderful that humans have learned to fly  
10 like the birds.

11 We all know, though, that there are public safety  
12 issues related to birds. And LAWA has spent a lot of money  
13 and effort to prevent bird strikes. And so I just want to  
14 point out that a short distance to the north is the Ballona  
15 Wetlands Ecological Preserve. Tens of thousands of birds  
16 winter there at Ballona each year.

17 So it makes no sense to me to move the runway  
18 north toward more birds. It seems to me that that needs to  
19 be studied. I didn't see anything in the Draft EIR about  
20 that. And we all know that that would have some devastating  
21 tragic consequences. So that seems to be important.

22 I also, you know, want to just point out that when  
23 LAX was built, there really were few homes around, not that  
24 much traffic. And I know when I lived in Huntington Beach,  
25 I would -- I never would come to LAX. I would go all the

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1 way to Ontario, which was much further from my home, but I  
2 just didn't want to get in the middle of all this  
3 congestion.

4 So it seems to me that now that we have so much  
5 more density here, that we really do need to start thinking  
6 about moving a larger -- if we're talking about expanding  
7 anything, it should be in another area, like Palmdale.

8 I mean, we have land there, and I just don't  
9 understand why the airlines and LAWA doesn't embrace that  
10 idea. It would mean way more jobs, just add them all up.  
11 And we still would have something livable here.

12 So finally, I'd just like to say that in -- in  
13 conjunction with my comments, I would support Number 2.

14 Thank you.

15 THE MODERATOR: Thank you.

16 Linda Peterson, Jack Topal, Ellen Klein.

17 LINDA PETERSON: My name is Linda Peterson, and I've  
18 been a resident of Playa del Rey for more than 15 years.  
19 First, let me say that I was dismayed by the fact that  
20 you're enumerated project objectives did not include the  
21 goal of regionalization of Southern California air traffic,  
22 which was at least a one time a goal of our current mayor of  
23 Los Angeles.

24 Only an aggressive regional approach to air  
25 transportation will mitigate the safety concerns, noise,

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1 congestion, and air pollution currently impacting all of us  
2 who live and are neighbors of LAX.

3 Only if the air traffic burden can be spread  
4 throughout the Southern California Region will we continue  
5 to see the jobs and economic benefits of a vibrant  
6 transportation system without unduly impacting any one  
7 portion of the Southern California community.

8 I really haven't had enough time to study all of  
9 the objectives, but at this -- all of the proposals, but at  
10 this time I -- I favor Alternative 2, combined with some  
11 aspects of either 8 or 9.

12 Certainly, the consolidated car rental facility  
13 makes sense, because it would remove traffic from the  
14 central terminal area.

15 Alternative 2 appears to be the best for  
16 modernization of LAX. I favor Alternative 2 because I'm  
17 convinced, not by Alan Rothenberg's scare tactics, but  
18 instead by the knowledgeable NASA experts, who studied the  
19 issue and determined that the disruption to local  
20 communities that would be caused by moving the runway north  
21 is completely unnecessary for either safety or operational  
22 efficiency.

23 The cost is also more reasonable in terms of the  
24 cost demolishing terminals or moving runways or putting  
25 Lincoln Boulevard below ground.

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1 I want to tell the Chamber of Commerce and LAWA  
2 that all of us want a first class airport, but you're never  
3 going to have that in the current LAX location, given its  
4 geographic constraints. You're just going to keep applying  
5 band-aid solutions.

6 So bite the bullet and start building somewhere  
7 where there is room for a world class airport.

8 Thank you.

9 THE MODERATOR: Thank you.

10 Jack Topal, Ellen Klein, and Jim Ouellet.

11 JACK TOPAL: Hi. I'm Jack Topal. I'm a member and  
12 director of the Westchester Playa del Rey Neighborhood  
13 Council. When I moved into our house 29 years ago, I knew I  
14 was near the Airport. We're half a block from Manchester  
15 and Foreman. And that was fine with me. Being near the  
16 Airport didn't bother me.

17 Now, it seems like the Airport is getting closer  
18 to me. In the middle of the night, I'll get up, and I'll  
19 turn off my cell phone, because I hear the stewardess say,  
20 "Turn off your cell phone." That's how close we're getting.

21 But seriously, I -- I really believe -- I don't  
22 want a north boundary expansion. And I move for  
23 Alternative 2 and 9. I don't want to have to get up one  
24 night and say, "Okay. I'll have a vegetarian meal when the  
25 stewardess announces that."

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1 So let's have the Airport stay south, not north of  
2 the runway.

3 Thank you.

4 THE MODERATOR: Thank you very much.

5 Ellen Klein, Jim Ouellet, and Greg Bashem.

6 ELLEN KLEIN: Hi. I'm Ellen Klein. I live two -- I  
7 live two short blocks --

8 THE MODERATOR: A little closer, please.

9 ELLEN KLEIN: I live two short blocks north of LAX. I  
10 heard somebody say NIMBY. I don't look at it that way at  
11 all. I -- I run up and down Westchester Parkway. I look at  
12 the Airport. I watch the planes land. I use the Airport.  
13 I sometimes work at the Airport. I'm glad it's nearby when  
14 I have to fly.

15 And I want to be a good neighbor. And I want the  
16 Airport to be a good neighbor to me. I don't see -- I do  
17 believe in modernization. Modernization will give us jobs.  
18 Everybody is talking about jobs. There are plenty of jobs  
19 in modernization, but it doesn't need to be expanded.  
20 What's there needs to be fixed.

21 If we're going to expand, we need to expand  
22 regionally. That's -- they want -- they want -- the  
23 neighbors there want us there. They want airports, not like  
24 here. There is a geographical boundary here. And it just  
25 won't work to go north or in any other direction.

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1 I support Alternative 2. I would like to see less  
2 traffic in the central terminal. It's efficient. It's  
3 environmentally sound. It's cost effective. It has low  
4 impact on the neighborhood. And it will modernize the  
5 Airport, and make it the kind of airport it should be for  
6 tourists coming to LA, and not just a horrible experience  
7 for them.

8 THE MODERATOR: Thank you.

9 Greg Bashem and Brenda Underwood.

10 JIM OUELLET: Good evening. My name is Jim Ouellet.  
11 I'm a resident of Playa del Rey. I want to encourage LAWA  
12 to pursue Alternative 2 and Alternative 9.

13 There's four reasons for that. The first is that  
14 Alternative 2 has the lowest runway north airfield  
15 construction cost.

16 Secondly, it results in the most airfield  
17 efficiency for LAX.

18 Third, it will result in the fewest delays in  
19 getting that work done.

20 And fourth, it will allow more money to be devoted  
21 to improving the experience and moving passengers through  
22 the terminals and onto their destinations.

23 The main reason for moving the runways north is to  
24 accommodate the L3080 made by Airbus. That plane is  
25 failing. It's falling far behind its sales targets. Airbus

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1 set a target for 2012 sales of 30. They only have 26 more  
2 to go.

3 Now, the main reasons that I can tell that LA  
4 Airports gives for expanding the runways north is safety and  
5 efficiency. The north airfield safety study said that the  
6 airfield is extremely safe at -- in its current  
7 configuration, if we do nothing to it.

8 They estimated the risk of a crash. They did  
9 everything they could to pump up the numbers, estimated the  
10 risk of a crash at once every 200 years. Now, 50 percent  
11 improvement that Mr. Rothenberg referred to means we might  
12 have a crash -- I don't know, it's either once every  
13 300 years or once every 400 years, really.

14 The other reason is efficiency. The north  
15 airfield safety study estimated that -- that moving the  
16 runway north by 340 feet might result in cost efficiency  
17 savings of 15 million a year. That's not much.

18 The FAA sent an angry letter refuting the north  
19 airfield safety study. And the academic panel that prepared  
20 it, simply said, "This is bologna," my words.

21 THE MODERATOR: Thank you.

22 JIM OUELLET: Thank you.

23 THE MODERATOR: Greg Bashem, Brenda Underwood, and then  
24 Rusty Roten.

25 GREG BASHEM: Good evening. My name is Greg Bashem.

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1 I'm here as a representative, Teamsters Local 986. We  
2 represent several hundred workers here at LAX; airline  
3 pilots, aircraft mechanics. We represent the customer  
4 service representatives. We represent the jet refuelers.  
5 We represent shuttle drivers. We represent several hundred  
6 workers that directly work at LAX. All of those employee  
7 deserve a modernized revitalized LAX.

8 We also represent construction workers, ready mix  
9 drivers that pour the concrete for these runways, keep them  
10 repaired and everything else. We also have pipeline  
11 construction workers. LAWA needs fuel out to those terminal  
12 areas where those planes sit and drop off passengers. We  
13 represent the jet refuelers.

14 So all of these people would benefit with LAX  
15 being modernized, revitalized. And hopefully, I would hope  
16 that -- that all of these here people here want the best for  
17 LAX.

18 We're here for that. I would -- I looked at all  
19 the different alternatives. I want an alternative that  
20 doesn't displace people that live around the Airport, or at  
21 least minimalizes (sic) that. And I'd also like to have an  
22 airport that I could be proud of, because I do use LAX. And  
23 it's not up to par with other airports that I've traveled in  
24 and out of.

25 So please, you know, it's a -- it's an emotional

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1 opinion, you know, meetings here. We just want to make sure  
2 that LAX gets what it deserves, and that's a face lift.

3 Thanks.

4 THE MODERATOR: Thank you.

5 Brenda Underwood, Rusty Roten, and Craig Eggers.

6 BRENDA UNDERWOOD: Okay. So I live in Manchester  
7 Square. Anybody else here in Manchester Square?

8 AUDIENCE MEMBER: Here you go. Back here.

9 BRENDA UNDERWOOD: Yeah so, we wanted to be  
10 well-informed -- well-informed -- well-informed of how it's  
11 going to work for us, how is our property getting appraised,  
12 how much time do we have to move, are we getting our taxes  
13 rolled over, are we getting moving expenses. We want  
14 private meetings with LAWA about our situation, because we  
15 are actually going to be uprooted and thrown out into the  
16 cold.

17 Although, I really think that an airport should be  
18 outside the city, just like every other city I've been to in  
19 Europe and in the United States. It's kind of, like, right  
20 in the underfoot here.

21 But it is what it is, and you guys are going to  
22 put a car rental, I'm pretty sure about that, in -- on my  
23 house. So can we have meetings with Manchester Square, and  
24 not, you know, with other people who are like, "Yay,  
25 Airport." We want to know where we're going and how we're

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1 going to maneuver through this.

2 Thank you.

3 THE MODERATOR: Thank you.

4 Rusty Roten, Craig Eggers, and then Donna Singh.

5 RUSTY ROTEN: Hi. My name is Rusty Roten. I'm a  
6 business representative for the International Brotherhood  
7 Electrical Workers, Local Union 11. I've been an  
8 electrician for 32 years. And before I became an  
9 electrician, I actually worked out at LAX for Delta Airlines  
10 when I was 17, a summer job. It was pretty cool.

11 Throughout my career, I've had the benefit of  
12 working at LAX. And in following the game plan of  
13 modernizing and always trying to make it a world class  
14 place, a show piece for Los Angeles. And most of Los  
15 Angeles has benefited from it. Los Angeles has grown and  
16 prospered and so have we all.

17 This -- this Airport needs to continue to  
18 modernize, do the right thing. As jet liners get bigger,  
19 you know, we need more room between them so that safety  
20 protocol can be adhered to.

21 And it's an appropriate modernization project as  
22 well as, you know, traffic mitigation, relocating some of  
23 the car rental agencies to a central location. Everything  
24 will better for all. And the money that everybody works and  
25 generates in this Airport goes to and is infused right back

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1 into the local economy. And these are definitely  
2 desperately needed jobs in this time in this economy.

3 Thank you for your time.

4 THE MODERATOR: Thank you.

5 Craig Eggers, Donna Singh, and William Widener.

6 CRAIG EGGERS: My name is Craig Eggers. I'm a 30-year  
7 resident of Playa del Rey. I don't have any financial  
8 interest in this -- in this project. I serve on the  
9 Neighborhood Council for Westchester Playa. And I chair our  
10 Airport Relations Committee.

11 I'm speaking today in support of both  
12 Alternatives 2 and 9. Combined they fulfill the SPAS goal  
13 of airfield, terminal, and transportation improvements, and  
14 that benefits the traveler.

15 These alternatives will bring billions of dollars  
16 of income investment into LAX and surrounding areas in the  
17 City of Los Angeles. Alts 2 and 9 combined are the most  
18 affordable and cost effective design options.

19 Alts 2 and 9 provide substantial, permanent,  
20 long-term jobs. Alts 2 and 9 do allow for safe airfield  
21 operations. And Alt 2 is superior when it comes to airport  
22 operational efficiency and is environmentally superior in  
23 its alternatives in air quality and other at environmental  
24 impacts.

25 Alt 9 reduces central terminal traffic and creates

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1 a consolidated rental car facility on property already owned  
2 by LAWA.

3 Our Neighborhood Council is hosting a community  
4 town hall meeting on September 27th at 7:00 p.m. It will be  
5 held in the auditorium at Westchester Enriched Sciences  
6 Magnate School AKA Westchester High. Our moderator will be  
7 Richard Katz.

8 So today, as yesterday, I want to personally  
9 invite Gina Marie and her team to participate in our town  
10 hall. And I also want to extend the invitation to  
11 Councilman Rosendhal, Congresswomen Waters and Hahn,  
12 Senators Feinstein and Boxer, Supervisor Knabe and  
13 Riddley-Thomas, Representatives Lou and Bradford, and any  
14 other concerned electives.

15 Also, we want to invite the Mayoral candidates to  
16 weigh in on their opinions. We're the first line of welcome  
17 for travelers to Los Angeles. And we want a modern,  
18 state-of-the-art facility, too. One that, as neighbors, we  
19 can be proud of.

20 Thank you.

21 THE MODERATOR: Thank you very much.

22 Donna Singh, William Widener, And Erik Koefoed.

23 DONNA SINGH: Good evening. My name is Donna Singh,  
24 and I live in the Briarwood Town House Complex in Inglewood  
25 I've been there about a year-and-a-half. And when I moved

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1 in, they told me the unit was insulated, and essentially, I  
2 would not hear any noise. Big lie.

3 I was here Saturday, and I listened to everyone  
4 say they had a right to a job, a right to a job with great  
5 benefits, and a right to a living wage. I'm here to tell  
6 you I have a right of peace and quiet. I have a right to  
7 clean air. I have a right to not have to clean my car every  
8 morning before I use it.

9 In the evening, when I go for my evening walk, so  
10 that I can exercise, I have my head phones on and try to  
11 listen to the radio. I can't do it because the jets are  
12 flying overhead.

13 Saturday when I left, I went home. And between  
14 4:03 p.m. and 5:05 p.m., 24 jets flew directly overhead my  
15 unit. That doesn't include the jets that I could hear, but  
16 not see. Those jets are so low, I can almost reach out and  
17 touch them. I can read the letters on some of the wings. I  
18 can tell you which ones were United. I can tell you which  
19 ones were Southwestern (sic). And I can tell you which ones  
20 were American.

21 Now, I know LAX is here to stay. It's not going  
22 anywhere, but you need to do something about the noise. You  
23 need to do something about our right to have clean air and  
24 just being able to live a clean healthy life.

25 Thank you.

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1 THE MODERATOR: Thank you very much.

2 William Widener, Erik Koefoed, and Gregg Aniolek.

3 WILLIAM WIDENER: Yeah, I'm William Widener, Bill  
4 Widener, and I've lived in the area for last 70 years. And,  
5 you know, I've seen a lot of change in LAX. Now, I saw them  
6 speak Saturday, on the issue, but last night at the  
7 Inglewood City Council Meeting, it was brought to my  
8 attention that the Sound Insulation Program isn't going all  
9 that well.

10 You know, it's been 30 years in existence. The  
11 house I live in, we bought 60 years ago, and it's not done  
12 at this time. So if they move the runway, they're going to  
13 have more homes that need to be insulated.

14 So if they're going to move the runway, then they  
15 need to insulate all the houses that are in the sound --  
16 noise barrier area, you know. And if they're going to do  
17 that, before they do that, they need to finish where they  
18 were.

19 I understand this program has been in existence  
20 for 30 years, and if they haven't got done by 30 years -- if  
21 they're going to spend all that money that they're going to  
22 spend, especially to move a runway, then they need to figure  
23 the other expenses, and -- and maybe get some more  
24 contractors, and get in Inglewood and get their job done and  
25 pay for it.

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1 Thanks.

2 THE MODERATOR: Thank you.

3 Erik, please correct my pronunciation of your  
4 name.

5 ERIK KOEFOED: Hi. My name is Erik Koefoed. I've  
6 lived in Playa del Rey for 40 years. Something is wrong.  
7 We don't have the proper vision. I'm thinking -- talking  
8 about transportation. If anybody has traveled to Europe, I  
9 was born in Denmark, if anybody has been at the airport in  
10 Copenhagen, you will see something that phenomenal. Trains  
11 go directly into the airport.

12 When you go outside the airport, what do you see?  
13 New Mercedes, Mercedes Benz, BMWs, Volvos.

14 When you have visitors that come in to Los Angeles  
15 Airport, what do they see? Antique cars with bald tires.  
16 That ought to be changed.

17 I support Alternative 2 and 9. And by all means,  
18 the Airport out at Ontario, that's where we should go.  
19 Let's get the people out of the freeways. Go to Ontario.

20 Thank you.

21 THE MODERATOR: Thank you very much.

22 Gregg Aniolek, Patricia Lyon, and Mark --

23 MARK RYAVEC: Ryavec.

24 THE MODERATOR: Thank you.

25 GREGG ANIOLEK: I'm Gregg Aniolek. I am a resident of

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1 Playa del Rey. And I am also an engineer, so I understand  
2 that LAWA has to put options out for the expansion or -- for  
3 modernization of the airport, but to steal Mr. Rosendhal's  
4 repeated comments, "Modernization. No expansion."

5 Those expansion ideas really should fall off the  
6 table first. If -- to -- we should look to San Francisco  
7 Airport and steal those ideas that they've done. I mean,  
8 it's an excellent airport. Now, I used to live there. The  
9 BART goes right to the airport. It doesn't go into it, it  
10 goes to it. It's got an automated people mover to a  
11 consolidated rental car facility. Very efficient. Vehicles  
12 are off the road. Excellent.

13 And we should also consider Heathrow Airport. If  
14 you look -- someone told these stats and I had to look them  
15 up myself. In 2011, Heathrow has 2 runways, LAX has 4.  
16 Heathrow has got 4.7 square miles, LAX has 5. And they  
17 moved more people in 2011 than the -- than LAX did.

18 Now, granted maybe LAX had more cargo, but  
19 nonetheless, there's some European efficiency that we have  
20 to capitalize on here. It really needs to be considered and  
21 not just the structure of the buildings and everything. So  
22 there's some ideas that really need to be taken from  
23 elsewhere.

24 And as for concerns about the safety, let's face  
25 it, LAX has been very good. Since I've been living here, I

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1 don't know of any major incidents, unlike the Santa Monica  
2 Airport, where hear of a once a year crash.

3 In fact, to my knowledge, LAX has one rescue.  
4 When the Jet Blue airline's wheels rotated, instead of  
5 landing back over in Long Beach, bring it to LAX, a much  
6 more safer place to land.

7 Thank you.

8 THE MODERATOR: Thank you.

9 Patricia Lyon, Mark --

10 MARK RYAVEC: Ryavec.

11 THE MODERATOR: Thank you.

12 AUDIENCE MEMBER: Patricia Lyon passes.

13 THE MODERATOR: She's going to pass? Okay.

14 Mark, thank you for the pronunciation.

15 MARK RYAVEC Mark Ryavec. I'm a resident of Venice.  
16 I'm a former staff to the Los Angeles City Council. I have  
17 a Master's Degree in Urban Studies. And many years ago, I  
18 worked with the Westchester Business District Association on  
19 various planning issues here.

20 I'd like to make two points. One of them is I  
21 don't think that this is -- that this review of alternatives  
22 is adequate without looking at the possibility of growing  
23 Ontario, and thus reducing some of the need for some of the  
24 new facilities that you are identifying here.

25 The other issue I'd point out is that I think that

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1 the this whole process should be an opportunity, not just to  
2 modernize the Airport, but also to significantly decrease  
3 the impact of the Airport on the residents surrounding the  
4 Airport.

5 And I would suggest that there is a possibility to  
6 take Alternative 3 and create out of it an Alternative 10.  
7 And that instead of large commercial developments in the  
8 center of the Airport, where the parking is now located,  
9 that, in fact, when you rebuild terminals -- under 3, when  
10 you rebuild Terminals 1, 2, and 3, you -- by taking some of  
11 this space that's now devoted to parking structures, you  
12 could free up space to provide more gates there.

13 And this would remove the -- this would -- again,  
14 it would also move that inbound -- excuse me, the outbound  
15 runway, which is the one that's creating so much noise in  
16 Playa del Rey, it would move it 300 feet south, so that you  
17 would attenuate to some extent, by doing that, the noise  
18 you're currently hearing at that location.

19 Thank you.

20 THE MODERATOR: Thank you.

21 Marco. And is that Marco Leal?

22 MARCO LEAL: Marco Leal, yes.

23 THE MODERATOR: Thank you.

24 Robert Acherman, and then Garrett Smith.

25 MARCO LEAL: Hi. My name is Marco Leal. I live on

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1 88th Street. I've lived in the Airport area for 26 years,  
2 15 years in my current house. I studied Airport Planning  
3 and Management at Cal State LA. I have a Bachelor's Degree  
4 in that. I work on the Airport. I'm an aircraft mechanic.  
5 I taxi airplanes back and forth. I'm really tired of seeing  
6 this proposal for a centerfield taxiway on the north  
7 complex. We rarely use it on the south side. It will never  
8 get used on the north side.

9 Also, do not relocate runway 6 left 24 right north  
10 even one foot. It's not needed. I haven't had a chance to  
11 totally study every single alternative. You know, on face  
12 value, I kind of like Alternative 2. Let's see. What else?

13 I was looking at the Manchester Square. I heard  
14 some of the residents' concerns there. I personally like  
15 the way the Orlando Airport is geared. They divided not  
16 by -- by arrivals and departures. They divided in four  
17 different ways. One of them being taxi cabs and limousines  
18 on one level; buses and shuttle vans on another level,  
19 rental cars on a another level, and pick up and drop off  
20 cars on a totally different level.

21 Now, if they were saying that, you know, Orlando  
22 isn't used as much as LAX, make it 8 levels. But it needs  
23 to be separated. And that would streamline it completely.  
24 And then, you know, as far as the rail is concerned, that  
25 actually would streamline it even more.

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1 Let's see. I guess that's about all. Another  
2 issue that's really near and dear to my heart is the TSA.  
3 Personally, I'd like to see it abolished. We're never going  
4 to get hit by -- by terrorists. I mean, you're more likely  
5 to get hit by lightning than terrorists. You know, we don't  
6 need to be radiated, and we don't need to be groped. We  
7 should do it like the Israelis do. Airport security is not  
8 that difficult.

9 And that's it.

10 THE MODERATOR: Thank you very much.

11 Robert Acherman, Garrett Smith, and then our last  
12 speaker, Lynne Paxton.

13 ROBERT ACHERMAN: Good evening. My name is Robert  
14 Acherman. I'm a resident of the City of Torrance. In  
15 Torrance, we are impacted by LAX. We have low-flying planes  
16 departing for Asia and Australia flying over our homes late  
17 at night. And during the day, we get them from Long Beach  
18 Airport.

19 Our access in and out of Torrance is also affected  
20 by the gridlock caused by the LAX traffic on the  
21 405 Freeway. I have family and many, many friends here in  
22 Westchester, Playa del Rey, so I'm very sympathetic to  
23 everyone who lives next to LAX.

24 Westchester, Playa del Rey was my home town of  
25 37 years. Westchester, Playa del Rey is a hidden gem in the

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1 City of Los Angeles, a great place to live, work, and play,  
2 a friendly hometown atmosphere where generations of people  
3 have raised their families. I know we'd certainly like to  
4 keep it that way.

5 I have been reading the Draft EIR and SPAS  
6 reports, and I found many problems, but 2 minutes is not  
7 enough time to go through them in detail. These comments  
8 will be submitted later in writing.

9 From what I have read, it's clear that  
10 Alternative 2, combined with some ground access elements in  
11 Alternative 9 would be best for the Westchester, Playa del  
12 Rey community and the flying public.

13 This combination will provide the best cost  
14 benefits for the airlines and the least environmental impact  
15 on the surrounding communities.

16 We can have a safe, secure, and convenient LAX  
17 that does not expand in the surrounding communities of  
18 Westchester and Playa del Rey.

19 Furthermore, LAWA needs to do more to make good on  
20 its legal obligation in the stipulated settlement agreement  
21 to promote regionalization of air services in -- at Ontario  
22 and Palmdale. LAX cannot and should not be the only major  
23 gateway in and out of Southern California.

24 We had an earthquake today in Orange County.  
25 Imagine what one could do to LAX. How will people get in

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1 and out of our region if LAX is closed? This is why we need  
2 more capacity at Ontario and Palmdale now.

3 And I noticed earlier there were some people  
4 reading other people's comments. It would great if those  
5 people would present them in person. It would just make  
6 that more personable.

7 Thank you.

8 THE MODERATOR: Thank you very much.

9 Garrett Smith, and then Lynne Paxton.

10 GARRETT SMITH: Hi. Good evening. I'm one of the --  
11 I'm a resident of Westchester. And want to tell the few  
12 people that are here from labor that we are your allies. We  
13 support a living wage. We support more jobs. And we  
14 support modernization.

15 What we don't support is the runway being moved  
16 forward, encroaching into our neighborhood. LAX has not  
17 been a good neighbor. They haven't -- their contractors  
18 haven't been good employers to you. You know, and -- so you  
19 should be our allies in stopping the runway moving forward.

20 Thank you.

21 THE MODERATOR: Thank you.

22 The last speaker is Lynne Paxton. I just want to,  
23 again, call out, our program ends this evening at 8:00. I  
24 want to be sure that you know that we have these comment  
25 forms. They're in each of the four corners. Please be sure

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1 to fill one of these out, if you'd like.

2 And then, Lynne Paxton.

3 LYNNE PAXTON: Hi. I'm Lynne Paxton. I live in Playa  
4 del Rey. I'm recent here. And I'd just like to state that  
5 I'm against moving the runway to the north, as it will  
6 result in excessive noise spikes affecting the residents  
7 living to the north of the area of the Airport, as I do.

8 The decibel level studies are homogenized in that  
9 they represent an averaging of 24 hours per day, and  
10 365 days per year. They don't address the actual noise  
11 spikes that come about. It's unknown at this point in time  
12 how great those noise spikes will increase if any moving of  
13 the runway to the north takes place. And I'm against moving  
14 any runway to the north.

15 Thank you.

16 THE MODERATOR: Thank you.

17 I did receive one more card, Diane, is it  
18 Sambrano?

19 DIANE SAMBRANO: Sambrano.

20 THE MODERATOR: Sambrano. Thank you.

21 DIANE SAMBRANO: Good evening. I live in the community  
22 called Inglewood. And I think that it's interesting there  
23 were several references made to the beginnings of this  
24 Airport.

25 And as the President of Local Historical Society,

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1 I want everyone to keep in mind that when the airport was  
2 put way down over there, near Airport Boulevard originally,  
3 no one had yet invented the jet aircraft.

4 And it seems everyone seems to forget that little  
5 tiny thing. I also want to remind everyone that the  
6 community that has taken the greatest hit is, in fact, that  
7 community that gave every single one of us the privilege of  
8 aerospace defense. And it is yet these senior adults now  
9 who are being impacted the greatest. It is they who are  
10 losing their quality life, they who are losing their homes.  
11 What a grand insult that is.

12 And yet, I hear other folks say, "How dare you  
13 people who live near the Airport be NIMBYs." Let me correct  
14 that. If you're going to call us names, make sure you call  
15 us the correct name, that would be CIMBY. For all these  
16 many years, the Airport has been "currently" in our  
17 backyard.

18 We are the ones significantly impacted by every  
19 negative thing. And yet, we have stood here and said, "We  
20 always want the employees to be treated fairly." We believe  
21 in regional approach. We believe that in case of some  
22 drama, there should be other airports to take that load.  
23 And LAWA has gone out of its way to not help Ontario or  
24 Palmdale develop as the plans were originally made when  
25 those two were purchased.

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1 So I would hope that we do not expand any further  
2 and destroy any more of the Westchester and Inglewood  
3 communities, but perhaps simply modernize that property  
4 which you already own.

5 THE MODERATOR: I just want to thank all of our  
6 speakers this evening. We are going to stay open for 15  
7 more minutes if you wanted to walk back to the graphics.  
8 Staff is still here. They can answer any additional  
9 questions.

10 Thank you so much. If you sign in, you will be  
11 apprised of the next steps in the process.

12 Thank you very much. We appreciate you coming  
13 out.

14 (End of Public Comments at 7:45 p.m.)

15 (Meeting adjourned at 8:00 p.m.)  
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