APPENDIX
LAX MASTER PLAN EIS/EIR

A. Scoping and Agency Coordination

January 2001

Prepared for:

Los Angeles World Airports
Federal Aviation Administration
U.S. Department of Transportation

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
Joel Rojas	City of Rancho Palos Verdes	30940 Hawthorne Blvd, RPV 90275	(310) 377-6008 (310) 377-9819		
Cordelia Wao	City of Rancho Palos Verdes	30940 Hawthorne Blvd RPV 90275	(310) 377-[illegible] (310) 377-3557		
Emma Schafer	Schafer Communications	515 So. Flower St, #1200 Los Angeles 90071	(213) 623-7427 (213) 627-7712		
Charles Herbertson	City of Hawthorne	4455 W 126th St. Hawthorne, CA 90250	(310) 970-7955 Phone (310) 970-7835 Fax		
Michael Goodson	City of Hawthorne	4455 W. 126th St. Hawthorne, Ca. 90250	(310) 970-7939 (310) 970-7033 Fax		
Dee Hardison	S. Bay Cities COG	3031 Torrance Blvd Torrance 90503	(310) 618-2601 (310) 618-4857		
Ruth Mermen	Citizen of L.A. Venice area	7401 Via Dolce Venice Marina Area, St. 72-A Zip 90292	(310) 827-3936		
Betty Forman	Voice South Bay Area	2201 Pike Ave., Manhattan Bch. Zip 90266	(310) 546-1991		
Lillian Jenkins	Del Rey Homeowners	5205 Ethelodo Ave Culver City CA 90230			

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
Robin Maloney-Rames	Calif Coastal Comm.	200 Oceangate, Long Beach	562-590-5071		
Capt. Dennis Dowd	LAPD Pacific Area	12312 Culver Blvd LA CA 90066	(310) 202-4571		
Lt. Rick Williams	LAPD LAX Section	6E World Way	310-646-[illegible]		
Nancy Heifer	LAX Airport	430-B Sheldon St. El Segundo 90245	322-5726		
Dave Doyle	City of Manhattan Beach	1400 Highland Ave MB 90266	545-5621		
Charles C. Swanson	Swanson Associates	18022 Cowan, Suite 100A Irvine CA 92614	714/[illegible]-2501		
Tony Catalina	" "	" "	" "		

APPENDIX A - AGENCY SCOPING AND COORDINATION

As a requirement of Federal Aviation Administration (FAA) Order 5050.4A, a scoping process must be conducted to provide the opportunity for maximum public and agency participation during the conduct of an Environmental Impact Statement (EIS). The guidelines for conducting such scoping are contained within the Council on Environmental Quality (CEQ) Regulations, 40 CFR 1501.7, which provide that "there shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action. This process shall be termed scoping."

The FAA, in cooperation with the Los Angeles World Airports (LAWA), completed a number of scoping activities to determine the range of issues to be analyzed, and the scope with which they were to be treated in the environmental document. These activities included:

- Filing of a "Notice of Intent/Notice of Preparation of a Joint Environmental Impact Statement/ Environmental Impact Report"
- Early written coordination with Federal, state, and local resource agencies;
- Conducting public scoping meetings and an agency scoping meeting.

Notice of Intent/Notice of Preparation

In accordance with NEPA regulations and CEQA guidelines, a Notice of Intent (NOI)/Notice of Preparation (NOP) for a joint Environmental Impact Statement and Environmental Impact Report was issued on June 11, 1997, initiating the formal scoping process. The notice indicated that the EIS/EIR would address the environmental impacts associated with the preparation of a master plan for airside and groundside facilities at Los Angeles International Airport (LAX). The notice identified the FAA as the Lead Agency responsible for environmental review under NEPA and the DOA (currently LAWA) as the lead agency responsible for environmental review under CEQA.

Coordination Letters

In an effort to identify potential issues associated with the proposed project, coordination letters were mailed to key agencies responsible for resource protection and public policy. The letters, dated June 11, 1997, were sent to 93 federal, state, and local agencies which might have information pertaining to natural and human resources and their locations within the airport environs. The letters requested that written comments be submitted to the FAA/LAWA by July 31, 1997. Forty-seven written comments from various public agencies were received. The FAA reviewed and considered the scoping comments in the development and implementation of the DEIS/EIR. Copies of the FAA/LAWA coordination letter, the list of agency coordination letter recipients, and the written comments received from the various agencies are included in this appendix.

Agency Scoping Meeting

To facilitate the early review of key issues related to the proposed project, four scoping meetings were conducted -- three Public Scoping Meetings and an Agency Scoping Meeting. The Agency Scoping Meeting was held on July 16, 1997, from 9:00 a.m. to 5:00 p.m. The purpose of these scoping meetings was to inform the agencies, public, and interested parties about the proposed LAX Master Plan alternatives, and associated potential environmental issues. The Agency meeting was conducted the morning of Wednesday, July 16, 1997, for federal, state, and local agency representatives. Of the 93 agencies which received the FAA coordination letter, 31 agency representatives attended the July 16, 1997 Agency Scoping Meeting. A copy of the agency scoping meeting registration sheet is included in this appendix. (A discussion of the Public Scoping Meetings is provided in Appendix B, *Public Coordination*.)

June 11, 1997

NOTICE OF INTENT/NOTICE OF PREPARATION
JOINT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

In accordance with the National Environmental Policy Act ("NEPA")[1] and the California Environmental Quality Act ("CEQA")[2], a joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is to be prepared by Federal Aviation Administration (FAA) and Department of Airports of the City of Los Angeles. The EIS/EIR will address the environmental impacts associated with preparation of a master plan for airside and groundside facilities at LAX. The Federal Aviation Administration ("FAA") is the Lead Agency responsible for environmental review under NEPA; the Department of Airports ("DOA") is the Lead Agency responsible for environmental review under CEQA.

The enclosed materials address the Proposed project. These materials are:

- Notice of Intent (NOI) - NEPA Process
- Notice of Preparation (NOP) - CEQA Process
- Notification of Public Scoping Meeting - NEPA/CEQA Process

Issuance of the NOI/NOP by the FAA and DOA, respectively, initiates the formal scoping process[3]. These documents briefly describe the proposed actions, alternatives proposed for consideration and evaluation and the process for submitting oral or written comments.

Comments on the possible environmental impacts of the proposed project are invited.

---

1 42 U.S.C. 4371 et. seq.; NEPA regulations: 40 CFR §§ 1500.1-1508.28.

2 PRC §§ 21000 et. seq; State CEQA Guidelines: 14 Cal Code Regs §§ 15000 et. seq.

3 NEPA requires a formal scoping process for each EIS (40 CFR § 1501.7 (a)(b)). CEQA encourages early public consultation as part of the draft EIR scoping process (14 Cal Code Regs §§ 15082, 15083).

P.O. Box 92216, Los Angeles, California 90009-2216 · (310) 646-5252 · FAX (310) 646-0523

U.S. Department
of Transportation
Federal Aviation
Administration

Western-Pacific Region
Airports Division

P. O. Box 92007
Worldway Postal Center
Los Angeles, CA 90009

Text of Notice of Intent to Appear in the *Federal Register* on June 11, 1997

DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Intent to Prepare an Environmental Impact Statement and hold Scoping Meetings For Los Angeles International Airport, Los Angeles, California.

AGENCY: Federal Aviation Administration

ACTION: Notice to hold three (3) public scoping meetings and one (1) Governmental and Public Agency scoping meeting.

SUMMARY: The Federal Aviation Administration (FAA) is issuing this notice to advise the public that an Environmental Impact Statement will be prepared for development recommended by the Master Plan for Los Angeles International Airport, Los Angeles, California. To ensure that all significant issues related to the proposed action are identified, three (3) public scoping meetings and one (1) governmental and public agency scoping meeting will be held.

FOR FURTHER INFORMATION CONTACT: David B. Kessler, AICP, Environmental Protection Specialist, AWP-611.2, Planning Section, Airports Division, Federal Aviation Administration, Western-Pacific Region, P.O. Box 92007, World Way Postal Center, Los Angeles, California 90009-2007, Telephone: 310/725-3615. Comments on the scope of the EIS should be submitted to the address above and **must be received no later than Thursday, July 31, 1997.**

SUPPLEMENTARY INFORMATION: The Federal Aviation Administration (FAA) in cooperation with the city of Los Angeles, California, will prepare an Environmental Impact Statement for future development recommended by the Master Plan for Los Angeles International Airport (LAX). The need to prepare an Environmental Impact Statement (EIS) is based on the procedures described in FAA Order 5050.4A, *Airport Environmental Handbook*: LAX is a commercial service airport located within a standard

metropolitan statistical area and the proposed development includes construction of new runway(s) capable of accommodating air carrier aircraft requiring FAA approval of the Airport Layout Plan, the area around the airport contains non-compatible land uses in terms of aircraft noise; and the proposed development is likely to be controversial.

The city of Los Angeles, pursuant to the California Environmental Quality Act of 1970 (CEQA) will also prepare an Environmental Impact Report (EIR) for the proposed development. In an effort to eliminate unnecessary duplication and reduce delay, the document to be prepared, will be a joint EIR/EIS in accordance with the President's Council on Environmental Quality Regulations described in 40 Code of Federal Regulations Sections 1500.5 and 1506.2.

The Joint Lead Agencies for the preparation of the EIR/EIS will be the Federal Aviation Administration and the city of Los Angeles, California.

The following master planning development concepts and the No Action Alternative are proposed to be evaluated in the EIR/EIS as described below:

CONCEPT 1:

- Construction of a new 6,000 foot long runway along the northern border of the airport.
- Relocation to the south and extension of Runways 6L/24R and 6R/24L to lengths of 10,000 and 12,000 feet respectively.
- Relocation to the south and extension of Runway 7R/25L to 12,000 feet in length.
- Terminal Building Expansion and associated terminal area improvements including adding 100 narrow body equivalent aircraft gates.
- Reduction of the ancillary facilities area to approximately 228 acres and relocating the fuel farm to an on-airport site located at Imperial Highway and Sepulveda Boulevard.
- Expansion of air cargo space to approximately 4.8 million square feet.
- Acquisition of approximately 220 acres of land.

CONCEPT 2:

- Construction of a new 6,000 foot long runway along the northern border of the airport.
- Relocation to the east and extension of Runways 6L/24R and 6R/24L to lengths of 10,000 and 12,000 feet, respectively.
- Relocation to the south and extension of Runway 7R/25L to 12,000 feet in length.
- Construction of a new 6,000 foot long runway along the southeastern border of the airport.
- Terminal Building Expansion and associated terminal area improvements including adding approximately 131 narrow body equivalent aircraft gates.

- Reduction of ancillary facilities area to approximately 228 acres and relocating the fuel farm to an off-airport site away from residential land uses.
- Expansion of air cargo space to approximately 4.7 million square feet.
- Acquisition of approximately 446 acres of land.

CONCEPT 3:

- Construction of a new 6,000 foot long runway along the northwestern border of the airport into the LAX dunes/preserve area.
- Relocation to the east and extension of Runway 6L/24R to a length of 10,000 feet
- Relocation to the south and extension of Runway 6R/24L to a length of 12,000 feet.
- Relocation to the south and extension of Runway 7R/25L to 12,000 feet in length.
- Construction of a new 6,000 foot long runway along the southeastern border of the airport.
- Terminal Building Expansion and associated terminal area improvements including adding approximately 131 narrow body equivalent aircraft gates.
- Reduction of ancillary facilities area to approximately 228 acres and relocating the fuel farm to an off-airport site away from residential land uses.
- Expansion of air cargo space to approximately 4.7 million square feet.
- Acquisition of approximately 400 acres of land.

CONCEPT 4:

- Realignment and extension of the existing runway at Jack Northrop Field/Hawthorne Municipal Airport to 6,000 feet in length to accommodate commuter aircraft operations.
- Relocation to the south and extension of Runway 6L/24R to a length of 10,000 feet
- Relocation to the south and extension of Runway 6R/24L to a length of 12,000 feet.
- Terminal Building Expansion and associated terminal area improvements including adding approximately 131 narrow body equivalent aircraft gates.
- Reduction of the ancillary facilities area to approximately 228 acres and relocating the fuel farm to an on-airport site located at Imperial Highway and Sepulveda Boulevard.
- Expansion of air cargo space to approximately 4.8 million square feet.
- Acquisition of approximately 500 acres of land.

NO ACTION ALTERNATIVE:

This alternative does not include any projects that would increase the airport's passenger or airfield capacity, but does include the following minor development items:

- Extension and minor improvements to existing taxiways.

- Remodeling and minor expansion of the existing Tom Bradley International Terminal.
- Construction of additional remote gates/aircraft ramp area on the west side of the airport.
- Minor expansion of public parking lots.
- Minor expansion of air cargo space.

Comments and suggestions are invited from Federal, State and local agencies, and other interested parties to ensure that the full range of issues related to these proposed projects are addressed and all significant issues are identified. Written comments and suggestions concerning the scope of the EIS/EIR may be mailed to the FAA informational contact listed above and **must be received no later than Thursday, July 31, 1997.**

PUBLIC SCOPING MEETINGS: The FAA will hold three (3) public and one (1) governmental agency scoping meetings to solicit input from the public and various Federal, State and local agencies which have jurisdiction by law or have specific expertise with respect to any environmental impacts associated with the proposed projects. The first two public scoping meetings will be held on Saturday, July 12, 1997, at the Proud Bird Restaurant, 11022 Aviation Boulevard, Los Angeles, California 90045. The first meeting will be held from 8:00 am to 12:30 p.m. Pacific Daylight Time (PDT). The second meeting will be held beginning at 2:00 p.m. to 7:00 p.m. (PDT). The third public scoping meeting will be held on Tuesday, July 15, 1997, from 5:00 p.m. to 9:00 p.m. (PDT) at the Hawthorne Memorial Center, 3901 El Segundo Boulevard, Hawthorne, California 90250. A scoping meeting will be held specifically for governmental and public agencies on Wednesday, July 16, 1997, from 9:00 a.m. to 5:00 p.m. (PDT) in the Board Room of the Los Angeles Department of Airports Building, Los Angeles International Airport, 1 World Way, Los Angeles, California 90009.

Issued in Hawthorne, California on Monday, June 4, 1997.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF PREPARATION

TO:	RESPONSIBLE OR TRUSTEE AGENCY	FROM:	LEAD AGENCY City of Los Angeles Dept. of Airports
	ADDRESS (Street, City, Zip)		ADDRESS (Street, City, Zip) Los Angeles Department of Airports LAX Master Plan 1 World Way, Room 218 Los Angeles, CA 90045-5803

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

PROJECT TITLE	CASE NO.
Los Angeles International Airport (LAX) Master Plan	

PROJECT APPLICANT, IF ANY
Federal Aviation Administration
City of Los Angeles Department of Airports

The City of Los Angeles Department of Airports and the United States Federal Aviation Administration will be the Lead Agencies and will prepare an Environmental Impact Report/Environmental Impact Statement for the project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR/EIS when considering your permit or other approval for the project.

The project description, location and the probable environmental effects are contained in the attached materials.

[x] A copy of the Initial Study **is** attached.

[ ] A copy of the Initial Study **is not** attached.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 45 days after receipt of this notice.

Please send your response to Mr. Jack Graham at the address of the Lead Agency as shown above. We will need the name of a contact person in your agency.

Note: If the Responsible or trustee agency is a state agency, a copy of this form must be sent to the State Clearinghouse in the Office of Planning and Research, 1400 Tenth Street, Sacramento, California 95814. A state identification number will be issued by the Clearinghouse and should be thereafter on all correspondences regarding the project, specifically on the title page of the draft and final EIR/EIS and on the Notice of Determination.

SIGNATURE	TITLE	TELEPHONE NUMBER	DATE
Philip Depoian	Deputy Executive Director	(310) 646-7690	6/11/97

Table of Contents

List of Tables

List of Figures

1.1 ATTACHMENT TO NOTICE OF PREPARATION

1.1.1 BACKGROUND TO THE MASTER PLAN PROCESS

In 1981 the Los Angeles International Airport (LAX) Interim Master Plan was adopted as a short term, general guide for coordinating the development of airport facilities with that of the surrounding communities. The study considered future demand issues and called for the initiation of a long range plan to address capacity requirements at LAX.

In 1986 the Los Angeles Department of Airports (LADOA) initiated preparation of environmental documentation to evaluate projected growth of LAX to the year 2000. Upon review of this draft document, the City Planning Department recommended that the capacity issue at LAX would be more properly resolved through preparation of a new master plan.

Based on this recommendation, the LAX Master Plan was initiated to address the long term issues of airport capacity, ground access, and environmental impacts. The ongoing LAX Master Plan is being developed in three phases. Phase I included detailed data gathering regarding the existing airport and environmental conditions as well as the development of aviation demand forecasts through the year 2015. Phase II involved establishing facility requirements to accommodate projected future activity levels and an iterative concept development process to evaluate potential options. During this process over 30 different airport development concepts were considered and evaluated based on technical, safety, environmental, and policy considerations. Phase III will include the environmental impact assessment and review processes, as well as the development of an airport layout plan and implementation plan.

The EIS / EIR which will be prepared for the Master Plan will evaluate numerous project components including, but not limited to: one or two additional 6,000 foot runways; relocation/extensions of existing runways; improved taxiway system; new passenger terminal facilities west of Tom Bradley International Terminal connected by an automated people mover system; expanded air cargo facilities; improvements to the ground access system including connections to the regional highway and transit networks; and the relocation of ancillary uses and other support facilities.

1.1.2 PURPOSE OF THE NOTICE OF PREPARATION

The California Environmental Quality Act (CEQA) sets forth a series of procedural requirements. One such procedural requirement is the Notice of Preparation (NOP) which is used to help determine the scope of an Environment Impact Report (EIR) as well as to foster intergovernmental coordination. The NOP provides a brief description of the project and its potential environmental impacts and the address where written comments can be sent. The Lead Agency must prepare and distribute an NOP after the decision is made to prepare an EIR. The NOP solicits participation

in determining the scope of the EIR from responsible agencies (public agencies which may have discretionary approval power over the proposed project), trustee agencies (agencies with jurisdiction over a natural resource affected by the project which are held in trust for the public), local governments and regional agencies, as well as private individuals and organizations which may be concerned with the environmental impacts of the project. This NOP is intended to inform public agencies, private organizations and individuals of the intent of Los Angeles Department of Airports (LADOA) to prepare a draft EIR on the proposed LAX Master Plan. The NOP solicits comments regarding the proposed scope and content of the environmental, economic and social studies and information that will be included in the EIR. The NOP is being prepared in accordance with the State CEQA Guidelines and City of Los Angeles CEQA Guidelines.

The Federal Aviation Administration (FAA) is a Co-lead agency on the proposed LAX Master Plan project. The FAA has prepared a Notice of Intent (NOI) pursuant to the requirements of the National Environmental Policy Act (NEPA). The NOI, like the NOP, solicits comments from cooperating agencies and the public regarding the scope and focus of the environmental analysis to be conducted on the proposed project. Upon receipt of comments on the NOI and NOP respectively, the FAA and LADOA will consider those comments and prepare a joint draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The EIS/EIR will analyze the potential adverse impacts that could result from implementation of the project. The draft EIS/EIR will also identify potential mitigation of those impacts and analyze possible alternatives to the proposed project which could lessen or avoid adverse impacts while still achieving the basic project objectives. All references in this NOP to the EIR should be considered to refer to the joint EIS/EIR.

1.1.3 PROJECT AREA

LAX is located in the southwest portion of Los Angeles County adjacent to the Santa Monica Bay and 14 miles southwest of downtown Los Angeles. (see Regional Location Map, **Figure 1.1**). Reference point coordinates for the Airport are 33° 56' north latitude by 118° 24' west longitude.

LAX encompasses 3,550 acres within the City of Los Angeles and is situated at an average elevation of 125.5 feet above mean sea level. LAX constitutes a large industrial district presently made up of the following facilities and uses:

- Four runways
- 3.9 million square feet of domestic and international terminal space including 145 narrow body equivalent gates
- 200 acres of cargo area including 1.9 million square feet of building space
- 384 acres of ancillary space including 30 acres of Los Angeles Department of Airports (LADOA) administrative and support facilities

- 21,930 parking spaces
- 900 acres of open space including 302 acres of LAX/El Segundo Dunes.

Within the five-county Los Angeles Metropolitan Area of Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties there are currently six commercial jet service airports -- LAX, John Wayne/Orange County (SNA), Ontario (ONT), Burbank (BUR), Palm Springs (PSP), and Long Beach (LGB); two regional commuter service airports, Oxnard Point Mugu (OXR) and Palmdale (PMD); and 48 general aviation airports. Additionally, there are eight military bases -- some of which, such as Southern California International (VCV) and San Bernardino International (SBO), have been converted to civilian or joint civilian use airports and others such as El Toro (NZJ) and March Air Force Base that may be converted in the future.

1.1.3.1 SURROUNDING LAND USES AND CONSTRAINTS

LAX is bounded on the north by the communities of Westchester and Playa del Rey; on the south by Imperial Highway, the City of El Segundo, and the community of Del Aire; on the east by Aviation Boulevard, the City of Inglewood, and the community of Lennox; on the west by Vista del Mar Street, Dockweiler State Beach, and the Santa Monica Bay.

The communities surrounding the Airport comprise a diverse mix of land uses. The predominant land use to the north and south is residential; to the east, primarily commercial/industrial. Generally, this tends to be low density single-family residential development, supported by a full range of neighborhood and regional commercial, and institutional uses. There are large areas of mixed single-family and multi-family uses in the City of Hawthorne and the unincorporated county area of Lennox. Concentrations of multi-family residential areas are located in the cities of El Segundo and Inglewood and the southwestern portion of Westchester, Playa del Rey area of the City of Los Angeles. Commercial uses generally occur as strip development along the major streets. Industrial uses are clustered adjacent to LAX particularly within the City of El Segundo. Institutional and public land uses are scattered throughout the entire area.

Below are the primary communities surrounding LAX by area:

North/Northeast:

The City of Los Angeles encompasses 302,596 acres with a 1990 resident population of 3,485,398.[1]

---

[1] 1990 consensus data is the most current accurate population data available at this time.

- The Westchester/Playa del Rey area of the City of Los Angeles directly borders LAX property to the north, west, and east. This area encompasses 9,281 acres with a 1990 resident population of 60,000.

South/Southeast:

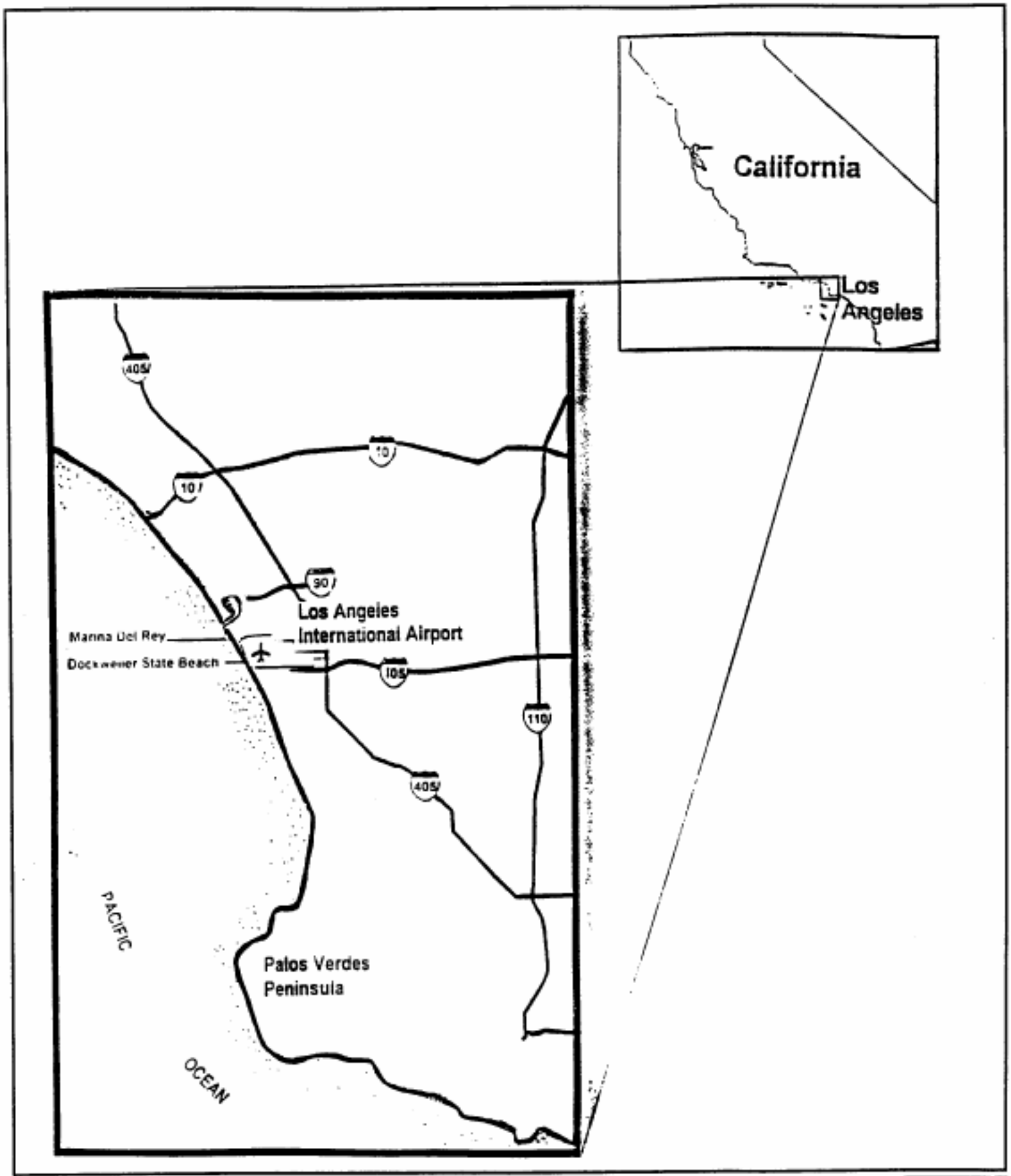
- The City of El Segundo is located adjacent to the southern boundary of LAX. El Segundo encompasses 3,495 acres with a 1990 resident population of 15,223.
- The City of Hawthorne is located approximately one mile southeast of LAX. Hawthorne encompasses 2,752 acres with a 1990 resident population of 71,349.
- Del Aire is an unincorporated area of Los Angeles County located directly south of LAX, east of Aviation Boulevard, between the City of El Segundo to the west and south, and the City of Hawthorne to the east. Del Aire encompasses 530 acres with a 1990 resident population of 3,359.

East:

- The City of Inglewood is located adjacent to the east boundary of LAX, partially beneath the flight approach paths for LAX. Inglewood encompasses 5,664 acres with a 1990 resident population of 109,602.
- Athens is an unincorporated area of Los Angeles County located 3.5 miles east of LAX. Athens encompasses 1,182 acres with a 1990 resident population of 39,213.
- Lennox is an unincorporated area of Los Angeles County located directly east of the LAX south runway complex. Lennox encompasses 800 acres with a 1990 resident population of 22,757.

West/Dunes/Coast:

- West and southwest of the Airport, much of the coastline is occupied by the City of Los Angeles. Immediately to the west of the LAX airfield lies the 302-acre El Segundo Dunes area. Approximately 200 acres (the southern two-thirds) comprise the El Segundo Blue (ESB) Butterfly Preserve Area, serving as habitat for the federally listed endangered ESB Butterfly (Euphilotes battoiedes allyni), and the coastal buckwheat (Eriogonum parvifoloum), the ESB Butterfly's host foodplant. The remaining 100 acres are to the north of the preserve area. The City of Los Angeles also operates two facilities in this area: the Hyperion Sewage Treatment Plant located immediately south of the ESB Butterfly Preserve area which is currently undergoing expansion, and the Los Angeles Department of Water and Power Scattergood Generating Station. Additionally, Southern California Edison Generating Station and a coastal portion of the Chevron Refinery are located in this area. Dockweiler State Beach, located directly west of LAX, is a 3.7 linear mile, 288 acre, sandy beach with many public use amenities. Built improvements include: 1,440 parking spaces on 19 acres of paved lots; a 118-space, five acre, recreational vehicle (RV) park; 12 restrooms; playground equipment; volleyball courts; bicycle path; picnic area; concession stand; and lifeguard facilities.



Los Angeles International Airport Master Plan	Regional Location Map	Figure 1.1

Although LAX has had a long-standing presence in the area, as development of the airport and its environs has evolved, sensitive land uses have come to co-exist with LAX in the surrounding areas. To a certain extent, land uses on these adjacent areas effectively constrain the feasible range of development alternatives.

The existence or severity of some environmental impacts resulting from airport development may differ relative to the various zones or areas surrounding the airport. Others are applicable throughout the area. For example, while the categories of air quality, transportation, and noise impacts are applicable to all areas or zones, impacts to biological resources would be central primarily to the west/dunes area.

Other planning considerations are listed below in connection with the areas/zones, where they may be identified:

- Biological Resources: West/dunes.
- Cultural/Historic Resources: West/dunes and On-Airport including Theme Building and Hangar 1.
- Land Use: North/northeast, south/southeast, west/dunes, and east.
- Residential Patterns: North/northeast, south/southeast, east, and west.
- Social Conditions: North, south/southeast, and east.
- Visual Resources: North/northeast, south, west/dunes, and east.
- Planning and Land Use Regulation: Northeast, west/dunes (Coastal Commission regulations), and east.
- Hazardous Materials/ Water Quality: North/northeast, southeast, and east.
- Drainage/Water Quality: North, west/dunes, and east.

List of Entitlements

It is anticipated that the LAX Master Plan may involve obtaining local, state and federal approvals including but not limited to the following:

City of Los Angeles Approvals

- General Plan Amendment to amend various elements of the City of Los Angeles General Plan;
- Zone changes and development standards for airside and landside activities;
- Master Conditional Use Permit for various services within LAX;
- Variances for various Master Plan components, such as parking;
- Encroachment Permits for streets and public rights of-way;

- LAX Tract Map; and
- Certification of the Final EIR.

Regional and State Approvals

- Highway improvements or modifications (CalTrans);
- Coastal Management Plan consistency determination (California Coastal Commission);
- Modification of National Pollution Discharge and Elimination Standards (NPDES) permit (Regional Water Quality Control Board);
- Governor's certificate of compliance with air and water quality standards pursuant to 49 U.S.C. §47106(c) (CalEPA);
- Protection of endangered or threatened species under California Endangered Species Act (California Department of Fish and Game);
- Transportation Conformity determination (Southern California Association of Governments); and
- Operating permits for new or modified stationary source equipment which emits or controls the emission of air pollutants (South Coast Air Quality Management District).

Federal Approvals

- Record of Decision on Final EIS (Federal Aviation Administration (FAA));
- Approval of Airport Layout Plan (FAA);
- Approval of Airport Improvement Program (FAA);
- General Conformity determination (FAA, U.S. EPA);
- Transportation Conformity determination (Department of Transportation, U.S. EPA);
- Permits for development in wetlands (U.S. Army Corps of Engineers);
- Protection of endangered or threatened species under Federal Endangered Species Act (U.S. Fish and Wildlife Service).

1.1.4 PURPOSE OF THE EIR

An Environmental Impact Report (EIR) is a detailed informational document prepared by a lead agency to analyze a project's potential environmental impacts and identify mitigation measures and reasonable alternatives that could eliminate or reduce those impacts. The purpose of an EIR is to inform decision makers and the public about a project's potential environmental impacts.

The preparation of an EIR is a multi-step process designed to integrate environmental factors into project planning and decision making and ensure adequate opportunities for public review and comment. Some of the major steps in the EIR process include distribution of the Notice of Preparation, scoping, preparation of a Draft EIR, public notice and review of the Draft EIR, response to comments and Finalization of the EIR and certification. Before a project can be approved, the lead agency must certify that the Final EIR was prepared in compliance with CEQA regulations and was presented to the lead agency's decision making body, which reviewed and considered it prior to making its decision.

Master Plan Objectives

- It is the intention of the Project Sponsor to provide, in an environmentally sound manner that is compatible with surrounding land uses, additional airport capacity for passengers and freight in the Los Angeles metropolitan area that will sustain and advance the economic growth and vitality of the South Coast Basin. In particular, the Project objectives are (1) to meet local and regional air transportation needs during the period 2000 - 2015 in respect of the amount, type, location and timeliness of such new capacity; (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 the City of Los Angeles.

  - 2000 - 2015 Air Transportation Needs. The need for additional airport capacity in the South Coast Basin during the 2000 - 2015 period has been widely acknowledged. Commercial service airports in the region already operate at or near their maximum peak-hour capacities, and region-wide demand for air transportation services is expected to increase by approximately 53% between 1996 and 2015. These projected increases in the regional demand for air transportation services have been more particularly identified in terms of when and where they are likely to occur and the type of airport capacity increments that will be required to meet them. The Project Sponsor has reviewed the potential contributions of the existing and planned commercial service airports in the region to meeting the increased demand and has concluded that the capacity of Los Angeles International Airport (LAX) needs to be increased to an appropriate level.

  - Efficient and Cost-Effective Investments. Public and private capital investment in Los Angeles International Airport and the commercial facilities already totals billions of dollars. The Project Sponsor is considering ways to maximize the return on that invested capital, and to help the region avoid making less productive investments in duplicative facilities, by making incremental investments in additional LAX capacity.

- The International Trade Component. The recent surge in the absolute amount and the relative importance of international trade in the South Coast Basin economy is likely to continue during the next two decades, if enough airport capacity exists in the region. To whatever extent such capacity is not added in the right place(s) and in a timely way, economic activity, jobs and investment will locate in or relocate to other metropolitan areas, such as San Francisco, Phoenix, Seattle, Las Vegas and Denver (all making or having recently made substantial investments in new capacity at their principal commercial service airports). The Project Sponsor is considering ways to create the additional capacity at LAX that would maintain Los Angeles' role as an international commercial gateway.

- Within the alternatives to be analyzed, potential project components will be evaluated including, but not limited to: one or two additional runways each 6,000 feet in length; relocation/extensions of existing runways; an improved taxiway system; new passenger terminal facilities; an automated people mover system; expanded cargo facilities; improvements to the ground access system, including connections to the regional highway and transit networks; relocation of ancillary uses and other support facilities; and land acquisition necessary for each concept.

1.1.5 MASTER PLAN ALTERNATIVES

This document describes the four future airport improvement concepts that are currently being considered as alternative development scenarios for the Los Angeles International Airport (LAX) Master Plan as well as the "No Project" alternative.

Evaluation of the four future airport improvement alternatives is based, in part, on an assessment of LAX's existing airside and landside facilities and the facility requirements needed to accommodate projected demand for commercial passenger and cargo operations by year 2015.

All of the figures for the alternatives presented in the NOP are provided to give a general idea of the master plan elements. All figures are preliminary and subject to change as a result of continued planning efforts and the environmental review process.

Forecasts to 2015

The LAX potential future aviation demand to the year 2015 is projected in the Forecasts of Aviation Demand study dated February 26, 1996. These forecasts represent an "unconstrained" demand in that they assume facilities and infrastructure will be in place to accommodate projected growth. Forecasts show that by the year 2015, LAX will service approximately twice as many passengers and more than two times the amount of cargo tonnage as currently occurs. These forecasts take into account aviation demand within the entire Southern California market and assume

other airports within the region take an increasing share of domestic origin and destination (O&D) passengers.

LAX is currently experiencing operational inefficiencies, as airport facilities are handling more aviation demand than they were designed to accommodate. The projections for the potential future aviation demand up to the year 2015, compared to existing conditions, are identified in **Table 1.1**.

Table 1.1

Future Projected Aviation Demand to the year 2015

	Existing (1996)	Projected (2015)	2015 Net Increase (Approximately)
Air passengers	58.0 MAP*	98 MAP*	69%
Air Cargo	1.9 mil. tons	4.2 mil. tons	121%
Aircraft operations	763,000	1.0 mil	30%

*Million Annual Passengers
Source: Landrum & Brown

Facility Requirements

The LAX Master Plan Facility Requirements study dated May 8, 1996 identified the need for additional capacity in each component of the airport system, to accommodate the forecasted increases in aircraft operations, passenger and cargo activity by year 2015, as summarized above. To meet the unconstrained forecasted demand of 98 million annual passengers (MAP), 4.2 million annual tons of cargo, and 1.0 million annual aircraft operations, the facility requirements, identified in **Table 1.2**, would be needed.

Aviation activity is projected to increase significantly at virtually all commercial airports in the regional system over the next 20 years, LAX needs to address plans to provide both near-term and mid-term capacity enhancements to service forecasted demand. If the region's future air transportation needs cannot be met, short-term economic disruption is likely to lead to permanent job losses and foregone opportunities as airport-related business activities accrue to other regions which provide more efficient and reliable air transportation service.

Table 1.2
LAX Projected 2015
Facility Requirements

Component	Requirement
Runways	5 or 6
Gates	276 NBEG*
Terminal facilities	7.9 million square feet
Cargo facilities	437 acres
Ancillary facilities	228 acres
Parking (employee and public)	48,750 spaces
Rental car facilities	101 acres

*Narrow Body Equivalent Gate
Source: Landrum & Brown

Ground Access System

It is anticipated that there will be the need for an integrated ground transportation system, which may feature the following components:

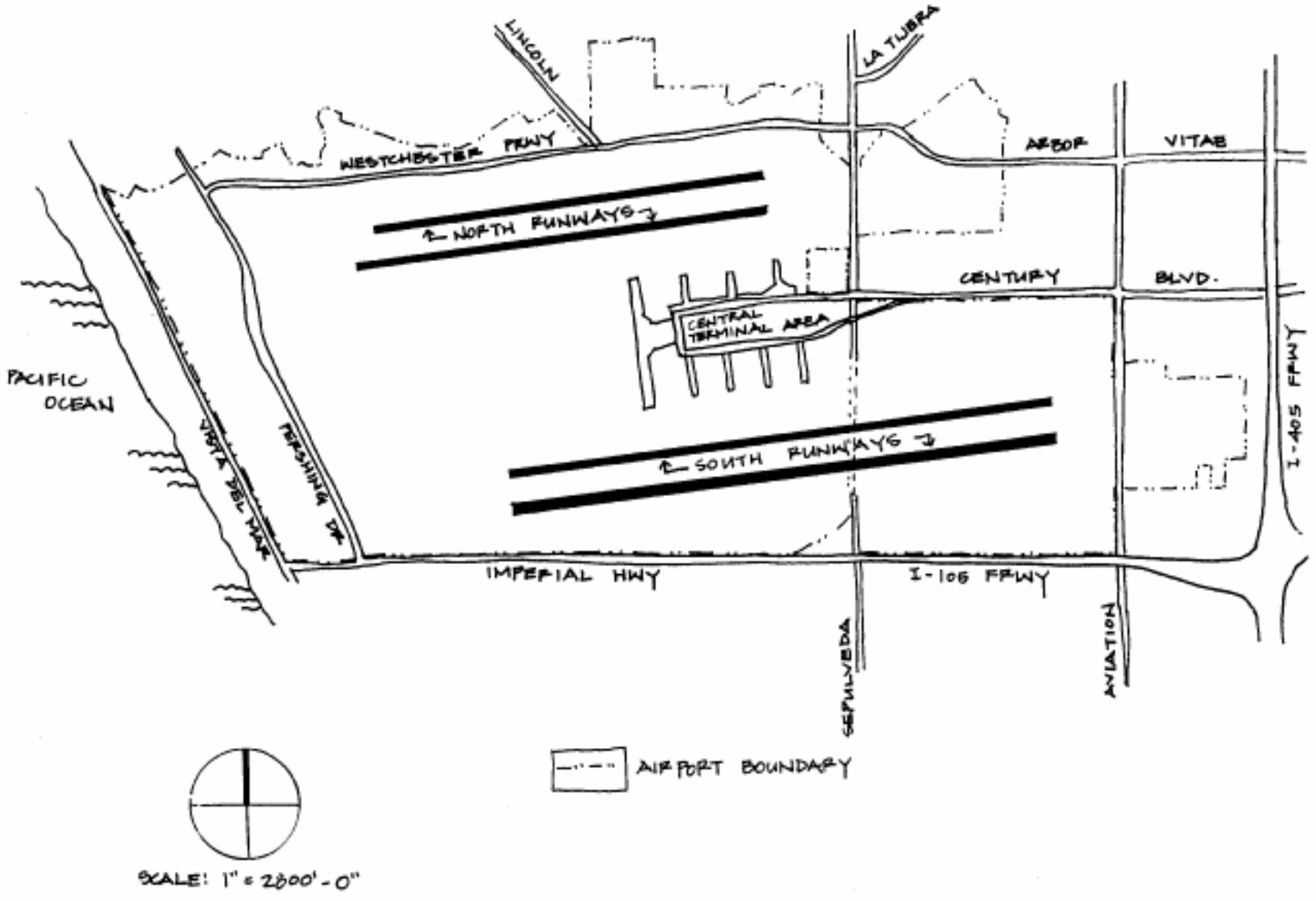
- a region-serving roadway system, which would connect the Airport to the greater Southern California region via linkages to the I-405 and I-105 freeways;
- a "ring road" encircling the Airport that would provide direct freeway access to the passenger terminals and better separate airport-related traffic from non-airport traffic, thereby minimizing traffic impacts to neighboring communities;
- surface access roads to facilitate traffic in and around the Airport;
- an inter-terminal people-mover system that would connect the eastern side of the Airport to the proposed newly developed western side, and potentially connect to a future MTA Green Line transit system extension.

The following section provides general descriptions of the five alternatives, including discussion of features/components, capacity data, and summaries of various components. None of the five alternatives would satisfy the unconstrained 2015 forecast for passenger demand and aircraft operations. All four development alternatives would, however, be expected to accommodate the anticipated 2015 cargo demand forecast of 4.2 million annual tons.

1.1.5.1 NO-PROJECT ALTERNATIVE

Aircraft activity in 1996 reached approximately 763,000 annual aircraft operations. That level of activity is approaching the capacity of the existing four runway airfield system, as evidenced by the higher delays experienced and the number of hours per day when the airport reaches its hourly operations capacity. Passenger activity in 1996 totalled nearly 58 MAP representing roughly 14% growth over the 1994 activity of 51 MAP. Airlines have been and will continue accommodating aircraft operational growth through adjustments in their service patterns (e.g., flight schedules and aircraft fleet size).

The No-Project Alternative (**Figure 1.2**) represents the conditions that would occur at LAX without comprehensive master plan improvements. Passenger demand at LAX will continue to grow as forecast in the near-term with limited and outdated facilities resulting in decreasing levels of service including increased aircraft flight delays, passenger terminal crowding and vehicle ground access system congestion. Even when continued growth of domestic passenger demand at other regional airports is considered, the demand at LAX is projected to increase to between 68 and 72 MAP within the next 20 years. Given the limited capital improvements currently approved by the Los Angeles Board of Airport Commissioners, LAX's inefficiency will continue to degrade as demand grows.



Los Angeles International Airport Master Plan	No Project Alternative	Figure 1.2

1.1.5.2 ALTERNATIVE 1

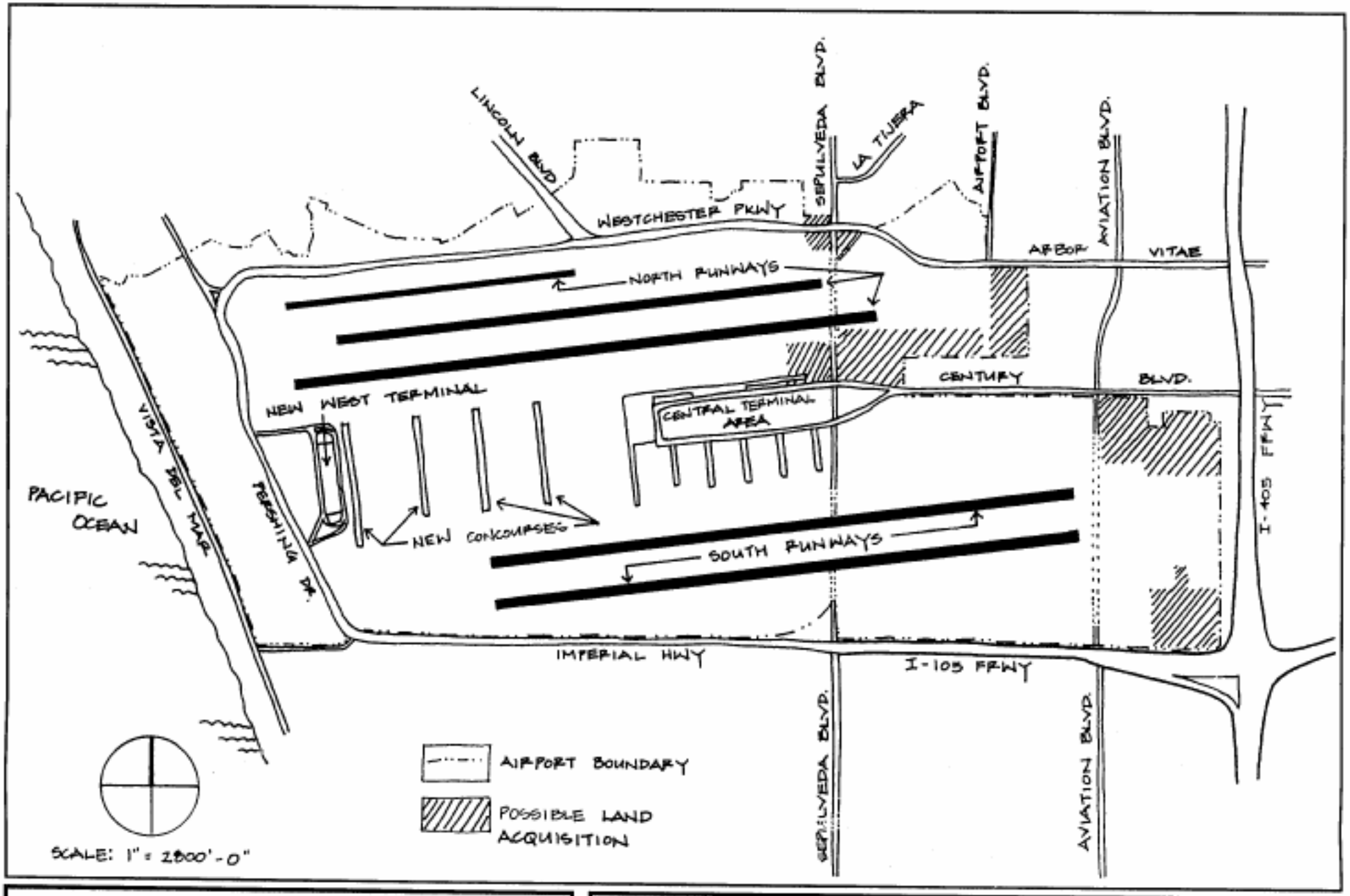
Features/Components

The following summarizes the major airport components proposed in Alternative 1 (see **Figure 1.3**):

- Five runways
  - North Airfield
    - Addition of one new 6,000 foot runway.
    - Relocation southward and extension of outboard runway (24R) from 8,925 feet to 10,000 feet.
    - Relocation southward and extension of inboard runway (24L) from 10,925 feet to 12,000 feet.
  - South airfield
    - No change to existing inboard runway (25R).
    - Relocation southward and extension of outboard runway (25L) from 11,095 feet to 12,000 feet.
- Terminal facilities to be expanded by approximately 3 to 4 million sq. ft., from existing 3.96 million sq. ft. to approximately 7 to 8 million sq. ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 100, from existing 145 to approximately 245 NBEG.
- Cargo space to be expanded by approximately 2.9 million sq. ft. and 240 acres, from existing 1.9 million sq. ft. on 197 acres to approximately 4.8 million sq. ft. on 437 acres.
- Ancillary facilities to decrease by approximately 127 acres, from existing 355 acres to 228 acres. Ancillary facilities to include an on-site fuel farm to be located at Imperial Highway and Sepulveda Boulevard.
- Land acquisition of approximately 220 acres.

Alternative 1 would provide enhanced performance and capacity to accommodate potential aviation demand as follows:

Aircraft operations	900,000 - 940,000
Air passengers	88 - 92 MAP
Air cargo	4.2 mil. tons



Los Angeles International Airport Master Plan	Alternative One	Figure 1.3

Alternative 1 represents the most physically compact airport development alternative. It also accommodates the smallest number of aircraft operations of the four airfield system expansion alternatives under evaluation.

Summary Description

Airside - Alternative 1 proposes five runways. A third runway (6/24) 6,000 feet in length would be added to the north airfield by relocating the existing two north runways southward. This runway relocation would move the longer, northside runways which are more heavily utilized by larger aircraft, further away from residential properties. The replacement north runways would be extended, from 8,925 feet to 10,000 feet (6L/24R), and from 10,285 feet to 12,000 feet (6R/24L). In the south airfield, the existing inboard runway (7L/25R) would remain the same, while the outbound runway (7R/25L) would be extended from 11,096 feet to 12,000 feet. Runway 7R/25L would also be shifted south of its current alignment to accommodate a central taxiway and make aircraft operations more efficient.

Terminal Facilities - The Central Terminal Area (CTA) would be reconfigured and expanded westward, increasing the number of aircraft parking positions, from 145 to 245 Narrow Body Equivalent Gates (NBEG). Between 3 and 4 million square feet of new and redeveloped terminal space would be added, increasing the terminal facilities to between 7 and 8 million square feet. Terminal Alternative 1 features a dual-sided multi-level main terminal serving eight piers. The terminal would be flanked on two sides by multi-level roadways serving arriving and departing international and domestic vehicles. The main vehicular access would be from both the east (through roadways connected to the existing CTA) and the west (Pershing Drive). A spine roadway would serve both north and south sides of the terminal. All passenger processing and baggage handling facilities would be centralized in the main terminal which is proposed to be modular in plan and flexible for expansion within its defined envelope. Parking would be adjacent to the east and west of the main terminal.

Cargo Facilities - The existing Imperial, South, and Century cargo complexes would be preserved. Approximately 2.9 million additional square feet of new and redeveloped cargo space is proposed. The cargo building space would thereby increase from 1.9 million square feet on 197 acres to 4.8 million square feet on approximately 437 acres. The new cargo space would be situated to the east of the south runways and the existing Century/Imperial cargo area. The existing Century Cargo complex would be redeveloped in phases.

Ancillary Facilities - Ancillary facilities are facilities that support the aviation-related activities at LAX, identified as general aviation, ground service, Federal Aviation Administration (FAA), airline administration and maintenance, LADOA, flight kitchens, fuel farm, aircraft rescue and firefighting (ARFF), and other support facilities.

To accommodate the needs of Alternative 1 approximately 228 acres of ancillary facilities would be needed. Under Alternative 1, some of the existing ancillary facilities would remain at their current site, along W. Imperial Highway, west of Sepulveda Boulevard. The remaining ancillary facilities would be relocated to the north side of the airport, and south of W. Century Boulevard.

It is anticipated that there would be a need for a new fuel farm facility. An on-Airport site at Imperial Highway and Sepulveda Boulevard is being considered for such a facility.

Land Acquisition

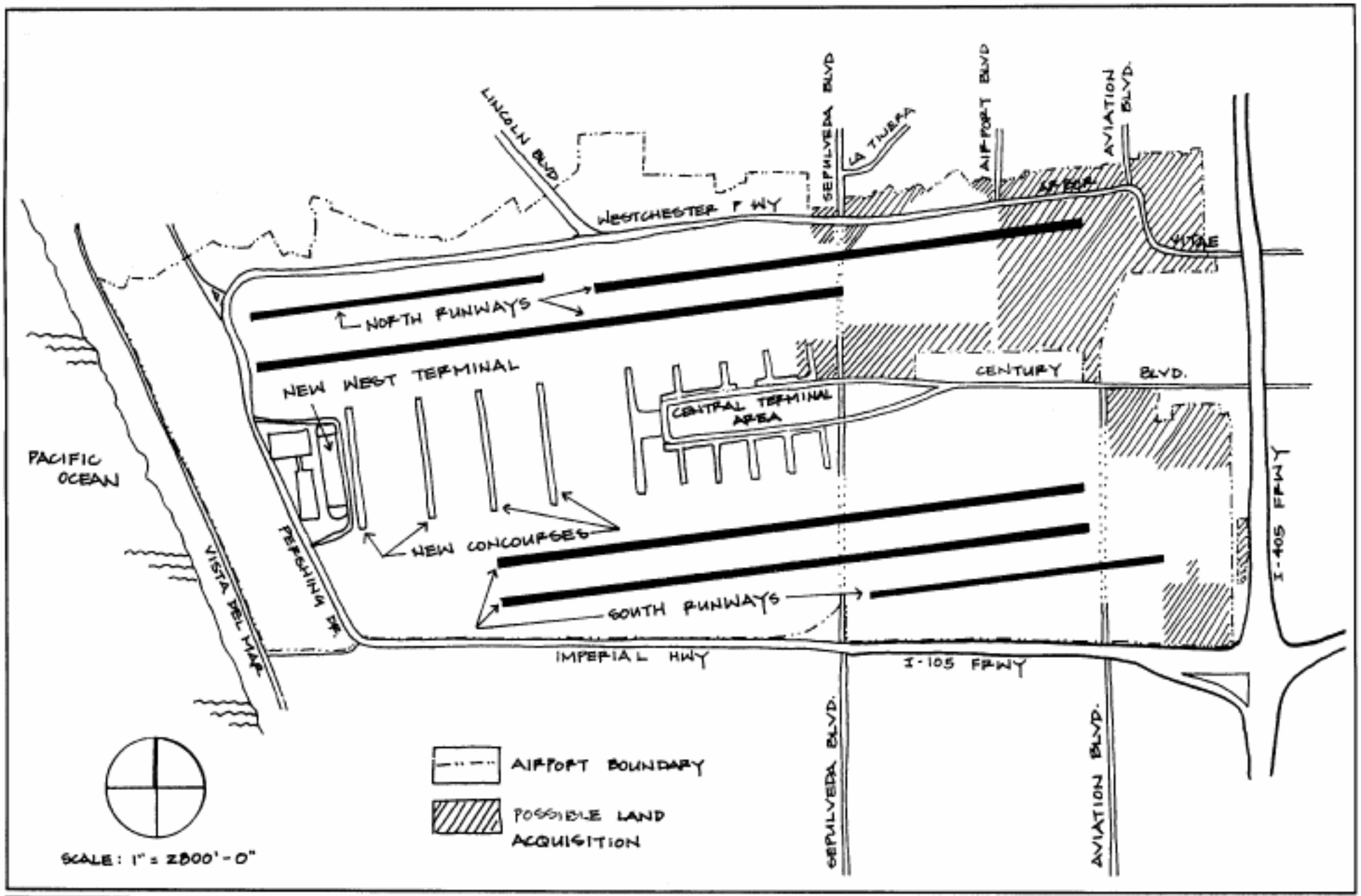
It is projected that approximately 220 acres of land would need to be acquired to accommodate Alternative 1. The property could include space along Sepulveda Boulevard to the north of LAX; property immediately to the east of LAX and south of W. Century Boulevard; uses south of W. Century Boulevard, just west of La Cienega Boulevard; and land south of Imperial Highway at La Cienega Boulevard. These areas are identified for purposes of accommodating new rental car space, community uses, new cargo, ancillary facilities, ground access, parking or to meet aeronautical standards under Alternative 1.

1.1.5.3 ALTERNATIVE 2

Features/Components

The following summarizes the major airport components proposed in Alternative 2 (see **Figure 1.4**):

- Six runways:
  - North airfield
    - Addition of one new 6,000-foot runway.
    - Relocation southward and extension of outboard runway (24R) from 8,925 feet to 10,000 feet.
    - Relocation southward and extension of inboard runway (24L) from 10,285 feet to 12,000 feet.
  - South airfield:
    - Addition of one new 6,000 foot runway.
    - No change to existing inboard runway (25R).
    - Relocation southward and extension of outboard runway (25L) from 11,096 feet to 12,000 feet.
- Terminal facilities to be expanded by approximately 3 to 4 million sq. ft., from existing 3.96 million sq. ft. to approximately 7 to 8 million sq. ft.



Los Angeles International Airport Master Plan	Alternative Two	Figure 1.4

- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 131 from existing 145 to 276 NBEG.
- Cargo space to be expanded by approximately 2.8 million sq. ft. and 249 acres, from existing 1.9 million sq. ft. on 197 acres to approximately 4.7 million sq. ft. on 446 acres.
- Ancillary facilities to decrease by approximately 127 acres, from existing 355 acres to 228 acres. Ancillary facilities to include an off-site fuel farm facility to be located in a compatible land use location southernly of the airport. Identification and evaluation of the site will be thoroughly analyzed within the context of the EIS/EIR.
- Land acquisition of approximately 446 acres.

Alternative 2 accommodates potential aviation demand components as follows:

Aircraft operations	920,000 - 960,000
Air passengers	90 - 94 MAP
Air cargo	4.2 mil. tons

Alternative 2 represents an increase in airport development and the amount of occupied land involved relative to Alternative 1.

Summary Description

Airside - Alternative 2 would extend the existing runways and add one 6,000-foot runway, to both the north and south airfields. In the north airfield, a new 6,000-foot runway would be added to the northwest of the existing runways. Outboard runway (24R) would be shifted eastward and extended from 8,925 feet to 10,000 feet becoming the new center runway. The existing inboard runway (24L) would be extended to the east from 10,285 feet to 12,000 feet. In the south airfield, the existing inboard runway (25R) would remain the same. The existing outboard runway (25L) would become the center runway and would be extended from 11,096 feet to 12,000-feet. A new 6,000-foot runway would be added to the south. The airfield improvements proposed in this alternative would significantly impact the Hawthorne Airport operations and could result in FAA-required operating restrictions or closure of that airfield.

Terminal Facilities - The Central Terminal Area (CTA) would be reconfigured, increasing aircraft gates by 131, from 145 to 276. Between 3 and 4 million square feet of new and redeveloped terminal space would be added, increasing the terminal facilities to between 7 and 8 million square feet. Terminal Alternative 2 proposes a dual-sided multi-level main terminal located at the west end of the airport adjacent to Pershing Drive. Main vehicular access to the terminal would be from the west via Pershing Drive. Pershing Drive would be linked to a 105 Freeway extension on the south and to the Westchester Parkway on the north. All passenger and baggage processing facilities serving the satellites would be centralized in the main west terminal. The proposed western terminal would be oriented north-south to facilitate

landside access. A parking structure is proposed adjacent to the west of the terminal along Pershing Drive.

Cargo Facilities - The new commuter runway on the southeast corner of the airport would displace a significant portion of the existing South/Imperial cargo areas. As a result, new cargo facilities would be constructed north of 98th Street, west of Aviation Boulevard, as well as on the southeast corner of the airport. The existing Century Cargo Complex would be redeveloped. Alternative 2 would increase cargo building space by about 2.8 million sq. ft. and 249 acres, from 1.9 million square feet on 197 acres to 4.7 million square feet on approximately 446 acres.

Ancillary Facilities - As in Alternative 1, ancillary facilities would require approximately 228 acres. Some of the existing ancillary facilities would remain at their current site, along W. Imperial Highway, west of Sepulveda Boulevard. Others would be relocated to the north side of the airport, and south of W. Century Boulevard.

It is anticipated that there would be a need for a fuel farm facility. An off-Airport site for such a facility will be identified in the draft EIR.

Land Acquisition

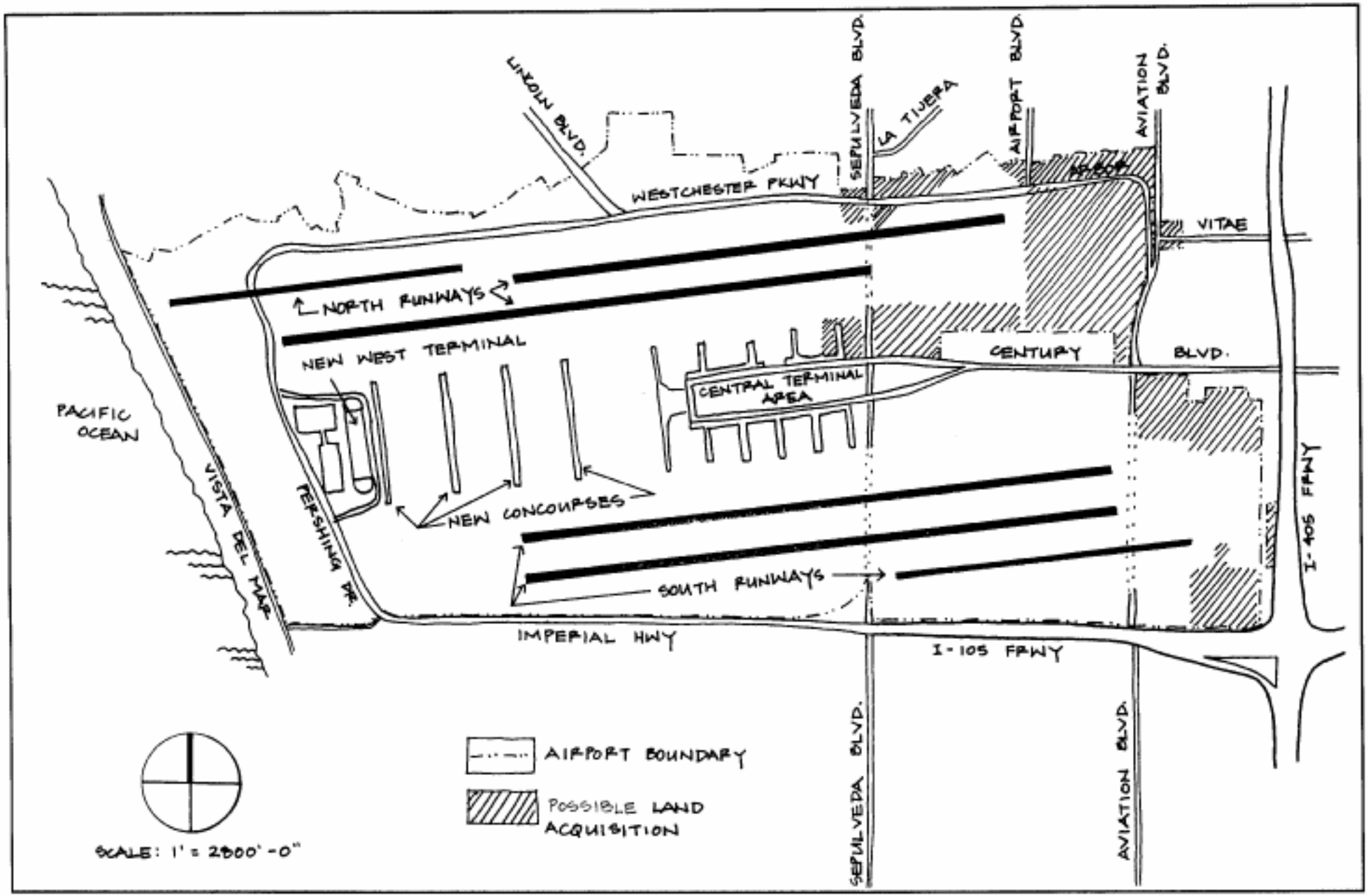
Approximately 446 acres of land would need to be acquired to accommodate Alternative 2. The property could include space along Sepulveda Boulevard, north of LAX; uses immediately to the east of LAX, off of W. Century Boulevard; property northeast of LAX, on both sides of Arbor Vitae Street; land south of W. Century Boulevard, on both sides of La Cienega Boulevard; and vacant land south of Imperial Highway at La Cienega Boulevard. These areas are identified for purposes of accommodating new or realigned runway space, new rental car space, community uses, new cargo and ancillary facilities, or to meet minimum safety requirements under Alternative 2.

1.1.5.4 ALTERNATIVE 3

Features/Components

Alternative 3 is similar to Alternative 2 in most respects. The following summarizes the major components proposed in Alternative 3 (see **Figure 1.5**):

- Six runways:
  - North airfield:
    - Addition of one new 6,000 foot runway.
    - Relocation southward and extension of outboard runway (24R) from 8,925 feet to 10,000 feet.
    - Relocation southward and extension of inboard runway (24L) from 10,285 feet to 12,000 feet.



Los Angeles International Airport Master Plan	Alternative Three	Figure 1.5

- South airfield:
  - Addition of one new 6,000 foot runway.
  - No change to existing inboard runway (25R).
  - Relocation southward and extension of outboard runway (25L) from 11,096 feet to 12,000 feet.
- Terminal facilities to be expanded by approximately 3 to 4 million sq. ft., from existing 3.9 million sq. ft. to approximately 7 to 8 million sq. ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 131 from existing 145 to 276 NBEG.
- Cargo space to be expanded by approximately 2.8 million sq. ft. and 249 acres, from existing 1.9 million sq. ft. on 197 acres to approximately 4.7 million sq. ft. on 446 acres.
- Ancillary facilities to decrease by approximately 127 acres, from existing 355 acres to 228 acres. Ancillary facilities to include an on-site fuel farm facility to be located at Imperial Highway and Sepulveda Boulevard.
- Land acquisition of approximately 400 acres.

Alternative 3 would accommodate the following potential aviation demand components:

Aircraft operations	920,000 - 960,000
Air passengers	90 - 94 MAP
Air cargo	4.2 mil. tons

Similar to Alternative 2, Alternative 3 represents a significant increase in airport development and the amount of occupied land relative to Alternative 1.

Summary Description

Airside - Similar to the airfield improvements proposed in Alternative 2, Alternative 3 proposes to extend existing runways and add two 6,000-foot runways, one to each airfield (north and south). In the north airfield, a proposed new 6,000-foot commuter runway would be staggered northwest of the new center runway, extending into the LAX dunes/preserve area with taxiways impacting about 4 acres of the preserve. Outboard runway (24R) would be relocated southward and extended from 8,925 feet to 10,000 feet. The inboard runway (24L) would be relocated westward and extended from 10,285 feet to 12,000 feet. The existing inboard runway (25R) would remain the same and the current outboard runway (25L) would be extended from 11,096 feet to provide a 12,000-foot runway. A new 6,000-foot runway would be added south of the current outboard runway. As in Alternative 2, the airfield improvements proposed in this alternative would significantly impact the Hawthorne Airport operations and could result in FAA-required operating restrictions or closure of that airfield.

Terminal Facilities - The Central Terminal Area (CTA) would be reconfigured, increasing aircraft gates by 131, from 145 to 276. Between 3 and 4 million square feet of new and redeveloped terminal space would be added, increasing the terminal facilities to between 7 and 8 million square feet. Terminal Alternative 3 proposes a dual-sided west main terminal located east of Pershing Drive with an adjacent parking structure (between Pershing Drive and the terminal). Straight linear satellites would be located between the west terminal and the existing CTA. Connections between the terminal areas would be made via an underground people mover system. On the north side of the existing CTA, a linear terminal replacing existing Terminals 1, 2 and 3, would accommodate aircraft as large as the MD-11. An elevated connector bridge, potentially with shops and moving walks, would be provided between the Theme Building and the north and south terminals along World Way.

Cargo Facilities - The new commuter runway on the southeast corner of the airport would displace a significant portion of the existing cargo area. As a result, new cargo facilities are proposed to be constructed north of 98th Street, west of Aviation Boulevard, as well as on the southeast corner of the airport. The existing Century Cargo Complex would be redeveloped. Alternative 3 would increase cargo building space by about 2.8 million sq. ft. and 249 acres, from 1.9 million square feet on 197 acres to 4.7 million square feet on approximately 446 acres.

Ancillary Facilities -Under this proposed alternative, 228 acres of ancillary facilities would be needed. As with all proposed alternatives, under Alternative 3, some of the existing ancillary facilities would remain at their current site, along W. Imperial Highway, west of Sepulveda Boulevard. Others would be relocated to the north side of the airport, and south of W. Century Boulevard.

It is anticipated that there would be a need for a fuel farm facility. The same on-Airport site at Imperial Highway and Sepulveda discussed in Alternative 1 is being considered in Alternative 3.

Land Acquisition

Approximately 400 acres of land would need to be acquired to accommodate Alternative 3. The 400 acres include space along Sepulveda Boulevard, to the north of LAX; land immediately to the east of LAX, off of W. Century Boulevard; property to the northeast of LAX, on both sides of Arbor Vitae Street; some uses south of W. Century Boulevard, on both sides of La Cienega Boulevard; and vacant land south of Imperial Highway at La Cienega Boulevard. These areas are identified for purposes of accommodating new or realigned runway space, new rental car space, community uses, new cargo and ancillary facilities, or to meet minimum safety requirements under Alternative 3.

1.1.5.5 ALTERNATIVE 4

Features/Components

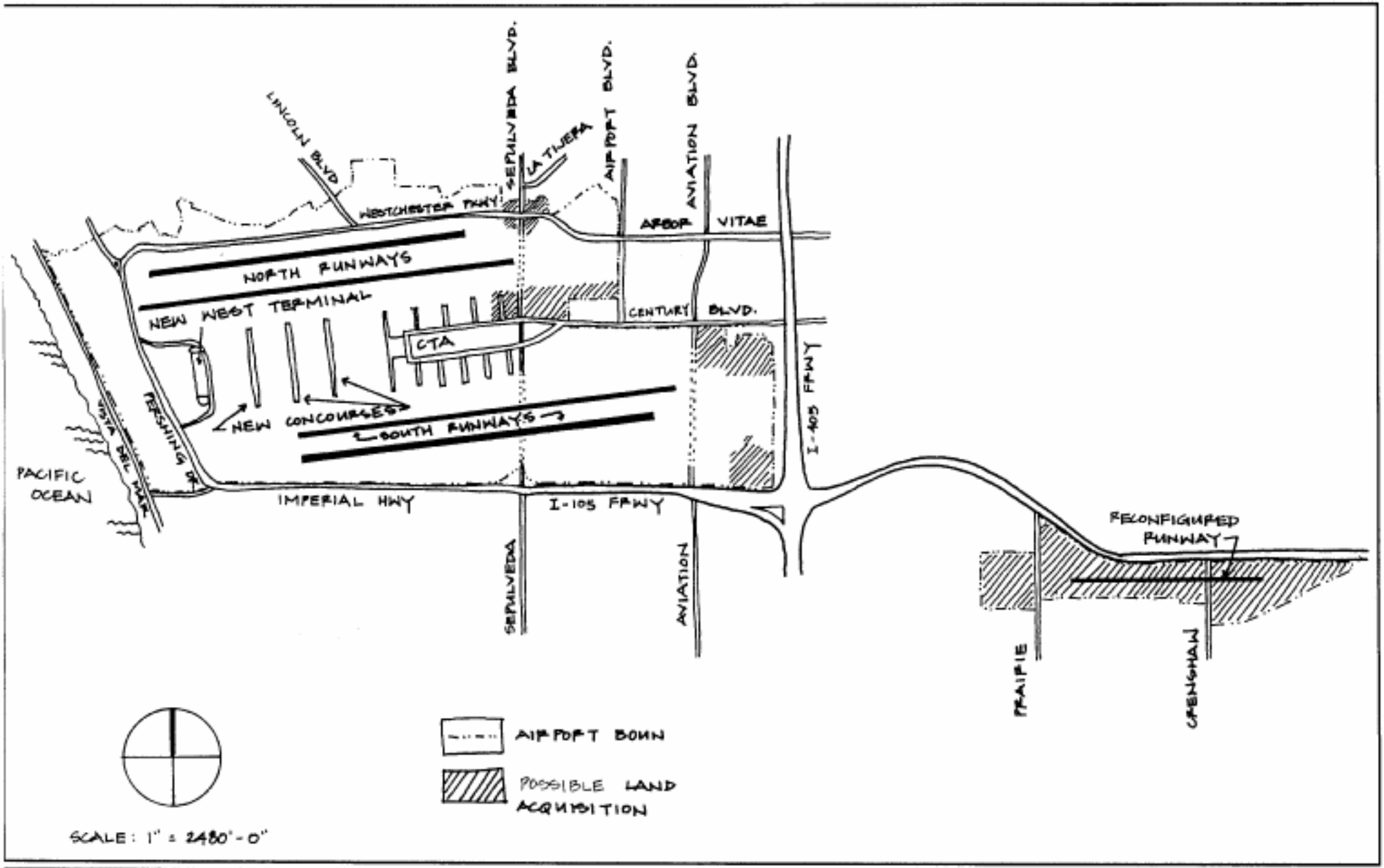
The following summarizes the major airport components proposed in Alternative 4 (see **Figure 1.6**):

- Five runways:
  - Realignment and extension of existing Hawthorne Airport runway from 4,956 feet to 6,000 feet.
  - LAX North airfield:
    - Relocation northward and extension of outboard runway (24R) from 8,925 feet to 10,000 feet.
    - Extension of existing inboard runway (24L) from 10,285 feet to 12,000 feet.
  - LAX South airfield:
    - No change to either existing runways (25R) or (25L).
- Terminal facilities to be expanded by approximately 3 to 4 million sq. ft., from existing 3.9 million sq. ft. to approximately 7 to 8 million sq. ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 131 from existing 145 to 276 NBEG.
- Cargo space to be expanded by approximately 2.9 million sq. ft. and 240 acres, from existing 1.9 million sq. ft. on 197 acres to approximately 4.8 million sq. ft. on 437 acres.
- Ancillary facilities to decrease by approximately 127 acres, from existing 355 acres to 228 acres. Ancillary facilities to include an on-site fuel farm to be located at Imperial Highway and Sepulveda Boulevard.
- Land acquisition of approximately 500 acres.

Of the five alternatives being considered, Alternative 4 would deliver the most airside capacity at approximately 946,000 aircraft operations. Alternative 4, however, would represent a significant increase in airport development and the amount of occupied land over the other alternatives.

Alternative 4 would accommodate potential aviation demand components as follows:

Aircraft operations	940,000 - 980,000
Air passengers	92 - 96 MAP
Air cargo	4.2 mil. tons



Los Angeles International Airport Master Plan	Alternative Four	Figure 1.6

Summary Description

Airside - Alternative 4 proposes to use the airfield capacity at the existing Jack Northrop (formerly Hawthorne Municipal) Airport to enhance the operations at LAX. Alternative 4 proposes realigning the existing Hawthorne runway from its slight east-northeast/south-southwest alignment to a more direct east/west alignment and lengthening it to 6,000-feet thereby allowing operation of commuter aircraft. The proposal would eliminate the need for these smaller and slower aircraft to use the LAX runways and impede larger aircraft operations. The two airports would be connected with a new dedicated roadway along the rights-of-way of I-105 and I-405. This secured roadway would allow bus transfer of passengers between the two operations. A small terminal would be provided at the Hawthorne facility for the convenience of commuter passengers transferring between a shuttle bus and commuter aircraft.

At LAX, the north outboard runway (24R) would be relocated northward and extended from 8,925 feet to 10,000 feet. The existing north airfield inboard runway (24L) would be extended eastward from 10,285 feet to 12,000 feet. The south airfield would remain the same.

Terminal Facilities - The Central Terminal Area (CTA) would be reconfigured, increasing aircraft gates by 131, from 145 to 276. Between 3 and 4 million square feet of new and redeveloped terminal space would be added to the existing 13.96 million sq. ft., increasing the terminal facilities to between 7 and 8 million square feet. Also proposed in Alternative 4 is the development of two dual-sided, multi-level facilities located west of the Tom Bradley International Terminal (TBIT) and east of Pershing Drive. A spine roadway would provide access to the terminals from the west and continue through to the existing CTA. The main vehicular access to the terminals from the west would be provided via Pershing Drive from the I-105 on the south and from Westchester Parkway on the north. All passenger and baggage processing facilities would be integral to the unit terminals. Parking facilities would be located at Pershing Drive to the west and would be accessible by the terminal area roadways and a people mover system. Additional parking would be remote and connected by road access to the terminals.

Cargo Facilities - Alternative 4 would redevelop the Century Cargo Complex, replacing many of the existing buildings along Century Boulevard with new facilities. New cargo buildings would also be built on the southeast corner of the Airport, between Aviation and La Cienega Boulevards. Alternative 4 would increase cargo building space by about 2.9 million sq. ft., from 1.9 million square feet on 197 acres to 4.8 million square feet on approximately 437 acres.

Ancillary Facilities - Approximately 228 acres would be needed for ancillary facilities. As with each of the other development alternatives, some of the existing ancillary facilities would remain at their current site, along W. Imperial Highway, west of Sepulveda Boulevard. Others would be relocated to the north side of the airport, and south of W. Century Boulevard.

It is anticipated that there would be a need for a fuel farm facility. Alternative 4 considers the siting of the fuel farm at the same on-Airport site at Imperial Highway and Sepulveda Boulevard discussed in Alternatives 1 and 3.

Land Acquisition

Approximately 500 acres of land would need to be acquired to accommodate Alternative 4. The 500 acres could include space along Sepulveda Boulevard, to the north of LAX; property immediately to the east of LAX, off of W. Century Boulevard; some uses south of W. Century Boulevard, on both sides of La Cienega Boulevard; vacant land south of Imperial Highway at La Cienega Boulevard, and property in Hawthorne, including the Jack Northrop Airport. These areas are identified for purposes of accommodating new or realigned runway space, new rental car space, community uses, new cargo and ancillary facilities, or to meet minimum safety requirements under Alternative 4.

1.1.6 POTENTIAL ENVIRONMENTAL IMPACTS OF THE PROJECT

To provide the enhanced operational capacity necessary to accommodate forecast increases in aviation activity through the year 2015, LAX must undergo a major redevelopment effort. Adverse environmental impacts could result from both the short term construction activities and long term increases in activity levels at the airport accompanying that redevelopment effort. Implementation of any of the proposed concept development plans would or could have significant environmental impacts in the following areas:

- Earth
- Air
- Water
- Plant Life
- Animal Life
- Noise
- Light & Glare
- Land Use
- Natural Resources
- Risk of Upset
- Population
- Housing
- Right of Way
- Transportation/Circulation
- Public Services
- Energy
- Utilities
- Human Health
- Aesthetics
- Recreation
- Cultural Resources

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV — City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of Airports	6th	6/11/97

PROJECT TITLE/NO.	CASE NO.
LAX Master Plan EIR/EIS	

PREVIOUS ACTIONS CASE NO.	
Not Applicable	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

See Attachment to Notice of Preparation, Section 1.1.5, Master Plan Alternatives.

PROJECT LOCATION

Los Angeles International Airport

PLANNING DISTRICT	STATUS:
Westchester - Playa Del Rey + Los Angeles International Airport Interim Plan	☐ PRELIMINARY ☐ PROPOSED ☐ ADOPTED date

EXISTING ZONING	MAX. DENSITY ZONING	PROJECT DENSITY
(T) (Q)M2-1	N/A	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	☐ DOES CONFORM TO PLAN ☐ DOES NOT CONFORM TO PLAN ☐ NO DISTRICT PLAN
Airport	N/A	
PLAN DENSITY RANGE	**PROJECT DENSITY**	
N/A	N/A	

DETERMINATION (to be completed by Lead City Agency)

On the basis of the attached initial study checklist and evaluation:

NEGATIVE DECLARATION	☐ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
CONDITIONAL NEGATIVE DECLARATION	☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A CONDITIONAL NEGATIVE DECLARATION WILL BE PREPARED. (See attached condition(s))
ENVIRONMENTAL IMPACT REPORT	☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Philip Depoian	Deputy Executive Director	29
SIGNATURE	TITLE	

2.1 INITIAL STUDY CHECKLIST

Discussion of Environmental Evaluation

1. **EARTH. Would the proposal result in:**

   a. **Unstable earth conditions or in changes in geologic substructures?**

   [**No**]. The project would not involve geologic structural changes at the site or decreased stability of earth conditions.

   b. **Disruptions, displacements, compaction or overcovering of the soil?**

   [**Yes**]. The construction of new runways, terminals, cargo and ancillary facilities, as well as roadway realignments would lead to the displacement, compaction, and overcovering of soils.

   c. **Change in topography or ground surface relief features?**

   [**Maybe**]. The construction of new airport facilities could lead to changes in topography at the LAX site.

   d. **Destruction, covering, or modification of any unique geologic or physical features?**

   [**Maybe**]. One alternative could entail intrusion into the El Segundo dunes complex at the west end of the airport.

   e. **Any increase in wind or water erosion of soils, either on or off the site?**

   [**Maybe**]. There could be the potential for short-term increases in wind erosion of soils during excavation or grading activities associated with construction.

   f. **Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet, or lake?**

   [**No**]. The proposed airport development plans would not be expected to affect beach sands or have effects from changes in siltation, deposition, or erosion to other water bodies.

   g. **Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?**

   [**Maybe**]. The dominant geologic feature in the LAX vicinity is the Newport-Inglewood fault zone (NIFZ), located about 3 miles to the east of the airport. Two smaller faults, the Overland and the Charnock faults, parallel the NIFZ to the southwest. The Overland fault is approximately two miles to the

northeast of LAX and the Charnock fault lies to the west of the Overland fault. All are considered potentially active.

2. AIR. Would the proposal result in:

a. Air emissions or deterioration of ambient air quality?

[Yes]. Increases in the number of aircraft operations and associated vehicular activity would result in emission increases over baseline levels. These mobile sources, along with stationary sources (central plant, fuel facilities, etc.) would increase carbon monoxide, nitrogen oxides, and potentially other criteria pollutants in the project vicinity. Potential short-term increases in fugitive dust emissions during construction activities could also occur.

b. The creation of objectionable odors?

[Maybe]. Additional aircraft operations at the airport could create objectionable odors.

c. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?

[No]. The proposed project would not be expected to result in the alteration of air movement, moisture or temperature, or any change in climate.

d. Expose sensitive receptors to severe air pollution conditions?

[Maybe]. While future increases in airport activity would likely increase emission levels for certain criteria pollutants, site meteorological conditions and the distance to offsite residents should prevent the creation of severe air pollution conditions. However, extensive analysis and modeling will be conducted to verify potential effects to sensitive receptors and nearby residents.

3. WATER. Would the proposal result in:

a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters.

[Maybe]. Changes in the airfield layouts to the north complex at LAX may alter drainage patterns. Storm water runoff in this area of the airport is currently conveyed through the Argo drainage ditch. Storm water runoff from the northern and south central portions of LAX initially drain into this grassy drainage swale and flow west to the Argo storm drain.

b. Changes in absorption rates, drainage patterns, or the rate and amounts of surface water runoff?

[**Yes**]. Modifications to the airport layout would result in the construction of impervious surfaces in the form of runways, aprons, buildings, roads, etc. Changes in the size and location of impervious surfaces could alter the rate and amount of surface water runoff as well as drainage patterns.

c. Alterations to the course or flow of flood waters?

[**No**]. No areas on or adjacent to LAX are identified as potential 100-year or 500-year flood event zones based on Federal Emergency Management Agency (FEMA) flood insurance rate maps.

d. Change in the amount of surface water in any water body?

[**No**]. There would be no alteration or addition to surface water bodies in the project area.

e. Discharge into surface water, or any alteration of surface water quality, including but not limited to temperature, dissolved oxygen, or turbidity?

[**Maybe**]. Increased imperviousness at the site due to structures, airfield components, and other hardscape areas could increase stormwater runoff into Santa Monica Bay.

Aircraft maintenance and servicing operations (fueling, deicing, etc.) also have the potential to generate pollutants which may enter the storm water runoff, but these pollutants can be controlled/minimized through actions outlined in the airport's Storm Water Pollution Prevention Plan.

f. Alteration of the direction or rate of flow of ground waters?

[**No**]. Implementation of the proposed project would not be expected to alter the direction or rate of flow of ground water.

g. Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?

[**No**]. The depth of groundwater below LAX is approximately 100 feet below the ground surface. The shallow groundwater beneath LAX is not used for water production and there are no production wells located on LAX. No interception of aquifer by cuts or excavations would be likely.

h. Reduction in the amount of water otherwise available for public water supplies?

[**Maybe**]. Increased activity levels at the airport may lead to increased use of public water supplies. Conservation measures including the use of

reclaimed water may reduce the potential increased demand on potable water supplies.

i. Exposure of people or property to water related hazards such as flooding or tidal waves?

[**No**]. The project site is not located in a flood plain or near any surface waters likely to expose people or property to water related hazards.

j. Changes in the temperature, flow, or chemical content of surface thermal springs?

[**No**]. There are no surface thermal springs located in the project area.

k. Changes to groundwater quality?

[**Maybe**]. The current LAX complex may be situated over an aquifer. Construction operations and fuel farm development among other aspects of the proposed project could adversely affect the quality of the water in the aquifer.

4. PLANT LIFE. Would the proposal result in:

a. Change in the diversity of species, or number of species of plants (including trees, shrubs, grass, crops and aquatic plants)?

[**Yes**]. Three of the proposed airport development plans and the No Project alternative would not be expected to directly effect the diversity of plant species. Further analysis will be conducted to determine potential secondary impacts to the dune area arising from its proximity to proposed runways and roadways (which would see increased use). One of the proposed airport development alternatives would intrude into the dunes, causing a direct impact to the dune area.

b. Reduction of the numbers of any unique, rare, or endangered species of plants?

[**Maybe**]. One of the current airport development proposals would intrude into the El Segundo dune area to the west of the airport. The dunes are a remnant of a once much greater dune ecosystem. The dune contains four California Department of Fish and Game designated sensitive habitats as well as two plant species (California spineflower and Lewis' evening primrose) that appear on the CDFG Special Plants List. Further analysis will be undertaken to determine the potential for direct or secondary impacts to these sensitive plants.

c. Introduction of new species of plants into an area, or be a barrier to the normal replenishment of existing species?

[**No**]. No new species would be expected to be introduced to the area as part of the project.

d. Reduction in acreage of any agricultural crop?

[**No**]. There are no agricultural lands on or adjacent to the project site.

e. Impacts to wetland habitat?

[**Maybe**]. Changes in the airfield layouts to the north complex at LAX may alter drainage patterns. Storm water runoff in this area of the airport is currently conveyed through the Argo drainage ditch. The Argo ditch could be considered a riparian habitat. The California Department of Fish and Game will be consulted for a determination of the riparian status of the Argo ditch.

5. ANIMAL LIFE. Would the proposal result in:

a. Change in the diversity of species, or number of species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms or insects)?

[**Yes**]. While three of the proposed airport development plans and the No Project alternative would not be expected to directly impact the diversity of any animal species, one of the proposed airport development plans would intrude into the El Segundo Dunes which could directly impact the El Segundo Blue Butterfly. Further analysis will be conducted to identify any potential primary or secondary impacts to animal species in the sensitive dune area.

b. Reduction of the number of any unique, rare, or endangered species of animals?

[**Maybe**]. One of the airport development plans would intrude into the dune area west of Pershing Drive and could have the potential to affect the El Segundo Blue Butterfly or its critical habitat. This development plan could disturb approximately 4 acres of land within the butterfly preserve.

c. Introduction of new species of animals into an area, or be a barrier to the migration or movement of animals?

[**Maybe**]. One of the proposed airport development scenarios could result in the impediment of the migration of the El Segundo Blue Butterfly which is currently located in the El Segundo Dunes.

d. Deterioration to existing fish or wildlife habitat?

[**Maybe**]. One of the airport development plans involves disturbing approximately 4 acres of land within the butterfly preserve. Further analysis will be conducted to assess these impacts as well as any secondary impacts to dune habitat due to its proximity to vehicle and aircraft activity.

6. NOISE. Would the proposal result in:

a. Increases in existing noise levels?

[**Yes**]. Reconfiguration of the airfield system, potential modifications to the airspace structure, and changes in the number and mix of aircraft operations would alter noise exposure patterns in the areas adjacent the airport. Some areas would see reductions from existing noise levels while others could see increases. Noise levels would also be affected by changes in the level of vehicular activity as well as short-term construction activity.

b. Exposure of people to severe noise levels?

[**Maybe**]. Traditional measures of noise exposure which account for cumulative effects of event duration (CNEL), indicate the potential for increased noise levels in certain areas but not necessarily at severe levels. However, further modeling will be conducted to quantify these potential effects including an analysis of single event sound exposure levels.

7. LIGHT AND GLARE. Would the proposal result in:

a. Produce new light or glare from street lights or other sources?

[**Yes**]. Modifications to the airport layout would require alterations to the number and location of on airport light sources. Typical airport lighting systems include taxiway guidance systems, runway guidance systems, apron/ramp floodlighting, ground lighting/marking, and airport beacons. Additional sources include hangars and warehouses, terminals, and parking lot lighting.

b. Reduce access to sunlight of adjacent properties due to shade and shadow?

[**No**]. Airport development would not be expected to reduce access to sunlight on adjacent properties.

8. LAND USE. Would the proposal result in:

a. An alteration of the present or planned land use of an area?

[**Yes**]. Land acquisition requirements associated with the proposed airport development plan would convert some existing residential, commercial, and industrial properties to airport-related uses. Compatibility between the LAX

Master Plan and Los Angeles community plans (Westchester-Playa del Rey District Plan), the Citywide General Plan Framework, the Los Angeles Coastal Transportation Corridor Specific Plan and the Los Angeles Airport Dunes / El Segundo Dunes Specific Plan will be assessed.

b. A conflict with existing general plan designations or zoning?

[**Maybe**]. Land acquisition requirements associated with the proposed airport development plan would convert some existing residential, commercial, and industrial properties to airport-related uses. Some aspects of the proposed conversion could require zone changes.

c. Conflict with applicable environmental plans or policies adopted by an agency with jurisdiction over the project?

[**Maybe**]. Components of the proposed LAX Master Plan could conflict in part with the plans or policies of agencies such as the U.S. Fish and Wildlife Services, the California Coastal Commission, the U.S. EPA, the South Coast Air Quality Management District and the City of Los Angeles among others.

9. NATURAL RESOURCES. Would the proposal result in:

a. Increases in the rate of use of any natural resources?

[**Yes**]. Forecast levels of airport activity would require additional consumption of fossil fuels by aircraft and other equipment over existing levels.

b. Depletion of any non-renewable natural resource?

[**No**]. While increased consumption of fossil fuels would occur, depletion of this resource would not be likely.

10. RISK OF UPSET. Would the proposal involve:

a. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil pesticides, chemicals or radiation) in the event of an accident or upset conditions?

[**Maybe**]. Storage and use of jet fuel and other potentially explosive or hazardous substances would continue under future airport operations, potentially increasing due to higher levels of flight activity.

b. Possible interference with an emergency response plan or an emergency evacuation plan?

[**Maybe**]. Existing emergency response plans have been formulated based on existing facility footprints, locations, and uses, such as the Central Utility Plant's Risk Management and Prevention Plan. Modifications to the size

or location of these types of facilities may require subsequent updates to emergency plans.

11. POPULATION. Would the proposal result in:

a. The relocation of any persons because of the effects upon housing, commercial, or industrial facilities?

[**Yes**]. Land acquisition requirements for the proposed airport development plans would include potential taking of both residential housing units (single and multi-family) as well as commercial and industrial properties.

b. Changes in the distribution, density or growth rate of the human population of an area?

[**Maybe**]. Accommodation of the forecast increases in commercial and cargo operations at the airport would enhance economic activity and growth in the region which could change the spatial distribution and growth in population.

c. Population increases cumulatively exceeding the regional or local population projection?

[**No**]. While the proposed project would be expected to result in enhanced economic activity any associated population growth or redistribution would be expected to remain within the overall growth projections for the region.

12. HOUSING. Would the proposal:

a. Affect existing housing, or create a demand for additional housing?

[**Yes**]. Land acquisition for the airport development plan could require taking units from the existing housing stock. Accommodation of forecast increases in commercial and cargo operations and resulting economic growth could create additional demand for housing within the region.

b. Have an impact on the available affordable or rental housing in the community?

[**Yes**]. Both the potential acquisition of housing units and direct and secondary economic growth as a result of the airport's ability to handle forecast increases in commercial and cargo activity could influence the rental and affordable housing markets in area.

c. Result in demolition, relocation or remodeling of residential, commercial or industrial facilities?

[**Yes**]. Land acquisition requirements associated with the airport development plans would require the potential taking of residential, commercial, and industrial properties. Airport development will also

require the demolition, relocation, or remodeling of selected airport-related structures and facilities.

13. RIGHT OF WAY. Would the proposal result in:

a. Reduced front/side lot area?

[**Maybe**]. The proposed airport development plans include land acquisitions which could reduce front/side lot areas.

b. Reduced access?

[**Maybe**]. The proposed airport development plans include roadway improvements to provide efficient access to the airport as well as reduce traffic-related impacts on adjacent communities. However, further analysis will be conducted to ascertain whether realignment of on and off-airport roadways could reduce access to selected commercial, industrial, or residential areas.

c. Reduced off-street parking?

[**No**]. The airport development plan would not be expected to result in reduced off-street parking. Additional parking space requirements have been programmed into the plan to accommodate increased passenger/employee demand for both short and long term parking.

d. Creation of abrupt grade differential between public and private property?

[**Maybe**]. While no abrupt grade differentials between public and private property would be expected, some portions of existing access roads (Aviation, Sepulveda) may be sunken to improve traffic circulation and accommodate airfield development.

14. TRANSPORTATION/CIRCULATION. Would the proposal result in:

a. Generation of additional vehicular movement?

[**Yes**]. Accommodation of forecast increases in commercial and cargo operations at the airport would generate additional vehicular traffic at the site.

b. Effects on existing parking facilities, or demand for new parking?

[**Yes**]. Airport development plans would require the relocation of some existing parking facilities. Increased commercial and cargo activity at the airport would increase the demand for short and long term parking spaces. Airport development plans could require approximately 45,000 spaces to accommodate increased passenger and employee parking demands. Currently there are approximately 8,400 parking spaces in the CTA, 13,000

long-term spaces in surface lots, and an additional over 6,700 employee spaces.

c. Impact upon existing transportation systems?

[**Yes**]. Additional vehicular traffic would utilize components of the existing transportation network around LAX.

d. Alterations to present patterns of circulation or movement of people and/or goods?

[**Yes**]. Airport development plans would require modifications to the existing on-airport circulation system as well as changes to the regional access system, thereby altering current circulation patterns.

e. Alterations to waterborne, rail or air traffic?

[**Yes**]. Modifications to the airport layout and potential changes in airspace structure would be required to accommodate forecast growth in operations at LAX. No changes would be expected to waterborne traffic or rail activity. The AT&SF line on the east side of the airport would not be expected to be impacted under the current proposals.

f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?

[**Maybe**]. Increased traffic and modified circulation and access systems to the airport could increase the risk of traffic hazards.

g. Conflicts with adopted policies supporting alternative transportation?

[**No**]. The proposed LAX Master Plan would encourage the continued and expanded use of alternative transportation.

15. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:

a. Fire protection?

[**Yes**]. The airport development plan would require the relocation of all or some of the existing fire protection facilities at the airport (Station Nos. 51, 95, and 80). Increased activity at the airport could require the potential for additional facilities, equipment, and/or staffing.

b. Police protection?

[**Yes**]. The airport development plan would require the relocation of the existing Airport Police Bureau facility. Increased activity at the airport could require the potential for additional facilities, equipment, and/or staffing.

c. Schools?

[**Maybe**]. Direct and secondary economic growth associated with forecast increase in airport activity could potentially alter population growth/distribution and, therefore, demands for educational services, including primary, secondary and community college systems. Increased flight activity would also change the noise exposure areas, potentially impacting schools in selected areas.

d. Parks or other recreational facilities?

[**Maybe**]. Direct and secondary economic growth associated with forecast increase in airport activity could potentially alter population growth/distribution and, therefore, demands for recreational facilities. Increased flight activity would also change the noise exposure areas, potentially impacting parks in selected areas.

e. Maintenance of public facilities, including roads?

[**Maybe**]. Increased vehicle activity on access roads would likely lead to an increase in street maintenance requirements.

f. Other governmental services?

[**Maybe**]. Increased airport activity and associated direct and indirect economic growth would likely result in additional demands on other governmental services, including customs and postal services.

16. ENERGY. Would the proposal result in:

a. Use of exceptional amounts of fuel or energy?

[**Yes**]. Increased levels of aircraft operations and other airport-related activity would likely result in an increase in the use of fuel and energy sources.

b. Significant increase in demand upon existing sources of energy, or require the development of new sources of energy?

[**Maybe**]. Increased energy consumption would likely occur. This increase would most likely be met from existing sources without the requirement for new energy sources.

c. Conflict with adopted energy conservation plans?

[**No**]. The proposed LAX Master Plan incorporates state of the art facilities designed to maximize energy efficiency and reduce waste.

17. UTILITIES. Would the proposal result in a need for new systems, or alterations to the following utilities:

a. Power or natural gas?

[**Yes**]. Major redevelopment of the airport would likely require additions/alterations to the existing power infrastructure and distribution system to handle increased capacity requirements.

b. Communications systems?

[**Yes**]. Major redevelopment of the airport would likely require upgrades/alterations to the existing communications systems to handle increased capacity requirements.

c. Water?

[**Yes**]. Major redevelopment of the airport would likely require additions/alterations to the existing water supply infrastructure to handle increased capacity requirements.

d. Sewer or septic tanks?

[**Yes**]. Major redevelopment of the airport would likely require additions/alterations to the existing sewage system.

e. Storm water drainage?

[**Maybe**]. New or altered storm water drainage systems could be required depending on the layout of the respective airport development plan.

f. Solid waste and disposal?

[**Yes**]. Increased airport activity would likely generate additional solid waste, although LAX has been successful in achieving waste stream reductions through implementation of its recycling/recovery program.

g. Water treatment?

[**Maybe**]. Some expanded water treatment services could be necessary to treat additional waste water generated as a result of the proposed project. Expanded operations would not, however, be expected to result in the need for new water treatment facilities to be built.

18. HUMAN HEALTH. Would the proposal result in:

a. Creation of any health hazard or potential health hazard (excluding mental health)?

[**Maybe**]. Increased airport activity could create noise or air quality hazards.

b. Exposure of people to potential health hazards?

[**Maybe**]. Increased airport activity could expose persons to potential noise or air quality-related health hazards.

19. AESTHETICS. Would the proposed project result in:

a. The obstruction of any scenic vista or view open to the public?

[**Maybe**]. One of the proposed airport development plans would require a runway extension into the northern portion of the El Segundo dunes complex. This area of the dunes, along Sandpiper Street, is a popular viewing area which provides the public views of airport operations to the east and the Pacific Ocean to the west. Under this development plan, public access on Sandpiper Street could be impacted.

b. The creation of an aesthetically offensive site open to public view?

[**Maybe**]. One of the proposed airport development plans would require a runway extension into the northern portion of the El Segundo dunes complex. This intrusion into the dunes area would likely be visible to vehicular traffic along Vista del Mar Boulevard as well as to people using Dockweiler Beach State Park.

c. The destruction of a stand of trees, a rock outcropping or other locally recognized desirable aesthetic natural feature?

[[**Maybe**]. One of the proposed airport development plans would result in a runway extension into the northern portion of the El Segundo dunes complex which is an aesthetic natural feature.

d. Any negative aesthetic effect?

[**Maybe**]. One of the proposed airport development plans would result in a runway extension into the northern portion of the El Segundo dunes complex possibly creating a negative aesthetic effect.

20. RECREATION. Would the proposal result in:

a. An impact upon the quality or quantity of existing recreational opportunities?

[**Maybe**]. One of the airport development plans (Alternative 4), could require the acquisition of a public use park (Holly Park).

b. The demand for additional neighborhood or regional parks or other recreational facilities?

[**Maybe**]. Direct and secondary economic growth associated with forecast increase in airport activity could potentially alter population growth/distribution and, therefore, demands for recreational facilities.

21. CULTURAL RESOURCES. Would the proposal result in:

a. Alteration of or the destruction of a prehistoric or historic archaeological site?

[**Maybe**]. Construction, excavation, and other ground disturbing activities associated with the airport development plans could have the potential to alter or destroy previously identified archaeological sites. Test excavations would be needed prior to construction activities in these areas to determine importance of site. A potentially significant site could occur in the southwest area of the dunes, but would not likely be affected under any of the currently proposed airport development plans.

b. Adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?

[**Maybe**]. Airport development plans could result in adverse physical or aesthetic effects to Hangar No. 1, a structure listed on the National Register of Historical Places. Removal or relocation of the historic building to accommodate cargo-related facilities could be required.

c. Physical change which would affect unique ethnic cultural values?

[**No**]. The proposal would not be expected to cause a physical change which could affect any unique ethnic cultural values.

d. Restrict existing religious or sacred uses within the potential impact area?

[**No**]. The project would not be expected to restrict existing religious or sacred uses within the area.

22. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project result in:

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range or a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

[**Maybe**]. Certain airport development plans could directly or indirectly impact the El Segundo Blue Butterfly and/or its critical dune habitat. In addition, Hangar No. 1, a National Register listed site, could be impacted by development of airport facilities.

b. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.

[**No**].

c. Does the project have impacts which are individually limited, but cumulatively considerable?

[**Yes**]. Airport development plans and increased activity levels could cause cumulative noise, traffic, and/or air quality impacts.

d. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

[**Maybe**]. The higher activity levels associated with the airport development plans could lead to increased human exposure to noise and air pollutant emissions.

GLOSSARY OF TERMS

ADG (Airplane Design Group): a grouping of airplanes based on wingspan. Group IV: from 118 feet (36m) up to but not including 171 feet (52m). Group V: from 171 feet up to but not including 214 feet (65m). Group VI: from 214 feet (65m) up to but not including 262 feet (80m).

ALP (Airport Layout Plan): a plan for an airport showing boundaries and proposed additions to all areas owned or controlled by the sponsor for airport purposes, the location and nature of existing and proposed airport facilities and structures, and the location on the airport of existing and proposed nonaviation areas and improvements thereon.

CEQA (California Environmental Quality Act): Enacted in 1970, with last major amendments made in 1995, CEQA requires all public agencies to consider the environmental consequences of any discretionary activity they undertake.

CNEL (Community Noise Equivalent Level): 24-hour sound level integrated over a 24-hour period. Higher weightings are applied for the noise levels occurring during the evening (7 p.m. - 10 p.m.) and nighttime (10 p.m. - 7 a.m.) hours.

CTA: Central Terminal Area

EIR (Environmental Impact Report): Under CEQA, a detailed informational document prepared by a Lead Agency that analyzes a project's potential significant impacts and identifies mitigation measures and reasonable alternatives to eliminate or reduce those impacts.

EIS (Environmental Impact Statement): The detailed statement required by NEPA when an agency proposes a major federal action significantly affecting the quality of the environment.

FAA: Federal Aviation Administration. The FAA is the Lead Agency for the LAX Master Plan for the purposes of NEPA.

LADOA: City of Los Angeles Department of Airports. The LADOA is the Lead Agency for the LAX Master Plan for the purposes of CEQA.

Lead Agency: Government agency that has the principal responsibility for carrying out or approving a project and therefore the principal responsibility for preparing the CEQA documents for that project.

MAP (Million Annual Passengers): The count of all enplaning (departing) and deplaning (arriving) passengers on a yearly basis.

Mitigation Measures: Measures to be included in the project which will reduce the level of significance of an impact.

NBEG (Narrow Body Equivalent Gate): Index which converts the gate requirements of diverse aircraft (from small commuters to new large aircraft) so they are equivalent to the apron capacity of a typical narrow body aircraft gate.

(NEPA) National Environmental Protection Act: Enacted in 1970, NEPA establishes national environmental policy.

NOI (Notice of Intent): The first formal step in the EIS process, consisting of a notice.

NOP (Notice of Preparation): The first step in the formal EIR process; under CEQA, the NOP solicits public and agency participation in determining the scope of the EIR.

O&D Passengers: Origination and Destination passengers, i.e., passengers who arrive or depart directly from LAX (not connecting to other flights at LAX)

TBIT: Tom Bradley International Terminal

u:\rdw\newnop2.doc

SUPPLEMENTAL NOTICE

REGARDING THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT FOR THE LOS ANGELES INTERNATIONAL AIRPORT (LAX) MASTER PLAN

The City of Los Angeles is preparing an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for future development recommended by the Master Plan update for Los Angeles International Airport (LAX). The Federal Aviation Administration (FAA) is also preparing an Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA). In order to eliminate unnecessary duplication and in accordance with the provisions of the State CEQA Guidelines (§§ 15222 and 15226) and with federal regulations promulgated by the Council on Environmental Quality (40 C.F.R. §§ 1500.2 and 1506.2), the EIR is being prepared jointly with the EIS and the necessary environmental documentation is planned to be included in an integrated document. The City of Los Angeles and the FAA are acting as Joint Lead Agencies on the EIR/EIS.

To meet CEQA requirements, a Notice of Preparation (NOP) of a Draft EIR was publicly circulated on June 11, 1997. On the same date, to meet NEPA requirements, a Notice of Intention (NOI) to Prepare an EIS was publicly circulated. Public scoping meetings were held on July 12th and 15th, and a scoping meeting for governmental and public agencies was held on July 16th.

This Supplemental Notice is intended to be an informational update regarding the status of the LAX Master Plan and the accompanying environmental documents. As a result of public input and further study and refinement through the master planning and environmental review process, three of the four potential development alternatives described in the June 1997 NOP and NOI have been eliminated from further consideration in the EIR/EIS detailed analysis sections. Those three alternatives – alternative 2, which called for the construction of two new runways, alternative 3, which involved construction of a new 6,000 foot long runway into the LAX dunes/preserve area, and alternative 4, which involved realignment and extension of the existing runway at Hawthorne Municipal Airport – are no longer proposed to be evaluated in detail in the EIR/EIS. The remaining "build" alternative and two additional "build" alternatives, as well as the "no action/no project" alternative, that will be evaluated in detail in the EIR/EIS are briefly described below.

All data presented in this supplemental notice are preliminary and subject to change as a result of continued planning efforts and the environmental review process.

Diagrams depicting each of the alternatives are on pages 4 - 5.

LAWA anticipates that the project alternatives and other matters discussed in this supplemental notice will be fully detailed and evaluated in the Draft EIR/EIS. The public will be afforded an opportunity to provide comments on the Draft EIR/EIS at the time it is issued, and all comments received in response to this supplemental notice or during the public comment period will be considered and will be addressed in the Final EIR/EIS. Additionally, public hearings will be scheduled regarding the Draft EIR/EIS and regarding the Master Plan as it is considered by the FAA and by the City.

ALTERNATIVE A (Five Runways/New North Runway)

This alternative, previously described in the June 1997 NOP/NOI as Alternative 1, would add a new 6,700-foot runway on the north airfield and relocate the two existing north airfield runways south toward the terminal area (see page 4). The newly relocated runways would be lengthened to 12,000 feet across Sepulveda Boulevard with increased lateral spacing to provide for a new center taxiway. A new terminal on the west side would be connected to the I-405 and I-105 freeways via a "ring road." The Metropolitan Transit Authority (MTA) Green Line would be extended to the new west terminal and a people mover would connect the new west terminal, new passenger concourses, a new short-term parking garage, the Tom Bradley International Terminal (TBIT) and the Central Terminal Area (CTA). Cargo facilities would be expanded on newly acquired land near the southeast corner of the airport.

The following summarizes the major airport components proposed in Alternative A:

- **Five runways**
  North Airfield
  - — Addition of one new 6,700-foot runway.
  - — Relocation southward and extension of outboard runway (24R) from 8,925 feet to 12,000 feet.
  - — Relocation southward and extension of inboard runway (24L) from 10,225 feet to 12,000 feet.

  South Airfield
  - — No change to existing inboard runway (25R).
  - — Relocation southward and extension of outboard runway (25L) from 11,096 feet to 12,000 feet.
- Terminal facilities to be expanded by approximately 6.4 million sq. ft., from existing 3.96 million sq. ft. to approximately 10.4 million sq. ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 89 from existing 185 to approximately 274.
- Cargo space to be expanded by approximately 2.2 million sq. ft. and 40 acres, from 2.3 million sq. ft. on 197 acres (as would exist in the No Action/No Project Alternative) to approximately 4.5 million sq. ft. on 237 acres.
- Ancillary facilities to decrease by approximately 296 acres, from 384 acres to 88 acres. Ancillary facilities to include an on-site fuel farm to be located at Imperial Highway and Sepulveda Boulevard.
- Land acquisition of approximately 269 acres.

Further study and refinement through the master planning and environmental review process currently projects Alternative A to accommodate potential aviation demand in the year 2015 at the following approximate activity levels:

Aircraft Operations	935,000
Air Passengers	98 million
Air Cargo	4.2 million tons

As noted above, two additional development alternatives have emerged through the master planning and environmental review process and will be the subject of detailed analysis in the EIR/EIS.

ALTERNATIVE B (Five Runways/New South Runway)

This alternative would add a new 6,700-foot runway on the south airfield in the existing cargo area (see page 4). The existing south runways would be relocated north providing lateral spacing to add approach capacity during poor weather conditions. On the north airfield, Runway 24L would be lengthened to 12,000 feet across Sepulveda Boulevard. A new terminal on the west side would connect to the I-405 and I-105 freeways via a "ring road." The MTA Green Line would be extended to the new west terminal and a people mover would connect the new west terminal, new passenger concourses, a new short-term parking garage, the TBIT and the CTA. Cargo facilities would be relocated to newly acquired property in the area north of 98th Street.

The following summarizes the major airport components proposed in Alternative B:

- **Five runways**
  North Airfield
  - — Relocation northward 130 feet and extension of outboard runway (24R) from 8,925 feet to 10,000 feet.
  - — Extension of inboard runway (24L) from 10,285 feet to 12,000 feet across Sepulveda Boulevard.

  South Airfield
  - — Relocate existing inboard runway (25R) northward 555 feet.
  - — Extend outboard runway (25L) from 11,096 feet to 12,000 feet and relocate 500 feet northward of its present location. Rename RW (25C).
  - — Construct new 6,700 foot long RW (25L) 2,500 feet south of new RW (25R)
- Terminal facilities to be expanded by approximately 6 million sq.ft., from existing 3.96 million sq. ft. to approximately 9.7 million sq.ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 70 from existing 185 to approximately 255.
- Cargo space to be expanded by approximately 2.6 million sq.ft. and 70 acres, from 2.3 million sq.ft. on 197 acres (as would exist in the No Action/No Project Alternative) to approximately 4.9 million sq.ft. on 267 acres.
- Ancillary facilities to decrease by approximately 313 acres, from 384 acres to 71 acres. Ancillary facilities to include an off-site fuel farm to be located at either the Chevron refinery or Scattergood power station.
- Land acquisition of approximately 345 acres.

As presently calculated, Alternative B would accommodate potential aviation demand in the year 2015 at the following approximate activity levels:

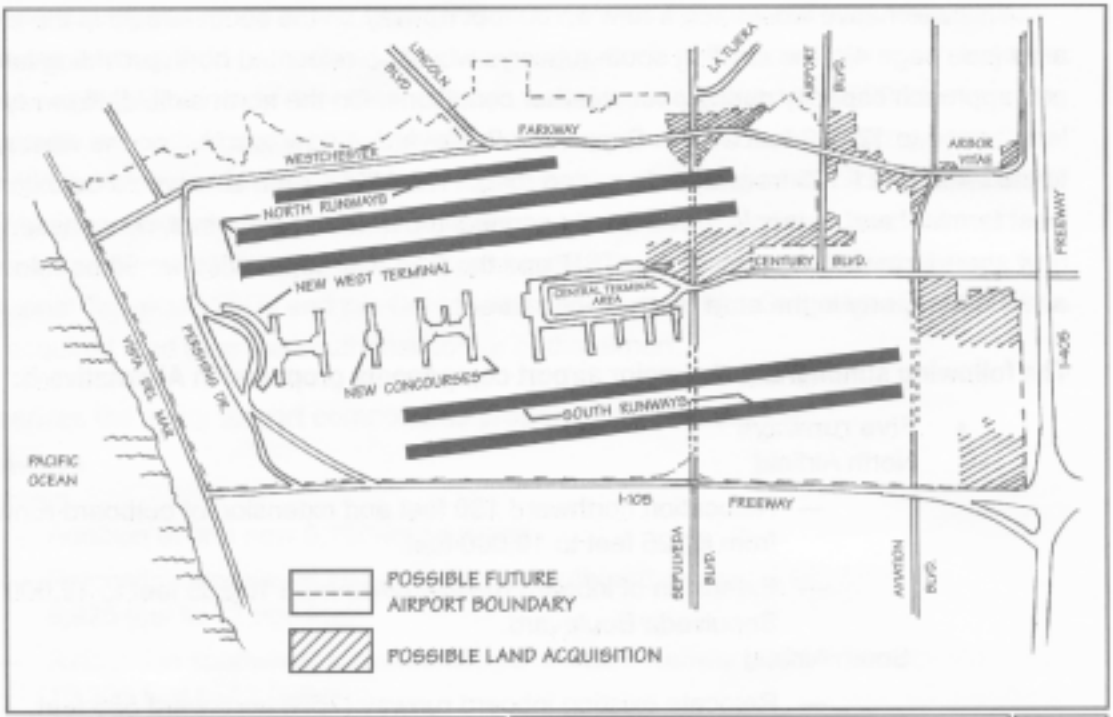
Aircraft Operations	935,000
Air Passengers	98 million
Air Cargo	4.2 million tons

LAX Master Plan Alternative A

Aircraft Operations
935,000

Air Passengers
98 million

Air Cargo
4.2 million tons



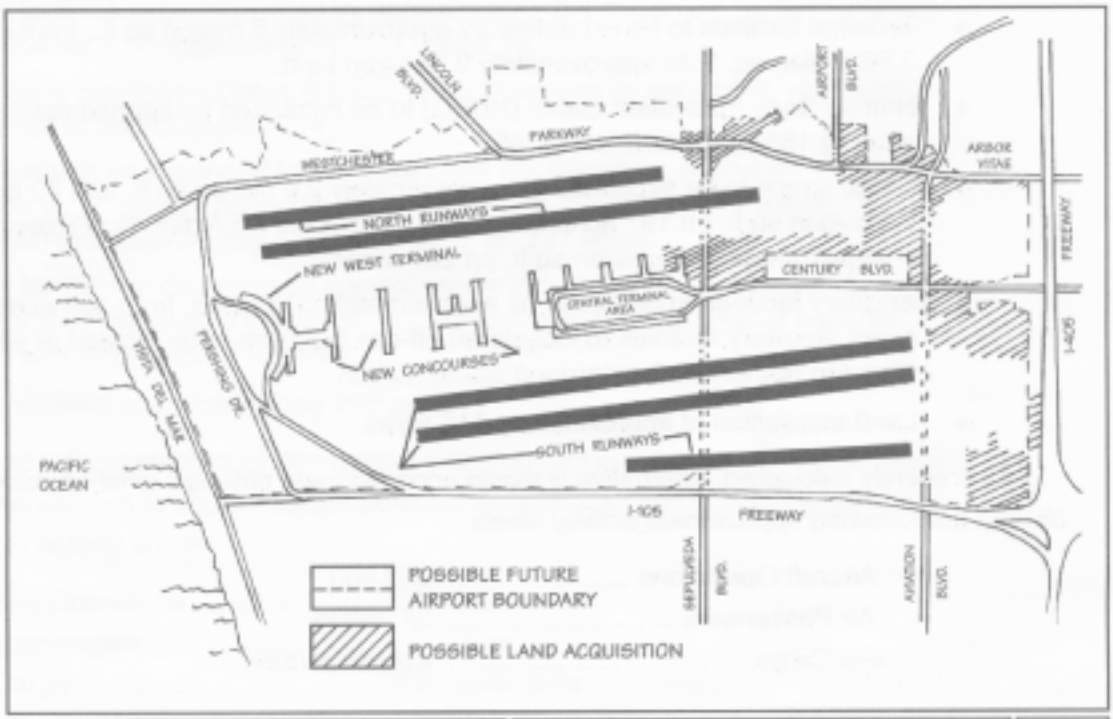
Los Angeles International Airport Master Plan	Alternative A	Figure

LAX Master Plan Alternative B

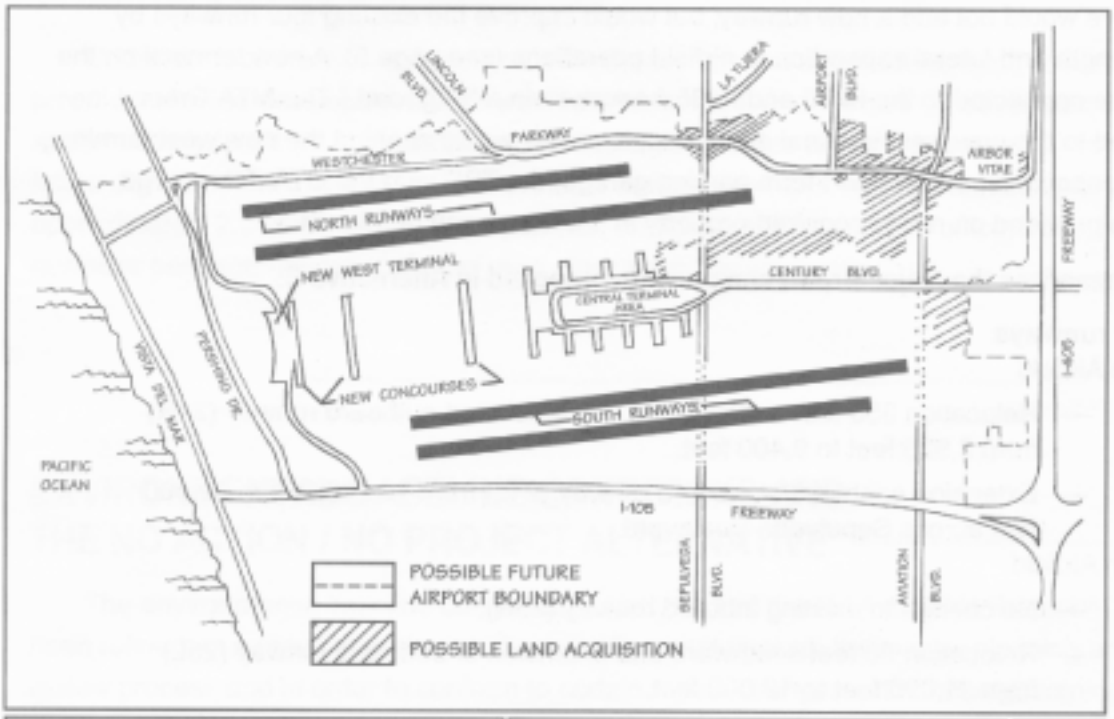
Aircraft Operations
935,000

Air Passengers
98 million

Air Cargo
4.2 million tons



Los Angeles International Airport Master Plan	Alternative B	Figure



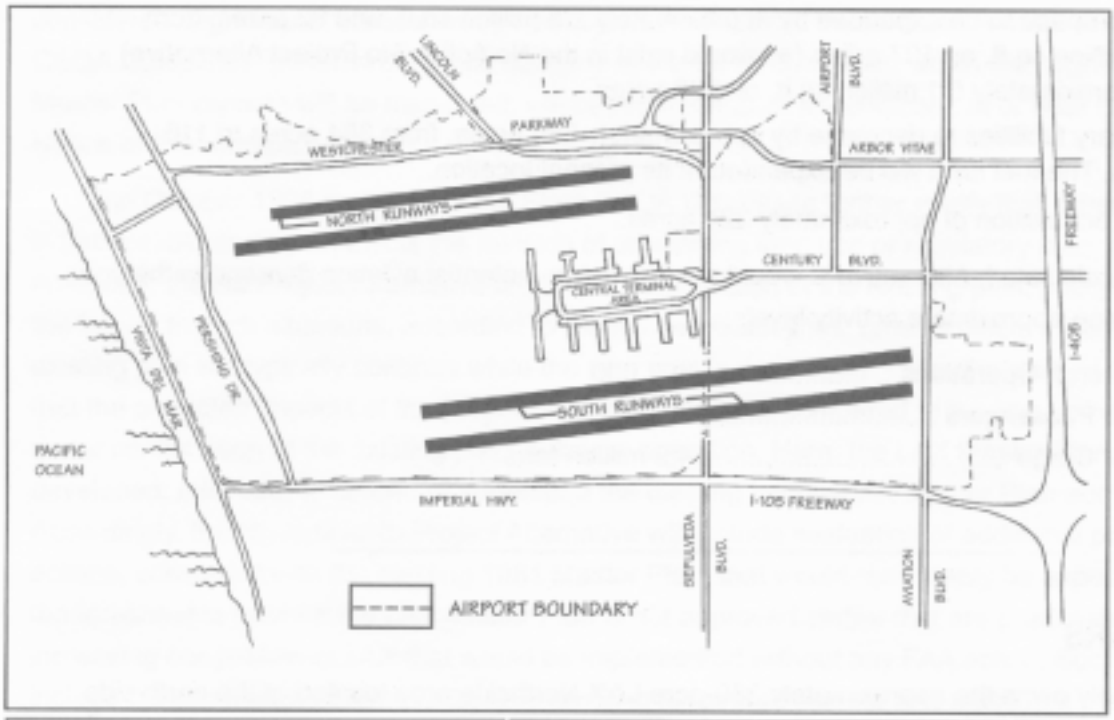
Los Angeles International Airport Master Plan	Alternative C	Figure

LAX Master Plan Alternative C

Aircraft Operations
797,000

Air Passengers
89 million

Air Cargo
4.2 million tons



Los Angeles International Airport Master Plan	No Action / No Project Alternative	Figure

LAX Master Plan No Action / No Project Alternative

Aircraft Operations
783,400

Air Passengers
78.5 million

Air Cargo
3.2 million tons

ALTERNATIVE C (Four Runways)

This alternative would not add a new runway, but would improve the existing four runways by increasing their length and lateral separation to airfield operations (see page 5). A new terminal on the west side would be connected to the I-405 and I-105 freeways via a "ring road." The MTA Green Line would be extended to the new west terminal and a people mover would connect the new west terminal, new passenger concourses, a new short-term parking garage, the TBIT and the CTA. New cargo facilities would be provided on newly acquired property in the area north of 98th Street.

The following summarizes the major airport components proposed in Alternative C:

- **Four runways**
  North Airfield
  - — Relocation 350 feet northward and extension of outboard runway (24R) from 8,925 feet to 9,400 feet.
  - — Extension eastward of inboard runway (24L) from 10,285 feet to 12,000 feet across Sepulveda Boulevard.

  South Airfield
  - — No change to existing inboard runway (25R).
  - — Relocation 50 feet southward and extension of outboard runway (25L) from 11,096 feet to 12,000 feet.
- Terminal facilities to be expanded by approximately 3 million sq.ft., from existing 3.96 million sq. ft. to approximately 7 million sq.ft.
- Narrow Body Equivalent Gates (NBEG) to be increased by approximately 43 from existing 185 to approximately 228.
- Cargo space to be expanded by approximately 2.8 million sq.ft. and 83 acres, from 2.3 million sq.ft. on 197 acres (as would exist in the No Action/No Project Alternative) to approximately 5.1 million sq.ft. on 280 acres.
- Ancillary facilities to decrease by approximately 268 acres, from 384 acres to 116 acres. The fuel farm will be expanded at its present location.
- Land acquisition of approximately 224 acres.

As presently calculated, Alternative C would accommodate potential aviation demand in the year 2015 at the following approximate activity levels:

Aircraft Operations	797,000
Air Passengers	89 million
Air Cargo	4.2 million tons

OTHER MATTERS

LAWA presently owns the approximately 330-acre LAX Northside area located at the north side of the airport property and bisected by Westchester Parkway. Under Ordinance 159,526 and Tract Map No.34836, both approved in the mid-1980s, this area is entitled to be developed with approximately 4.5 million sq.ft. of office, hotel, restaurant, retail, research and development, and airport-related uses. LAWA also presently owns the approximately 28.5-acre Continental City site at

Aviation Boulevard and Imperial Highway. This parcel is entitled to be developed with approximately 3.1 million sq.ft. of office, hotel and retail uses.

Under each of the above-described airfield development alternatives, the Continental City site's presently allowed development uses would be eliminated, and it would be developed solely for airfield/ airport uses, while the LAX Northside area would be modified so as to substantially reduce the level of future development. The EIR/EIS will evaluate reducing the LAX Northside development uses to approximately 2.5 million sq. ft. for airport administrative offices, general office, hotel, restaurant, business park and educational uses, and other airport-related uses.

ENVIRONMENTAL BASELINE CONDITIONS AND THE NO ACTION / NO PROJECT ALTERNATIVE

The environmental baseline comparative analysis and the No Action/No Project Alternative have been refined as a result of further study and refinement through the master planning and environmental review process and in order to conform to certain recent changes in the rules governing the CEQA definition of the No Project Alternative (see page 5). The October 1998 revisions to the State CEQA Guidelines clarify that it is the existing environmental setting as of the time the Notice of Preparation is published (here June 1997) that normally constitutes the baseline physical conditions by which a lead agency determines under the EIR process whether potential impacts of a proposed action are to be considered "significant." (Guidelines § 15125(a).) As provided in the October 1998 revisions of the CEQA Guidelines, the environmental baseline in the EIR/EIS, against which the "significance" of the LAX Master Plan impacts will be measured, will be representative of conditions at or near the June 1997 Notice of Preparation.

The October 1998 revisions of the State CEQA Guidelines further clarify that, where the project that is being evaluated by an EIR is the revision of an existing land use or regulatory plan, policy or ongoing operation, the No Project Alternative will be the continuation of the existing plan, policy or operation into the future. In such situations, according to the revised Guidelines, other projects initiated under the existing plan will typically continue while the new plan is developed. Thus, the revised Guidelines provide that the projected impacts of the proposed plan(s) are to be compared to the impacts that would occur under continuation of the existing plan, policy or operation. Here, the LAX Master Plan is being developed, *inter alia*, to amend or supersede the existing interim LAX Master Plan adopted in 1981. Accordingly, the No Action/No Project Alternative will include evaluation of additional projects and actions, consistent with the existing 1981 Master Plan, that would reasonably be expected to occur in the foreseeable future if the LAX Master Plan is not approved and/or that are predictable responses to increasing congestion at LAX that would be implemented without any FAA action. Such actions would include the increased use of remote hardstanding for aircraft parking and additional measures to reduce curbside congestion. This scenario will also evaluate the airlines' likely continued response during the next fifteen years to increasingly restrictive LAX capacity limitations through adjustments in their air service such as introducing a greater proportion of wide-body aircraft.

The No Action/No Project alternative will evaluate land use and regional transportation infrastructure as it is forecast to exist during the plan years of 2005 and 2015. Additionally, the No Action/No Project Alternative will evaluate development of the LAX Northside (4.5 million sq.ft.) and Continental City (3.1 million sq.ft.) sites owned by LAWA in accord with the previous approvals for those parcels.

The following summarizes the major airport components that will be evaluated with respect to the No Action/No Project Alternative:

- Runways remain as existing with the addition of minor taxiway improvements.
- Terminal facilities to remain as existing with 3.96 million sq.ft. of space.
- Narrow Body Equivalent Gates (NBEG) to remain at the existing figure of 185.
- Cargo space to be expanded by approximately 0.4 million sq.ft. from the existing 1.9 million sq.ft. Acreage to remain at 197.
- Ancillary facilities to remain as existing on 384 acres.
- Only land currently planned for acquisition outside of the Master Plan is included in this scenario.

As presently calculated, the No Action/No Project Alternative would accommodate potential aviation demand in the year 2015 at the following approximate activity levels:

Aircraft Operations	783,400
Air Passengers	78.5 million
Air Cargo	3.2 million tons

For further information about Master Plan Los Angeles World Airports (LAWA) call the Master Plan office at 310. 646.7690 or visit our website at www.LAX2015.org.

June 11, 1997

RE: **LAX MASTER PLAN**

Enclosed is your agency's copy of the Department of Airport's Notice of Preparation, the Federal Aviation Administration Letter and the Scoping Meeting Notice for the Environmental Impact Statement/Environmental Impact Report regarding the Department of Airports' Master Plan for LAX.

You will note that the agency scoping meeting is held on July 16, 1997 from 9:00 AM to 4:45 PM at the Department of Airports Board Room. There will be a lunch break between 12:00 (noon) and 1:30 PM. **Preference will be given to federal agencies during the morning session hours**. Two fifteen minute public comment periods will be held; one at the close of the morning session and one at the close of the afternoon session.

Written comments are welcome and will, of course, be treated as importantly as your verbal testimony. Written comments will be accepted through July 31, 1997.

AGENCYLT

P.O. Box 92216, Los Angeles, California 90009-2216 · (310) 646-5252 · FAX (310) 646-0523

All comments must be submitted in writing to this office no later than July 31, 1997. Please submit your comments directly to:

John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite. 218
Los Angeles, CA 90045

Copies of all comments will be forwarded to the FAA to insure their review in compliance with NEPA requirements. Federal agencies with regulations requiring a response directly to the FAA are requested to also send a copy of their comments to the above Department of Airport Address.

Scoping Meetings for the General Public will be held July 12, 1997 at 8:00 a.m. and at 2:00 p.m. at the Proud Bird Restaurant (11022 Aviation Blvd., Los Angeles) and on July 15, 1997 at 5:00 p.m. at the Hawthorne Memorial Center (3901 El Segundo Blvd., Hawthorne) to receive public testimony regarding the appropriate scope and content of the environmental information to be included in the draft EIR/EIS.

A Scoping Meeting for Public Agencies will be held on July 16, 1997 at 9:00 a.m. at the Department of Airports, Administration Building (1 World Way, Los Angeles) to receive agency testimony regarding the appropriate scope and content of the environmental information to be included in the draft EIR/EIS.

The **Initial Study** is available for review at local libraries, the Department of Airports, and the Los Angeles City Clerk's office.

For further information, please call 310-646-7690.

Yours truly,

John L. Graham
Chief of Airport Planning

enclosures: Notice of Intent
Notice of Preparation
Notification of Public Scoping Meeting

jlg:sg:t:letter:nop4

EIS Agency Scoping Coordination Letter Mailing List

Elin D. Miller, Director
California, Department of Conservation
801 K Street, 24th Floor
Sacramento, CA 95814

C.F Raysbrook
California, Department of Fish and Game
1416 9th Street, 12th Floor
Sacramento, CA 95814

David N. Kennedy, Director
California, Department of Water Resources
1416 9th Street, 12th Floor
Sacramento, CA 95814

David Kessler
Federal Aviation Administration, District Office
15000 Aviation Boulevard
P.O. Box 92007-WWPC
Hawthorne, CA 90261

Reuben Cabalbag
Federal Aviation Administration, District Office
15000 Aviation Boulevard
P.O. Box 92007-WWPC
Hawthorne, CA 90261

Robert Bloom, District Airport Engineer
Federal Aviation Administration, District Office
15000 Aviation Boulevard
P.O. Box 92007-WWPC
Hawthorne, CA 90261

The Honorable Howard Berman
Congressman, House of Representatives
10200 Sepulveda Boulevard, Suite 300
Mission Hills, CA 91345

Colonel Mike Warden
Los Angeles Air Force Base
SMC/PA
2430 East El Segundo Boulevard, suite 4049
El Segundo, CA 90244-4687
National Transportation Safety Board
1515 West 190th Street #555
Gardena, CA 90248

Todd Morris, Meteorologist-In-Charge
National Weather Service
520 North Elevar Street
Oxnard, CA 93030

David Castanon, Chief
U.S. Army Corps of Engineers
2151 Alessandro Drive, Suite 100
Ventura, CA 93001

Don Beaver
U.S. Department of Commerce
9650 South Flair Drive
El Monte, CA 91731

Jacquelyn J. Stayton
U.S. Department of Housing & Urban Development
1615 West Olympic Boulevard
Los Angeles, CA 90015

Julia Barrow, Chief
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Leslie Rogers, Regional Administrator
U.S. Federal Transit Administration
Regional Office
201 Mission Street, Suite 2210
San Francisco, CA 94105-1800

James Boyd, Executive Officer
California Air Resources Board
2020 L Street
Sacramento, CA 95814

Pam Emerson
California Coastal Commission
200 Oceangate, Suite 1000
Long Beach, CA 90802

Chris Parry, Director of Public Education Programs
California Coastal Commission
45 Freemont Street, #2000
San Francisco, CA 94105

Chanelle David, Unit Biologist
California Department of Fish and Game
330 Golden Shore Avenue, #15
Long Beach, CA 90802

P. Brown
California Trade and Commerce Agency
801 K Street, Suite 1700
Sacramento, CA 95814

Robert I. Remen, Executive Director
California Transportation Commission
1120 N Street, Room 2233
Sacramento, CA 95814

Jerry Epstein, Chairman
California Transportation Commission
4201 Via Marina
Marina del Rey, CA 90292

James J. McCarthy, Executive Assistant
Caltrans – District 7
120 South Spring Street
Los Angeles, CA 90012

Martin Beckwith, Chief
Caltrans – Division of Aviation
P.O. Box 942873
Sacramento, CA 94273

Gerald Chaleff
City Planning Commission
221 North Figueroa Street, Room 1600
Los Angeles, CA 90012

Glenn Stober
State Clearinghouse
Office of Planning and Research
1400 10th Street, Room 121
Sacramento, CA 95814

Michael Fischer, Executive Officer
State Coastal Conservancy
1330 Broadway, #1100
Oakland, CA 94612-2530

Wilma Jose Ryder, Deputy Labor Commissioner
State of California, Industrial Relations
Division of Labor Standards Enforcement
Los Angeles, CA 90012

Airport Manager, Hawthorne Municipal Airport
City of Hawthorne
12101 South Crenshaw Boulevard
Hawthorne, CA 90250-3369

Airport Manager, Santa Monica Airport
City of Santa Monica
3223 Donald Douglas Loop Drive
Santa Monica, CA 90405

Barry Kurtz, Supervising Civil Engineer
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91802-1460

Director, Sanitation District
County of Los Angeles
1955 Workman Mill Road
Whittier, CA 90601

Larry J. Matthews, Manager
County of Los Angeles
Community Development Commission
2 Coral Circle
Monterey Park, CA 91755

Charles Carry, Chief Engineer
County of Los Angeles
Sanitation District
Whittier, CA 90601

Los Angeles Unified School District
Environmental Review Unit
P.O. Box 2298, Room 101
Los Angeles, CA 90051

Renee Berlin, Director
Los Angeles County Metropolitan Transportation Authority
San Fernando Valley/North County Area
1 Gateway Plaza
Los Angels, CA 90053

Vic Kamhi
Los Angeles County Metropolitan Transportation Authority
1 Gateway Plaza
Los Angels, CA 90053

Karen Heit, Director
Los Angeles County Metropolitan Transportation Authority
South Bay Area Team
1 Gateway Plaza
Los Angels, CA 90053

Carol Inge, Director
Los Angeles County Metropolitan Transportation Authority
Westside Area Team
1 Gateway Plaza
Los Angels, CA 90053

Robert Ghirelli, Executive Officer
Los Angels Regional Water Quality Board
101 Center Plaza Drive
Monterey Park, CA 91754

David Mieger
Metropolitan Transportation Authority
818 West Seventh Street
Los Angeles, CA 90017

Dee Hardison, Chairperson
South Bay Council of Governments
3031 Torrance Boulevard
Torrance, CA 90503

Jim Lents, Executive Officer
South Coast Air Quality
Local Government CEQA
21885 Copley Drive, 2nd Floor South
Diamond Bar, CA 91765

Tim Merwin, Aviation Program Manager
Southern California Association of Governments
Aviation Technical Committee
818 West 7th Street, 12 Floor
Los Angeles, CA 90017

Mark Pisano, Executive Director
Southern California Association of Governments
818 West 7th Street, 12 Floor
Los Angeles, CA 90017

Environmental Review Unit
354 South Spring Street, Suite 700
Los Angeles, CA 90013

City News Service
200 North Spring Street, City Hall, Room 337A
Los Angeles, CA 90012

Ann Siracusa
Citywide Planning Division
City of Los Angeles
221 South Figueroa Street, 4th Floor
Los Angeles, CA 90012

Darryl Fisher
Zoning Administration
City of Los Angeles
221 South Figueroa Street, Room 1540
Los Angeles, CA 90012

Rowella H. Louie
Department of Cultural Affairs
City of Los Angeles
433 South Spring Street, 10th Floor
Los Angeles, CA 90012

Bob Rogers
South Los Angeles Metropolitan Planning Division
City of Los Angeles
221 South Figueroa Street, 3rd Floor
Los Angeles, CA 90012

Crime Prevention Unit, Police Department
City of Los Angeles
Parker Center, 150 North Los Angeles Street
Los Angeles, CA 90012

Commission Office, Police Department
City of Los Angeles
150 North Los Angeles Street, Room 150
Los Angeles, CA 90012

Jim Bort, Agricultural and Land Developer
Department of Airports – Palmdale Region
City of Los Angeles
39516 North 25th Street East
Palmdale, CA 93550-2158

Marc Woershing
City Planning Department
City of Los Angeles
221 South Figueroa Street, 16th Floor
Los Angeles, CA 90012

Haripal Vir, City Traffic Engineer
Department of Transportation
City of Los Angeles
7166 West Manchester Avenue
Los Angeles, CA 90012

Ronald F. Deaton, Chief Legislative Analyst
City of Los Angeles
200 North Spring Street, City Hall, Room 255
Los Angeles, CA 90012

Keith Comrie, City Administrative Officer
City of Los Angeles
200 North Spring Street, City Hall, Room 1500
Los Angeles, CA 90012

Robert Takasaki, City Traffic Engineer
Department of Transportation
City of Los Angeles
221 North Figueroa Street, Suite 6
Los Angeles, CA 90012

Gordon Hamilton
City Planning Department
City of Los Angeles
221 South Figueroa Street, 16th Floor
Los Angeles, CA 90012

Gerald L. Chaleff
City Planning Commission
City of Los Angeles
221 South Figueroa Street, Suite 1600
Los Angeles, CA 90012

Valley Area Coordinator, Mayor's Office
Van Nuys City Hall, Room 505
Van Nuys, CA 91401

John Malloy, Director
Community Redevelopment Agency
City of Los Angeles
354 South Spring Street
Los Angeles, CA 90013

General Manager
Department of Transportation
City of Los Angeles
221 North Figueroa Street, Suite 500
Los Angeles, CA 90012

Management Division
City of Los Angeles, Bureau of Engineering
650 South Spring Street, Suite 1100
Los Angeles, CA 90012

Anthony Zamora, City Planning Commission
City of Los Angeles
221 North Figueroa Street, Room 1600
Los Angeles, CA 90012

Mama Schnabel, City Planning Commission
City of Los Angeles
221 North Figueroa Street, Room 1600
Los Angeles, CA 90012

Robert Scott, City Planning Commission
City of Los Angeles
221 North Figueroa Street, Room 1600
Los Angeles, CA 90012

Peter M. Weil, City Planning Commission
City of Los Angeles
221 North Figueroa Street, Room 1600
Los Angeles, CA 90012

Management Division, Bureau of Engineering
Consultant Waste Water Program
650 South Spring Street, Suite 1100
Los Angeles, CA 90013

Chris O'Donnell, Economic Development
Los Angeles Mayor's Office
200 North Spring Street, City Hall, Room 1400
Los Angeles, CA 90012

Frank J. Portnoy, Property Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Anita Domingo, Accounting Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Kelly Wong, Communications Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Leigh H. Hatayama, Airfield Operations Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

John J. Driscoll, Executive Director
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Nancy Castles, Public Affairs Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Stephen Yee, LAX Airport Manager
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Elaine Staniec
Secretary, Board of Airport Commissioners
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Breton K. Lobner, City Attorney's Office
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Lydia H. Kennard, Deputy Executive Director
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Daniel P. Garcia, President
Airport Commission
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Jack L. Graham, Facilities Planning
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Patricia Mary Schnegg
Vice President, Airport Commission
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Maurice Z. Laham, Environmental Management Bureau
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Warren Valdry, Airport Commissioner
Los Angeles World Airport
#1 World Way
P.O. Box 92216
Los Angeles, CA 90009

Richard Palmisano
Valley Engineering District
14410 Sylvan Street
Van Nuys, CA 91401

Stacy T. Geere, Public Relations
Van Nuys Airport
16461 Sherman Way, Suite 300
Van Nuys, CA 91406

Jay Cunningham, City Planner
City of Culver City
4095 Overland Avenue
Culver City, CA 90232

Mark Bozigian, Transportation Programs Administrator
City of Lancaster
44933 North Fern Avenue
Lancaster, CA 93534

Brian N. Hawley, Director Community Development
City of Lancaster
44933 North Fern Avenue
Lancaster, CA 93534

Leroy Jackson, City Manager
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503

West Coast Helicopter
7240 Hayvenhurst Avenue
Van Nuys, CA 91406

Laura Dwan, Sr. Librarian
Baldwin Hills
2906 South La Brea Avenue
Los Angeles, CA 90016

Denice Nossett, Sr. Librarian
ASCOT
256 West 70th Street
Los Angeles CA 90003

Kathleen Strelioff, Sr. Librarian
Exposition Park Regional
3665 South Vermont Avenue
Los Angeles, CA 90007

Nancy Cummings, Sr. Librarian
Hyde Park
6527 Crenshaw Boulevard
Los Angeles, CA 90043

Tracy Eason-Mochizuki, Sr. Librarian
John Muir
1005 West 64th Street
Los Angeles, CA 90044

Camille Carter, Sr. Librarian
Junipero Serra
4301 South Figueroa Street
Los Angeles, CA 90037

Gladys Hardcastle, Sr. Librarian
Mar Vista
12006 Venice Boulevard
Los Angeles, CA 90066

Natalie Duvenary, Sr. Librarian
Mark Twain
9621 South Figueroa Street
Los Angeles, CA 90003

Lucille Cappas, Sr. Librarian
Venice
501 South Venice Boulevard
Venice, CA 90291

June Cheng, Sr. Librarian
Vermont Square
1201 West 48th Street
Los Angeles, CA 90037

Rosetta Warren, Sr. Librarian
Vernon
4504 South Central Avenue
Los Angeles, CA 90011

Eloise Logan, Sr. Librarian
Washington Irving
1803 South Arlington Avenue
Los Angeles, CA 90019

Norma Anders, Sr. Librarian
Alma Reaves Woods Watts
10205 Compton Avenue
Los Angeles, CA 90002

Judy Sanchez-Moorhead
Westchester
8946 Sepulveda Eastway
Los Angeles, CA 90045

Cathy Chang, Sr. Librarian
Angeles Mesa
2700 West 52nd Street
Los Angeles, CA 90043

The Honorable Anthony Beilenson
Congressman, 24th District, California
District Office
21031 Ventura Boulevard
Woodland Hills, CA 91364

Fannie Love, Library Manager
AC Bilbrew Library
150 East El Segundo Boulevard
Los Angeles, CA 90061

George Runner, Assemblyperson
California State Assembly
District 36
709 West Lancaster Boulevard
Lancaster, CA 93534

Jody Hall-Esser, City Manager
City of Culver City
4095 Overland Avenue
P. O. Box 507
Culver City, CA 90232

Jim Morrison, City Manager
City of El Segundo
350 Main Street
El Segundo, CA 90245

Daniel Juarez, City Clerk
City of Hawthorne
4455 West 126th Street
Hawthorne, CA 90250

Bud Cormier, City Manager
City of Hawthorne
4455 West 126th Street
Hawthorne, CA 90250

Hermanita Harris, City Clerk
City of Inglewood
One Manchester Boulevard
Inglewood, CA 90301

Jacquelynne Corby, Interim Administrative Officer
City of Inglewood
One Manchester Boulevard, 9th Floor
Inglewood, CA 90301

The Honorable Richard Riordan
Mayor, City of Los Angeles
City Hall, 200 North Spring Street
Room 305
Los Angeles, CA 90012

The Honorable Laura Chick
Councilmember, District 3
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Rudy Svorinich
Councilmember, District 15
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Joel Wachs
Councilmember, District 2
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable John Ferraro
Councilmember, District 4
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Jackie Goldberg
Councilmember, District 13
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Mike Hernandez
Councilmember, District 1
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Nate Holden
Councilmember, District 10
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Mark Ridley-Thomas
Councilmember, District 8
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

Robert R. Yates, General Manager
Department of Transportation
City of Los Angeles
221 North Figueroa Street, Suite 500
Los Angeles, CA 90012

The Honorable Rita Walters
Councilmember, District 9
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Mike Feuer
Councilmember, District 5
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Hal Bernson
Councilmember, District 12
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Ruth Galanter
Councilmember, District 6
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Richard Alatorre
Councilmember, District 14
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

The Honorable Richard Alarcon
Councilmember, District 7
City of Los Angeles
City Hall, 200 North Spring Street
Los Angeles, CA 90012

Mike Carey, City Clerk
City of Los Angeles
700 East Temple, Rm. B23
Los Angeles, CA 90012

Liza Tamura, City Clerk
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266

Geoff Dolan, City Manager
City of Manhattan Beach
1400 Highland Avenue
Manhattan Beach, CA 90266

Robert Toone, Jr., City Administrator
City of Palmdale
38300 North Sierra Highway
Palmdale, CA 93550

Paul Connolly, City Manager
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

John Oliver, City Clerk
City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277

The Honorable Susan Seamans
Councilmember
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, CA 90274

Suzanne Frick
Planning & Community Development Director
City of Santa Monica
1685 Main Street
Santa Monica, CA 90401

John Jalili, City Manager
City of Santa Monica
1685 Main Street
Santa Monica, CA 90401

Robert Trimborn, Airport Manager
City of Santa Monica
1685 Main Street
Santa Monica, CA 90401

John Oliver, City Clerk
City of Torrance
3031 West Torrance Boulevard
Torrance, CA 90503

The Honorable Gloria Molina
Supervisor, District 1
County of Los Angeles
500 West Temple Street, Room 856
Los Angeles, CA 90012

The Honorable Michael Antonovich
Supervisor, District 5
County of Los Angeles
500 West Temple Street, Room 869
Los Angeles, CA 90012

The Honorable Yvonne Braithwaite-Burke
Supervisor, District 2
Member, LAX Airport Area Advisory Committee
County of Los Angeles
500 West Temple Street, Room 866
Los Angeles, CA 90012

The Honorable Don Knobe
Supervisor, District 4
Member, LAX Airport Area Advisory Committee
County of Los Angeles
500 West Temple Street, Room 822
Los Angeles, CA 90012

The Honorable Zev Yaroslavsky
Supervisor, District 3
County of Los Angeles
500 West Temple Street, Room 821
Los Angeles, CA 90012

Linda Fernandes, Library Manager
Culver City Library
4975 Overland Avenue
Culver City, CA 90230

Dr. William Manahan, Superintendent
El Segundo Unified School District
641 Sheldon Street
El Segundo, CA 90245

Helene Ireland, Library Manager
Florence Library
1610 East Florence Avenue
Los Angeles, CA 90001

Diane Pearce, Library Manager
Gardena/Mayme Dear Library
1731 West Gardena Boulevard
Gardena, CA 90247

Dennis Martin, Library Manager
Hawthorne Library
12700 South Grevillea Avenue
Hawthorne, CA 90250

Ron Schneider, Library Manager
Hermosa Beach Library
550 Pier Avenue
Hermosa Beach, CA 90254

Dr. McKinley Nash, Sr., Superintendent
Inglewood Unified School District
401 South Inglewood Avenue
Inglewood, CA 90301

Mary MacTaggart, Library Manager
Lake Los Angeles Library
16921 East Avenue O, #A
Palmdale, CA 93550

Sherrie Gray, Library Manager
Lawndale Library
14615 Burin Avenue
Lawndale, CA 90260

Glorita Navo, Library Manager
Lennox Library
4359 Lennox Boulevard
Lennox, CA 90304

Dr. Bruce McDaniel, Superintendent
Lennox School District
10319 Firmona Avenue
Lennox, CA 90304

Joe Drew
Acting Chief Executive Officer
Los Angeles County Metropolitan
Transportation Authority
1 Gateway Plaza
Los Angeles, CA 90053

Penny Rowland
Los Angeles Public Library Admin. Offices
630 West 5th Street
Los Angeles, CA 90071

Sidney A. Thompson, Superintendent
Los Angeles Unified School District
450 North Grand, Suite A-223
Los Angeles, CA 90012

Lila Held, Library Manager
Manhattan Beach Library
1320 Highland Avenue
Manhattan Beach, CA 90266

Claudia Fifhler, Library Manager
Marina del Rey Library
4533 Admiralty Way
Marina del Rey, CA 90292

Alice Pang, Library Manager
Masao W. Satow Library
14433 South Crenshaw Boulevard
Gardena, CA 90249

The Honorable Edward Vincent
Member of the California State Assembly
District 51
1 Manchester Boulevard
P. O. Box 6500
Inglewood, CA 90301

Karen Heit, Director
Los Angeles County MTA
818 West 7th Street
Los Angeles, CA 90017

The Honorable Julian Dixon
U.S. House of Representatives
District 32
5100 West Goldleaf Circle, #208
Los Angeles, CA 90056

The Honorable Jane Harman
U.S. House of Representatives
District 36
5200 West Century Boulevard, #960
Westchester, CA 90045

The Honorable Maxine Waters
U.S. House of Representatives
District 35
10124 South Broadway, #1
Los Angeles, CA 90003

The Honorable Henry Waxman
U.S. House of Representatives
District 29
8436 West Third Street, #600
Los Angeles, CA 90048

The Honorable Lucille Roybal-Allard
U.S. House of Representatives
District 33
255 East Temple Street, #1860
Los Angeles, CA 90012

The Honorable Steve Horn
Congressperson
U.S. House of Representatives
District 38
210 Lakewood Boulevard, Suite 100
Los Angeles, CA 90712

The Honorable Matthew G. Martinez
Congressperson
U.S. House of Representatives
District 31
320 South Garfield Avenue, Suite 214
Alhambra, CA 91801

The Honorable Juanita Millender-McDonald
Congressperson
U.S. House of Representatives
District 37
#1 Civic Center Drive, Suite 650
Carson, CA 90745

The Honorable Esteban E. Torres
Congressperson
U.S. House of Representatives
District 34
8819 Whittier Boulevard, Suite 101
Pico Rivera, CA 90660

Carol Thompson, Library Manager
View Park Library
3854 West 54th Street
Los Angeles, CA 90043

Brian Singleton, Library Manager
Willowbrook Library
11838 South Wilmington Avenue
Los Angeles, CA 90059

Joan Mead, Library Manager
Wiseburn Library
5335 West 135th Street
Hawthorne, CA 90250

Evelyn Udenyi, Library Manager
Woodcrest
1340 West 106th Street
Los Angeles, CA 90044

LIST OF AGENCIES RESPONDING TO THE LAX MASTER PLAN NOI/NOP

Elected Officials

1. Congresswoman Jane Harman
2. Assemblywoman Debra Bowen
3. Los Angeles County Supervisor Don Knabe
4. Los Angeles City Councilmemeber Ruth Galanter

Federal/State/Regional

1. United States Environmental Protection Agency
2. United States Department of the Interior – Fish and Wildlife Service
3. United State Department of the Interior – National Park Service * (two responses)
4. Department of the Army *
5. California State Department of Transportation
6. California State Department of Fish and Game
7. California Coastal Commission *
8. California Environmental Protection Agency *
9. California Department of Parks and Recreation *
10. South Coast Air Quality Management District
11. Southern California Association of Governments

County

1. Los Angeles County Metropolitan Transportation Authority
2. Los Angeles County Department of Public Works
3. Los Angeles County West Vector Control District

School Districts

1. Los Angeles Unified School District
2. Lennox School District (Two Responses)
3. El Segundo Unified School District

City of Los Angeles

1. Los Angeles City Fire Department
2. Los Angeles City Public Library
3. Los Angeles City Planning Department
4. Los Angeles City Police Department (two responses)
5. Los Angeles City Department of Public Works
6. Los Angeles City Department of Public Works, Bureau of Engineering
7. Los Angeles City Department of Transportation
8. Los Angeles City Department of Water and Power

Other Cities

1. City of Culver City
2. City of El Segundo (Through Shute, Mihaly & Weinberger)
3. City of Gardena
4. City of Hawthorne
5. City of Hermosa Beach
6. City of Inglewood
7. Lennox Coordinating Council
8. City of Lomita
9. City of Manhattan Beach
10. City of Palmdale
11. City of Rancho Palos Verdes
12. City of Santa Monica
13. City of Torrance
14. City of Whittier (Through Richard D. Jones)
15. Gateway Cities Council of Governments – Southeast Los Angeles County
16. City of Redondo Beach

Academic Institutions

1. University of California, Los Angeles *

NOTE: * Indicates comments recently received from the FAA

JANE HARMAN
36TH DISTRICT, CALIFORNIA

COMMITTEES:
NATIONAL SECURITY
MERCHANT MARINE
PERSONNEL
RESEARCH AND DEVELOPMENT
PERMANENT SELECT COMMITTEE
ON INTELLIGENCE
TECHNICAL AND TACTICAL INTELLIGENCE
STEERING

Congress of the United States
House of Representatives
Washington, DC 20515–0536

WASHINGTON OFFICE:
325 CANNON BUILDING
WASHINGTON, DC 20515
(202) 225-8220
DISTRICT OFFICES:
1217 EL PRADO AVENUE
TORRANCE, CA 90501
(310) 783-4500
[illegible] VENICE BLVD.
SUITE 6
VENICE, CA 90291
(310) [illegible]
[illegible]@MAIL.HOUSE.GOV
http://www.house.gov/harman/

July 31, 1997

Board of Airport Commissioners
Department of Airports
LAX Master Plan Project
1 World Way - Room 218
Los Angeles, CA 90012

Dear Commissioners:

For jigsaw puzzle enthusiasts, the proposed LAX expansion must be totally absorbing. After all, the goal is to fit new runways, new terminals, and new mass transit in essentially fixed boundaries. But jigsaw puzzles often go back into the box -- or stay glued on a card table. This exercise now underway might meet the same fate unless more care is taken to fit the puzzle into a larger context.

In the Department of Airport's zeal to accommodate an anticipated doubling of human and auto traffic in the next decade, it has perfected a plan which may well be totally dysfunctional.

Already, access to LAX by freeway or light rail is difficult. Who remembers the promise that the Green Line would service the airport? Now we hear that it will service the new airport. But ridership consists almost solely of airport employees. So how, exactly, are thousands of new travelers going to reach the dedicated ring road around the new LAX?

Off-airport transportation is only one issue. Others include air and noise pollution and critical safety issues. If the view heavenward from Lincoln Boulevard at the stream of airplane lights ready to land looks scary now, what will it look like in two years? How can we assure neighboring communities like El Segundo, Playa del Rey and Westchester that problems of early turns and overhead collisions won't recur?

Airport officials are adamant that theirs will be the last expansion of LAX because there's no room to grow further. Yet scant work has been done on how to connect LAX to Palmdale and other hubs and build the high speed rail corridor that will be necessary. Many question why not do the Palmdale option now.

If we are to retain the benefits of LAX, the environmental impact statements that accompany the formulation of the LAX Master Plan must be comprehensive and credible. A sloppy or evasive analysis will be unacceptable. And it is imperative that the current process integrate the interests and responsibilities of all major players -- state, city, surrounding jurisdictions, federal government and Airport Commission.

Aviation trust funds, for example, can now be used to mitigate traffic only within a mile of the airport. Common sense tells us that mitigation will be necessary at much greater distances from the core. Thus, it is already time for the Airport Commission to seek additional aid. Good intentions on mitigation are worthless if they remain unfunded.

As the federal representative for the area, I am especially focused on making certain that the FAA -- the key watchdog agency within the U.S. Department of Transportation -- guarantees the integrity of the environmental assessment on the pivotal question of aviation safety. Recently, I expressed my determination directly to Secretary of Transportation Rodney Slater, who responded: "Safety and related concerns associated with the increase in air traffic are the highest priority for me and the Department. Let me assure you and your constituents that these issues will be carefully and thoroughly assessed before any expansion plan is approved."

So far, so good. But I intend to see these fine words become hard facts, for my constituents have not been shy about letting me hear their worries.

Yet public discussion and media coverage of the planning process can actually be quite useful in finding solutions to these widespread concerns. In addition to cataloguing future issues and impacts, the requirement for environmental reviews and impact statements often provides a unique opportunity to study the causes and circumstances of current problems and complaints. Hopefully, it will also identify gaps in communications. One recent incredible example is the failure of the FAA personnel to inform LAX management that the altitude of airspace monitored by flight controllers would be lowered by 2,500 feet.

"LAX" is shorthand for Los Angeles International Airport. It would be sadly ironic and downright dangerous if it also became the adjective to describe the Airport Commission's attitude toward the spirit of cooperation and coordination and the necessity for a comprehensive, long-term strategy for our region's quality of life and future well-being.

Sincerely,

Jane Harman

Jane Harman

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0001
(916) 445-0526

18411 CRENSHAW BLVD.
SUITE 200
TORRANCE, CA 90504
(310) 533-4601

Email: bowen@assembly.ca.gov

Assembly
California Legislature

DEBRA BOWEN
ASSEMBLYWOMAN, FIFTY-THIRD DISTRICT

Representing the communities of El Segundo, Hermosa Beach, Lomita, Manhattan Beach, Mar Vista, Malibu and Playa Vista, Palos Verdes Estates, Playa del Rey, Redondo Beach, Torrance, Venice & Westchester

CHAIRWOMAN
NATURAL RESOURCES

MEMBER
BANKING & FINANCE
BUDGET
ENVIRONMENTAL SAFETY
& TOXIC MATERIALS
HIGHER EDUCATION
WATER, PARKS & WILDLIFE

July 29, 1997

Mr. John L. Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
1 World Way, Room 218
Los Angeles, CA 90012

Via Facsimile
Original To Follow Via U.S. Mail

Dear Mr. Graham:

As the Assemblymember representing many of the cities and neighborhoods surrounding Los Angeles International Airport (LAX), I would like to express my concerns and highlight certain subjects that I believe should be included in the LAX Master Plan environmental impact report/environmental impact statement (EIR/EIS).

Rather than restate the extensive, detailed comments submitted to you by the South Bay Council of Governments and individually by many of the cities in the area, I will instead focus on the broader perspective, looking at the long-term and regional implications of your proposal to expand LAX.

Alternatives

After reviewing the four proposed options for expansion, attending several public meetings and listening to many comments from my constituents, it is clear to me that your intention to expand LAX is, at best, an exercise in self-contradiction. You state that in order to meet the transportation needs of a strong, economically competitive region, LAX must grow to nearly 100 million air passengers (MAP) by 2015. However, it doesn't appear to me that any of the plans being considered include any region-wide solutions to the impact that the continuing overflow of passengers and cargo at LAX has on the community.

Before any expansion is considered for LAX, the EIR/EIS for the LAX Master Plan must look at how the patterns of growth at other airports in the region might affect the flow of passengers and cargo at LAX. The construction of the Alameda Corridor and the availability of both March and George Air Force Bases and the El Toro Naval Air Station as commercial airports make an EIR/EIS that focuses primarily on LAX clearly out of touch with the changing demographics and infrastructure of the region.

It seems to me that those other airports are better alternatives to accommodate much of the growth that you project to occur at LAX. Any EIR/EIS that fails to include a complete review of all the regional alternatives, including the city-owned airports in Palmdale and Ontario, would be incomplete and unacceptable.

Infrastructure

Another long-term planning issue the environmental review process needs to address is the significant change that will take place in the ground transportation infrastructure of Southern California over the next fifteen years. According to the Southern California Association of Governments, increased rail and truck traffic focusing on the eastern half of the region will make moving passengers and cargo through that area more economically and environmentally acceptable than in the increasingly congested area around LAX.

Your plans for LAX also require the installation of a new road/bus/rail infrastructure -- an infrastructure for which the Department of Airports will be only partially financially responsible. The practical effect of this means cities and communities surrounding LAX will be competing with the LAX expansion plan for funds to complete much-needed road, bus and rail projects elsewhere in the subregion and the county. This "zero-sum game" will be detrimental to these communities and will undermine efforts to actually accomplish critical mitigation measures off airport property.

To prevent what could only be described as a serious drain on funding for local infrastructure improvements, the EIR/EIS needs to identify new funding sources for improvement and repair of the roads leading into the expanded LAX. Any mitigation measures predicated on sources that are allocated for other projects or would be spent on other projects if not for the LAX expansion must be considered illusory at best.

Air Quality

Air quality is another area where the EIR/EIS needs to examine the impact of LAX expansion on air quality in the region as a whole, not solely on the air quality above the airport. By more than doubling the design capacity to increase the number of planes going into and out of the airport and adding in the much higher levels of congested traffic that will accompany that expansion, we'll greatly exacerbate the already difficult process of reaching the air quality conformity required under the Clean Air Act. Beyond the obvious health impacts of not complying with the Clean Air Act, this conformity is necessary if the region hopes to have its Regional Transportation Plan approved -- a plan necessary for us to capture hundreds of millions of dollars in federal funding each year.

The EIR/EIS must detail the air quality impacts not only as they pertain to the number of planes flying into and out of LAX, but also as to related operations such as fueling and aircraft maintenance, as well as the effects of a vastly increased volume of cars, trucks and other forms of ground transportation.

The EIR/EIS must describe how this increased burden on regional air quality will be mitigated to bring the air basin into compliance with federal clean air standards. Again, my focus is on actual results. If vastly increased air emissions attributable to the LAX expansion increase the pressure on stationary sources to further reduce their emissions to compensate for the increases at LAX, air quality mitigation may be impossible to achieve without significant costs to non-aviation related businesses -- an option that is not feasible.

Air quality impacts must be addressed at the local level, as well as regionally. Even if impacts can be mitigated on a regional basis, the EIR/EIS still must properly mitigate the impact of increased air toxics and particulate matter on the schools, parks, homes, apartment complexes, and businesses near the airport.

Water Quality

Additional flights and traffic will also severely impact the ability of the cities and counties to achieve their water pollution reduction goals under the national pollutant discharge elimination system (NPDES) permit and other Clean Water Act requirements. The EIR/EIS must examine the effects of expansion on the quantity and the content of toxic urban runoff and include a plan to mitigate these changes in keeping with federal clean water standards.

Baseline & Growth

For the EIR/EIS to have any value whatsoever in estimating and addressing the potential effects of expansion at LAX, it must use the appropriate baselines for any comparisons of environmental impact. Today, LAX operates at nearly 50% above its 40 MAP design capacity. The baselines for air and water quality, noise and other environmental impacts that were set when the current configuration of LAX was approved must be the only ones used when assessing the environmental impact of any expansion at LAX. To do otherwise would result in an EIR/EIS that is hopelessly out of touch with reality and virtually worthless to the people and businesses which will be impacted by any expansion.

Finally, in light of the fact that LAX is currently operating nearly 50% above its planned passenger capacity, the EIR/EIS must also include long-range mitigation plans that would address the possibility that the number of passengers at LAX might exceed the 100 MAP and related air freight traffic that this plan projects will be using the airport by 2015.

Conclusion

The oft-stated promise of the proposed expansion of LAX is its potential to invigorate the region's economy. This is a tempting prospect for a region that has been especially hard hit by the recession of the early 1990's and years of cutbacks in federal defense spending.

However, we must not ignore the reality that a vital element of our economic well-being is the quality of life that draws people to this region to live and work. I urge you to review your plans, incorporate a more regional, long-term view of the need for expanded air transportation into any potential expansion model, and provide us with a manageable, environmentally sound growth plan that will ensure the highest possible quality of life -- not only for us, but for generations to come.

Sincerely,

Debra Bowen

Debra Bowen
Assemblywoman, 53rd District

DB:ap

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

822 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
Telephone (213) 974-4444 / FAX (213) 626-6041

DON KNABE
SUPERVISOR, FOURTH DISTRICT

July 25, 1997

Mr. John L. Graham
Chief of Airport Planning
Department of Airports
1 Worldway-Room 218
Los Angeles, CA 90012

Dear Mr. Graham:

The Southern California Association of Governments (SCAG) is presently in the process of updating the Regional Transportation Plan (RTP). Currently, none of the alternatives being considered in the draft RTP reflect an expansion of LAX. Also, SCAG staff is having difficulty developing a plan which conforms to federal air quality standards. As a result, the federal government has advised that SCAG's failure to meet federal air quality standards could result in the withholding of federal funds to the region.

All the expansion options indicated in the LAX Notice of Proposal will have significant negative air quality impact. LAX alone already produces more air pollution than the output of several of the area's largest oil refineries combined. The airport's expansion will simply exacerbate it's contribution to the region's air pollution problem. If the RTP does not result in the attainment of federal air quality standards, and it may not, then the federal government may follow through on it previous threats to withhold funds from the region.

It is my belief that the EIR should examine LAX expansion alternatives that would reduce air quality impact. Moreover, for those alternatives that will create greater air quality impact, the EIR should examine not only those direct impacts, but also the environmental impact of having federal funds withdrawn from the region.

Please call upon me or my South Bay Deputy, Tom Martin, at (310) 222-3015 whenever we may be of service on any matter.

Sincerely,

Don Knabe

DON KNABE
Supervisor, Fourth District
County of Los Angeles

DK:gyp

RUTH GALANTER
COUNCILMEMBER
SIXTH DISTRICT

City Council
of the
City of Los Angeles
City Hall
90012

200 N. SPRING ST.
ROOM 830, CITY HALL
LOS ANGELES, CA 90012
485-3387
FAX (213) 237-0649

DISTRICT OFFICE
7166 W. MANCHESTER AVE.
LOS ANGELES, CA 90045
(310) 824-1180
FAX (213) 337-0553

July 31, 1997

John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham,

Attached are my comments on the Notice of Preparation for the Los Angeles International Airport Master Plan. The comments have been prepared by my consultant, Rubell Helgeson. As you know, Ms. Helgeson served as my Planning Deputy for five years and brings extensive relevant experience to our team.

A project of this magnitude requires a thoughtfull plan which seriously addresses the concerns and needs of the people of Los Angeles and it's surrounding areas. These comments reflect my continued commitment to ensuring that any plans for expansion meet that requirement.

Sincerely,

Ruth Galanter
Councilmember, 6th District

Rubell Helgeson, Planning Consultant
Landuse, Transportation, Natural Resources
855 Radcliffe Ave., Pacific Palisades, CA 90272

July 31, 1997

John L. Graham, Chief of Airport Planning
Department of Airports - LAX Master Plan Project
1 World Way, Room 218
Los Angeles, CA 90012

Re: Response to NOP for LAX 2015 EIR/EIS

Dear Mr Graham:

The following comments on the Notice of Preparation for the Los Angeles International Airport 2015 Master Plan EIR/EIS are submitted on behalf of Councilwoman Ruth Galanter.

OVERRIDING CONCERNS

The forthcoming EIR/EIS must address Los Angeles International Airport (LAX) in a regional context and must fully analyze how LAX can most effectively interact as a critical component in a comprehensive intermodal transportation system, including buses, paratransit and rail. It must deal more realistically with the practical limits to growth. It must address issues unrealistically claimed by the Initial Study not to cause impacts. The NOP does not suggest adequate analysis of these issues, nor does it propose analyses of appropriate alternatives.

The Alternatives Analysis is Inadequate

The alternatives listed in the NOP are in some cases unrealistic and in any event inadequate.

A reader would not know, on the basis of this NOP, that the City of Los Angeles purchased some 18,000 acres of land near Palmdale for the specific purpose of accommodating passenger levels in excess of 40 MAP at LAX. Since growth in demand for air transport must be presumed to continue after 2015 as well as up until that time, and since other airports in the region also face constraints, Palmdale must eventually become operational. The EIR/EIS clearly must address the alternative of directing much of the growth projected for LAX to Palmdale by 2015. For decades, the City's Antelope Valley land holdings have been largely a wasted asset.

Please note that the project objectives (NOP p. 8) of meeting regional transportation needs, maximizing return on capital, and sustaining/advancing the international trade component of the regional economy, are all met equally well if new capacity is provided at Palmdale rather than at LAX. To the extent that LAX operations become more unsafe or unpleasant due to overcrowding in the skies and on the streets, they are better met at Palmdale.

Moreover, for persons living closer to Palmdale than to LAX, local transportation needs would be better served by Palmdale.

It is relevant to note in this context that other major cities that are potential rivals for our City's international trade have generally added capacity not at their old central airports, but at newer airports on the periphery or beyond. This fact makes the exclusion of Palmdale as an alternative site for expanded capacity yet more inscrutable.

The argument that the region's stake in international trade is at risk unless capacity is added at LAX, and nowhere else in the region, will not withstand scrutiny.

The Baseline for Measuring Impacts is 40 MAP

Since all growth in operations in excess of 40 MAP has occurred without proper environmental clearance, the EIR/EIS must use 40 MAP (as well as the current level of operations) as a baseline for measuring impacts of growth under any of the possible scenarios.

Operations at LAX already greatly exceed the 47 MAP for which current facilities were designed; it is generally conceded that this added growth has compromised passenger safety. The EIR/EIS must explain by what means added growth at LAX will not further degrade the safety of the traveling public and the communities below the flight patterns. The EIR/EIS should also define a capacity level at which freeway/arterial LOS within 15 miles of the airport to the east and south, and equidistant between LAX and Palmdale to the north/northeast, drop to unacceptable levels or beyond by virtue of airport-generated traffic. Noise and pollution impacts on the greater community must be evaluated. Residents living 25 to 30 miles from LAX complain frequently about losses to property values and quality of life created by LAX.

These factors should define LAX capacity.

Unless It Sets Enforceable Limits, the 2015 Plan Lacks Integrity

The NOP states (p. 12, 1.1.5.1) that "Airlines have been and will continue accommodating aircraft operational growth through adjustments in their service patterns" whether or not an expansion

of facilities is undertaken. This is exactly what has occurred since service exceeded the 40 MAP level at which growth was previously promised to be capped, and it explains why the public has such little confidence in LADOA's willingness to constrain growth at any level that may be set by a new plan.

But the potential for continuing this squeeze play into cramped facilities has obviously nearly reached its maximum. As the NOP admits, because of limited capital improvements currently approved, "LAX's efficiency will continue to degrade as demand grows."

This statement is contradictory to the one in the prior paragraph. Unless additional improvements are approved and more gates provided, the airlines will not be able indefinitely to stuff additional passengers through LAX, no matter how inventive their service patterns. The NOP essentially concedes this point, since the unconstrained projection is 98 MAP, whereas the "no project" alternative would hold levels to 68 to 72 MAP.

It is a task of the forthcoming EIR/EIS to propose a reasonable expansion that does not place intolerable and unmitigatable burdens on the surrounding communities, does not create insoluble traffic congestion, does not bring the region yet further out of compliance with air quality standards, and does not compromise safety for the traveling public or the communities below the flight patterns. When that expansion level is defined, and eventually adopted, the public has a right to expect that it will hold; that operations will not expand yet again beyond the optimum efficiency and safety of new capacity. Without such assurance, public resistance to airport expansion can only increase.

The EIR/EIS must explain why service levels of up to 96 MAP are under consideration, given LADOA's 1988 conclusion in the LAX 2000 Plan Draft EIR that "at 65 MAP, it is likely that LAX will have reached its air space capacity." By what miracle has air space capacity been expanded?

It is respectfully suggested that service levels up to 96 MAP are included in the alternatives only to make excessive levels above 60 MAP appear more reasonable.

ALTERNATIVES ANALYSIS

For all existing and proposed alternatives, the following comments apply:

The EIR/EIS must identify by acreage the existing landuses that would be displaced by proposed acquisitions. How many dwelling units, housing how many persons, would be displaced by each

alternative? What is the income range of persons who would be displaced? How does LADOA propose to mitigate a loss of housing in an area that already suffers a severe housing shortage? How many businesses of what type would be forced to relocate?

New employment on and new trips generated by landuses within the 3550 acres of LAX (or whatever its expanded size will be) were not considered in the EIR for the General Plan Framework. The cumulative impacts of this growth must be considered in the LAX 2015 EIR/EIS in conjunction with growth anticipated by the Framework, and appropriate, enforceable mitigation must be defined.

The zoning of all areas considered for acquisition under each alternative should be should be indicated on maps.

If You Build It, They Will Come

One of the most alarming (and least noted) statistics in the NOP is buried in Table 1.2. The need for public and employee parking at LAX is projected to increase from the present 21,930 spaces (NOP, p. 3) to 48,750 spaces in 2015. At present, 58 MAP are served by 21,930 spaces, or 1 space per 7.5 passengers/day. By 2015, the unconstrained 98 MAP projection would be served by 1 space per 5.7 passengers/day. In other words, the passengers of 2015 are presumed to be significantly more auto-dependent than those of today. At 96 or 94 MAP and lower levels, the ratios are even worse. As a consequence, street congestion and landside pollution impacts per passenger will be worse in 2015 than they are now.

This is unacceptable. LAX must plan for and achieve reduced auto-dependency, which means that parking availability per passenger must be cranked down. If you build the parking facilities, the cars will come.

The alternatives provide only a generalized discussion of parking. The EIR/EIS must be specific, and must require reduced parking per passenger as compared to the current ratio. The EIR/EIS should define nodes that can be connected to LAX by express bus, van or rail service, and must seek other ways aggressively to reduce the use of single-occupancy autos by both employees and passengers.

Impacts on Schools

Some 3500 students attend six schools within 2000 feet of the new and/or expanded northern runways of alternatives 1, 2 and 3. Alternative 4 would also impact these schools (and possibly others to the south and east of LAX) by virtue of expanded operations, ergo increased noise and pollution. The EIR/EIS must carefully examine noise, pollution and safety impacts to these schools, and

must propose appropriate mitigation, including possible replacement locations and new facilities, should these structures cease to be functional for educational purposes.

Ancillary Facilities

In alternatives 1 through 4, ancillary facilities are projected to decrease by approximately 127 acres from the current 355 acres. This appears to be somewhat misleading since an unquantified amount of the reduced acreage devoted to these uses is apparently intended to be transferred to newly-acquired property. The EIR/EIS must disclose more precisely what current ancillary facilities are unnecessary, or if necessary, how much newly-acquired land they will consume, and what kinds of landuse conflicts the relocation of these facilities will entail.

Delineation of Flight Paths and Escape Corridors

The request of the LAX Area Advisory Committee, to delineate all flight path configurations associated with each alternative under varied conditions, is reasonable and appropriate, as is their request to define escape corridors for aborted landings.

When Habitats Becomes Uninhabitable

Although any significant loss of housing must be regarded as serious in the jobs-rich/housing poor airport area (and appropriate mitigation must be addressed in the EIR/EIS), it is important to recognize that new impacts of LAX growth on some already highly-impacted neighborhoods may make them untenable for residential use. This may be the case with Manchester Square. If preliminary results of a survey conducted by the Manchester Square Neighborhood Association (indicating that more than 70% of responding residents are interested in participating in a buyout if it involves the entire area) are upheld by further inquiry, the EIR/EIS should consider whether such an acquisition will suit the needs of the alternative growth scenarios, as they are appropriately redefined.

Alternatives for Cargo Capacity

An EIR/EIS prepared consistent with this NOP would be grossly inadequate in failing to address alternatives to serving all expansions of cargo service at LAX. Alternatives 1 through 4 all assume that acreage devoted to cargo at LAX will nearly double, that structural square footage will more than double, and that tonnage served will increase by 250%.

Alternatives to using LAX for all air cargo expansion are not even suggested. Under CEQA and common sense, they must be.

The EIR/EIS must address the relative impacts to traffic congestion and air quality of serving various proportions of cargo out of other airports, including Palmdale. This analysis will require a determination of cargo destination and (if it arrives from the east, north or south) cargo origin. For destinations closer to Palmdale, including all points east and north, less air pollution and congestion would result from expanding air cargo service in the Antelope Valley.

A key component in this analysis must determine the proportion of air cargo that is carried by trucks vs rail, and identification of surface routes that the trucks would follow to the point of the cargo's use or sale. Impacts of such truck traffic on the regional highway and freeway system must be assessed.

The "No Project" and Environmentally Superior Alternatives

None of the alternatives defined in the NOP can be defined as environmentally superior. The analysis of an environmentally superior alternative is mandated by CEQA.

CEQA also requires that the "no project" alternative be given serious consideration. The NOP does not even give this alternative a number; it has been dismissed in advance.

As noted, the NOP assumes, under the "no project" alternative, that the airlines have an inalienable right to continue to cram expanded loads through LAX regardless of the impacts on safety, efficiency, and the environment. Passenger service is projected to climb to 68 to 72 MAP whether or not the additional passengers have a place to park or an alternative to auto connections to the airport; whether or not waiting lines push the patience of travelers past endurance; whether or not there is a shortage of gates; and whether or not passengers begin to regard takeoffs and landings as unsafe.

The EIR/EIS must address a realistic "no project" alternative, as well as an alternative location in which Palmdale and other potential airport sites take most of the expanded load, and LAX operates efficiently and safely with a modest expansion of facilities.

The "no project" alternative does not list the number of annual operations, whereas alternatives 1 through 4 are anticipated to result in 900,000 to 980,000 annual operations (on average, up to 2785 takeoffs and landings per day). Please provide the number of annual operations and average daily operations at the present time and at the 40 MAP level, as well as lengths of existing runways.

The "no project" alternative should compare the impacts of growth to a maximum of 68 to 72 MAP (assuming the doubtful proposition that this range could be achieved with no expansion of facilities), with the impacts of growth to 88 to 96 MAP (assuming the expansions as defined in the various alternatives). Since LADOA has stated, in prior policy documents, that at 65 MAP, LAX will likely reach its air space capacity, impacts of this service level should also be analyzed, and reasons provided as to why 65 MAP (rather than 68 to 72 MAP) is not the maximum that can be achieved under the "no project" alternative.

Alternative 1

Alternative 1, the most modest (though the word hardly applies) of the four, would increase passenger service to a minimum of 88 MAP, while (like the other three) increasing air cargo served by 250%.

When the most conservative expansion proposes a 45% increase in passenger service from existing levels (which are grossly out of conformance with the General Plan) and a 250% increase in cargo service, it is clear that a rational reduced-impact project has not been defined. The EIR/EIS should address an expansion that would safely and efficiently serve 60 to 70 MAP.

Although Alternative 1 would move the longer northside runways (more heavily used by larger aircraft) farther from residential neighborhoods, it would place a new runway even closer to these neighborhoods. Does "larger aircraft" automatically translate to "noisier aircraft?" Is it posited that an additional runway closer to single family homes will result in reduced noise impacts to these homes, even when existing (slightly relocated) runways remain in use? The EIR/EIS must document the difference in noise impacts that would be expected to occur.

Alternative 2

This alternative, along with number 3, "would significantly impact the Hawthorne Airport operations and could result in FAA-required operating restrictions or closure of that airfield."

It appears counter-productive to increase capacity at LAX by decreasing capacity at a nearby airport that provides significant relief to LAX. The threshold question of whether operations at the Hawthorne Airport would be restricted or closed down should be answered early, and the EIR/EIS must consider the net impacts of this probability on regional capacity.

This alternative appears to more than double the length of north runways near residential neighborhoods, and place them in even

closer proximity, while also increasing the length and impacts of the southern runways. Newly (or about-to-be) soundproofed homes may again become uninhabitable.

Alternative 3

This alternative is unacceptable on its face because it would extend taxiways into the habitat reserve on the El Segundo Dunes. Unless revised to preclude this intrusion (in which case we have alternative 2), it does not merit further consideration. Alternative 3 offers no improved service as compared to alternative 2, yet has far greater environmental consequences. It is a throwaway alternative, and ought to be thrown out now, without the expenditure of time and money on further analysis.

Other objections to alternatives 1 and 2, as stated above, also apply to alternative 3.

Alternative 4

This alternative is unacceptable because it proposes the most grandiose expansion of capacity, up to 96 MAP, plus a 250% increase in cargo operations. However, it includes some sensible ideas that merit closer examination within the context of a more reasonable capacity goal.

Chief among these good ideas is the joint use of the Hawthorne airport with LAX. This could be accomplished either by purchase or shared management, and both options deserve careful consideration. Realigning and extending the Hawthorne runway would appear to improve air safety for both airports. Although a greater acreage appears to be converted for LAX expansion under alternative 4, much of the land is already in airport use. Alternative 4 therefore creates fewer landuse conflicts and would appear to reduce significantly impacts to the environment, except those associated with air quality and ground traffic.

A key question that arises from the data provided on this alternative is how an increase in passenger service of more than 60% can be accomplished with an increase in runways of only 8790 feet; 6000 feet of runway length would be added to LAX facilities at Hawthorne, but 4956 feet are already there, providing service. Thus only 3834 feet of runway would be new to regional capacity.

In contrast, alternatives 2 and 3 would add about 15,700 feet of new runway while accommodating a lesser expansion in passenger service. This 15,700 feet is nearly twice as much runway length as would be added to LAX facilities, and four times as much as would be added to regional facilities, under alternative 4. How is it

possible for alternative 4 to serve more passengers than alternatives 2 and 3?

If alternative 4 were reconfigured to serve 60 to 70 MAP, it could qualify as environmentally superior, assuming impacts not obvious at this time are not uncovered by the environmental review. This alternative presumes the early expansion of operations at Palmdale.

The Palmdale Alternative

For reasons already explicated, the EIR/EIS must include a full analysis of accommodating a significant portion of the air traffic projected for LAX by 2015 at Palmdale. If the City had honored its prior commitments, planes carrying some 18 MAP, now overcrowding the skies above LAX, would already be served at Palmdale.

As noted above, the Palmdale alternative can be combined with a modified version of alternative 4 to provide an environmentally superior choice. It would be a choice that honors the investment of our citizens in 18,000 acres of land in the Antelope Valley, on which they have not yet received an honorable return.

The analysis of the Palmdale alternative should integrate connections by high speed rail with other key components of the regional intermodal transportation system.

THE INITIAL STUDY

The following comments relate to the Initial Study Checklist included with the NOP. Where no comment is offered, no challenge is now made to the response provided. The environmental review process may uncover additional concerns.

EARTH, a. The answer is "Maybe." Increased runoff can result in unstable earth conditions.

c. The answer appears to be "Yes," based on information in the NOP itself; see the checklist, p. 34, re: the Argo ditch.

d. The answer appears to be "Yes" for all alternatives. Additional pollution, fuel drops, etc. are likely to have an impact on the flora of the Dunes, some of it unique, and upon which the fauna depend. The answer is undoubtedly "Yes" if alternative 3 is considered.

AIR, b. The answer is "Yes." It is impossible to think that huge increases in passenger and cargo service and the increased landside traffic impacts they entail will not result in additional odors.

d. The answer is "Yes." Additional congestion on the streets leading to the airport will result in impacts to sensitive

receptors even if aircraft were deemed to be too distant--in itself a questionable concept, since air pollution does not stay in place.

WATER, a. The answer is "Yes." Runoff will increase at LAX by virtue of greater ground coverage, and the runoff will be dirtier by virtue of increased operations. The ultimate destination of water sent to the Argo storm drain is the Santa Monica Bay.

e. For many of the same reasons above, the answer is "Yes," unless adequate mitigation is provided.

h. Conservation measures that would avoid an increase in the amount of water otherwise available for public use must be fully detailed in the EIR/EIS.

k. The answer is "Yes," based on experience under existing conditions.

PLANT LIFE, a. and b. These concerns cannot be overstressed.

c. The answer is "Maybe." Pollution can affect the ability of existing species to replenish themselves. Moreover, to insure against the introduction of new species, landscaping at the west end of the airport must be reviewed from the perspective of protecting the Dunes from invasive vegetation.

ANIMAL LIFE, a. The answer ("Yes") is correct, but it applies in all cases due to pollution from expanded operations.

b. The burden of proof lies with the EIR/EIS to show that the answer is not "Yes."

d. The EIR/EIS should drop alternative 3 forthwith; nevertheless, it must be demonstrated that wildlife habitat will not suffer under all of the scenarios.

NOISE, b. It is impossible to believe that the answer is not "Yes."

LIGHT & GLARE, a. The EIR/EIS should require mitigation that prevents potential impacts of light and glare upon Dune species.

LAND USE, b. Alternatives 1 through 4 require rezoning and General Plan amendments, which define inconsistency. The answer is "Yes."

c. The answer is "Yes." Alternative 3 is inconsistent with every policy mentioned. All alternatives are inconsistent with the Clean Air Act as administered by EPA and the SCAQMD, and with the policies of the City.

RISK OF UPSET, a and b. The answers appear to be "Yes."

POPULATION, b. The answer is "Yes." Please note that the increases in economic activity induced by airport growth were not addressed in the General Plan Framework (GPF) EIR. The forthcoming EIR/EIS must therefore address cumulative impacts on spacial distribution and growth in population.

c. Since the GPF did not consider LAX-induced growth, the answer is "Yes."

RIGHT OF WAY, b. The answer is "yes" unless adequate mitigation is required.

c. As noted above, the excessive new parking proposed will induce greater auto dependency, congestion and pollution.

f. The answer is "Yes."

g. The answer is "Yes." The proposal to increase the ratio of parking spaces to passengers indicates that LAX's commitment to encourage and expand alternative transportation is lip service.

HUMAN HEALTH, a. and b. The answers are surely "Yes."

AESTHETICS, a., b., c. and d. Under alternative 3, scenic vistas and public views would definitely be impacted; an aesthetically (not to mention morally) offensive site would be opened to public view; a desirable natural feature would be impacted; and negative aesthetic effects would result. The answers are "Yes" to all.

RECREATION, a. The answer is "Yes." Holly Park could no doubt be replaced, and this must be a required mitigation. But noise, odor and pollution impacts to Dockweiller State Beach and other recreational facilities in the area would be severe under all alternatives, and no mitigation appears feasible.

CULTURAL RESOURCES, a. In addition to advance test excavations, any construction activities that could impact on archaeological sites should be overseen by a qualified archaeologist.

b. Relocation of an historic building diminishes its historic value and should be avoided. If avoidance is impossible, the impacts of relocation must be mitigated. The EIR/EIS must determine that Hanger No. 1 can safely be relocated (i.e., that the building will maintain structural integrity during resiting), should this prove necessary, and must define a site for its placement, hopefully one that allows for greater public access.

MANDATORY FINDINGS OF SIGNIFICANCE, a. and d. The answers are "Yes." All of the alternatives are likely to have an indirect impact on the Dunes, and alternative 3 would have a profound direct impact. The project will have substantial direct and indirect environmental effects on human beings.

SUMMARY AND CONCLUSIONS

The EIR/EIS must be a more comprehensive document than is indicated by the NOP, integrating LAX into a multi-modal regional transportation system. It must present a realistic "no project"

alternative as well as a real environmentally superior alternative. It is pointless to include alternatives that offer no real benefits at tremendous environmental cost, such as alternative 3.

Los Angeles International Airport belongs to the citizens of Los Angeles, not to LADOA or the airlines. The citizens' interests are paramount in considering a new Master Plan for LAX; it is their welfare that must be most rigorously protected in the forthcoming environmental review process.

Thank you for this opportunity to comment on the NOP. I look forward to an ongoing dialogue.

Yours very truly,

Rubell Helgeson

Rubell Helgeson

c: Mayor Richard Riordan
Congresswoman Jane Harmon
Senator Tom Hayden
Assemblywoman Debra Bowen

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUL 31 1997

Mr. David B. Kessler, AICP
Environmental Protection Specialist, AWP-611.2
Federal Aviation Administration
PO Box 92007, Worldway Postal Center
Los Angeles, CA 90009

Dear Mr. Kessler:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement/Report (DEIS/R) for **LOS ANGELES INTERNATIONAL AIRPORT (LAX) MASTER PLAN DEVELOPMENTS**. We also reviewed the Notice of Preparation issued by the Los Angeles Department of Airports that accompanied your June 6, 1997 letter to EPA. Our comments on the NOI are provided pursuant to the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508).

The FAA and the Los Angeles Department of Airports intend to prepare the DEIS/R to identify potential environmental impacts associated with proposed developments at LAX. In addition to the No Action Alternative, the DEIS/R will evaluate four action alternatives (Concept Development Alternatives 1, 2, 3 and 4). Each of the concept alternatives will address various components including construction of a new runway; relocation and extension of existing runways; expansion of the terminal building and associated terminal improvements; expansion of air cargo facilities; relocation of the fuel farm; and acquisition of approximately 220 to 500 acres of land. We offer the attached scoping comments for the four action alternatives.

We appreciate the opportunity to comment on the upcoming DEIS/R. Please send two copies of the DEIS/R to my attention (code: CMD-2) at the letterhead address when it is filed with EPA's Washington, D.C. office. If you have any questions, please call me or David Tomsovic of my staff at 415-744-1575.

Sincerely,

David Farrel, Chief
Federal Activities Office

cc: John L. Graham, Chief of Airport Planning
LA Dept of Airports, PO Box 92216, Los Angeles CA 90009

M.I. 002885

Attachments: 4
(a) Detailed EPA scoping comments
(b) Pollution prevention checklist
(c) Presidential directive on tribal government coordination
(d) U.S. DOT environmental justice order

JUL 3 1 1997

AIR QUALITY

Air Quality Conformity: We recommend that the Draft Environmental Impact Statement/Report (DEIS/R) discuss the applicability of EPA's general conformity rule to the proposed project. EPA's general conformity rule does not require a specific linkage between a Federal agency's conformity determination and its NEPA documentation. However, the rule allows for a linkage to be made, and in some cases such linkage may be efficient or convenient. Should air quality conformity be an applicable requirement (i.e., if de minimus thresholds are exceeded), the FAA should determine the best way to link the NEPA and conformity processes for the DEIS/R. There is no need to perform a conformity analysis for each action alternative analyzed in detail in the EIS, but only for the selected alternative (Proposed Project). Therefore, at that point in the NEPA process when the specific action alternative is determined, the air quality analyses for conformity should be performed. Should the FAA have a preferred alternative at the DEIS/R stage, it may be beneficial to have a joint notification and public participation process for both the DEIS/R and the draft conformity determination. Should the FAA not have a preferred alternative until the Final EIS/R, that would be the proper time to simultaneously circulate the FEIS/R and draft conformity determination. In either case, we recommend that the conformity process be completed prior to issuance of the FAA's Record of Decision so that air quality mitigation measures required by the conformity process may be incorporated or referenced in the ROD. You may want to refer to an EPA document titled GENERAL CONFORMITY GUIDANCE: QUESTIONS AND ANSWERS (U.S. EPA, Office of Air Quality Planning & Standards, Research Triangle Park, N.C., July 13, 1994).

Air Quality Mitigation under NEPA: Because of the South Coast Air Basin's significant air pollution problems, we strongly encourage the FAA and the Los Angeles Department of Airports to thoroughly analyze a broad range of mitigation to reduce or eliminate adverse air quality impacts that may be associated with the proposed project's construction and operation. Mitigation measures may include:

a) Adopting airport entrance and parking policies which encourage airline passengers and airport employees to utilize public transit, shuttle services, or carpool/vanpool arrangements. We suggest that the FAA consider the merits of appropriate pricing policies in the DEIS/R.

b) Integrating public transit and shuttle features into the action alternatives. The DEIS/R should discuss existing public transit/shuttle resources and methods to integrate such features into the project. We encourage the FAA and the Department of Airports to work closely with local transit agencies and other transportation providers to identify and implement the maximum feasible transit opportunities for the project.

c) Reducing emissions from aircraft and ground vehicles (e.g., flight scheduling to minimize delays, towing, regulating use of aircraft engines on the ground, use of alternative fuels, control of emissions from fueling, vapor recovery, electrification of ground service vehicles, etc.). We refer you to Response to Comments on the DEIS/R for the **Immediate Action Program, Lindbergh Field, San Diego Airport**, prepared by the Port of San Diego. In its response to comments, the Port of San Diego identified opportunities where CO emissions can be significantly reduced by electrifying ground service vehicles and using alternative fuels.

d) Reducing or eliminating adverse air impacts during the project's construction phase through adherence to local air district rules to control particulate emissions. Emissions from construction equipment (carbon monoxide, oxides of nitrogen, etc.) should also be mitigated as fully as is practicable.

FUEL FARM RELOCATION & POTENTIAL GROUNDWATER CONTAMINATION

The DEIS/R should discuss the nature and extent of environmental contamination at the existing fuel farm and environmental restoration efforts underway or planned at the fuel farm. The DEIS/R should discuss the environmental implications of relocating the fuel farm to a new area, in particular the potential for groundwater contamination at the new site. We note that page 33 of the attachment to the Notice of Preparation states "...fuel farm development...could adversely affect the quality of the water in the aquifer." Page 33 also indicates that the current airport complex "may be situated over an aquifer." We recommend that the DEIS/R provide the best available information regarding whether or not the LAX complex sits atop an aquifer and, if so, the beneficial uses associated with this aquifer, including whether it may be a source of public drinking water.

We recommend that the FAA and the Department of Airports analyze alternative sites for the new fuel farm to reduce the potential for contamination of groundwater resources, and identify mitigation measures to avoid or prevent groundwater contamination to the maximum extent feasible. The mitigation measures associated with the fuel farm relocation would compliment current Federal and State requirements concerning the location of new fuel facilities and pipelines. In view of the statement that the LAX complex sits atop an aquifer, we believe it is critical for

the proposed Federal action to avoid/minimize potential adverse impacts to groundwater resources. This would be particularly important if the aquifer serves as a source of drinking water.

TOXIC AND HAZARDOUS MATERIALS/WASTE

The following hazardous/toxic issues may apply to the proposed project. If so, they should be discussed in the DEIS/R.

Hazardous Materials & Hazardous Waste: The DEIS/R should discuss any ongoing efforts at LAX to reduce the use of hazardous materials by the Department of Airports and airport tenants, and parallel efforts to reduce the amount of hazardous waste requiring proper treatment, storage and disposal. We strongly recommend that the Department of Airports and the FAA make hazardous waste minimization an integral component of the proposed project. We recommend that pollution prevention assessments be conducted at airport sites that utilize hazardous materials and/or generate hazardous waste in order to identify source reduction and recycling opportunities. The pollution prevention assessments would lay the framework for a facility-wide hazardous waste minimization effort.

PCBs: The DEIS/R should discuss whether the proposed project would require the disturbance or removal of polychlorinated biphenyls (PCBs). If PCBs are presently in use or in storage at the airport, the DEIS/R should discuss compliance with EPA's PCB rule. The DEIS/R should note that the Toxic Substances Control Act and EPA's PCB rule (40 CFR 761) govern the use, storage and disposal of PCBs and PCB-contaminated equipment and substances. We recommend that the DEIS/R contain a map showing where PCBs are used or stored at the airport, in relation to proposed construction work.

Asbestos-Containing Materials: The DEIS/R should discuss whether the demolition or renovation of any structures or facilities at the airport may involve the disturbance or removal of asbestos-containing materials (ACMs). If so, we recommend that your office contact the South Coast Air Quality Management District concerning compliance with the asbestos NESHAPS rule (National Emission Standards for Hazardous Air Pollutants) and the air district's rules on asbestos management.

Hazardous Air Pollutants: The DEIS/R should discuss the types and volumes of hazardous air pollutants presently emitted at LAX. A previous FAA DEIS (**Phoenix Sky Harbor Master Plan Improvements**, 1991) suggests that many hazardous air pollutants are emitted at airports from mobile and stationary sources, including benzene, toluene, formaldehyde, xylene, ethylene, styrene, phenol and naphthalene. The DEIS/R should explore the potential to reduce hazardous air emissions at the airport by reducing the use of hazardous materials that contribute to such emissions.

Lead-Based Paint: The DEIS/R should discuss whether proposed project activities may involve the disturbance of lead-based paint which may have been used in the past, such as renovation or removal of existing terminal areas, air cargo facilities, etc. Appropriate means to protect public health and safety, and the health and safety of construction personnel, should be included in the DEIS/R, including limiting public access to areas containing lead-based paint during construction. Please note that wastes associated with lead-based paint and asbestos may be considered as hazardous waste under California law, being subject to State hazardous waste requirements.

POLLUTION PREVENTION

The Council on Environmental Quality (CEQ) published a guidance memorandum for all Federal agencies concerning the integration of pollution prevention techniques and mechanisms in agency NEPA documents (January 29, 1993 Federal Register, pp. 6478-6481). In this document, the CEQ encouraged all Federal agencies to incorporate pollution principles, techniques and mechanisms in NEPA planning and decision-making. We encourage your office and the Los Angeles Department of Airports to include a wide variety of pollution prevention features in the project. For reference I've attached a checklist of pollution prevention features for airport projects.

LAND ACQUISITION AND SOIL/GROUNDWATER CONTAMINATION

The Notice of Intent indicates that development concepts 1, 2, 3 and 4 would acquire approximately 220, 446, 400 and 500 acres of land, respectively. We recommend that the DEIS/R recognize that the land proposed for acquisition may be contaminated with hazardous substances due to past industrial, commercial or other activities. Groundwater under the land proposed for acquisition may be contaminated as well. We recommend that the DEIS/R discuss, as fully as possible, the nature and extent of soil and groundwater contamination at the areas proposed for acquisition and the status of environmental restoration efforts.

NOISE

Noise Impacts: Since several project features (new and/or extended runway, expansion of air cargo facilities, etc.) will likely lead to increased aircraft operations, we believe that the DEIS/R should assess the noise impacts associated with such operations. In addition to the standard noise analysis for the DNL 65, 70 and 75 db contours, the DEIS/R should analyze areas between the DNL 60 and 65 db contours that will experience a DNL 3 db increase. To facilitate an understanding of the noise impacts from aircraft, the DEIS/R should clearly portray both current and projected aircraft operations. To fully disclose the changes in aircraft operations, the DEIS/R should include a

detailed table of all aircraft operations. The table should list operational data for each jet aircraft type and for day and night operations. A contour map of db levels should be included. The proposed project may also lead to increased auto and truck traffic, including trips associated with the air cargo facilities. An analysis of potential increased auto and truck traffic noise should be provided.

Noise Mitigation: The noise mitigation section should discuss how non-compatible land uses will be avoided, reduced or mitigated (e.g., buyout of affected properties, soundproofing, use of noise easements, etc.). If the DEIS/R proposes mitigation to reduce noise impacts, the document should contain a firm commitment by the FAA that such mitigation will be implemented with or without FAA funding. In addition, the noise mitigation study should include an analysis of different operational scenarios, which could prove to be cost-effective noise mitigation measures. We strongly encourage the FAA to work closely with other jurisdictions (e.g., adjacent cities such as El Segundo, potentially affected tribal governments) to determine their concerns as the FAA develops its NEPA documentation for the proposed project.

SECTION 404 PERMIT

Page 7 of the attachment to the Notice of Preparation indicates that one Federal approval for the proposed project is "[p]ermits for development in wetlands," issued by the Army Corps. Page 34 states that the Argo ditch could be considered a riparian habitat which is subject to the requirements of Section 404 of the Clean Water Act and the Section 404(b)(1) Guidelines, 40 CFR 230. Should Section 404 permitting prove necessary, we recommend that the DEIS/R contain a brief discussion to enable the reader to understand the major requirements of the Section 404(b)(1) Guidelines. The Guidelines are very specific in terms of the requirements that must be clearly demonstrated before an applicant can receive Section 404 authorization. For example, 40 CFR 230.10(a) provides that no discharge of dredged or fill material shall be permitted

> "...if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences..."

Should the placement of fill material in Section 404-regulated areas be required, the DEIS/R should clearly demonstrate whether all necessary steps have been taken to avoid impacts to aquatic resources protected under Section 404. In order to determine the least environmentally damaging practicable alternative under Section 404, the DEIS/R should clearly portray the proposed

project's direct, indirect and cumulative impacts on Section 404-regulated aquatic resources over the life of the project. Should Section 404 permitting prove applicable, we encourage the FAA to identify the least environmentally damaging practicable alternative in its DEIS/R, taking into account all reasonably foreseeable direct, indirect and cumulative impacts over the life of the project. (Identification of the least environmentally damaging practicable alternative would assist the Corps and Federal and State resource agencies in reviewing 404 permit actions for the project). The DEIS/R should discuss mitigation measures to compensate for the unavoidable loss of Section-404 regulated resources.

GOVERNMENT-TO-GOVERNMENT COORDINATION WITH FEDERALLY-RECOGNIZED TRIBAL GOVERNMENTS

The President issued a memorandum for departments and agencies on **Government-to-Government Relations with Native American Tribal Governments** in 1994 (copy attached). To the extent that overflight and airspace issues associated with new LAX developments have implications for Federally-recognized tribal lands, the DEIS/R should discuss the consultation process that the FAA would undertake with potentially-affected tribal governments. We are aware that the Morongo Tribe recently expressed concerns with the action alternatives presented in FAA's Draft Environmental Assessment (DEA) for the LAX **International Airport Arrival Enhancement Project** due to potential noise increases on Morongo lands. We presume that increased flight traffic to and from LAX could engender similar concerns by the Morongo or other tribal authorities. The Presidential directive provides that each Federal agency shall consult, to the greatest extent practicable and to the extent permitted by law, with tribal governments "prior to taking actions that affect federally recognized tribal governments." We recommend that the consultation process be documented in the DEIS/R. We believe that tribal authorities are in the best position to identify the tribal resources that may be potentially affected by proposed projects, including wildlife, economic resources and cultural resources (we would interpret potential impacts to tribal lands due to the proposed project as an indirect impact under NEPA).

ENVIRONMENTAL JUSTICE (EJ)

The DEIS/R should discuss the proposed project's consistency with Executive Order 12898, **Federal Actions to Address Environmental Justice in Minority Populations & Low-Income Populations** and the Department of Transportation's final order for the EJ Executive Order. The DOT's final order was printed in the April 15, 1997 Federal Register (copy attached). Should the FAA undertake an EJ analysis, we recommend that it be incorporated or referenced in the DEIS/R.

POLLUTION PREVENTION/ENVIRONMENTAL IMPACT REDUCTION CHECKLIST FOR AIRPORTS

How Can Airports Affect the Environment?

The planning, design, construction, and operation/maintenance of airports can have a variety of impacts on the environment. These impacts include destruction or alteration of wildlife habitats, erosion, sedimentation, soil compaction, noise pollution, chemical pollution resulting from aircraft maintenance and deicing, aircraft emissions, contaminated runway runoff, and the generation of waste construction materials, as well as litter and other debris from administrative and food service operations. The implementation of pollution prevention strategies can help reduce the volume and toxicity of waste generated by an airport, minimize environmental effects, and reduce operating costs.

Also see checklists on Ecosystem Preservation and Protection, Siting, Energy Management, Vehicle Maintenance, Building/Housing Construction, Highways and Bridges, and Water Use.

What Questions Should Be Asked To Ensure That These Effects Are Minimized or Eliminated?

- Have other forms of mass transit been considered as an alternative to constructing a new airport? Expansion/improvement of commuter rail service may, for example, reduce the need for building new airports.

Noise Concerns. Noise pollution from airports can represent a significant negative impact on human and wildlife health and welfare. Concerns related to noise pollution can include noise-induced hearing loss, annoyance, and sleep disturbance. A number of techniques are, however, available to reduce noise pollution associated with airport operations.

- Does the airport construction and operation plan explain noise and noise analysis methodologies? Are single-event and cumulative noise metrics defined and used in the analysis? *
- Are potential noise effects on human health and welfare analyzed? Have the locations of all noise-sensitive areas (e.g., residences, schools, parks, and ecologically sensitive wildlife areas) been identified? *
- Does the airport operation plan include provisions to increase the distance between the source of noise and sensitive areas? Techniques include changing flight corridors and flight altitudes, gate locations, and taxiway and runup pad patterns. *
- Does the airport construction plan include the use of noise barriers (e.g., berms, hush houses) to reduce impacts on the surrounding environment? *
- Does the airport operation plan include provisions to reduce noise pollution by reducing the number of operations that produce noise, reducing the duration of noise-making events, or limiting the operation of noisier aircraft types at the airport?

* Indicates an environmental impact reduction opportunity.

- Does the aircraft operation plan reduce the number of operations or noise making events that occur at night? Techniques include rescheduling night arrivals and departures to daytime, limiting engine maintenance at night, limiting the use of auxiliary and ground power units, providing preferential runway use based on time of day, and limiting nighttime departures and arrivals based on sound level of the aircraft.

Aircraft Maintenance. Wastes generated as a result of aircraft maintenance activities can include organic solvents, oil and grease, tires, and batteries. Some of these wastes can be toxic or otherwise hazardous, and uncontrolled releases can contaminate surface waters, groundwater, and soils.

- Will aircraft maintenance hangars be located to minimize the potential impacts of maintenance activities? *
- Is there a plan for spill reduction and collection in maintenance areas (such as the use of drip pans, secondary containment, and absorbent products)?
- Will spill prevention and control plans for hazardous materials be located in aircraft service hangars?
- Will aircraft maintenance be conducted on an as-needed basis? Performing maintenance on an as-needed basis rather than on a set schedule can help reduce waste generated by unnecessary maintenance and fluid changes.
- Will aircraft maintenance shops use recycled maintenance products when possible? *
- Will the facility collect engine and hydraulic oil for recycling? Segregating and recycling used oil can significantly reduce the quantity of waste generated and managed at an airport. *
- Will the facility reuse or recycle spent antifreeze? Onsite antifreeze recycling units can be a cost-effective alternative to disposing of spent antifreeze for larger operations. *
- Will precautions be taken to segregate oils and other hydraulic fluids from other waste streams (including solvents)? Oils and hydraulic fluids that are not commingled can be recycled into usable products. *
- Will a bulk fluids distribution system be cost effective? These distribution systems allow employees to dispense only as much product as is necessary for a job, and they reduce the potential for spills associated with the use of large, unwieldy containers.
- Will the facility's solvent sink be operated to reduce environmental impacts? Environmentally preferable operating practices include pre-rinsing parts with dirty solvent before using fresh solvent to extend solvent life, removing parts from the sink slowly to reduce solvent dragout, using drip racks to reduce solvent loss, keeping sink lids closed when not in use to minimize evaporation of solvent, not leaving solvent streams running, and cleaning out sludges regularly to maintain fresh solvent.

* Indicates an environmental impact reduction opportunity.

- Will the facility use aqueous or semi-aqueous cleaners as an alternative to solvents when possible? Aqueous and semi-aqueous cleaners already are being used by several major air carriers to reduce solvent use.
- Will tires removed from aircraft or service vehicles be retapped or recycled for use in other applications? *
- Will lead-acid, lithium, and nickel-cadmium batteries be collected and stored for recycling and metals recovery? *
- Will the facility collect and recycle scrap metals generated at shops (e.g., used parts, empty material storage drums)? In some instances, punctured aerosol spray cans and drained oil filter casings may also be recycled as scrap. *
- Will hazardous materials be properly stored and handled? Proper storage and handling can include labeling containers, protecting materials from the elements, maintaining secondary containment, ensuring the compatibility of stored materials to avoid explosion hazards, and following instructions on the product's Material Safety Data Sheets (MSDSs). *
- Will access to hazardous materials be limited? Limiting access to hazardous materials allows for easier tracking of chemical usage and helps reduce unnecessary waste generation.

Aircraft Painting. Wastes associated with aircraft painting operations include unused paints, dirty thinner, and emissions of volatile organic compounds (VOCs) from thinners and solvents. Used spray booth filters are also waste products that may be generated. Proper training of employees and the use of high efficiency equipment can help reduce waste generation.

- Will aircraft painting operations be located and enclosed to minimize the potential impacts of painting activities?
- Will a non-solvent based paint stripping system be used? Media blast systems have proven to be an effective alternative to solvent strippers.
- Will employees be trained to minimize the amount of waste paint generated by mixing only the amount of paint needed?
- Will the facility employ high efficiency painting technologies? When properly used, high volume, low pressure (HVLP) and electrostatic painting systems can reduce the amount of paint needed for a job and reduce the amount of VOCs released to the air.
- Will employees be trained to use as little solvent/thinner as possible to clean up after painting activities?
- Would it be cost effective to install a distillation unit to recover solvents for reuse? *

* Indicates an environmental impact reduction opportunity.

- Will the facility employ a gun cleaning station? Gun cleaning stations capture the thinner/solvent shot through the gun and condense it for reuse instead of venting to the air. In some cases, it may be possible to use water-based gun cleaners as an alternative to solvent thinner.
- Will the paint shop utilize reusable polystyrene booth filters? Traditional paint booth filters often must be handled as hazardous waste because of the presence of wet paint or paint containing lead or chromium. Polystyrene filters can be cleaned with compressed air and reused (with the paint residue captured for disposal). Once it can no longer be used, the cleaned filter can often be disposed of by dissolving it in a waste thinner drum.

Aircraft Washing. Aircraft washing typically involves pressure spraying the aircraft with cleaning agents, brushing surfaces with an alkaline water-based cleaner, and rinsing with hot or cold water. This activity can generate large quantities of wastewater that may be contaminated with oils, grease, dirt, and detergent.

- Will a centralized, stationary washpad area be located to reduce impacts to the surrounding environment?
- Will washwaters be contained to reduce runoff to the surrounding environment? Will an oil/water separator be used? *
- Can water from the aircraft washpad be captured, filtered, and reused in aircraft washing or other activities? *
- Will the facility use the least toxic cleaner/detergent necessary to effectively clean the aircraft?
- Will equipment (such as flow restrictors) be used to control the amount of water used to wash aircraft?

Deicing Activities. The chemicals used in aircraft and runway deicing activities are a glycol/water mixture that can be released to the environment (soils, surface water and groundwater) via stormwater runoff. Deicing chemicals also may be ingested by deer and other wildlife.

- Will deicing operations be located at a centralized, stationary position to allow aircraft to stop over a drain that captures the glycol-based fluids? Mobile deicers typically do not have secondary containment systems and thus can release deicing chemicals into the environment.
- Can deicing chemicals be collected and reused in aircraft deicing or other purposes? Deicing chemicals can be reused in aircraft applications if they meet performance specifications. *
- Would it be cost effective to install a computerized spraying system to apply deicing chemicals? These systems, which are in use today, are more efficient and require less chemicals per square foot.

* Indicates an environmental impact reduction opportunity.

- Does the facility construction plan call for the installation of in-pavement heating elements (e.g., tubing filled with heated liquid or gas and electrical elements) to aid in taxiway deicing? The use of this type of equipment can reduce the quantity of deicing chemicals that need to be applied.

Concession/Food Services. Concession shops and food service operations can generate significant quantities of solid waste, such as corrugated cardboard, paperboard, office paper, newspapers, magazines, wooden pallets, aluminum, plastic, and glass containers, as well as leftover food. The application of pollution prevention techniques to these operations can help reduce the volume of waste that an airport must dispose of, as well as associated waste management costs.

- Will the facility be designed and constructed to facilitate an in-terminal recycling program for such materials as cardboard, beverage containers, and newspapers that will be convenient and easy to follow for both passengers and shop keepers? *

Administrative Offices. Airports, like other administrative offices, can generate large quantities of waste paper and consume large amounts of energy from lighting, heating and cooling systems, and computers.

- Will office paper generated in the airport's administrative offices be collected for recycling? *
- Will the airport administration facilities specify the purchase of recycled content paper and other office products? *
- Will the facility plan call for the purchase of energy efficient computers that shut off when not in use? Executive Order 12845 committed the Federal Government to purchase energy-efficient computers, monitors, and printers to the maximum extent possible.
- Can motion sensors and other energy conservation techniques be used to reduce energy usage?

Other References

Federal Interagency Committee on Noise (FICON). August 1992. "Federal Agency Review of Selected Airport Noise Analysis Issues."

National Research Council (NRC), Assembly of Behavioral and Social Sciences, Committee on Hearing, Bioacoustics, and Biomechanics (CHABA). 1977. "Guidelines for Preparing Environmental Impact Statements on Noise." Report of Working Group 69.

U.S. Department of Transportation, Federal Aviation Administration. 1989. "Final Environmental Impact Statement for Baltimore/Washington International Airport Extension of Runway 15L/33R."

U.S. Department of Transportation, Federal Aviation Administration. February 1991. "Management of Airport Industrial Waste." AC: 150/5320-15.

U.S. EPA. October 1993. "Eliminating CFC-113 and Methyl Chloroform in Aircraft Maintenance Procedures.". EPA-430-B-93-006.

* Indicates an environmental impact reduction opportunity.

THE WHITE HOUSE

WASHINGTON

April 29, 1994

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

SUBJECT: Government-to-Government Relations with Native American Tribal Governments

The United States Government has a unique legal relationship with Native American tribal governments as set forth in the Constitution of the United States, treaties, statutes, and court decisions. As executive departments and agencies undertake activities affecting Native American tribal rights or trust resources, such activities should be implemented in a knowledgeable, sensitive manner respectful of tribal sovereignty. Today, as part of an historic meeting, I am outlining principles that executive departments and agencies, including every component bureau and office, are to follow in their interactions with Native American tribal governments. The purpose of these principles is to clarify our responsibility to ensure that the Federal Government operates within a government-to-government relationship with federally recognized Native American tribes. I am strongly committed to building a more effective day-to-day working relationship reflecting respect for the rights of self-government due the sovereign tribal governments.

In order to ensure that the rights of sovereign tribal governments are fully respected, executive branch activities shall be guided by the following:

(a) The head of each executive department and agency shall be responsible for ensuring that the department or agency operates within a government-to-government relationship with federally recognized tribal governments.

(b) Each executive department and agency shall consult, to the greatest extent practicable and to the extent permitted by law, with tribal governments prior to taking actions that affect federally recognized tribal governments. All such consultations are to be open and candid so that all interested parties may evaluate for themselves the potential impact of relevant proposals.

(c) Each executive department and agency shall assess the impact of Federal Government plans, projects, programs, and activities on tribal trust resources and assure that tribal government rights and concerns are considered during the development of such plans, projects, programs, and activities

(d) Each executive department and agency shall take appropriate steps to remove any procedural impediments to working directly and effectively with tribal governments on activities that affect the trust property and/or governmental rights of the tribes.

(e) Each executive department and agency shall work cooperatively with other Federal departments and agencies to enlist their interest and support in cooperative efforts, where appropriate, to accomplish the goals of this memorandum.

(f) Each executive department and agency shall apply the requirements of Executive Orders Nos. 12875 ("Enhancing the Intergovernmental Partnership") and 12866 ("Regulatory Planning and Review") to design solutions and tailor Federal programs, in appropriate circumstances, to address specific or unique needs of tribal communities.

The head of each executive department and agency shall ensure that the department or agency's bureaus and components are fully aware of this memorandum, through publication or other means, and that they are in compliance with its requirements.

This memorandum is intended only to improve the internal management of the executive branch and is not intended to, and does not, create any right to administrative or judicial review, or any other right or benefit or trust responsibility, substantive or procedural, enforceable by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

The Director of the Office of Management and Budget is authorized and directed to publish this memorandum in the Federal Register.

William J. Clinton

JUL 31 1997

JUL 31 1997

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

11 JUL 1997

Mr. David B. Kessler
Federal Aviation Administration
U.S. Department of Transportation
P.O. Box 92007, Worldway Postal Center
Los Angeles, California 90009-2007

Subject: Notice of Preparation for Los Angeles International Airport Master Plan

Dear Mr. Kessler:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Preparation (NOP) for the proposed Environmental Impact Statement/Environmental Impact Report on the Master Plan for the Los Angeles International Airport (DEIS/DEIR). The proposed project is a master plan for the Los Angeles International Airport in Los Angeles, Los Angeles County, California. It is our understanding that the proposed master plan includes five alternatives, including one which involves extending a runway through the northern portion of the Airport Dunes. The Airport Dunes, which is bounded by Pershing Avenue, West Imperial Highway, Vista del Mar, and Waterview/Napoleon Avenues, is the largest coastal sand dune between the mouth of the Santa Maria River and Ensenada in Baja California.

The Service is concerned about the impacts of this proposed project on the endangered El Segundo blue butterfly (*Euphilotes bernardino allyni*)(butterfly), endangered Pacific pocket mouse (*Perognathus longimembris pacificus*)(mouse), endangered California least tern (*Sterna antillarium browni*)(tern), endangered brown pelican (*Pelecanus occidentalis*)(pelican), endangered American peregrine falcon (*Falco peregrinus*)(falcon), several animal and plant Species of Special Concern, fish and wildlife resources, and wetlands. The butterfly, mouse, falcon, pelican, and tern are protected under the Endangered Species Act of 1973, as amended (Act). The comments and recommendations in this letter are based on the project NOP for the DEIS/DEIR dated June 11, 1997, a visit to the Airport Dunes by Chris Nagano and Marj Nelson of my staff on July 9, 1997, a visit to the Airport Dunes by Chris Nagano, Art Davenport, and Bob James of my staff on July 15, 1997, and other information available to the Service.

Regarding fish and wildlife resources, the DEIS/DEIR should assess fully the impacts of the proposal and its alternatives on species populations and their habitats, with emphasis on wetlands and endangered, threatened, proposed, candidate species, and Species of Special

Concern. The DEIS/DEIR should state clearly the purposes of, and document the needs for the proposed project so that the capabilities of the various alternatives to meet those purposes and needs can be readily determined. The DEIS/DEIR should include a thorough description of all the facilities to be constructed as part of the proposal. Figures accurately depicting proposed project features in relation to natural features in the project areas also should be included in the DEIS/DEIR.

Section 9 of the Endangered Species Act of 1973, as amended (Act) prohibits the "take" of any federally listed animal species. As defined in the Act, take means "...to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" has been further defined to include habitat destruction when it kills or injures a listed species by interfering with essential behavioral patterns such as breeding, foraging, or resting. Thus, not only is a listed animal protected from activities such as hunting or collecting, but also likely from actions that damage or destroy its habitat. The term person is defined as "an individual, corporation, partnership, trust, association, or any other private entity, or any officer, employee, agent, department, or instrumentality of the Federal Government, of any State, municipality, or political subdivision of a State, or any other entity subject to the jurisdiction of the United States."

Take incidental to an otherwise lawful activity may be authorized by one of two procedures. If a Federal agency is involved with the permitting, funding, or carrying out of the project, then initiation of formal consultation between that agency and the Service pursuant to Section 7 of the Act is required if it is determined that the proposed project may affect a federally listed species. Such consultation would result in a biological opinion that addresses the anticipated effects of the project to the listed species and may authorize a limited level of incidental take. If a Federal agency is not involved with the project, and federally listed species may be taken as part of the project, then an incidental take permit pursuant to Section 10(a) of the Act would need to be obtained. The Service may issue such a permit upon completion of a satisfactory conservation plan for the listed species that would be affected by the project.

Surveys for several federally listed species may only be conducted by permitted biologists. Complete surveys should be conducted on the Airport Dunes, as well as other areas of the Los Angeles International Airport, including the areas located between Pershing Avenue and the existing runways. The findings of the surveys and measures that will be taken to avoid/mitigate any adverse impacts to these species should be included in the DEIS/DEIR.

The Service offers the following specific information and recommendations to assist the Federal Aviation Administration in planning for the preservation of sensitive wildlife species and habitats within the proposed project area, and as a means to assist you in complying with pertinent statutes. To facilitate the evaluation of the proposed project from the standpoint of environmental resource planning, we request that the DEIS/DEIR contain the following specific information:

1) The Airport Dunes contain the largest known population of the endangered El Segundo blue butterfly. The DEIS/DEIR should contain information on the location of the animals and their food plants, as well as all areas containing coastal sand dune habitat. The survey for the animal and its habitat should be conducted within the area bordered by Napoleon/Waterview Avenues, West Imperial Highway, Vista del Mar, and Pershing Drive, as well as the areas located between Pershing Drive and the runways. The information in the DEIS/DEIR should include the precise location and number of butterflies observed, as well as the dates and times, and weather conditions when the animals were observed. The information presented in the DEIS/DEIR should include the survey data collected by Sapphos Environmental during the 1995-1997 flight seasons of the El Segundo blue butterfly and any other relevant information.

2) The project area is a historical locality for the Pacific pocket mouse, a Federal endangered species, extant at only three other locations. A live-trapping survey should be done for this animal by a permitted biologist following Service survey protocol. The survey conducted in 1997 was inadequate since the area was incompletely covered. The Service would like the opportunity to review the survey approach with the biologist prior to initiation of trapping.

3) The DEIS/DEIR should completely assess the impacts of the proposed project on the California least tern, brown pelican, and American peregrine falcon.

4) An assessment should be made of the direct, indirect, and cumulative project impacts to wildlife and associated habitats as a result of this project and other reasonably expected projects. All facets of the project (e.g., construction, implementation, operation and maintenance) should be included in this assessment.

5) Cumulative impacts should include an complete discussion of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency, pursuant to §15130 of the CEQA Guidelines.

6) A description of Federal (listed, proposed, candidate) species, state-listed species, and locally sensitive species that are on or near the project site should include a detailed discussion, including information pertaining to their local status and distribution. This discussion should include species not observed but reasonably expected to occur. The species of concern include the burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), El Segundo spineflower (*Chorizanthe californica* var. *suksdorfii*), El Segundo dune flower (*Phalisma paniculatum*), Trask's snail (*Helminthoglypta traski*), El Segundo goat moth (*Comadia introusa*), Ford's sand dune moth (*Psammobatys fordi*), El Segundo scythrid moth (*Scythris* new species), lesser dunes scythrid moth (*Scythris* new species), El Segundo Jerusalem cricket (*Stenopelmatus* new species), Dorothy's sand dune weevil (*Trigonoscuta dorothae*), Lange's dune weevil (*Onychobaris langei*),

El Segundo crab spider (*Ebo* new species), El Segundo sun spider (*Eremobates* new species), trapdoor spider (*Aptostichus simus*), Santa Monica dunes moth (*Copablepharon sanctamonicae*), River's dune moth (*Eucoa riversii*), south coast dune beetle (*Psammodius macclayi*), dune scarab beetle (*Aegilia convexa*), Belkin's dune fly (*Brennania belkini*), San Diego horned lizard (*Phrynosoma coronatum blainvillei*), California legless lizard (*Anniella pulchra*), and western spadefoot toad (*Scaphiopus hammondi*). Complete surveys should be conducted by qualified biologists who are familiar with these species and the results and appropriate mitigations included in the DEIS/DEIR. The surveys should include the habitats located east of Pershing Drive and west of the runways and also the habitats located in the area bordered by Waterview/Napoleon Avenues, Vista del Mar, Pershing Drive, and Sand Piper Street. The real and anticipated impacts of the project on these species should be fully addressed.

7) The status and likely impacts to botanical resources, including rare plants, should be reassessed. A literature search should be conducted, including a review of the Natural Diversity Database maintained by the State of California, for species that are Federal and State listed, proposed, candidate, or are otherwise considered to be endemic or rare by knowledgeable authorities such as the California Native Plant Society.

8) The Service is concerned about potential impacts to wetlands and waters of the United States resulting from the proposed project. We recommend avoidance as the preferred form of mitigation for projects that contain aquatic habitat for resident and migratory species of wildlife and plants. Wetlands, ponds, and drainages in the project area should be accurately mapped according to the Service's definition of biological wetlands. Since the purposes of this section is to discuss biotic resources, a biologically based definition of wetland should be used. Mapping of wetlands based on the U. S. Army Corps of Engineers may not result in disclosure of all resources associated with biological wetlands. In reviewing any future proposals for development in these areas, the Service will evaluate impacts not only on jurisdictional wetlands, but on all wetlands and other habitats for fish and wildlife. We recommend that the DEIS/DEIR include complete information on the impacts and mitigation for wetlands and waters of the United States.

9) Specific mitigation plans should be made to fully offset project-related impacts, including proposals for mitigating the cumulative impacts of direct and indirect habitat loss, degradation, or modification. Adverse project-related impacts should be mitigated, to the maximum extent practicable, through appropriate on-site conservation or revegetation of impacted habitat types. The objective of each mitigation plan should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. These mitigation plans involving restoration and enhancement should be prepared by persons with specific expertise on southern California coastal ecosystems and state-of-the-art native plant revegetation techniques. Each plan should include, at a minimum: a) the location of the mitigation site; b) the species, actual number, and size of the plants to

be used (seeds and seedlings should be obtained from an appropriate on-site location or from an appropriate site in the immediate vicinity of the project site); c) a schematic layout depicting the arrangement of the plants within the compensation area; d) time of year that planting will occur; e) identification of the irrigation methodology to be employed; f) measures to be taken to control exotic vegetation on site; g) a detailed monitoring program that includes provisions for replanting areas where planted materials have not survived; and h) identification of the agency or party responsible for assuring the successful creation of the mitigation habitat and providing for the perpetual conservation of the restoration site.

10) A complete description should be made of measures to be taken to perpetually protect habitat values that are created during restoration (mitigation). Issues that should be addressed include, but not be limited to, restrictions on vehicle and people access, proposed land dedications, monitoring and management programs, control of illegal dumping, and lighting restrictions near mitigation areas.

We are available to assist the Federal Aviation Administration and the City of Los Angeles in the development of a master plan for Los Angeles International Airport that avoids or minimizes adverse impacts to listed species, wetlands, and other wildlife resources. Please contact Chris Nagano or Marj Nelson (butterfly and other wildlife) or Bob James (Pacific pocket mouse) of my staff at the letterhead address or at 760/431-9440 if you have any questions.

Sincerely,

Gail C. Kobetich
Field Supervisor

1-6-97-TA-155

cc: CDFG, San Diego, CA (Attn: B. Tippets)
CDFG, Long Beach, CA (Attn: J. Hernandez)
CDFG, Long Beach, CA (Attn: Environmental Services Supervisor)
CDFG, Sacramento, CA (Attn: D. Warenycia)
DRP, Los Angeles, Ca (Attn: D. Koutnik)
CCC, Long beach, CA (Attn: P. Emerson)
LAX, Westchester, CA (Attn: S. Crowther)

[illegible]

United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
30401 Agoura Road, Suite 100
Agoura Hills, California 91301

IN REPLY REFER TO:

N36 (SAMO)

July 29, 1997

Mr. David B. Kessler, AICP
Environmental Protection Specialist, AWP-611.2
Planning Section, Airports Division
Federal Aviation Administration
Western-Pacific Region
P.O. Box 92007
World Way Postal Center
Los Angeles, California 90009-2007

Dear Mr. Kessler:

We request that the name of the Santa Monica Mountains National Recreation Area, a unit of the National Park System, be added to your mailing list to receive all public information related to preparation of an EIS for Development Recommended by the Master Plan for Los Angeles International Airport, Los Angeles, California.

Although we will be coordinating our comments through Mr. George Turnbull of the National Park Service, Pacific West Region, Pacific Great Basin Support Office in San Francisco, we would like to receive a copy of all EIS related documents for the park's own use in analyzing the potential impacts of airport expansion on the natural, cultural, recreational and scenic resources of the Santa Monica Mountains and Simi Hills.

Please add the following name and address to your mailing list: Jim Benedict, Chief of Science and Resources Management; Santa Monica Mountains NRA; 30401 Agoura Road, Suite 100; Agoura Hills, CA 91301; telephone number (818) 597-1036 extension 233, fax number (818) 865-8709.

If you have any concerns about this request, please contact me at (818) 597-1036, extension 233.

Sincerely,

Jim Benedict
Chief, Science and Resources Management

United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Field Area
Pacific Great Basin System Support Office
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

IN REPLY REFER TO:
L7619(PP-PGSO)

JUL 31 1997

RECEIVED
AUG - 6 1997
AIRPORTS DIV.

RECEIVED
AUG - 6
AIRPORTS DIVISION
AWP-611

Mr. David B. Kessler, AICP, AWP-611.2
Planning Section, Airports Division
Western Pacific Region
Federal Aviation Administration
P.O. Box 92007
World Way Postal Center
Los Angeles, California 90009-2007

Dear Mr. Kessler:

Thank you for the opportunity to review the **Notice of Intent (NOI) to Prepare an Environmental Impact Statement for the Proposed Development at Los Angeles International Airport (LAX), ER-97/351.** The NOI describes six master plan development "action alternative" concepts and the No Action alternative for future development of LAX as recommended by the LAX Master Plan.

The National Park Service (NPS) appreciates being included in the scoping process for development of the Draft Environmental Impact Statement (DEIS) to guide future growth at LAX. The NPS is very interested in proposals having potential to affect the human, natural and physical environment in and around national parks.

Cumulative Effects: The NPS is concerned with the potential cumulative impacts the proposed LAX expansion may have upon national park and regional resources including natural quiet and air quality. The effects of this proposal combined with existing and proposed county, municipal and private aircraft use should be evaluated. In that one of the project objectives is to increase the airport's capacity to receive and service aircraft, the DEIS should analyze the degree which this may increase the volume of air traffic over or near Channel Islands National Park (CHIS), Joshua Tree National Park (JOTR) and Santa Monica National Recreation Area (SAMO).

LAX Arrival Enhancement Project: On July 21, 1997 the NPS provided comments after reviewing the Draft Environmental Assessment (DEA) for the Los Angeles International Airport Arrival Enhancement Project. NPS concerns focused on redirecting aircraft approaching LAX to a route away from JOTR to preserve natural quiet and decrease visual intrusion by approaching aircraft. To date the DEA has not been finalized.

We request that the subject LAX development planning process and DEIS consider and evaluate how the foreseeable increase in air traffic resulting from proposed airport expansion will affect the airport arrival enhancement planning currently underway. We further suggest that the documents developed through these two concurrent compliance processes include a section describing each project's relationship with the other.

NRHP Comments: The NPS is concerned with safeguarding all resources listed on the National Register of Historic Places (NRHP). We request that the California State Historic Preservation Officer (SHPO) be consulted now, as well as prior to cultural and historical resources surveys of construction areas. FAA consultation with SHPO should identify mitigation for potential construction project impacts to NRHP resources.

Summary:

The National Park Service welcomes future opportunities to review and comment on LAX planning documents. We request future meeting notices and review documents be forwarded to CHIS, JOTR, SAMO as well as this office.

We thank you for the opportunity to comment on the scoping document. If you have any questions regarding our comments, please contact Mr. Matt Wagers, External Compliance Specialist, Pacific Great Basin Support Office at (415) 427-1442.

Sincerely,

Patricia J. Neubacher

John J. Reynolds
Regional Director, Pacific West

cc:
Mr. Bill Johnstone, AWP-520.5, Air Traffic Division, FAA,
P.O. Box 92007, Worldway Postal Center, L.A., CA 90009
CHIS-Superintendent, 1901 Spinnaker Drive, Ventura, CA 93001
JOTR-Superintendent, 74485 National Monument Drive,
Twentynine Palms, CA 92277
SAMO-Superintendent, 30401 Agoura Road, Suite 100,
Agoura Hills, CA 91301
PGSO-NOR:Regional Overflight Coordinator
WASO-POPS:NPS Overflight Coordinator
WASO-EQD
PWFA-REO

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325
July 29, 1997

REPLY TO
ATTENTION OF:

Office of the Chief
Regulatory Branch

Federal Aviation Administration
Attn: Mr. David Kessler
AWP - 611.2
P.O. Box 92007
Worldway Postal Center
Los Angeles, California 90009-2607

Dear Mr. Kessler:

Reference is made to the Notice of Intent and Notice of Preparation for the LAX Master Plan project, Los Angeles County, California. We have conducted a preliminary review of the material provided to us and have determined that a jurisdiction delineation of waters of the United States is necessary to determine potential impacts to the Corps of Engineers jurisdiction. A Corps of Engineers permit is required for:

a) Structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act of 1899. Examples include, but are not limited to,

1. constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water;

2. dredging, dredge disposal, filling and excavation;

b) the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;

3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;

4. placing pilings when such placement has or would have the effect of a discharge of fill material;

c) any combination of the above.

If you have any questions, please contact Fari Tabatabai of my staff at (213) 452-3412. Please refer to this letter and 96-00324-FT in your reply.

Sincerely,

Mark Durham for

David J. Castanon
Chief, North Coast Section

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-4610

July 10, 1997

IGR/CEQA cs/970632
NOI/NOP
City of Los Angeles
Sepulveda Bl./Century Bl.
LAX Master Plan
Vic. LA-1/105/405-VAR
SCH#

Mr. John L. Graham
Chief of Airport Planning
Los Angeles Department of Airports
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham:

Thank you for including Caltrans in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

Expansion of LAX facilities will have a significant impact on the Los Angeles County Congestion Management Plan (CMP) Roadway System. A traffic study will need to be prepared for the EIS/EIR. To assist us in completely evaluating the Project impact on this systen, we recommend that the traffic study be prepared in advance of the DEIR.

Since Interstate 105 (Glenn Anderson/Century Freeway), Interstate 405 (San Diego Freeway), and State Route 1 (Sepulveda Blvd/Lincoln Blvd.) are located within the project area, the traffic study will need to include the following items for these mainline freeways and their affected on/off ramps as well as impact to State Route 1, a conventional State highway. The traffic study should include, but not be limited to the following:

1) Assumptions and methods used to develop trip generation/distribution percentages and assignments.

2) An analysis of ADT, AM and PM peak hour volumes for both the existing and future (year 2015) conditions. This should also include, but not be limited to, level-of-service calculations
   - existing traffic volumes
   - existing level-of-service (LOS) calculations
   - future traffic volume projections for year 2015
   - future level-of-service (LOS) calculations
   - cumulative traffic projections and cumulative level-of-service (LOS) calculations

3) A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should include, but not be limited to, the following:
   - financing
   - scheduling considerations
   - implementation responsibilities
   - monitoring plan

4) City's percent share of the cost, as well as a plan of realistic mitigation measures under the control of the City should be addressed. Any assessment fees for mitigation should be of such proportion as to cover mainline highway deficiencies that occur as a result of the additional traffic generated by future projects.

5) Truck origins and destinations including the projected growth in air cargo volumes should be prepared for this traffic study.

6) Caltrans Encroachment Permits will be needed for projects which will take place adjacent to or within State Right-of-Way. Project Study Reports (PSRs) will be needed for any State highway projects which exceeds $1 million.

We would appreciate two (2) advanced copies of the EIS/EIR and the traffic study to facilitate our internal review process. These copies should be sent to the undersigned at:

c/o Stephen Buswell
IGR/CEQA Program Manager
Caltrans District 7
120 South Spring Street, 1-10C
Los Angeles, CA 90012

If you have any questions regarding our comments, refer to Caltrans IGR/CEQA Record# 970632, and please do not hesitate to contact me at (213) 897-4429.

Sincerely,

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Chris Belsky, State Clearinghouse

DEPARTMENT OF FISH AND GAME
Region 5
330 Golden Shore, Suite 50
Long Beach, California 90802
(562) 590-5113

August 13, 1997

Mr. Jack Graham
City of Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, California 90045-5803

Dear Mr. Graham:

Notice of Preparation of Draft Environmental Impact Report
Los Angeles International Airport Master Plan
Los Angeles County

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. To enable Department staff to adequately review and comment on the proposed project, we recommend the following information be included in the Draft Environmental Impact Report:

1. A complete assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.

   a. A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (Attachment 1).

   b. A complete assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and U.S. Fish and Wildlife Service.

   c. Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, § 15380).

   d. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or environmentally Sensitive Habitat Area ESHAs) that have been identified by the County of Los Angeles or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area must be addressed.

2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.

   a. CEQA Guidelines, § 15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.

   b. Project impacts should also be analyzed relative to their effects on off-site habitats and populations. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided.

   c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

   d. A cumulative effects analysis should be developed as described under CEQA Guidelines, § 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

   a. Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Off-site compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.

b. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts (Attachment 2).

c. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

4. The California Supreme Court has granted review of the appellate court in the *Planning and Conservation League v. Department of Fish and Game* case. The Supreme Court's grant of a hearing in this case vacates the Court of Appeal decision. Therefore, the Department will resume the California Endangered Species Act (CESA) § 2081 Memorandum of Understanding (MOU) process. Project proponents, however, are advised that if the California Supreme Court embraces the Court of Appeal's view, then, in absences of legislation, the Department's 2081 process would cease permanently and any MOUs that have been entered in the meantime would be under a legal cloud.

   A CESA-MOU must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA-MOUs are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA-MOU.

   a. Biological mitigation proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA-MOU.

   b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.

   a. The Department has direct authority under Fish and Game Code § 1600 et seq. in regard to any proposed activity which would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

   b. A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts, must be included.

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Ms. Chanelle Davis, Wildlife Biologist, at (909) 627-1613.

Sincerely,

for Patricia Wolf
Acting Regional Manager

Attachments

cc: Ms. Chanelle Davis
Department of Fish and Game
Chino Hills, California

Mr. Ray Ally
Department of Fish and Game
Long Beach, California

Ms. Mary Meyer
Department of Fish and Game
Ojai, California

Ms. Leslie MacNair
Department of Fish and Game
Long Beach, California

U.S. Fish and Wildlife Service
Carlsbad, California

U.S. Army Corps of Engineers
Los Angeles, California

State Clearinghouse
Sacramento, California

ATTACHMENT 1

State of California
THE RESOURCES AGENCY
Department of Fish and Game
May 4, 1984

GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED DEVELOPMENTS ON RARE AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted and what information should be contained in the survey report.

1. Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare and endangered plants and plant communities. Rare and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare and/or endangered under the following definitions.

   A species, subspecies or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy form one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition or disease. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

   Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare or endangered species. The most current version of the California Natural Diversity Data Base's Outline of Terrestrial Communities in California may be used as a guide to the names of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare plants will be affected by a proposed project when:

   a. Based on an initial biological assessment, it appears that the project may damage potential rare plant habitat;

   b. Rare plants have historically been identified on the project site, but adequate information of impact assessment is lacking; or

   c. No initial biological assessment has been conducted and it is unknown whether or not rare plants or their habitat exist on the site.

3. Botanical consultants should be selected on the basis of possession of the following qualifications (in order of importance):

   a. Experience as a botanical field investigator with experience in field sampling design and field methods;

   b. Taxonomic experience and a knowledge of plant ecology;

   c. Familiarity with the plants of the area, including rare species; and

   d. Familiarity with the appropriate state and federal statutes related to rare plants and plant collecting.

4. Field surveys should be conducted in a manner that will locate any rare or endangered species that may be present. Specifically, rare or endangered plant surveys should be:

   a. Conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys should be scheduled (1) to coincide with known flowering periods, and/or (2) during periods of phenological development that are necessary to identify the plant species of concern.

   b. Floristic in nature. "Predictive surveys" (which predict the occurrence of rare species based on the occurrence of habitat or other physical features rather than actual field inspection) should be reserved for ecological studies, not for impact assessment. Every species noted in the field should be identified to the extent necessary to determine whether it is rare or endangered.

   c. Conducted in a manner that is consistent with conservation ethics. Collection of rare or suspected rare species (voucher specimens) should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit regulations. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.

   d. Conducted using systematic field techniques in all habitats of the site to ensure a reasonably thorough coverage of potential impact areas.

   e. Well documented. When a rare or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form should be completed and submitted to the Natural Diversity Data Base.

5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations, EIR's and EIS's, should contain the following information:

   a. Project description, including a detailed map of the project location and study area.

   b. A written description of biological setting referencing the community nomenclature used and a vegetation map.

   c. Detailed description of survey methodology.

   d. Dates of field surveys.

   e. Results of survey (including detailed maps).

   f. An assessment of potential impacts.

   g. Discussion of the importance of rare plant populations with consideration of nearby populations and total species distribution.

   h. Recommended mitigation measures to reduce or avoid impacts.

   i. List of all species identified.

   j. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.

   k. Name of field investigator(s).

   l. References cited, persons contacted, herbaria visited, and disposition of voucher specimens.

ATTACHMENT 2

SENSITIVITY OF TOP PRIORITY RARE NATURAL COMMUNITIES IN SOUTHERN CALIFORNIA*

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1. - Less than 6 known locations and/or on less than 2,000 acres of habitat remaining.

S2. - Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3. - Occurs in 21-100 known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to the natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name		
S1.1	Mojave Riparian Forest		Southern Dune Scrub
	Sonoran Cottonwood Willow Riparian		Southern Coastal Bluff Scrub
	Mesquite Bosque		Maritime Succulent Scrub
	Elephant Tree Woodland		Riversidean Alluvial Fan Sage Scrub
	Crucifixion Thorn Woodland		Southern Maritime Chaparral
	Allthorn Woodland		Valley Needlegrass Grassland
	Arizonan Woodland		Great Basin Grassland
	Southern California Walnut Forest		Mojave Desert Grassland
	Mainland Cherry Forest		Pebble Plains
	Southern Bishop Pine Forest		Southern Sedge Bog
	Torrey Pine Forest		Cismontane Alkali Marsh
	Desert Mountain White Fir Forest		
S1.2	Southern Foredunes		
	Mono Pumice Flat		
	Southern Interior Basalt Fl. Vernal Pool		
S2.1	Venturan Coastal Sage Scrub		Coastal and Valley Freshwater Marsh
	Diegan Coastal Sage Scrub		S. Arroyo Willow Riparian Forest
	Riversidian Upland Coastal Sage Scrub		Southern Willow Scrub
	Riversidian Desert Sage Scrub		Modoc-G. Bas. Cottonwood Willow Rip.
	Sagebrush Steppe		Modoc-Great Basin Riparian Scrub
	Desert Sink Scrub		Mojave Desert Wash Scrub
	Mafic Southern Mixed Chaparral		Engelmann Oak Woodland
	San Diego Mesa Hardpan Vernal P.		Open Engelmann Oak Woodland
	San Diego Mesa Claypan Vernal P.		Closed Engelmann Oak Woodland
	Alkali Meadow		Island Ironwood Forest
	Southern Coastal Salt Marsh		Island Cherry Forest
	Coastal Brackish Marsh		S. Interior Cypress Forest
	Transmontane Alkali Marsh		Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes		White Mountains Fellfield
	Active Desert Dunes		
	Stab. and Part. Stab. Desert Dunes		
	Stab. and Part. Stab. Desert Sandfield		
	Mojave Mixed Steppe		
	Transmontane Freshwater Marsh	S2.3	Bristlecone Pine Forest
	Coulter Pine Forest		Limber Pine Forest
	S. California Fellfield		

Top Priority Rare Natural Communities
From Region Five

Code Number	Location	Few Records	Name
S1.1 Rank			
21330	Cis		Southern Dune Scrub
31200	Cis		Southern Coastal Scrub
32400	Cis		Maritime Succulent Scrub
32720	Cis		Riversidean Alluvial Fan Sage Scrub
37030	Cis	Y	Southern Maritime Chaparral
42110	Cis		Valley Needlegrass Grassland
43000	Des	Y	Great Basin Grassland
43777	Des	Y	Mojave Desert Grassland
47000	Cis		Pebble Plains
51177	Cis	Y	Southern Sedge Bog
52310	Cis		Cismontane Alkali Marsh
61700	Des		Mojave Riparian Forest
61810	Des		Sonoran Cottonwood Willow Riparian
61820	Des		Mesquite Bosque
75100	Des	Y	Elephant Tree Woodland
75200	Des	Y	Crucifixion Thorn Woodland
75300	Des	Y	Allthorn Woodland
75400	Des	Y	Arizonan Woodland
81000	Cis		Southern California Walnut Forest
81820	Cis	Y	Mainland Cherry Forest
83122	Cis	Y	Southern Bishop Pine Forest
83140	Cis		Torrey Pine Forest
85330	Des	Y	Desert Mountain White Fir Forest
S1.2 Rank:			
21230	Cis		Southern Foredunes
35410	Des		Mono Pumice Flat
44310	Cis		Southern Interior Basalt Fl. Vernal Pool
S2.1 Rank:			
32300	Cis	Y	Venturan Coastal Sage Scrub
32500	Cis		Diegan Coastal Sage Scrub
32710	Cis	Y	Riversidian Upland Coastal Sage Scr.
32730	Cis	Y	Riversidian Desert Sage Scrub
35300	Des	Y	Sagebrush Steppe
35120	Des	Y	Desert Sink Scrub
37122	Cis	Y	Mafic Southern Mixed Chaparral
44321	Cis		San Diego Mesa Hardpan Vernal P.
44322	Cis		San Diego Mesa Claypan Vernal P.
45310	Des		Alkali Meadow
52120	Cis		Southern Coastal Salt Marsh
52320	Cis		Coastal Brackish Marsh
52410	Des		Transmontane Alkali Marsh

Coded as either cis (for cismontane) or des (for desert)

Code Number	Location	Few Records	Name
52410	Cis		Coastal and Valley Freshwater Marsh
61320	Cis		S. Arroyo Willow Riparian Forest
63320	Cis		Southern Willow Scrub
61610	Des		Modoc-G Bas Cottonwood Willow Rip.
63600	Des	Y	Modoc-Great Basin Riparian Scrub
63700	Des	Y	Mojave Desert Wash Scrub
71160	Cis	Y	Engelmann Oak Wood
71161	Cis	Y	Open Engelmann Oak Wood
71162	Cis	Y	Closed Engelmann Oak Woodland
71190	Cis	Y	Island Oak Woodland
71210	Cis		California Walnut Woodland
81700	Cis	Y	Island Ironwood Forest
81810	Cis		Island Cherry Forest
83230	Cis		S. Interior Cypress Forest
84150	Cis	Y	Bigcone Spruce-Canyon Oak Forest
S2.2 Rank:			
21100	Cis	Y	Active Coastal Dunes
22100	Des		Active Desert Dunes
22200	Des		Stab. and Part Stab. Desert Dunes
22300	Des	Y	Stab. and Part Stab. Desert Sandfield
34220	Des	Y	Mojave Mixed Steppe
52420	Des	Y	Transmontane Freshwater Marsh
84140	Cis	Y	Coulter Pine Forest
81130	Cis	Y	S. California Fellfield
81140	Des	Y	White Mountains Fellfield
S2.3 Rank:			
86400	Des		Bristlecone Pine Forest
86700	Des	Y	Limber Pine Forest

ELEMENT RANKING

GLOBAL RANKING

The *global rank* (G-rank) is a reflection of the overall condition of an element throughout its global range.

SPECIES OR NATURAL COMMUNITY LEVEL

G1 = Less than 6 viable EOs OR less then 1000 individuals OR less than 2000 acres.
G2 = 6-20 EOs OR 1000-3000 individuals OR 2000-10,000 acres.
G3 = 21-100 EOs OR 3000-10,000 individuals OR 10,000-50,000 acres.
G4 = Apparently secure; this rank is clearly lower than G3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat.
G5 = Population or stand demonstrably secure to ineradicable due to being commonly found in the world.

SUBSPECIES LEVEL

Subspecies receive a T-rank attached to the G-rank. With the subspecies, the G-rank reflects the condition of the entire species, whereas the T-rank reflects the global situation of just the subspecies or variety.
For example: *Chorizanthe robusta var. hartwegii*.
This plant is ranked G2T1. The G-rank refers to the whole species range i.e. *Chorizanthe robusta*. The T-rank refers only to the global condition of var. *hartwegii*.

STATE RANKING

The *state rank* is assigned much the same way as the global rank, except state ranks in California often also contain a threat designation attached to the S-rank.

S1 = Less than 6 EOs OR less than 1000 individuals OR less than 2000 acres
- S1.1 = very threatened
- S1.2 = threatened
- S1.3 = no current threats known

S2 = 6-20 EOs OR 1000-3000 individuals OR 2000-10,000 acres
- S2.1 = very threatened
- S2.2 = threatened
- S2.3 = no current threats known

S3 = 21-100 EOs or 3000-10,000 individuals OR 10,000-50,000 acres
- S3.1 = very threatened
- S3.2 = threatened
- S3.3 = no current threats known

S4 - Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e. there is some threat, or somewhat narrow habitat. NO THREAT RANK.

S5 - Demonstrably secure to ineradicable in California. NO THREAT RANK.

Notes:

1. Other considerations used when ranking a species or natural community include the pattern of distribution of the element on the landscape, fragmentation of the population/stands, and historical extent as compared to its modern range. It is important to take a bird's eye or aerial view when ranking sensitive elements rather than simply counting EOs.

2. Uncertainty about the rank of an element is expressed in two major ways:

   By expressing the rank as a range of values:
   ex. S2S3 means the rank is somewhere between S2 and S3.

   By adding a ? to the rank:
   ex. S2? This represents more certainty than S2S3, but less then S2.

3. Other symbols

   GH All sites are historical; the element has not been seen for at least 20 years but suitable habitat still exists (SH = All California sites are historical).
   GX All sites are extirpated; this element is extinct in the wild (SX = All California sites are extirpated).
   GXC Extinct in the wild; exists in cultivation.
   G1Q The element is very rare, but there is a taxonomic question associated with it.

STATE OF CALIFORNIA - THE RESOURCES AGENCY PETE WILSON, Governor

CALIFORNIA COASTAL COMMISSION
South Coast Area Office
200 Oceangate, 10th Floor
Long Beach, CA 90802-4302
(562) 590-5071

July 30, 1997

David B. Kessler, AICP
Planning Section
Airports Division
Federal Aviation Administration
Western Pacific Region
P.O. Box 92007
World Way Postal Center
Los Angeles, CA 90009-2007

Re: Notice of Intent to Prepare an Environmental Impact Statement for the Los Angeles International Airport Master Plan (dated June 11, 1997)

Mr. Kessler:

The South Coast office of the California Coastal Commission has received the notice of intent to prepare an environmental impact statement and hold scoping meetings for the Los Angeles International Airport Master Plan to be prepared by the Federal Aviation Administration in conjunction with the City of Los Angeles.

The notice of intent discusses five different project alternatives, including a no project alternative. All of the project alternatives involve either adding a north or south runway and extending existing north and south runways. Only one alternative, alternative number three, involves land within the coastal zone boundary. Alternative number three involves constructing a new 6,000 foot runway which would extend across Pershing Dr. into the Airport Dunes or El Segundo Dunes almost to Vista Del Mar. Los Angeles International Airport is outside of the coastal zone boundary which runs along Vista Del Mar up to Imperial Highway and along Pershing Dr., north of Manchester Parkway.

There are three issue areas the Commission is concerned about in reference to this project: permit jurisdiction, protection of coastal dune habitat, and beach access and recreation.

Planning History

In 1985 the City of Los Angeles submitted to the Coastal Commission a Local Coastal Program for the Airport Dunes consisting of an 80 acre nature conservancy, 12 acre dune preserve, 27 hole golf course and other active recreational uses. The Coastal Commission determined that the Airport Dunes is an Environmentally Sensitive Habitat Area and denied the Local Coastal Program on the grounds that the proposal was inconsistent with the resource protection policies of Chapter 3 of the Coastal Act regarding Environmentally

Sensitive Habitat Area. Commission staff recommended that the entire 302 acre site be set aside as Environmentally Sensitive Habitat Area.

Since the 1985 denial of the LCP submittal the Coastal Commission has approved three coastal development permits for restoration of 200 acres of the Airport Dunes to native coastal dune habitat. The restoration of the 200 acres is completed and the Coastal Commission receives progress reports on the monitoring and maintenance of the restored dunes.

In March of 1992 the City of Los Angeles submitted to the Coastal Commission a general plan amendment to the Los Angeles International Airport Interim Plan which was to serve as the LCP. Commission staff notified the City of Los Angeles that the submittal was incomplete and no further action on the LCP has been taken since then.

Jurisdiction

Implementation of the proposed Airport Master Plan will trigger the need for a federal consistency certification and/or a coastal development permit if alternative three is the preferred alternative. Expansion of the airport runways will require a permit or license from the Federal Aviation Administration and, in all likelihood, federal funding. FAA certificates for the operation of new airports are among the listed federal permits automatically requiring federal consistency review under the California Coastal Zone Management Program. Based on this requirement, a federal consistency certification will need to be prepared by the City of Los Angeles and submitted with its application to the Federal Aviation Administration. The applicant must provide a copy of the certification along with the supporting information to the Executive Director of the Coastal Commission, including an assessment of the individual and cumulative effects on the coastal zone and findings that demonstrate that the proposed development is consistent with the provisions of the California Coastal Management Program, i.e., Chapter 3 of the Coastal Act, in particular Section 30240.

If alternative number three is selected as the preferred alternative, and development will take place within the coastal zone boundary, a coastal development permit from the California Coastal Commission for that portion located within the coastal zone will also be required.

Environmentally Sensitive Habitat Area

The Airport Dunes is a remnant of the once extensive El Segundo Dunes formation which covered 36 square miles of coastline between San Pedro and Playa del Rey. The coastal dune ecosystem in Southern California is an extremely endangered habitat type. The revegetation effort of the Airport Dunes was sparked by the presence of the federally listed endangered species the El Segundo Dunes Butterfly. However, there are numerous other sensitive plants and animals located in the dune habitat.

Coastal dune habitat in southern California is a finite resource and any impacts to it are considered significant. The Airport Dunes is recognized as Environmentally Sensitive Habitat by the Coastal Commission, is designated as Significant Ecological Area No. 28 in the Los Angeles County General Plan, and is recognized as a biological significant area in the California Department of Fish and Game's Natural Diversity Data Base. In addition, the Southern

California Association of Governments (SCAG) listed the Airport Dunes as an area of regional significance and concern in its 1977 Conservation and Open Space Plan.

Prior coastal development permits approved by the Commission for the Airport Dunes have been limited to revegetation of native coastal dune habitat and the installation of equipment necessary for airport safety. The Coastal Commission has approved interim revegetation efforts for 200 acres of coastal dune habitat but did not approve the 1985 or 1992 Local Coastal Programs. Therefore, the question of whether 200 acres is adequate for the long term health of the endangered dune habitat has not been determined. Construction of a runway in this portion of the Airport Dunes would permanently remove acreage which could be used for habitat enhancement purposes.

The EIS should include an analysis of the implications of locating hardened structures, i.e., a runway, in coastal dune habitat. The EIS should also address the potential impacts of a runway on the flora and fauna of the existing dune habitat, including noise, jet fuel exhaust, microclimate changes, lights, ancillary electronic equipment, and increased impermeable surfaces. Additionally, Coastal Act section 30240 limits the type of development that can occur in an Environmentally Sensitive Habitat Area. The EIS should address how alternative number three is consistent with Section 30240 of the Coastal Act. Section 30240 states:

> (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
>
> (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Installing a runway in a portion of the Airport Dunes also has safety considerations. In the past the airport has objected to the presence of a least tern nesting site on Dockweiler State Beach. If a runway is proposed closer to the coast, this issue of potential bird strikes and aircraft safety would logically be increased and, therefore, should be addressed.

Coastal Access & Recreation

Although the airport is outside the coastal zone, expansion of airport infrastructure could have adverse impacts on coastal beach access and recreation to Dockweiler State Beach and vicinity and public access to the existing 200 acres of restored environmentally sensitive coastal dune habitat. Currently the Airport Dunes acts as a buffer zone between the beach area and the airport. Constructing a runway in that buffer zone would eliminate its function as a buffer zone and reduce the distance between the airport and the recreational beach resources. The potential impact of increased airport traffic, noise and jet fuel exhaust on beach access and recreation needs to be addressed in the Environmental Impact Statement. Another factor that should be addressed is the potential impact of a runway in the Airport Dunes on the ability of the public to visit the dune habitat which has been restored through the expenditure of public funds. Past proposals for the area of the proposed runway, in particular the 1985 Local Coastal Program

submittal, have included active and passive recreation in the form of golf courses or parks. Construction of a runway in this location would eliminate any potential recreational uses in this area

Thank you for the opportunity to comment on the proposed alternatives. We look forward to participating in the upcoming scoping process. If you have any questions, please contact Robin Maloney-Rames at the South Coast office of the California Coastal Commission (562) 590-5071. For information or questions concerning federal consistency review by the Commission, please contact Jim Raives, federal consistency coordinator, at (415) 904-5292.

Sincerely yours,

Pam Emerson
Los Angeles County Area Supervisor, CPA III

9128F

Cal/EPA

California Environmental Protection Agency

Air Resources Board

John D. Dunlap, III
Chairman

P.O. Box 2815
2020 L Street
Sacramento, CA
95812-2815
(916) 322-5840
(916) 327-5748 FAX

Pete Wilson
Governor

Secretary for
Environmental
Protection

July 31, 1997

David B. Kessler
Federal Aviation Administration
Western-Pacific Region
Airports Division, AWP-611.2
P.O. Box 92007, WPC
Los Angeles, California 90009-2007

Dear Mr. Kessler:

Thank you for providing the Air Resources Board (ARB) with the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the Master Plan for Los Angeles International Airport (LAX). We appreciate being kept informed about the development and implementation of the LAX Master Plan.

As you may know, our interest in the LAX Master Plan stems primarily from the potential for ARB to be requested to issue an air quality certificate if new runways are constructed or existing runways are extended. In our determination of whether to issue an air quality certificate, we will be evaluating whether the emissions associated with each of the proposed alternatives are consistent with those assumed in the State Implementation Plan (SIP) for ozone, the clean air plan for the Los Angeles region. Therefore, our main comment on the scope of the EIS concerns the need for the EIS to clearly address consistency between estimated air emissions in the EIS and those used in the SIP. If the emissions associated with a selected alternative exceed the emissions assumed for LAX in the SIP, the excess emissions would need to be addressed, either through mitigation measures or in the air quality planning process. To facilitate the comparison of emissions, the EIS should identify the estimated emissions for 2010 (as well as 2015). The EIS also needs to discuss how the requirements of the general conformity rule (40 CFR sections 51.850-51.860) will be met.

If mitigation measures are needed to address excess emissions, we suggest that you explore measures such as: using low-emission alternative fuels in captive fleets; using low-emission alternative fuels or electric power for ground support equipment; providing adequate infrastructure for alternative fuels and electric power, with access to the public where appropriate; reducing trips where feasible, e.g., consolidation of hotel shuttles, improved intermodal connections, and incentives for the use of alternative modes of transit to the airport; encouraging the use of cleaner vehicles accessing the airport; and

reducing aircraft emissions through better ground traffic management systems or incentives for cleaner aircraft. We are available to discuss these mitigation measures with you.

Thank you again for the opportunity to comment. If you have any questions or comments regarding this letter, please contact me at (916) 322-2739, or Gary Honcoop, Manager of the Strategic Analysis and Liaison Section, at (916) 322-8474.

Sincerely,

Lynn Terry
Assistant Executive Officer

cc: Barry Wallerstein, SCAQMD

STATE OF CALIFORNIA--RESOURCES AGENCY PETE WILSON, Governor

DEPARTMENT OF PARKS AND RECREATION
Angeles District
1925 Las Virgenes Road
Calabasas, California 91302
(818)880-0350

August 1, 1997

Mr. David B. Kessler, AICP
Planning Section, Airports Division
FAA, Western Pacific Region
P. O. Box 92007, World Way Postal Center
Los Angeles, California 90009-2007

Dear Mr. Kessler:

The Angeles District of the California Department of Parks and Recreation appreciates the opportunity to comment on the scope of the upcoming Environmental Impact Statement for future development at Los Angeles International Airport.

The California Department of Parks and Recreation holds in trust for the people of California Dockweiler State Beach, which is located west of Los Angeles International Airport. We request that the EIS address any potential impacts to Dockweiler State Beach. Discussion of impacts should include natural resources, particularly to the least terns, as well as impacts to recreational opportunities on the beach and in the water. The EIS should disclose whether or not the development plans will entail any extension of airport facilities onto the sand at Dockweiler State Beach.

Thank you for the consideration of our comments.

Sincerely,

Neil Braunstein
District Planner

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

July 30, 1997

Mr. John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham:

Notice of Preparation (NOP) of a Joint
Environmental Impact Report/Impact Statement for the LAX Master Plan

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the NOP for the LAX Master Plan expansion. The majority of AQMD's comments are recommendations for the Draft EIR/EIS.

Air Quality Analysis
The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook to assist other public agencies with the preparation of air quality analyses in 1993. The AQMD recommends that the Lead Agency use this Handbook when preparing its air quality analysis.

The AQMD assumes that the Lead Agency will be utilizing the EPA-approved Emissions and Dispersion Modeling System (EDMS) to identify any potential localized impacts that could occur from the project. Air quality impacts from indirect sources, that is, all trips generated as a result of the expansion should be evaluated. Trips generated include, but are not limited to, rental cars, shuttles, passenger vehicles, employees, cargo trucks, etc. The AQMD is currently reviewing the EDMS model to ensure that it covers all emission sources related to the project. The AQMD would like to work with the Lead Agency prior to conducting any modeling to ensure that appropriate assumptions have been made and that all sources of emissions are included.

The AQMD would like to see an analysis of all emission sources related to the proposed expansion, including those not at the site. Construction of a proposed green line extension, changes to major intersections around the airport, and any other road or service enhancements needed for the expansion should also be included.

Mitigation Measures
The AQMD recommends that all feasible mitigation measures be utilized during project construction and operation to minimize air quality impacts. AQMD's Rule 403 - Fugitive Dust, and its Implementation Manual contain several rule requirements as well as numerous mitigation measures for controlling construction-related emissions that should be considered for use as CEQA mitigation. (Rule 403 and its Implementation Manual have been included for your convenience.)

Operational mitigation measures could include, but are not limited to, the following: conversion of ground support equipment (GSE) and any other feasible equipment to an alternative clean fuel such as electricity; usage of centralized ground power and preconditioned air to reduce auxiliary power usage (APU); availability of on-site clean fuel stations (compressed natural gas, electricity, etc.) to all support vehicles such as airport/hotel shuttles, cargo delivery trucks, etc; proper scheduling of flights to avoid airport congestion and aircraft queuing, etc. These and any other feasible mitigation measures should be implemented to reduce operational impacts. Incentives could also be considered for individuals who choose a transportation option other than a single occupant vehicle for airport trips.

Please refer to Chapter 11 of the CEQA Handbook for sample air quality mitigation measures.

Conformity
The Draft EIR should discuss how a conformity determination will be made to meet the requirements of Rule 1901 - General Conformity. For the purpose of making a conformity determination, the 1994 California Ozone State Implementation Plan (SIP) is the applicable plan and contains the budgets for volatile organic compounds (VOC) and oxides of nitrogen (NOx). A general conformity determination must be based on historical operation levels of the existing facility during 1990 for carbon monoxide (CO), oxides of sulfur (SOx), and particulates (PM10), since there are not currently approved SIPs for these pollutants.

Thank you for the opportunity to comment on the NOP/IS for the proposed LAX Master Plan Expansion. The AQMD is willing to work with the Lead Agency at any time to ensure that project-related emissions are accurately categorized and evaluated. Please call Tara Tisopulos of my staff at (909) 396-3102 with any questions regarding this letter.

Sincerely,
Steve Smith

Steve Smith, Ph.D.
Program Supervisor
Planning and Policy

RECEIVED
TT

cc: Adi Liberman, City of Los Angeles, Office of Councilmember Ruth Galanter
Gary Hoecoop, Office of Air Quality and Transportation, California Air Resources Board
Board of Airport Commissioners

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

June 26, 1997

Mr. John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218,
Los Angeles, CA 90045

RE: **Comments on the Los Angeles Department of Airports, LAX Master Plan, Notice of Preparation of a Draft Environmental Impact Report/Statement - SCAG No. I9700272**

Dear Mr. Graham:

Thank you for submitting the **Los Angeles Department of Airports, LAX Master Plan, Notice of Preparation of a Draft Environmental Impact Report/Statement** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

In addition, The California Environmental Quality Act requires that EIRs discuss any inconsistencies between the proposed project and the applicable general plans and regional plans (Section 15125 [b]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

Policies of SCAG's Regional Comprehensive Plan and Guide which may be applicable to your project are outlined in the attachment.

Please be advised that Tim Merwin, SCAG Aviation Staff, is preparing technical comments on various technical documents in support of the Draft LAX Master Plan. He will transmit these comments to you under separate cover.

Please provide a minimum of 45 days for SCAG to review the DEIR/DEIS if and when this document is available. If you have any questions regarding the attached comments, please contact Bill Boyd at (213) 236-1960.

Sincerely,

VIVIANE DOCHE-BOULOS
Manager, Intergovernmental Review

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT LAX MASTER PLAN

PROJECT DESCRIPTION

The Project involves the update of the Los Angeles Airport (LAX) Master Plan. LAX is located in the southwest portion of Los Angeles County adjacent to Santa Monica Bay and fourteen miles southwest of downtown Los Angeles. The intent of the Project is to (1) meet local and regional air transportation needs during the period 2000-2015 in respect to the amount, type, location and timeliness of such new capacity; (2) ensure that new investments in airport capacity are efficient and cost effective, maximizing the return on existing infrastructure capital; and (3) sustain and advance the international trade component of the regional economy and the international commercial gateway role of the City of Los Angeles.

Within the alternatives to be analyzed, potential project components will be evaluated including, but not limited to : one or two additional runways each 6,000 feet in length; relocation/extensions of existing runways; improved taxiway system; new passenger terminal facilities; an automated people mover system; expanded cargo facilities; improvements to the ground access system, including connections to the regional highway and transit networks; relocation of ancillary uses and other support facilities; and land acquisition necessary for each concept.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the Draft EIR for the General Plan Update.

- *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

- *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

The Regional Mobility Element (RME) also has policies pertinent to this proposed project[1]. This chapter 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. Among the relevant policies of this chapter are the following:

[1] See Endnote.

Transportation Demand Management Policies

- *Promote Transportation Demand Management (TDM) programs along with transit and ridesharing facilities as a viable and desirable part of the overall mobility program while recognizing the particular needs of individual subregions.*
- *Support the extension of TDM program implementation to non-commute trips for public and private sector activities.*
- *Support the coordination of land use and transportation decisions with land use and transportation capacity, taking into account the potential for demand management strategies to mitigate travel demand if provided for as a part of the entire package.*
- *Support the use of market incentives as a mechanism to affect and modify behavior toward the use of alternative modes for both commute and non-commute travel.*

Regional Transit Program Policies

- *Public transportation programs should be considered an essential public service because of their social, economic, and environmental benefits.*
- *Implementation of new transit service or improvements in existing and expanded transit should be supportive of the Centers-Based Transit Network (cbtn) concept.*
- *Specific service types, levels and configuration should be determined by the local transit providers, transit users, local jurisdictions, and applicable county transportation commissions.*
  - *a* - *Public transit services shall be designed to provide the maximum availability at times convenient for use.*
  - *b* - *Public transit services shall be designed to be available for use without impediments.*
  - *c* - *Public transit services should be designed to provide maximum user utility.*
  - *d* - *New and expansion transit programs which are designed to meet the objectives of Transportation Control Measures contained in the AQMP shall receive priority for funding.*
  - *e* - *Local funding resources for transit should be used to leverage all available federal funding sources as applicable.*

  - *f* - *All existing and new public transportation services, facilities, and/or systems shall be fully accessible to persons with disabilities as defined, mandated, and required under the applicable Titles and Sections of the Americans With Disabilities Act, 1990 and the Rehabilitation Act, 1974.*
  - *g* - *All existing and new public transit services shall be provided in a manner which does not preclude use on the basis of race, color, and/or national origin as defined, mandated and required under Title 6 of the Civil Rights Act, 1964.*
  - *h* - *All existing and new public transit services, facilities, and/or systems shall evaluate the potential for private sector participation through the use of competitive procurement based on Fully Allocated Costing methodologies.*

Transportation System Management

- *Expanded transportation system management by local jurisdictions will be encouraged.*
- *New transportation infrastructure will incorporate advanced system technologies, where appropriate.*
- *TSM activities throughout the region shall be coordinated among jurisdictions.*
- *Methods to improve safety and reduce incidents on the regional transportation system will be considered.*

Non-Motorized Transportation

- *The development of the regional transportation system should include a non-motorized transportation system that provides an effective alternative to auto travel for appropriate trips. The planning and development of transportation projects and systems should incorporate the following, as appropriate:*
  - *a* - *Provision of safe, convenient, and continuous bicycle and pedestrian infrastructure to and throughout areas with existing and potential demand such as activity areas, schools, recreational areas (including those areas served by trails), which will ultimately offer the same or better accessibility provided to the motorized vehicle.*
  - *b* - *Accessibility to and on transit (bus terminals, rail stations, Park-And-Ride lots), where there is demand and where transit boarding time will not be significantly delayed.*
  - *c* - *Maintenance of safe, convenient, and continuous non-motorized travel*

during and after the construction of transportation and general development projects. Existing bikeways and pedestrian walkways should not be removed without mitigation that is as effective as the original facility.

- *Entities and programs that currently support the auto should be encouraged to provide the same types of services for non-motorized transportation, including education, promotion, and enforcement.*

- *Urban form, land use and site-design policies should include requirements for safe and convenient non-motorized transportation, including the development of bicycle and pedestrian-friendly environments near transit.*

Goods Movement

- *Growth in the demand for goods movement will be accommodated through the provision of adequate multi-modal and intermodal infrastructure that is consistent with overall regional goals, objectives and policies.*

- *Pricing strategies will be considered as one of the strategies to reduce peak-period congestion.*

- *The feasibility of air cargo transport at all major air carrier airports in the region will be considered as a means to address growth in cargo volumes.*

- *Demand for increased goods movement will be given consideration in corridors where system connectivity and gap closure projects are being planned.*

- *The ports and major air carrier airports in the SCAG region are regionally significant and important trade links with the remainder of the world and shall be supported as a major foundation of the regional economy.*

- *Arterial truck access routes will be coordinated for the purpose of improving system connectivity, eliminating circuitous routings, and reducing delays.*

- *The potential for adverse impacts to mode shares, diversion of business to other ports and loss of cost-competitiveness in goods movement to, from, and through the SCAG region will be considered in the development and implementation of local and regional plans.*

- *Planning to accommodate multi-modal and inter-modal goods movement shall be an integral part of the land use and circulation elements of local government general plans and specific plans.*

- *Local governments shall consider requiring off-street dock facilities for all new buildings and for existing buildings that are approved for extensive renovation; the facilities should be*

sufficient to accommodate the shipping and receiving needs of such buildings.

- *In order to assist in the identification of potential bottlenecks that could occur downstream of cargo flows, the identification of potential intermodal routes that cross or connect to provide future transfer facility nodes (highway, rail, harbor or airports) shall be encouraged.*

Commercial Airport Capacity

- *Support the more efficient use of commercial airport facilities to serve growing air passenger demand in the region. Airport-generated noise, air quality and ground access impacts resulting from increasing air service should be mitigated.*

- *Each subregion should provide environmentally acceptable capacity within its own market area to meet local, short-haul air passenger demand due to shorter access time of short-haul passengers. Subregion in this context refers to county-sized subregional market areas.*

- *For those military airbases which are, or will be, closed by the Department of Defense, support conversion to commercial air service if such bases have been determined to a have technical and market potential for use as commercial airports. This policy most strongly applies to those subregions which cannot otherwise provide sufficient, environmentally acceptable capacity to meet their own local, short-haul air passenger demand.*

- *Examine the feasibility of commercial air passenger service at remaining active duty air bases if invited to do so by the military.*

- *Support outlying airports, such as Palm Springs, George AFB and Palmdale to serve their own market area. Also, examine high-speed access systems to attract passengers from the metropolitan areas of the Los Angeles basin.*

- *Support continued examination of new technologies and their potential impact on the aviation system, and its inter-modal connection to the rest of the Metropolitan Transportation System (MTS). This would include locational opportunities for tiltrotor service, and possible applications of high-speed rail. It would also include development of a multi-modal transportation demand model for various ground modes to assess their ability to attract air passengers.*

- *Policy constraints on existing air carrier airports should be defined in terms on environmental impacts and should remain in place, except where relevant noise, air quality, and ground access impacts are mitigated[2]. Airports proprietors and/or the Regional Airport Authority are encouraged to reassess constraints to determine if additional service can be provided, but in no case should constraints be lifted until negative impacts are mitigated.*

---

[2] Significant impacts other than noise, air quality, and ground access that might occur over and beyond existing policy constraints should also be mitigated.

Commercial Airport Ground Access

- *In accordance with State law (SB 2487), SCAG will conduct multi-modal and inter-modal ground access studies to the region's commercial airports for each update of the Regional Transportation Plan.*

- *Traffic impacts generated by significant new off-airport development should be mitigated if they worsen ground access to a commercial airport and reduce that airport's operational capacity. This especially applies to those areas where the commercial airport is host to nationwide and international air service. This type of mitigation should be a condition of project approval.*

- *Traffic impacts generated by non-aviation development on airports should be mitigated through prudent planning. Such development is encouraged for revenue purposes, but only if it utilizes excess capacity not needed for aviation purposes.*

- *SCAG, in cooperation with appropriate transportation agencies, should ensure that airport-related ground access projects are placed in the Regional Transportation Improvement Program (RTIP). It is important to include airport planning staff in the identification of airport-related projects, especially those which link directly to the airport roadway system.*

- *Support development of a multi-modal transportation demand model which integrates various ground transportation modes.*

Commercial Airport Air Cargo

- *Support development of a comprehensive strategy to find additional air cargo handling capacity in the region, to reduce projected shortfalls in that capacity. A regional strategy should locate potential additional capacity as close to where cargo is produced as possible, and should evaluate the feasibility and relative effectiveness of new airports, conversion of military airports to commercial uses, and increasing cargo handling efficiencies at existing airports.*

- *Ground freight routes should be planned that minimize impacts upon residential neighborhood and heavy commuter routes.*

- *The conversion of Norton Air Force Base to civilian/commercial use is a most promising alternative for adding substantial new cargo handling capacity to the regional airport system.*

- *For those military airbases which are, or will be closed by the Department of Defense, support conversion to commercial air service, including air cargo, if such bases have been determined to have a high technical and market potential for use as commercial air passenger and air cargo service airports. This policy most strongly applies to those subregions which cannot otherwise provide sufficient, environmentally acceptable capacity to meet their own local air cargo shipment demand.*

- *Examine feasibility of commercial air cargo service at remaining active duty air bases if invited to do so by the military.*

- *Long-term trends in the regional economic profile of Southern California, their relationship to the world economy, and their implications for air cargo forecasts and handling capacity shortfalls, should be explored in an aviation strategic plan for the SCAG region.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*

- *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*

- *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- *Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions.*

- *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

- *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

- *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

- *Support local jurisdictions strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.*

- *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*

- *Support and encourage settlement patterns which contain a range of urban densities.*

- *Encourage planned development in locations least likely to cause environmental impact.*

- *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*

- *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

- *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

- *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources ,measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter core actions related to the proposed project include:

- *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

- *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

- *Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.*

- *Coordinate watershed management planning at the subregional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply).*

- *Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.*

- *Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.*

- *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

CONCLUSIONS

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

ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

SCAG is a ***Joint Powers Agency*** established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's ***Metropolitan Planning Organization*** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. SCAG is also the designated ***Regional Transportation Planning Agency***, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the ***South Coast Air Quality Management Plan***, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. §7504(a) as a ***Co-Lead Agency*** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining ***Conformity*** of Projects, Plans and Programs to the Air Plan, pursuant to 42 U.S.C. §7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for ***reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans*** required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for ***Inter-Governmental Review*** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, ***Environmental Impact Reports*** of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized ***Areawide Waste Treatment Management Planning Agency***.

SCAG is responsible for preparation of the ***Regional Housing Needs Assessment***, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the ***Southern California Hazardous Waste Management Plan*** pursuant to California Health and Safety Code Section 25135.3.

Los Angeles County
Metropolitan
Transportation
Authority

One Gateway Plaza
Los Angeles, CA
90012

213.922.6000

July 29, 1997

Mr. John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham:

Thank you for giving the Los Angeles County Metropolitan Transportation Authority (MTA) the opportunity to review and comment on the proposed Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the Los Angeles International Airport (LAX) Master Plan.

The MTA has worked closely with the Department of Airports for many years on developing a ground transportation system that would link the LAX with existing and planned transportation systems in the County. Among those that our staffs have jointly worked on and which we would like to continue to actively participate in are the following:

1. **Extension of the Metro Green Line from its Aviation Station to the LAX terminal.** All four concepts for the future development of the LAX include a new terminal building west of the Tom Bradley International Terminal towards Pershing Drive. Understandably, the alignment of any future rail extension from the Metro Green Line Aviation Station will be studied in light of this expansion. The MTA would like to participate in developing this extension to ensure connectivity with its rail system and consistency with its existing operations.

2. **Northerly Extension of the Metro Green Line or Equivalent Rail System from the LAX terminal to Westchester Parkway.** This segment not just extends the current regional rail system into the rest of the LAX and surrounding businesses but, more importantly, provides a future connection to the Crenshaw-Prairie rail corridor and the Metro Rail system to Downtown Los Angeles. The MTA is in the process of completing a preliminary EIR/EIS on the Crenshaw-Prairie rail corridor. We would like to closely coordinate with the Department of Airports in developing a rail extension from the LAX terminal to the Crenshaw-Prairie corridor.

3. **Existing MTA facility at the City Bus Center and future plans for ground transportation, particularly public transportation.** The MTA currently leases airport property near Parking Lot C for buses that operate within the area. The Santa Monica Municipal Bus Lines, Torrance Transit and Culver City also stop at the City Bus Center. An earlier planning study for a Metro Green Line northern extension, conducted through an interagency task force (including the Department of Airports), identified Lot C as a possible multimodal transit center. As planning for the LAX continues, the MTA would like to see the development of a comprehensive ground transportation program. We would like to participate in this discussion as well.

4. **Impact of LAX Master Plan on major roadway and arterial system improvements.** The MTA in conjunction with various local agencies has initiated an extensive program of major roadway and arterial improvements throughout the South Bay, including the I-105 and 405 corridors, and all major arterials and roadways within the area. The Master Plan needs to address its impacts on the functional linkages of this programmed network. The South Bay is currently involved in a multi-year, multi-phase signal project with some advanced ITS elements. The impact of the Master Plan on these emerging network should also be examined.

5. **Compliance with the requirements of the Congestion Management Program for Los Angeles County (CMP).** In response to the requirements of the CMP, the City of Los Angeles adopted a land use analysis program in 1993 that specifies that all EIRs for projects within the City incorporate the following:

   - A Transportation Impact Analysis (TIA) which is consistent with the requirements of the CMP.
   - An evaluation of the proposed project's effects on the CMP regional roadway system.
   - Consultation with affected transit operators.
   - A thorough analysis of transit impacts.

   The TIA Guidelines contained in Appendix D of the CMP provides a detailed discussion of issues that are required to be addressed. These comments include a summary of the TIA requirements, as well as other comments regarding transit planning and operations.

   Traffic Analysis. The CMP requires an analysis of potential project impacts on the regional CMP highway and freeway system. The following freeways and arterial highways in the vicinity of the project are included in the CMP system: Interstate 10, 105, 110 and 405; State routes 1 (Sepulveda Boulevard), 42 (Manchester/Firestone Boulevard), 90 (Marina Expressway/Freeway), 91 (Artesia Boulevard), 107 (Hawthorne Boulevard), 187 (Venice Boulevard), and 213 (Western Boulevard); and La Cienega Boulevard.

   This traffic analysis must include:

   - An examination of the CMP arterial and freeway monitoring locations in the study area, as defined in the TIA Guidelines; Documentation of existing traffic conditions including

traffic volumes, LOS, and projections of background traffic growth, as described in the TIA Guidelines;

- Projections of proposed project traffic generation, and mode assignment information for both average daily traffic and for morning and evening peak hour periods.
- Projections of trip distribution consistent with the TIA procedures;
- Project impact analysis, including intersection LOS, freeway segment analysis, and transit impact analysis, for CMP roadways that may receive significant increases in traffic, as defined in the TIA Guidelines; and,
- Identification and evaluation of mitigation measures for significant impacts on the CMP system, including fair share cost estimates and implementation responsibilities.
- If the EIR concludes that project impacts will be mitigated by future regional transportation improvements, such as rail transit, freight-to-rail facilities or high occupancy vehicle lanes, the EIR must document any project contribution to the improvement and the means by which project generated trips will access the regional facility.
- If the EIR assumes or concludes that project impacts will be reduced through implementation of TDM measures, the EIR must substantiate these conclusions and list the specific actions to be implemented by the project.

Transit Analysis. The CMP requires an analysis of potential project impacts on local and regional transit, including:

- A summary of existing transit services in the project area;
- Trips assigned to transit will also need to be calculated for the same peak hour and daily periods as done for vehicular traffic;
- Documentation on the assumptions/analyses that were used to determine the number/percent of trips assigned to transit;
- Information on facilities and programs incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures, and;
- Expected transit impacts and proposed mitigation measures.

CMP Credit Opportunities. The proposed project offers unique opportunities for the City to meet its annual deficiency plan requirements under the CMP. While the mitigation measures required of a land use project are at the City's discretion, the measures required by the City for this project can be designed to have multiple benefits. Mitigation measures can be drafted that reduce local traffic impacts and also give the City credit towards reducing its share of traffic impacts on regional facilities. Appendix G of the 1995 CMP lists the mitigation strategies that give the City credits under the CMP. The City should also track progress on the Draft 1997 CMP which is currently under review and scheduled for adoption in November, 1997. The proposed update of the CMP includes new and expanded strategies for traffic mitigation. To take advantage of the opportunity to receive CMP credit, we recommend that the EIR evaluate the potential for including CMP approved strategies as project mitigation measures.

We recommend that an interagency committee be formed to address the ground transportation issues related to the LAX Master Plan and develop alignments of possible extensions of existing and planned rail systems connecting to the airport. We will be happy to participate in this and other related efforts of the Department of Airports.

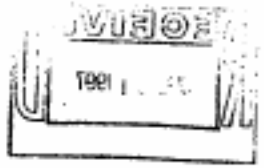
The MTA strongly supports the development of an LAX Master Plan and will fully cooperate to achieve the vital links between the airport and the regional transportation system. Should you need further information, please call Robert D. Cashin at (213) 922-3009 or Karen Heit at (213)922-3086.

Sincerely,

JAMES L. de la LOZA
Executive Officer
Regional Transportation Planning & Development

c: Robert D. Cashin, Deputy Executive Director, Multimodal Planning, RTP&D
Karen Z. Heit, Director, South Bay Area Team

x:\rc\mpcomments-july29



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

July 24, 1997

IN REPLY PLEASE REFER TO FILE: P-2

Mr. Jack Graham
City of Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 210
Los Angeles, CA 90045-5803

Dear Mr. Graham:

RESPONSE TO A NOTICE OF PREPARATION (NOP)
LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN

Thank you for the opportunity to provide comments on the NOP for the proposed Los Angeles International Airport (LAX) Master Plan. We have reviewed the NOP and offer the following comments:

Environmental Programs

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each "development project" to provide an adequate storage area for collection and removal of recyclable materials. The Environmental Impact Report/Environmental Impact Study (EIR/EIS) should include/discuss standards to provide adequate "waste storage areas" for collection/storage of recyclable and green waste materials for this development.

Current estimates indicate that a shortfall in permitted daily land disposal capacity in Los Angeles County will occur within the next few years. The proposed development may increase the generation of construction and demolition waste and other solid waste, and may negatively impact solid waste management facilities in the County. Therefore, the proposed EIR/EIS must identify what measures the project proponent may implement to mitigate the impact. These measures may include, but are not limited to, implementation of waste reduction, recycling and composting programs, as well as programs to divert the generated construction, demolition, and other solid waste from the landfills.

The existing hazardous waste management (HWM) facilities in this County are inadequate to handle the hazardous waste currently being generated. The proposed development may generate hazardous waste and household hazardous waste which could adversely impact existing HWM facilities. This issue should be addressed and mitigation measures provided.

The EIR/EIS needs to fully assess the impacts of this project on the quality of stormwater runoff. The EIR/EIS should reference order number 96054, National Pollutant Discharge Elimination System Permit CAS614001 issued by the California Regional Water Quality Control Board to the County and local agencies. The EIR/EIS should also indicate compliance with all relevant stormwater quality management programs of the Federal, State, County, and local agencies.

If you have any questions regarding this review please contact Mr. Tom Brachko of our Environmental Programs Division at (626) 458-3567.

Traffic and Lighting

A project of this magnitude could significantly impact the existing circulation system in the project vicinity. We welcome the opportunity and look forward to the review of the EIR/EIS upon its completion. We recommend using County criteria when evaluating County intersections and roadways. A copy of our Traffic Impact Analysis Report Guidelines is attached.

It appears that this project may also impact Congestion Management Plan arterial and freeway monitoring locations in the area. A separate analysis should be prepared which addresses these impacts.

We recommend that the State of California Department of Transportation and adjoining cities review this document for significant impacts/mitigations within their jurisdictions.

If you have any questions, please contact Mr. Suen Fei Lau of our Traffic and Lighting Division at (626) 458-5909.

If you have any questions regarding the environmental reviewing process of this Department, please contact Mr. Vik Bapna at the address on the first page or at (626) 458-4363.

Very truly yours,

HARRY W. STONE
Director of Public Works

DAVID YAMAHARA
Assistant Deputy Director
Planning Division

YC:km/17

Traffic Impact Analysis Report Guidelines

January 1, 1997

Prepared by the County of Los Angeles
Department of Public Works

Harry W. Stone
Director of Public Works

Table of Contents

JHC:scp
T-2/ACCESS2
(11/26/96 Rev.)

I. Introduction

The County of Los Angeles Department of Public Works has established the following Guidelines for the preparation of Traffic Impact Analysis (TIA) reports. The purpose of these Guidelines is to establish procedures to ensure consistency of analysis and the adequacy of information presented and timely review by County staff. It is strongly recommended that the applicant's traffic engineer consult with County staff before beginning the study to establish the scope and basic assumptions of the study and any deviations from these Guidelines to avoid unnecessary delays or revisions. For assistance in the TIA scoping process, the Traffic and Lighting Division, Traffic Studies Unit, can be contacted at (818) 458-5909.

II. Requirements

Generally, the Department staff is concerned with adverse impacts on traffic if,

1. Traffic generated by a project considered alone or cumulatively with other related projects, when added to existing traffic volumes, exceeds certain capacity thresholds of an intersection or roadway, contributes to an unacceptable level of service (LOS), or exacerbates an existing congested condition.

2. Project generated traffic interferes with the existing traffic flow (e.g., due to the location of access roads, driveways, and parking facilities).

3. Proposed access locations do not provide for adequate safety (e.g., due to limited visibility on curving roadways).

4. Nonresidential uses generate commuter or truck traffic through a residential area.

5. Project generated traffic significantly increases on a residential street and alters its residential character.

A traffic report must be prepared by a registered Civil or Traffic Engineer. A traffic report is generally needed if a project generates over 500 trips per day or where other possible adverse impacts as discussed in the Analysis and Impact Section (see page 4) of these Guidelines are identified. Before a full review is conducted, the County staff will check the completeness of the TIA report using the attached check list (Exhibit A). If the report is missing any of the check list items, it will be returned for revision.

III. TIA Report Contents

A. Project Description

The following information is required.

1. A description of the project, including those factors which quantify traffic generators, e.g., dwelling units, square feet of office space, persons to be employed, restaurant seats, acres of raw land, etc. For residential developments, the description should indicate the type of residence, (e.g., one level or townhouse condominiums, and if its use is for families, adults or retirees).

2. A plot plan showing proposed driveways, streets, internal circulation, and any new parking facilities on the project site.

3. A vicinity map showing the site location and the study area relative to other transportation systems.

4. A brief history of the projects that are part of the phased Master Plan or a parent tract/parcel map.

B. Transportation Circulation Setting

The following information is required.

1. Existing and Proposed Site Uses

A description of the permitted and/or proposed uses of the project site in terms of the various zoning and land use categories of the County, and the status and the usage of any facilities currently existing on the site.

2. Existing and Proposed Roadways and Intersections

A description of existing streets and roadways, both within the project site (if any) and in the surrounding area. Include information on the roadway classifications (per the Highway Plan), the number of lanes and roadway widths, signalized intersections, separate turn lanes, and the signal phases for turning movements.

Existing daily directional and peak-hour through and turning traffic volumes on the roadways surrounding and/or logically associated with the project site, including Secondary and Major highways and freeways. Local streets affected by the project should also be

shown. Each report shall include appendices providing count data used in the preparation of the report. The source and date of the traffic volume information shall be indicated. Count data should not be over one year old. Since peak volumes vary considerably, a ten percent daily variation is not uncommon, especially on recreational routes or roadways near shopping centers; therefore, representative peak-hour volumes are to be chosen carefully.

All assumed roadways and intersections or any other transportation circulation improvements must be identified and discussed. The discussion should include the scope and the status of the assumed improvements including the construction schedule and financing plan. It should be noted that all assumed roadways and intersections or any other transportation circulation improvements will be made a condition of approval for the project to be in place prior to the issuance of building permits. If assumed improvements do not get built on time due to an unforeseeable condition, traffic conditions for a different assumed highway network or other mitigation measures will be considered if a traffic study is submitted with a different assumed network or other measures are recommended to mitigate the traffic impact in question.

C. Analysis and Impact

The following information is required.

1. Trip Generation Analysis

Tabulate the estimated number of daily trips and a.m. and p.m. peak-hour trips generated by the proposed project entering and exiting the site. Trip generation factors and source are to be included. The trip generation rates contained in the latest edition of the Institute of Transportation Engineers Trip Generation manual should generally be used, except in the case of condominiums/townhomes when the following rates should be used per unit.

	ADT	A.M.-Peak	P.M.-Peak
		Outgoing/Incoming	Outgoing/Incoming
Condominiums/ Townhomes	8.0	0.48/0.06	0.26/0.47

There may be a trip reduction due to internal and/or pass-by trips. Internal trip reduction can only be applied for mixed-use types of developments and pass-by trip reduction for retail/commercial types of developments. Internal or pass-by trip reduction assumptions will require analytical support based on verifiable actual similar developments to demonstrate how the figures were derived and will require approval by the County.

2. Trip Distribution

Diagrams showing the percentages and volumes of the project and nearby project's a.m. and p.m. peak-hour trips logically distributed on the roadway system must be provided. The Regional Daily Trip Distribution Factors (Exhibit D-3) contained in the Congestion Management Program (CMP) Land Use Analysis Guidelines shall be referenced for regional trip distribution assumptions. If it is assumed that new routes will alter traffic patterns, adequate backup including traffic distribution maps must be provided showing how and why these routes will alter traffic patterns.

The study area should include arterial highways, freeways, and intersections generally within a one-mile radius of the project site.

Note: This distance may be greater than one-mile for rural areas depending on the proximity to nearby signalized intersections and the availability of master plan access routes.

3. Related Projects List

A list of related projects that are approximately within a one-and-a-half mile radius of the project site and would reasonably be expected to be in place by the project's build out year must be included in the report. Related projects shall include all pending, approved, recorded, or constructed projects that are not occupied at the time of the existing traffic counts.

The County of Los Angeles Department of Regional Planning (DRP) and other public agencies (if necessary) should be contacted to obtain the latest listings. A table and a map showing the status, project/zone change/conditional use permit/parcel map/tract number, and the location of each project must be provided. For a computer printout of the listing of all filed projects within the County, Land Development Management Section of the DRP, at (213) 974-6481 can be contacted.

4. LOS Analysis

If it appears that the project's generated traffic alone or together with other projects in the area could worsen the LOS of an intersection or roadway, a "before" and "after" LOS analysis is necessary. The Intersection Capacity Utilization (ICU) or Critical Movement Analysis are two methods often used to assess existing and future LOS at intersections.

If the ICU planning method is used, a maximum of 1,600 vehicles per hour per lane should be used (2,880 vehicles per hour should be used for dual left-turn lanes) and a ten percent yellow clearance cycle should be included. Intersection LOS analysis and calculation work sheets, as well as diagrams showing turning volumes shall be included in the report for the following traffic conditions.

(a) Existing traffic;
(b) Existing traffic plus ambient growth to the year the project will be completed (preproject);
(c) Traffic in (b) plus project traffic;
(d) Traffic in (c) with the proposed mitigation measures (if necessary);
(e) Traffic in (c) plus the cumulative traffic of other known developments; and
(f) Traffic in (e) with the proposed mitigation measures (if necessary).

The project's impact on two-lane roadways should also be analyzed for all of the above traffic conditions if those two-lane roadways are used for access. LOS service analysis contained in the Highway Capacity Analysis, Chapter 8, Two-Lane Highways, should be used to evaluate the project's impact. For simplified analysis, use the established significant impact thresholds for two-lane roadways as shown on page 7.

5. Significant Impact Threshold

For intersections, the impact is considered significant if the project related increase in the volume to capacity (v/c) ratio equals or exceeds the threshold shown below.

INTERSECTIONS		
Pre-Project		Project v/c Increase
LOS	v/c	
C	0.71 to 0.80	0.04 or more
D	0.81 to 0.90	0.02 or more
E/F	0.91 or more	0.01 or more

The project is deemed to have a significant impact on two-lane roadways when it adds the following percentages based on LOS of the preproject conditions.

TWO-LANE ROADWAYS				
Directional Split	Total Capacity (pcph)	Percentages Increase in Passenger Car Per Hour (pcph) by Project		
		Pre-Project LOS		
		C	D	E/F
50/50	2,800	4	2	1
60/40	2,650	4	2	1
70/30	2,500	4	2	1
80/20	2,300	4	2	1
90/10	2,100	4	2	1
100/0	2,000	4	2	1

6. Analysis Discussion

Discuss conclusions regarding the adverse impacts caused by the proposed project on the roadway system. If the cumulative traffic impact of this and other projects require mitigation measures, such as traffic signals, then estimate the percent share using the project percent share formula given in the Section III D of the TIA Guidelines. When the proposed project and other nearby developments are expected to significantly impact adjacent roadways, the developer may be required to enter into a secured agreement to contribute to a benefit district to fund major roadway and bridge improvements in the region. Also, for all recommendations to increase the number of travel lanes on a street or at an intersection as a mitigation measure, the report must clearly identify the impacts associated with such a change such as whether or not additional right of way will be required and whether it is feasible to acquire the right of way based on the level of development of the adjacent land and buildings (if any).

Discuss other possible adverse impacts on traffic. Examples of these are: (1) the limited visibility of access points on curved roadways; (2) the need for pavement widening to provide left-turn and right-turn lanes at access points into the proposed project; (3) the impact of increased traffic volumes on local residential streets; and (4) the need for road realignment to improve sight distance.

Projects which propose to amend the County's General Plan Land Use and substantially increase potential traffic generation must provide an analysis of the project at current planned land use versus proposed land use in the build out condition for the project area. The purpose of such analysis is to provide decision makers with the understanding of the planned circulation network's ability to accommodate additional traffic generation caused by the proposed General Plan Land Use amendments.

D. Traffic Models and Model Generated TIA's

Computerized traffic models are planning tools used to develop future traffic projections based on development growth patterns. The Department currently operates two traffic models, one for the Santa Clarita Valley and another for the Ventura Corridor area. The Department can test proposed development project traffic impacts for the public in these areas for a fee. For assistance in the traffic modeling, the Planning Division, Transportation Planning/Assessments Section, can be contacted at (818) 458-4351.

For TIA's prepared using data from outside traffic modeling, the following information is required.

1. The type of modeling software used to generate the traffic analysis report data (i.e., TRANPLAN, EMME/2, etc.).

2. The list of land use assumptions by traffic analysis zones (TAZ's) and their sources used in the traffic model in lieu of a related projects list.

3. A copy of the computerized roadway network assumed to be in place at the time of the project. Streets should be color-coded by street type. Also, TAZ's and their corresponding centroidal connectors, as well as number of lanes should be displayed.

4. The list of trip generation rates used in the traffic model and their sources.

5. Model runs (plots) identifying both the with and without project scenarios. The volumes displayed on the plots should be in 100's for Average Daily Vehicle Trips (ADT) and 10's for peak-hour plots.

E. Traffic Signals

The following information is required.

Traffic signal warrant analysis using the State of California Department of Transportation (Caltrans) Peak-Hour (Figures 9-8 and 9-9 of Caltrans Traffic Manual) and Estimated Average Daily (Figure 9-4 of Caltrans Traffic Manual) Traffic Warrant Analysis should be provided. If the installation of signals is warranted with the addition of the project's traffic, then the installation will be the sole responsibility of the project. If it is warranted with cumulative traffic of the project and other related projects, the following formula should be used to calculate the project percent share.

$$\text{Project Percentage Share} = \frac{\text{Project Traffic}}{\text{Project+Other Related Projects Traffic}}$$

The project percent share should be based on the peak-hour volumes that warrant signals. If both peak hours satisfy the installation of signals, the average of the two peak-hour volumes should be used in the percent share analysis.

F. Mitigation Measures

The following information is required.

Identify feasible mitigation measures which would mitigate the project and/or other related projects' significant impacts to a level of insignificance. Also, identify those mitigation measures which will be implemented by others. Those mitigation measures that are assumed to be implemented by others will be made a condition of approval for the project to be in place prior to issuance of building permits. Mitigation measures may include, but are not limited to, the following.

1. Traffic Engineering Techniques.

a. Locate access points to optimize visibility and reduce potential conflict.
b. Design parking facilities to avoid queuing into public streets during peak arrival periods.
c. Provide additional off-street parking.
d. Dedicate visibility easements to assure adequate sight distance at intersections and driveways.
e. Signalize or modify traffic signals at intersections.
f. Install left-turn phasing and/or multiple turning lanes to accommodate particularly heavy turning movements.
g. Widen the pavement to provide left- or right-turn lanes to lessen the interference with the traffic flow.[1]
h. Widen intersection approaches to provide additional capacity.
I. Prohibit left turns to and from the proposed development.
j. Restrict on-street parking during peak hours to increase street capacity.[1]

2. Contribute to a benefit district to fund major capital improvements

a. Construct a grade separation.
b. Improve or construct alternate routes.
c. Complete proposed routes shown on the Los Angeles Highway Plan.
d. Improve freeway interchanges (bridge, widening, modifications, and etc.).

[1] Physical roadway improvements to improve capacity should be considered before considering parking restrictions.

3. **Transportation System Management (TSM) Techniques[2]**

a. Establish flexible working hours.
b. Encourage employee use of carpools and public transportation (specific measures must be indicated).
c. Establish preferential parking for carpools.

d. Restrict truck deliveries to Major and Secondary highways and encourage deliveries during the off-peak hours.
e. Establish a monitoring program to ensure that project traffic volumes do not exceed projected traffic demand.

Note: When it appears that other jurisdictions will be impacted by a development, the Department will request that the involved jurisdiction also review the TIA. A written response from that jurisdiction should be provided with appropriate follow-up to the lead County agency.

G. CMP Guidelines

The following information is required.

Where the project meets the criteria established in the County of Los Angeles' CMP Land Use Analysis Guidelines, a CMP analysis must be provided. A copy of the latest Guidelines will be available upon request. A CMP TIA is required for all projects required to prepare an Environmental Assessment based on local determination or projects requiring a traffic study. The geographic area examined in the TIA must include the following, at a minimum.

* All CMP arterial monitoring intersections (see Exhibit B of the Guidelines), including freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. peak hours.

* Main line freeway monitoring locations (see Exhibit C of the Guidelines) where the project will add 150 or more trips, in either direction, during the a.m. or p.m. weekday peak hours.

[2] Contributions to a benefit district and/or TSM techniques may not be used to lower LOS in the capacity calculations.

- Caltrans must also be consulted to identify other specific locations to be analyzed on the State highway system.

If, based on these criteria, the TIA identifies no facilities for study, no further traffic analysis is required.

JHC:lg
T-3/ACCESS
(11/20/96 Rev.)

Attach.

EXHIBIT A
TRAFFIC IMPACT ANALYSIS REPORT CONTENTS CHECK LIST

Note: Before a full review is conducted, the County staff will check the completeness of the Traffic Impact Analysis report. If the report is missing any of the items listed below, it will be returned for revision.

CONTENT	YES/NO	COMMENT
Site Plan •Access locations •Interior circulation		
Trip Generation Rates •ITE trip generation rates •Documentation for alternate rates		
Trip Distribution •Regional •Local project (am/pm) •Local related projects(am/pm)		
Traffic Counts •Taken within one year •Date/Time		
Discounting •Internal trip discounts for mixed use developments •Pass-by trip discounts for commercial/retail developments •Backup		
Level of Service Calculations •ICU or CMA •10% yellow clearance for ICU planning method •1600 vpl; 2880 vpl for dual left turn lanes for ICU planning method •Calculation sheets •Scenarios as required per Guidelines •Existing/Future lane configurations		
Signal Warrant Analysis •Peak hour/ADT per Caltrans standards		
Mitigation Measures •Project impacts •Cumulative developments impacts •Projects % share of the cost to mitigate cumulative development impacts		
Congestion Management Program Analysis		

JHC:mcp
T-2/ACCESS
11/26/96

NOTE to L+B:
LAST PAGE IS COLOR MAP

Revised
7/21/97

SCOPING REPORT
ON
LAX MASTER PLAN
PHASE II
2ND ITERATION CONCEPT NOTEBOOK

RESPONDING PARTY

LOS ANGELES COUNTY
WEST VECTOR CONTROL DISTRICT
6750 Centinela Avenue
Culver City, CA 90230

TABLE OF CONTENTS

SCOPING REPORT
ON
LAX MASTER PLAN
PHASE II
2ND ITERATION CONCEPT NOTEBOOK

RESPONDING PARTY

LOS ANGELES COUNTY
WEST VECTOR CONTROL DISTRICT
6750 Centinela Avenue
Culver City, CA 90230

1. Public Health & Disease Control

The history of mosquito control and the importance of mosquitoes are directly related to the health, comfort, and the economy of humans and their use of real property.

There is an intimate ecological relationship between humans and mosquitoes. By inadequately managing land and water resources, and failing to solve the problems of liquid waste management, larger, more productive habitats for mosquitoes grow and cause disease and intolerable annoyance.

Even mosquitoes which carry no transmissible disease but are present in sufficient numbers to produce intense annoyance and distress to humans and animals are recognized as a public health problem. Public health, more than the mere absence of disease, includes the right to an environment free of mental and physical discomforts that destroy its positive values.

Some species of mosquitoes are involved in the transmission of important human diseases. Encephalitis, malaria, yellow fever, dengue, and filariasis

are transmitted to man and animals in various regions of the world through the bite of the mosquito. The area in which LAX is located has been declares by the California Department of Health Services as endemic for mosquito borne St. Louis Encephalitis (SLE) and Western Equine Encephalitis (WEE).

Secondary infections can result from scratching mosquito bites even when no disease agent is transmitted. Some people exhibit an allergic reaction to mosquito bites.

Western Equine Encephalitis

Western equine encephalomyelitis (WEE) is a mosquito-borne zoonotic infection, primarily involving wild birds and *Culex tarsalis*, that can produce acute central nervous system (CNS) disease in infected horses and humans. WEE is transmitted, primarily by *Cx. tarsalis* to a variety of avian and mammalian hosts. People and horses are dead-end hosts for the virus, in that the concentration of virus particles circulating in the blood stream of humans and horses is too low to infect a blood feeding mosquito.

Passerine birds, primarily house sparrows and house finches, are highly preferred hosts of *Cx. tarsalis* and are an important source of vector infections. Infections in house sparrows, particularly nestlings, amplify WEE virus that is present. Diseases which appear suddenly as epidemics, cause sever illness in children, and are transmitted by mosquitoes, invariable produce a high level of public concern.

St. Louis Encephalitis

SLE is a central nervous system (CNS) infection in man. In the U.S., SLE virus is cycled primarily between *Culex* mosquitoes and passeriform and columbiform birds. Infected mosquitoes and birds apparently suffer no adverse effects. *Cx. tarsalis* is the vector mosquito in the western United States. Where *Cx. tarsalis* is a vector, transmission of both SLE and WEE virus occur.

The original epidemic of St. Louis encephalitis occurred in St. Louis in 1933. The epidemic caused over 1,000 clinical cases and at least 200

deaths. In the 1950's major outbreaks occurred in California's Central Valley followed by large epidemics that occurred in 1962 in Tampa Bay, FL, in 1964 in Houston, TX, the Delaware River Valley, Philadelphia and New Jersey, in 1974 in Memphis, TN, and in 1975, the largest epidemic of St. Louis encephalitis occurred in the central part of the U.S. Investigations of outbreaks from the 1950's to the present by the Centers for Disease Control and its Arbovirology Laboratory have established that St. Louis encephalitis is the principal arboviral problem in the United States. St. Louis encephalitis is endemic in Los Angeles County as evidenced by outbreaks in 1983 and 1984 and by serological data obtained from wild birds and sentinel chickens from 1985 to current.

II. Economics

Vector-related problems decrease property values, affect residents, and lower the overall economic potential of a community.

Obvious economic losses due to mosquitoes biting include illness, or loss of life by disease or physiological reaction in man and domestic animals, or simply intolerable nuisance levels. Such factors can destroy the economy in large areas, greatly reduce productivity, and drive many residents away.

The previous incidence of malaria in many countries so debilitated the population that national productivity was reduced to 40% of estimated capacity due to this mosquito transmitted disease.

The enormous cost of medical care and the loss of life where vector-borne diseases are prevalent represent significant economic loss. One study examined the economic burden imposed on residents of Massachusetts who had survived Eastern equine encephalitis infections. Transiently affected persons mainly required assistance of direct medical services; the average total cost per case was $21,000. Those who suffered persistent symptoms remained at home and seemed likely to live a normal life span, but without gainful employment. The cost associated with persistent symptoms, which included medical expenses, education, institutionalization, and loss of income, was approximately $3 million per case. Major losses may occur to recreational interests, tourist trade, real estate and land development, and to

other associated local business, when an area gets a reputation for being infested with vectors.

The presence of vectors usually leads to significant costs in preventive measures; either by a effective and efficient public program, or by individual efforts in the use of repellents, insect aerosol dispensers, screening, coupled with curtailed outdoor activity and wasted effort.

III. History of Existing Site

Currently, to control mosquito breeding, the District must routinely treat over 22,000 square yards of ponded water created by improperly graded storm drains, runoff channels, and sumps on property owned by LAX. All of these areas are a direct result of inadequate design features and/or faulty construction during previous expansions. A map highlighting the existing problem areas is attached.

IV. Prevention

Sections 2270-2294 of the California Health & safety Code empowers the Los Angeles County West Vector Control District to direct any owner or party in possession of any property (public or private) to take appropriate steps to eliminate, or prevent a nuisance (mosquito breeding). In order to prevent the increase in areas that will support additional mosquito breeding, Los Angeles County West Vector Control District requests that the environmental impact report address in detail the impact new construction will have on mosquito populations. Specifically, what mitigating factors are to be employed in the design and construction that will prevent increased mosquito breeding associated with areas of potential standing.

V. Specific Areas to be Addressed by EIR with respect to Mosquito Breeding

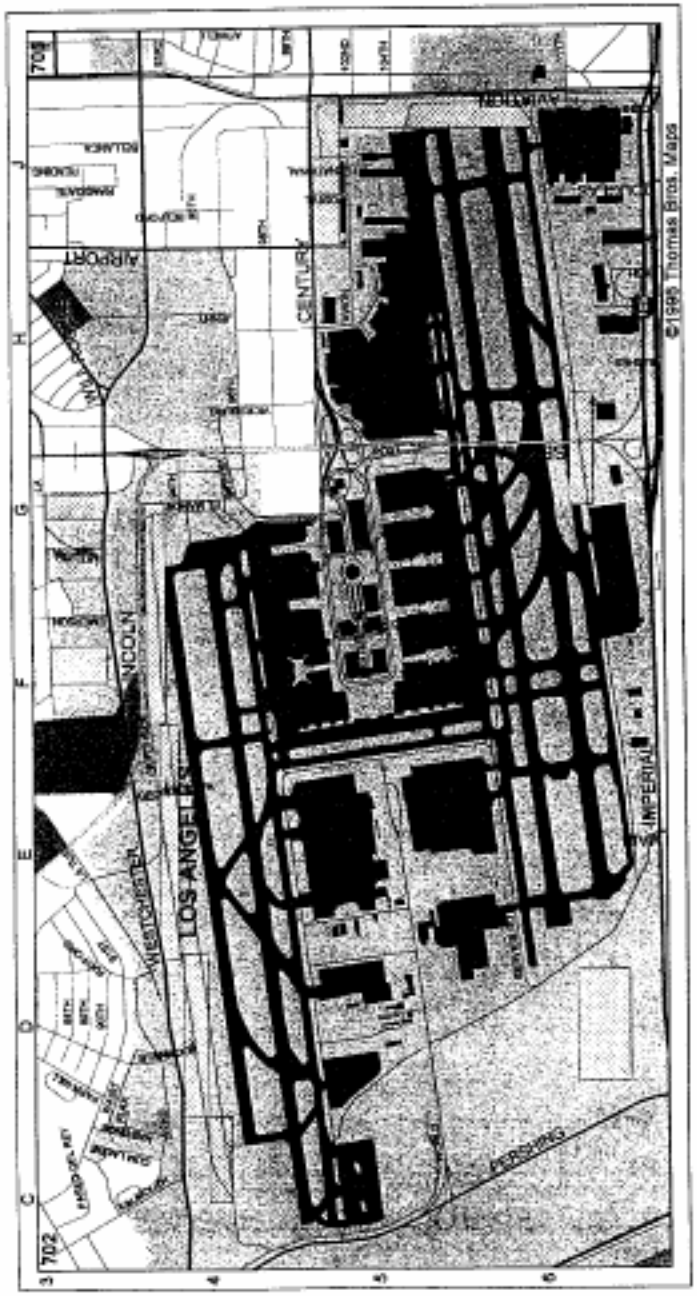
The following are areas that must be designed to properly drain all water so as not to allow conditions that will breed mosquitoes. Additionally, all sumps, holding tanks, and similar enclosures are to be designed to facilitate easy access for inspection and treatment of mosquito breeding. Major areas of specific concern are as follows:

1. Box drains
2. Catch basins and underground storm drains
3. Curbing
4. Drainage channels
5. Improperly graded unimproved areas (dirt depressions, improperly mounded soil, etc.) that will support excess water
6. Improperly graded improved areas (runways, terminal access, service runs, etc.) that will support excess water
7. Meter boxes and other underground utilities vaults
8. Ponds
9. Septic or hazardous waste tanks and/or vaults.
10. On-site sewage and/or waste water reclamation treatment facilities

VI. Traffic (Adequate Ingress and Egress for Suppression and Disease Surveillance Operations)

The projected doubling of traffic along Pershing Drive will adversely impact access to all of the present and future mosquito breeding sites on the LAX property. In transit and access delays may prevent the timely treatment of all breeding sites and thereby cause the emergence of large numbers of adult mosquitoes into the surrounding community.

LAX 1997
MOSQUITO TREATMENT AND SURVEILLANCE



AREAS REQUIRING TREATMENT AND SURVEILLANCE FOR MOSQUITO BREEDING

Los Angeles Unified School District

Facilities Services Division

RUBEN ZACARIAS
Superintendent of Schools

BETH LOUARGAND
General Manager

BOB NIECCUM
Director of Real Estate and Asset Management

Environmental Review File
LAX Master Plan

July 30, 1997

John L. Graham, Chief of Airport Planning
Department of Airports
LAX Master Plan Project
1 World Way - Room 218
Los Angeles, CA 90012

Dear Mr. Graham:

Re: LAX Master Plan

The Los Angeles Unified School District's has reviewed the information contained in the Notice of Preparation/ Notice of Intent for the LAX Master Plan project, and submits the following comments on the scope and content of the Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

Attachment A provides the addresses, phone numbers, and fax numbers for the District schools located within the project area.

Flight Patterns

The EIR/EIS should show the location of the schools listed in Attachment A, and the relationship of these schools to existing flight patterns, and any proposed modifications to those patterns. The EIR should discuss the effect that the realignment of the Jack Northrop (formerly Hawthorne Municipal) Airport runways, as proposed under Alternative 4, will have on flight patterns over District schools. The administration at Clay Middle School reports that there are now problems with aircraft flying low over the school in approach to that airport.

School Enrollment

The Initial Study acknowledges that the airport expansion project could affect the demand for educational services (Section 15c). The EIR/EIS should evaluate the project's impact on the District's school enrollment levels. Enrollment data, including five-year projections, for the schools listed in Attachment A will be sent under separate cover.

Attached are excerpts from the Los Angeles Unified School District School Facilities Fee Plan, February 22, 1966, which was prepared by Recht Hausrath & Associates. That report provides guidelines for determining the relationship between employment growth and student enrollment levels.

Noise

The Initial Study also acknowledges that the ambient noise levels at District school sites may increase under the proposed master plan (Section 15c). Ninety-eighth Street Elementary School reports an existing problem with noise from aircraft flying overhead.

Kentwood and Westport Heights Elementary and Wright Middle Schools, along with Emerson Adult Center, are the schools listed in Attachment A that do not have air conditioning. At these schools, doors and windows have to be kept opened for ventilation.

The District's Environmental Health and Safety Branch has prepared Attachment B on project noise. The District noise standards referenced in the attachment are provided.

Air

The District's Environmental Health and Safety Branch has prepared Attachment C on project air emissions. The guidelines referenced in the attachment for assessing air emissions are provided.

Risk of Upset

Attachment C addresses also the risk of aircraft accidents and crashes under the proposed master plan. The EIR/EIS should perform the risk assessment requested in the attachment.

Transportation and Circulation

The EIR/EIS should assess the project's impact on pedestrian and vehicular access to District school sites. Under the proposed master plan, Westchester Parkway will be a main vehicular route to the airport terminals. This roadway is also a route for District buses and private vehicles traveling to and from area schools. The EIR/ EIS should determine the project's effect on traffic flow along that roadway, and other roadways in the vicinity of schools.

Attachment D contains the District's guidelines for evaluating traffic impacts on schools. The attached measures should be adopted as project mitigation, where applicable.

The EIR/EIS should also include the following two measures to address construction traffic specifically:

- No hauling past District schools; where that is not feasible, restrict hauling to times when schools are not in session.

- No staging or parking of construction vehicles, including vehicles to transport workers, on streets adjacent to District schools.

In addition, Pat Butts of the District's Transportation Branch, (310) 268-8046, should be notified of the construction scheduling and any planned street or lane closures. The responsibility to contact the Transportation Branch should be shown as project mitigation to address the project's potential impact on school bus routes.

Conclusion
The Los Angeles Unifies School District is charged with protecting the health and safety of students, and the integrity of the learning environment. It is the District's role to ensure that the issues affecting schools are adequately addressed as part of the project approval process.

Please contact me at (213) 633-8986 if we can provide any additional information.

Very truly yours,

Joan Friedman
Realty Agent

JF:ld

Attachments

c: (W/Attachments A, B & C)
Members, Board of Education
Dr. Zacarias
Ms. Louargand
Mr. Koch
Ms. Doi
Mr. Rodriguez
Ms. Roberts
Ms. Takaki
Mr. Thompson

Westchester High School
7400 W. Manchester Ave
Los Angeles, CA 90045
(310) 670-4000
FAX (310) 410-1067

Paseo Del Rey Fundamental Magnet School
7751 Paseo Del Rey
Playa Del Rey, Ca 90291
(310) 823-2356
FAX (310) 305-0251

Loyola Village Elementary School
8821 Villanova Ave
Los Angeles, CA 90045
(310) 670-0480
FAX (310 216-9529

Cimarron Elementary School
11559 Cimarron Ave
Los Angeles, CA 90047
(213) 757-1226
FAX (213) 756-1686

98th Street Elementary School
5431 W. 98th Street
Los Angeles, CA 90045
(310) 649-2991
FAX (310) 338-9425

Clay Middle School
12226 S. Western Ave
Los Angeles, CA 90047
(213) 757-4181
FAX (213) 777-6056

Del Rey Continuation High School
8701 Park Hill Drive
Los Angeles, Ca 90045
(310) 641-3858
FAX (310) 337-6901

Wright Middle School
6550 W 80th Street
Los Angeles, CA 90045
(310) 670-5666
FAX (310) 568-8942

Kentwood Elementary School
8401 Emerson Ave
Los Angeles, CA 90045
(310) 670-8977
FAX (310) 670-6957

Emerson Adult Center
8810 Emerson Ave
Los Angeles, CA 90045
(310) 641-4867

Westport Heights Elementary School
6011 W. 79th Street
Los Angeles, CA 90045
(310) 645-5611
FAX (310) 654-4258

Cowan Avenue Elementary School
7615 Cowan Ave
Los Angeles, CA 90045
(310) 645-1973
FAX (310) 645-6273

ATTACHMENT "B"

INTER-OFFICE CORRESPONDENCE

Los Angeles Unified School District

TO:	Joan Friedman, Realty Agent Real Estate and Asset Management Branch	Date	July 24, 1997
FROM:	Richard Lui Environmental Health and Safety Branch		
SUBJECT:	LAX MASTER PLAN – NOP/NOI		

In response to your request for comments regarding potential noise impacts related to the above referenced project, the following is provided.

The project has the potential to produce significant noise impacts on District sites during construction and operational phases. The District agrees with the applicant's approach to include single event sound exposure levels in its analysis of noise impacts. It is expected that data acquired from the analysis of single event sound exposure levels will be used in evaluating impacts and determining what, if any, mitigation measures are necessary to reduce the impacts to a level of insignificance. In order to ensure that District sites are adequately protected, the applicant must include in the EIS/EIR its method for assessing noise impacts and what criteria are used to determine thresholds of significance.

We realize that Federal Aviation Administration regulations and California Airport Noise Standards use the Day-Night Average A-Weighted Sound Level (DNL) and Community Noise Equivalent Level (CNEL), respectively, as levels of significance. However, these values do not provide adequate protection from construction and operational noise impacts to District sites. In order to ensure that District sites are adequately protected from project-related noise impacts, the applicant must be provided with, and required to comply with, District noise standards. I have attached the District noise standards and guidelines for your information and review.

Please keep us abreast of any new developments regarding this project. If you should have any questions or comments, please call me (213) 743-5086.

RL:rl
Attachment

Approved by: Dianne Doi, Acting Director

FORM [illegible]

ATTACHMENT "C"

INTER-OFFICE CORRESPONDENCE

Los Angeles Unified School District

TO:	Joan Friedman, Realty Agent Real Estate and Asset Management Branch	Date July 28, 1997
FROM:	Bill Piazza Environmental Health and Safety Branch	
SUBJECT:	Los Angeles International Airport (LAX) Master Plan: NOP	

In response to your request to provide comments on the air quality and risk of upset elements for the above referenced project, the following is provided.

Construction

The applicant has the responsibility to provide full and open disclosure of project related emissions on sensitive receptor populations. However, upon review of the initial study only the potential for "short term increases in fugitive dust" are considered. Although we concur that particulates (PM_{10}) generated from demolition and construction activities must be assessed, staff believes that construction related activities will impact roadway capacity and reduce existing levels of service (LOS). As a result, concentrations of vehicular emissions such as carbon monoxide (CO) may create "hot spots" with concentrations exceeding relevant ambient air quality standards.

Therefore, an assessment of these microscale impacts is warranted and should be incorporated into the project's environmental documentation.

Operational

The initial study suggests that "increases in the number of aircraft operations and associated vehicular activity would result in emission increases over baseline levels" and subject the local community to the "deterioration of ambient air quality." Specifically referenced are criteria pollutant emissions such as carbon monoxide (CO), nitrogen oxides (NO_X) and fugitive dust (PM_{10}). Yet, with the applicants admission of local air quality degradation, they consider it unlikely that the project will expose sensitive receptors to "severe air pollution conditions."

Although the applicant discounts the potential for the proposed project to adversely affect the health of individuals who work or reside within the local community, they offer to provide "extensive analysis and modeling to verify potential effects to sensitive receptors and nearby residents." Staff agrees with this approach. However, it is clear that the applicant intends to only consider the impact from criteria pollutants. Staff believes the applicant's approach to assess only criteria pollutants is an attempt to minimize the quantification of the project's true and substantive impacts on the local community.

Of relevance is the quantification of toxic emissions generated from combustion sources such as aircraft, ground support equipment, power plant operations and vehicular sources associated with patrons utilizing the airport facilities. Emissions from related operations including but not limited to aviation and motor fuel use and fixed based sources such as aircraft maintenance are additional sources of toxic air contaminants. Specific chemical speciation profiles for these and other sources are readily available and include such compounds as benzene, formaldehyde, 1,3-butadiene and acetaldehyde.

Therefore, staff contends that the proposed project has a significant potential to emit toxic air contaminants to such a degree that their impact may adversely affect the various communities that encircle the airport. The analytical approach to perform the appropriate air pathway analysis and quantify the potential impact through the preparation of a health risk assessment is available through regulatory guidance and must be utilized to effectively quantify the air quality impacts for all project alternatives.

To underscore the viability of our claim for the preparation and inclusion of a health risk assessment into the project's environmental documentation, the local air district (i.e., South Coast Air Quality Management District) has promulgated guidance to assist applicants in preparing an effective air quality analysis under the auspices of the California Environmental Quality Act (CEQA). As such, the South Coast Air Quality Management District recommends that if a project has the potential to emit toxic emissions, then a "quantitative analysis should be performed." It is clear that our request is relevant and appropriate.

Risk of Upset

Staff concurs with the applicant that an analysis is warranted to assess the potential for an upset condition to create either an explosion or subsequent release of hazardous substances associated with ground support operations (e.g., aircraft fuel storage and refueling).

However, the applicant fails to address the numerous reports and documented incursions associated with increase aircraft operations. Therefore, staff requests that an analysis be conducted to determine accident probabilities and the severity of such events resulting from implementation of the project and its alternatives.

Please advise as to the disposition of this memorandum and subsequent response by the applicant. I can be reached at (213) 743-5086.

BP:bp

Approved: Dianne Doi, Acting Branch Director

FUGITIVE DUST (PM10)

The current California ambient air quality standard (AAQS) for daily (24-hour) exposures is 50.0 micrograms per cubic meter (ug/m3). The South Coast Air Quality Management District reports that exposure to PM10 can result "in both short and long term reductions in lung function" and cites children as "especially sensitive" to its effects. The California Air Resources Board additionally states that when inhaled, these particles expose children to adverse health effects such as "increased risk of asthma attacks, reduced pulmonary function and increased risk of respiratory illnesses."

In accordance with the California Environmental Quality Act, significance criteria has also been established to account for the continued degradation of ambient air quality when contaminant concentrations already exceed the AAQS. For the 24-hour standard, an incremental increase of 2.5 ug/m3 over existing background concentrations is considered measurable and significant and likely to increase the frequency and severity of an existing PM10 violation.

Assessment Methodology

The following methodology is presented to ensure that short term and intermittent source-receptor concentrations are quantified and impacts on the school based population defined.

The air quality analysis should quantify construction and related emissions generated from the following soils handling and dust generating activities:

- Structural demolition
- Grading
- Excavation
- Aggregate loading and unloading
- Transportation of heavy equipment and haul trucks on paved and unpaved roadways (reentrainment)
- Aggregate stockpiling and storage

The District recommends that appropriate project scheduling reports and standard operating variables be used with the above soils handling and dust generating activities to produce credible emission estimates.

The following guidance documents are recommended to assist in the quantification of PM10 emissions:

1. U.S. Environmental Protection Agency, 1985. Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources, Fourth Edition. AP-42. Supplement A to the Fourth Edition, 1986. Supplement B to the Fourth Edition, 1988. Supplement C to the Fourth Edition, 1990. Supplement D to the Fourth Edition, 1991.

2. U.S. Environmental Protection Agency, 1988. Control of Open Fugitive Dust Sources. EPA-450/3-88-008.

3. U.S. Environmental Protection Agency, 1989. Air/Superfund National Technical Guidance Study Series, Volume III: Estimation of Air Emissions from Cleanup Activities at Superfund Sites (Interim Final). EPA-450/1-89-003.

4. U.S. Environmental Protection Agency, 1992. Fugitive Dust Background Document and Technical Information Document for Best Available Control Technology. EPA-450/2-92-004.

5. South Coast Air Quality Management District, 1993. CEQA Air Quality Handbook, Chapter 9: Emission Calculation Procedures.

Air Dispersion Models

Once emissions have been quantified, air dispersion modeling utilizing sequentially processed meteorological data is necessary to determine maximum ground level concentrations. The modeling exercise should be conducted to account for the hours associated with the appropriate dust generating activities (i.e., 8:00 a.m. to 4:00 p.m.). The following air dispersion model is recommended:

- Industrial Source Complex Short Term (ISCST3)

To ensure a viable modeling effort, all appropriate input variables should be based on the above referenced assessment methodology.

To permit a technical review, the District requests that all emission calculations and assumptions used to perform the analysis, including model input and output files, be provided.

CARBON MONOXIDE

The current California short term ambient air quality standards (AAQS) for one and eight hour exposures to carbon monoxide are 20.0 ppm and 9.0 ppm, respectively. The South Coast Air Quality Management District (SCAQMD) has also established emergency episode criteria for carbon monoxide exposure. The first-stage one hour concentration is 40 ppm. The SCAQMD reports that concentrations at this level may "endanger or cause significant harm to the public."

In accordance with the California Environmental Quality Act, significance criteria has also been established to account for the continued degradation of ambient air quality when contaminant concentrations already exceed the AAQS. For the one and eight hour standards, an increase over existing background concentrations of 1.0 and 0.45 ppm are considered measurable and significant and likely to increase the frequency and severity of an existing carbon monoxide violation.

Modeling Methodology

Where appropriate, the District recommends that the carbon monoxide microscale analysis be conducted in accordance with the methodology and protocol presented in the following guidance documents:

1. California Department of Transportation, 1989. CALINE 4 - A Dispersion Model for Predicting Air Pollutant Concentrations Near Roadways.

2. California Department of Transportation, 1988. Air Quality Technical Analysis Notes.

3. California Air Resources Board, 1989. Air Quality Analysis Tools".

4. U.S. Environmental Protection Agency, 1992. EPA User's Guide for CAL3QHC: A Modeling Methodology for Predicting Pollutant Concentrations Near Roadway Intersections. EPA-454/R-92-006.

5. U.S. Environmental Protection Agency, 1992. Guideline for Modeling Carbon Monoxide from Roadway Intersections. EPA-454/R-92-005.

Input parameters for the following variables should be made in accordance with the following approach:

- vehicles/lane/cycle (NCYC):

$$\frac{\textit{vehicle approach volume (VPH)}}{\textit{number of traffic lanes} \times (3600/\textit{total cycle time})}$$

- vehicles delayed/lane/cycle (NDLA):

$$\frac{\textit{vehicles/lane/cycle} \times \textit{red cycle time}}{\textit{total cycle time}}$$

- last vehicle idle time (IDT2): values should be based on the average stopped delay time per vehicle (seconds/vehicle) for each respective lane group or movement. A value of zero is not appropriate when delay times exceed the green cycle time.

Air Dispersion Models

The District recommends use of the following air dispersion models to determine school based exposures:

1. CALINE4: Preferred for all roadway and traffic conditions.
2. CAL3QHC: May be used for free flow links. Signalized intersections may also be considered when the following conditions are met:

   - all vehicles clear an intersection during the respective green time (average delay < green cycle time).

   - vehicle capacity (V/C) ratios predicted by the model are consistent with the values presented in the project's traffic study.

To ensure a viable modeling effort, all appropriate input variables should be based on data presented in the project's traffic study (e.g. traffic volumes, cycle and delay times).

To permit a technical review, the District requests that all data collected pursuant to the above requirement, including model input and output files, be provided.

LENNOX SCHOOL DISTRICT • 10319 FIRMONA AVE. • LENNOX, CA 90304 • (310) 330-4950
Lennox Web Page: Http://www.lennox.k12.ca.us/

July 15, 1997

Mr. John Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
One World Way, Room 218
Los Angeles, CA 90012

To Whom It May Concern:

The following information is provided on behalf of the Lennox School District relative to input for the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the LAX Master Plan Project. While the Lennox School District is cognizant of the financial benefits of increasing the capacity of Los Angeles International Airport, it does not believe that this should occur at the expense of our students or staff.

A recent noise contour map reflects that five of the six schools in the Lennox School District are in the state-defined airport noise impact area (the area exposed to 65 decibels or more as measured on the community noise equivalent noise level scale). It is our belief that these existing noise levels are already higher than appropriate and should be brought down to approved levels at the schools, as well as for the neighborhoods surrounding them. Two of our schools are immediately adjacent to the 405 Freeway, and a third school is only one block further east. On a daily basis, we are already experiencing an extremely negative impact from noise and pollution associated with the proximity of the airport. Further expansion of the airport, in particular in an eastwardly direction, would only exacerbate these matters.

We have performed a layman's review of the four different concepts currently being discussed relative to the proposed master plan. Even a cursory analysis would indicate that Concept 2, and Concept 3 in particular, would have a significantly negative effect on the Lennox community and our schools relative to additional noise beyond the unacceptable level which already exists today. Presently, the distance between an active runway and one of our school campuses is approximately two-thirds of a mile. These two concepts extend the runway eastward beyond Aviation Boulevard, making that distance dramatically closer. Beyond the negative effect of additional noise and pollution, we are also extremely concerned about the increased risk factor from a safety viewpoint in having a runway so close to a school campus. The Lennox School District is uncategorically opposed to Concept 2 and Concept 3.

Although the District has implemented a sound attenuation program of its school buildings, utilizing funding provided via a legal judgment in 1980, that process does not fully mitigate against the negative impacts which are continuing to be felt in the school district. Students residing in this area are compelled to attend our schools and spend approximately one and a quarter to one and a half hours per day, while at school, outside of these buildings. Clearly, the nature of the normal school day requires students to have physical education activities, recess, classroom passing

periods, and a number of other activities outside of the protection of sound-proof buildings. It is clearly evident that overflights interrupt instruction and activities. In a recent study to be published later this year in the *Journal of Environment and Behavior*, Gary W. Evans and Lorraine Maxwell, Cornell University, found that children who attend schools that are beset by frequent airport noise do not learn to read as well as children who attend quiet schools.

Some district staff members, such as physical education teachers and gardeners, literally spend their entire work day outside of buildings. These employees are exposed to noise beyond acceptable levels on a continuous day-long basis; and, in fact, the school district has, to date, paid a settlement in one worker's compensation case to a former employee due to work-related hearing loss.

In summary, the Lennox School District is opposed to airport expansion which increases negative environmental effects on our students and staff; and, specifically, we are opposed to the implementation of either Concept 2 or Concept 3 in that it is obvious to us that either of these options will add to the already unacceptable conditions which we are experiencing today.

Sincerely,

Bruce McDaniel

Bruce McDaniel, Ed.D.
Superintendent

LENNOX SCHOOL DISTRICT • 10319 FIRMONA AVE. • LENNOX, CA 90304 • (310) 330-4950
Lennox Web Page: Http://www.lennox.k12.ca.us/

LENNOX

July 22, 1997

Mr. John Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
One World Way, Room 218
Los Angeles, CA 90012

Dear Mr. Graham:

Attach for your information is a copy of a resolution opposing the Los Angeles International Airport Master Plan: specifically, proposals 2 and 3, and any other proposal which would impact the Lennox School District and surrounding community with additional noise or pollution. This resolution was adopted by the Board of Trustees of the Lennox School District on July 21, 1997.

Sincerely,

Bruce McDaniel, Ed.D.
Superintendent

BM:es

Attachment

LENNOX SCHOOL DISTRICT

RESOLUTION OPPOSING LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN

Resolution NO. 97-4

WHEREAS, Los Angeles International Airport and City of Los Angeles officials have recently unveiled four proposals to expand Los Angeles International Airport as part of its Project 2015 Master Plan; and

WHEREAS, two of the proposals (Concepts 2 and 3) involve extension of a certain runway at Los Angeles International Airport in an eastward direction, bringing it significantly closer to Lennox schools; and

WHEREAS, the increase of noise levels and/or pollution on the schools in the Lennox School District will have a negative effect on its students and staff,

NOW, THEREFORE, BE IT RESOLVED by the Lennox School District Board of Trustees as follows:

The Lennox School District is specifically opposed to current Proposals No.'s 2 and 3 and any other proposal which would bring additional noise or pollution to our community.

PASSED, APPROVED, AND ADOPTED this 21st day of February 1997

Edward A. Urrutia
President, Board of Trustees

Clerk, Board of Trustees

Member, Board of Trustees

Member, Board of Trustees

Laura Atherton
Member, Board of Trustees

Bruce McDaniel
Secretary, Board of Trustees

El Segundo Unified School District
641 SHELDON STREET • EL SEGUNDO, CALIFORNIA 90245
(310) 615-2650 • FAX (310) 640-6272

July 30, 1997

Mr. John Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
One World Way, Room 218
Los Angeles, CA 90012

Dear Mr. Graham:

The following topics represent certain areas of our concern with regard to the proposed airport expansion project. These concerns are being supplied in response to your Notice of Preparation of Draft Environmental Impact Report dated June 11, 1997, requesting commentary by July 31, 1997.

Noise
Any increase of noise will certainly affect school activities adversely. Consideration of expansion of LAX must mediate quieter school facilities. Our children and staff who routinely must conduct classes i.e. Physical Education outside are already severely impacted by the noise levels.

Fuel Farm Relocation
Several of the alternatives discussed include the relocation and expansion of the fuel farm. If placement of such a facility is in closer proximity to El Segundo or significantly increased in size, this would increase risk in the event of a disaster or spill to our students, staff and public. Sensitivity to disaster such as explosion, toxic smoke and emergency response must be a consideration. Any additional pollution whatsoever related to the airport is unacceptable to the learning environment of our children and staff.

Air Traffic
Several of the alternatives discussed will most certainly increase air traffic over the El Segundo community. Some of the plans include a new runway south of the airport. Air traffic over the community will most certainly increase from this runway with shortened turns, wave-off, etc. causing greater noise and potential for a serious community disaster. Currently we have a school on Imperial Avenue facing the airport which already has major noise issues. Adding this new runway will increase the noise more and will be greater concern for potential disaster.

Automobile Traffic
The community will most certainly be impacted by a proposed terminal in the Pershing Avenue area. Imperial Highway is already heavily traveled and more vehicles will adversely impact the local El Segundo community streets. This additional local traffic will have a serious affect on the quality of life for our students, staff and community.

In summary we are opposed to any airport expansion that does not mitigate the already undesirable and negative effects on our children and community.

Sincerely,

William N. Manahan, Ed.D.
Superintendent

WNM/me

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Development Services File

July 1, 1997

TO: Mr. John Driscoll, Executive Director
Department of Airports

Attention: John L. Graham

FROM: Fire Department

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT - MASTER PLAN FOR LOS ANGELES INTERNATIONAL AIRPORT

The Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) which will be prepared for the Master Plan will evaluate numerous project components including, but not limited to: one or two additional 6,000 foot runways; relocation/extensions of existing runways; improved taxiway system; new passenger terminal facilities west of Tom Bradley International Terminal connected by an automated people mover system; expanded air cargo facilities; improvements to the ground access system including connections to the regional highway and transit networks; and the relocation of ancillary uses and other support facilities.

ENVIRONMENTAL/ADVERSE IMPACT

- Project implementation will increase the need for fire protection and emergency medical services in this area.
- The proposed project could potentially require the need for additional training of Fire Department personnel.
- Traffic generated by the proposed project development is likely to worsen existing traffic conditions. All street intersections with a level of service of "E" or "F" decreases the level or service of fire protection and emergency medical services provided by this Department.
- Due to the size of the airport site, various access points for off-site Fire Department apparatus, shall be provided.

MITIGATION MEASURES

- The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).
- A Traffic Congestion Management Plan (TCMP) should be developed and implemented prior to completion of the project. Consideration should be given to phasing the TCMP to coincide with various stages of development in the project area, to ensure adequate remediation of street intersections with levels of service of "E" or "F".
- To ensure timely access to all portions of the airport for off-site Fire Department apparatus and personnel, various access points shall be strategically located. For additional information, please contact Fire Station No. 90 at (818) 756-8690.

The following mitigating activities will aid in reducing the environment/adverse impact to less than significant:

- The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

  The required fire-flow for this project has been set at 9,000 G.P.M. from four to six fire hydrants flowing simultaneously. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing.

  Improvements to the water system in the area may be required to provide 9,000 G.P.M. fire-flow. The cost of improving the water system will be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

  Based on a required fire-flow of 9,000 G.P.M., the first-due Engine Company should be within one mile, the first-due Truck Company within one and one-half miles.

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 51
10435 Sepulveda Boulevard
Los Angeles, CA 90045
Single Engine Company
Staff - 4
Miles - .4

Fire Station No. 80
6911 World Way West
Los Angeles, CA 90045
Crash Unit
Staff - 12
Miles - .4

Fire Station No. 95
10010 International Road
Los Angeles, CA 90045
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Staff - 12
Miles - 1.0

Fire Station No. 5
6621 W. Manchester Avenue
Los Angeles, CA 90045
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Battalion 4 Headquarters
Staff - 13
Miles - 1.7

The above distances were computed to World Way and Sepulveda Boulevard.

Based on this criteria (response distance from existing fire stations), fire protection would be considered adequate.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Standard cut-corners will be used on all turns.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Additional vehicular access may be required by the Fire Department where buildings exceed 28 feet in height.

Battalion 10 should be contacted at (818) 756-7596, for further discussion relative to the possible need for additional training (hot drills, etc.).

In addition to providing adequate fire protection for new hangers, consideration must be given to provide effective fire protection systems, which will effectively protect the areas beneath the wings and fuselage portions of, particularly, large aircraft. This can be accomplished by incorporating foam-water deluge sprinkler systems with foam-producing and oscillating nozzle (see NFPA 409, aircraft hangers for design criteria).

CONCLUSION

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The redevelopment of this site, along with other approved and planned projects in the immediate area, may result in the need for the following:

1. Increased staffing for existing facilities.

2. Additional fire protection facilities.

3. Relocation of present fire protection facilities.

For additional information, please contact the Construction Services Unit at (213) 485-5964.

WILLIAM R. RAMATTRE
Chief Engineer and General Manager

Thomas E. McMaster, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

TEM:DMT:lq:s\airport.wp

cc: Councilmember Hal Bernson, Twelfth Council District

CITY OF LOS ANGELES

CALIFORNIA

RICHARD J. RIORDAN
MAYOR

LOS ANGELES PUBLIC LIBRARY

ADMINISTRATIVE OFFICES:
630 WEST FIFTH STREET
LOS ANGELES, CA 90071
(213) 228-7515

SUSAN GOLDBERG KENT
CITY LIBRARIAN

July 25, 1997

John Graham, Chief of Airport Planning, LAX
1 World Way - Room 218
Los Angeles, CA. 90012

SUBJECT: Los Angeles Public Library's Comments for consideration on the appropriate scope and content of the environmental information (including alternatives) to be included in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for LAX Master Plan.

Dear Mr. Graham:

Los Angeles Public Library has two branches immediately north of Los Angeles International Airport (LAX), they are:

Westchester Branch Library
8946 Sepulveda Eastway (Borders Westchester Parkway)
Los Angeles, Ca. 90045

Loyola Village Branch Library
7114 West Manchester Ave.,(Borders Lincoln Blvd.)
Los Angeles, Ca. 90045

The Department is concerned that the expected traffic, increased area parking demands, and increased noise level will have an adverse effect on patronage at these two local public libraries. The Department, in the near future, will be consolidating branch library service to the Westchester/Playa del Rey communities. The Library wants to be able to provide a larger facility that is easily accessible to the local residential population. While all four plans under consideration for the LAX Master Plan include some northern expansion, two of the proposals would appear to have a more adverse impact, especially on the current Westchester Branch property. The second property, Loyola Village Branch is bordered by the main thoroughfare to Marina del Rey and Santa Monica, would undoubtedly be negatively impacted by the increased traffic that would result from any expansion plan.

The Library Department would welcome an opportunity for a future discussion on what possibilities exist for each of us to achieve our goals of expanded service.

Sincerely,

Suzanne N. Johnson

Suzanne N. Johnson, Western Area Manager
Western Area Office
11360 Santa Monica Boulevard
Los Angeles, CA. 90025-3172

Jul-30-97 10:39

P.01

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE: July 30, 1997

TO: John L. Graham, Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218
Mail Stop: 101

FROM: Gordon B. Hamilton, Deputy Director
Department of City Planning
221 N. Figueroa Street, Suite 1640-B
Mail Stop: 395

SUBJECT: **NOTICE OF PREPARATION FOR THE EIS/EIR, LAX MASTER PLAN STUDY**

We have reviewed the Notice of Preparation and Initial Study Checklist for the EIS/EIR for the LAX Master Plan Study and, with two exceptions, agree that the initial study checklist has correctly determined the areas of environmental impact and non-impact from the future expansion of LAX. The two exceptions are:

1. Item 8b, Land Use. The "maybe" should be changed to "yes" for the question on whether the new master plan will "conflict with existing general plan designations or zoning" because the four alternatives for the master plan will definitely require general plan amendments and zone changes, particularly for the land acquisitions to the east.

2. Item 22c, Mandatory Findings of Significance. The "no" should be changed to "maybe" for the question on whether the expansion of LAX will "have the potential to achieve short-term, to the disadvantage of long-term environmental goals". This is because one of the alternatives would permanently impact the El Segundo Dunes and all of the alternatives would result in a permanent increase in fuel consumption, traffic generation, air pollution and, in some locations, an increase in noise levels.

We also think that the EIS/EIR should thoroughly discuss how the environmental impacts identified in the checklist are to be mitigated. In particular, mitigation is needed for these impacts:

1. Schools impacted by high noise levels.

2. Residences impacted by high noise levels.

3. The increase in traffic resulting from the projected increase in passenger volumes.

4. The increase in air pollution resulting from the projected increase in aircraft operations.

GH:MW/pdm

[illegible]/deputy/hamilton/laxeir.wpd

For June
Bouefield
- Marc
[illegible]

LOS ANGELES POLICE DEPARTMENT

WILLIE L. WILLIAMS
Chief of Police

RICHARD J. RIORDAN
Mayor

P.O. Box 30158
Los Angeles, Calif. 90030
Telephone
(213) 485-3202
Ref #: 1.4.5

July 11, 1997

Mr. John L. Graham
Chief of Airport Planning
LAX Master Plan
Los Angeles Department of Airports
One World Way, Suite 218
Los Angeles, California 90045

Dear Mr. Graham:

PROJECT TITLE: Los Angeles International Airport (LAX) Master Plan

The proposed LAX Master Plan has been reviewed. The proposed project involves the Los Angeles Police Department's (LAPD) Pacific Area. I have enclosed Area and individual Reporting District population, average crime rate per thousand persons, predominant crimes, response time to emergency calls for service and Area personnel statistics and information.

A plan of this magnitude would have a significant impact on police services in Pacific Area. Because the impact is expected to be significant for the LAPD, there are some areas of concern. These include expected increases in airport population, hours of accessibility to the public, potential increases in crime in and around the airport as well as lighting issues for nighttime use.

During construction and upon completion of the project, you are encouraged to provide the Pacific Area Commanding Officer with a diagram of each portion of the property. The diagram should include access routes and any additional information that might facilitate police response.

The LAPD's Crime Prevention Section (CPS) is available to advise you regarding crime prevention features appropriate to the design of the property involved in the plan. The LAPD strongly recommends that the developers meet with CPS personnel to discuss these features.

Any questions regarding this response should be referred to Sergeant Reid F. Morthel, Officer-In-Charge, CPS, at (213) 485-3134.

Very truly yours,

BAYAN LEWIS
Chief of Police

CHARLES HELM, Lieutenant
Acting Commanding Officer
Community Affairs Group

Enclosures

PACIFIC AREA

The Los Angeles International Airport is located in Pacific Area Reporting District (RD) 1494. The Pacific area covers 24.1 square miles and is located at: 12312 Culver Blvd., Los Angeles, California, 90066, (310) 202-4571.

The service boundaries of Pacific Area are as follows: The Santa Monica-Los Angeles City Boundary and the Santa Monica Freeway to the north, Imperial Highway to the south, the Culver City-Los Angeles City Boundary to the east, and the Pacific Ocean to the west.

The average response time to emergency calls for service in Pacific Area in 1996 was 8.0 minutes. The Citywide average during 1996 was 7.3 minutes. There are approximately 368 sworn officers and 35 civilian support staff deployed at Pacific Area. Patrol officers are deployed on 3-day/12-hour shifts at Pacific Area.

There were 83 crimes per 1000 persons in Pacific Area in 1996. Individual RD crime statistics, population and crimes per 1000 persons are listed on the attached RD information sheets. The predominant crimes in Pacific Area are vehicle theft, burglary from vehicle and aggravated assault.

FORMULA FOR POPULATION DETERMINATION

The following formula for determining population of new developments was suggested by Michael Brandman Associates, Inc.

Residential: Single and two bedroom condos, apartments, houses equal (3) persons per unit. Three and four bedroom houses and condos equal (4) persons per unit.

Office Space: Four persons per 1,000 square feet of space.

Retail Space: Three persons per 1,000 square feet of space.

Hotels: Estimate 1.5 persons per room per day at a 59 percent occupancy rate.

CRIMES PER 1000 PERSONS

REPORTING DISTRICTS	CRIMES	+	POPULATION X 1000	CITYWIDE = 75/1000
RD 1494	2,870	+	2,428	1183/1000
PACIFIC AREA	16,485	+	197,656	83/1000

LOS ANGELES POLICE DEPARTMENT
CRIMES BY REPORTING DISTRICT OF OCCURRENCE

TYPE OF CRIME	RD #1494	PACIFIC	CITYWIDE
Burglary from Business	40	269	7,635
Burglary from Residence	1	1,157	20,919
Burglary Other	6	370	7,339
Street Robbery	14	615	15,881
Other Robbery	12	397	9,153
Murder	1	20	710
Rape	1	76	1,498
Aggravated Assault	26	1,362	35,638
Burglary from Vehicle	269	3,480	37,123
Theft from Vehicle	140	904	14,913
Grand Theft	1,203	2,076	13,573
Theft from Person	91	130	1,272
Purse Snatch	3	41	710
Other Theft	972	2,312	26,632
Vehicle Theft	89	3,253	44,524
Bunco	2	23	297
TOTAL	2,870	16,485	237,817

LOS ANGELES POLICE DEPARTMENT

BAYAN LEWIS
Chief of Police

P.O. Box 30158
Los Angeles, Calif. 90030
(310) 202-4571

Ref #: 6.2

RICHARD J. RIORDAN
Mayor

July 23, 1997

Mr. Philip Depoian
Deputy Executive Director
External Affairs
Los Angeles World Airports
1 World Way, Room 2118
Los Angeles, California 90045-5803

Dear Mr. Depoian:

This correspondence is in response to the Notice of Preparation for the Master Plan of the Los Angeles International Airport. A review of the Initial Study and Checklist, Section 15, Public Services (police), revealed that the Los Angeles World Airports Police Bureau facility was mentioned but the Los Angeles Police Department (LAPD) nor any other law enforcement agency was included in the plan.

The Los Angeles Police Department, LAX Detail has been the primary local law enforcement entity for the airport since 1962. The Detail was originally housed at 237 Center Way until 1991, when it was relocated to its present site, a portable building in the northeast corner of Terminal 8. This relocation was due to the construction of the new Air Traffic Control Tower and was to last for two years. However, relocation has lasted far longer than anticipated by the Los Angeles Police Department.

It is imperative that the LAPD have a presence in the "horseshoe" area of the airport. The conspicuous and close proximity of an LAPD Substation will provide quicker and better service to the passengers and visitors of the airport. Additionally, we recommend that law enforcement entities be co-located in one facility. This will allow for better communications between the principal providers of law enforcement services to the traveling public and employees. The facility should also include a space for a unified command post such as the one created for the Unabomber Task Force at LAX. The Officer-in-Charge of the LAX Detail, has discussed this matter with representatives of the Federal Bureau of Investigation and they are in support of this recommendation.

The expansion of the airport will cause an increase in passengers, visitors, employees and cargo shipments. As the airport expands, the LAPD staffing will need to expand accordingly so that the level of police service is not diminished. This expansion will require larger facilities for the LAX Detail.

The master plan indicates that vehicular traffic to the airport will increase and some modifications would be required to the regional access road systems to the airport. We recommend that any plan consider the use of tow trucks to remove disabled vehicles from the roadway so that congestion may be alleviated at the earliest time period. A single disabled vehicle in the Sepulveda tunnel or the on or off-ramps of the 105 Freeway could cause significant traffic delays. The Department of Transportation or the current Department of Airports contract towing service could provide this service. It is also recommended that a system of electronic and visual devices be developed for the monitoring, controlling, and rerouting of traffic to deal with unusual traffic patterns and congestion. It is also recommended that electronic signs be place on all of the freeways and major roadways leading to LAX at a sufficient distance from the airport to advise motorists of what routes to take to avoid congested roadways, freeways or other traffic related problems.

Lastly, it is recommended that during the design phase of the terminals and cargo areas, law enforcement entities be consulted so the environmental contributors to criminal activity may be reduced. Staff from the Los Angeles Police Department is available to provide such consultation.

The Los Angeles Police Department stands ready to serve the airport community and work in partnership with the Department of Airports. If you require additional information, please contact Lieutenant Bill Williams, Officer-in-Charge, LAPD, LAX Detail at (310) 646-2255.

Very truly yours,

BAYAN LEWIS
Chief of Police

Michael J. Bostic

MICHAEL J. BOSTIC, Deputy Chief
Commanding Officer
Operations-West Bureau

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

HARRY W. STONE, Director

July 24, 1997

IN REPLY PLEASE REFER TO FILE: P-2

Mr. Jack Graham
City of Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Dear Mr. Graham:

RESPONSE TO A NOTICE OF PREPARATION (NOP)
LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN

Thank you for the opportunity to provide comments on the NOP for the proposed Los Angeles International Airport (LAX) Master Plan. We have reviewed the NOP and offer the following comments:

Environmental Programs

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each "development project" to provide an adequate storage area for collection and removal of recyclable materials. The Environmental Impact Report/Environmental Impact Study (EIR/EIS) should include/discuss standards to provide adequate "waste storage areas" for collection/storage of recyclable and green waste materials for this development.

Current estimates indicate that a shortfall in permitted daily land disposal capacity in Los Angeles County will occur within the next few years. The proposed development may increase the generation of construction and demolition waste and other solid waste, and may negatively impact solid waste management facilities in the County. Therefore, the proposed EIR/EIS must identify what measures the project proponent may implement to mitigate the impact. These measures may include, but are not limited to, implementation of waste reduction, recycling and composting programs, as well as programs to divert the generated construction, demolition, and other solid waste from the landfills.

The existing hazardous waste management (HWM) facilities in this County are inadequate to handle the hazardous waste currently being generated. The proposed development may generate hazardous waste and household hazardous waste which could adversely impact existing HWM facilities. This issue should be addressed and mitigation measures provided.

The EIR/EIS needs to fully assess the impacts of this project on the quality of stormwater runoff. The EIR/EIS should reference order number 96054, National Pollutant Discharge Elimination System Permit CAS614001 issued by the California Regional Water Quality Control Board to the County and local agencies. The EIR/EIS should also indicate compliance with all relevant stormwater quality management programs of the Federal, State, County, and local agencies.

If you have any questions regarding this review please contact Mr. Tom Brachko of our Environmental Programs Division at (626) 458-3567.

Traffic and Lighting

A project of this magnitude could significantly impact the existing circulation system in the project vicinity. We welcome the opportunity and look forward to the review of the EIR/EIS upon its completion. We recommend using County criteria when evaluating County intersections and roadways. A copy of our Traffic Impact Analysis Report Guidelines is attached.

It appears that this project may also impact Congestion Management Plan arterial and freeway monitoring locations in the area. A separate analysis should be prepared which addresses these impacts.

We recommend that the State of California Department of Transportation and adjoining cities review this document for significant impacts/mitigations within their jurisdictions.

If you have any questions, please contact Mr. Suen Pei Lau of our Traffic and Lighting Division at (626) 458-5909.

If you have any questions regarding the environmental reviewing process of this Department, please contact Mr. Vik Bapna at the address on the first page or at (626) 458-4363.

Very truly yours,

HARRY W. STONE
Director of Public Works

DAVID YAMAHARA
Assistant Deputy Director
Planning Division

YC:km/17

Traffic Impact Analysis Report Guidelines

January 1, 1997

Prepared by the County of Los Angeles
Department of Public Works

Harry W. Stone
Director of Public Works

Table of Contents

JBC:acp
T-2/Access2
(11/26/96 Rev.)

I. Introduction

The County of Los Angeles Department of Public Works has established the following Guidelines for the preparation of Traffic Impact Analysis (TIA) reports. The purpose of these Guidelines is to establish procedures to ensure consistency of analysis and the adequacy of information presented and timely review by County staff. It is strongly recommended that the applicant's traffic engineer consult with County staff before beginning the study to establish the scope and basic assumptions of the study and any deviations from these Guidelines to avoid unnecessary delays or revisions. For assistance in the TIA scoping process, the Traffic and Lighting Division, Traffic Studies Unit, can be contacted at (818) 458-5909.

II. Requirements

Generally, the Department staff is concerned with adverse impacts on traffic if,

1. Traffic generated by a project considered alone or cumulatively with other related projects, when added to existing traffic volumes, exceeds certain capacity thresholds of an intersection or roadway, contributes to an unacceptable level of service (LOS), or exacerbates an existing congested condition.

2. Project generated traffic interferes with the existing traffic flow (e.g., due to the location of access roads, driveways, and parking facilities).

3. Proposed access locations do not provide for adequate safety (e.g., due to limited visibility on curving roadways).

4. Nonresidential uses generate commuter or truck traffic through a residential area.

5. Project generated traffic significantly increases on a residential street and alters its residential character.

A traffic report must be prepared by a registered Civil or Traffic Engineer. A traffic report is generally needed if a project generates over 500 trips per day or where other possible adverse impacts as discussed in the Analysis and Impact Section (see page 4) of these Guidelines are identified. Before a full review is conducted, the County staff will check the completeness of the TIA report using the attached check list (Exhibit A). If the report is missing any of the check list items, it will be returned for revision.

III. TIA Report Contents

A. Project Description

The following information is required.

1. A description of the project, including those factors which quantify traffic generators, e.g., dwelling units, square feet of office space, persons to be employed, restaurant seats, acres of raw land, etc. For residential developments, the description should indicate the type of residence, (e.g., one level or townhouse condominiums, and if its use is for families, adults or retirees).

2. A plot plan showing proposed driveways, streets, internal circulation, and any new parking facilities on the project site.

3. A vicinity map showing the site location and the study area relative to other transportation systems.

4. A brief history of the projects that are part of the phased Master Plan or a parent tract/parcel map.

B. Transportation Circulation Setting

The following information is required.

1. Existing and Proposed Site Uses

A description of the permitted and/or proposed uses of the project site in terms of the various zoning and land use categories of the County, and the status and the usage of any facilities currently existing on the site.

2. Existing and Proposed Roadways and Intersections

A description of existing streets and roadways, both within the project site (if any) and in the surrounding area. Include information on the roadway classifications (per the Highway Plan), the number of lanes and roadway widths, signalized intersections, separate turn lanes, and the signal phases for turning movements.

Existing daily directional and peak-hour through and turning traffic volumes on the roadways surrounding and/or logically associated with the project site, including Secondary and Major highways and freeways. Local streets affected by the project should also be

shown. Each report shall include appendices providing count data used in the preparation of the report. The source and date of the traffic volume information shall be indicated. Count data should not be over one year old. Since peak volumes vary considerably, a ten percent daily variation is not uncommon, especially on recreational routes or roadways near shopping centers; therefore, representative peak-hour volumes are to be chosen carefully.

All assumed roadways and intersections or any other transportation circulation improvements must be identified and discussed. The discussion should include the scope and the status of the assumed improvements including the construction schedule and financing plan. It should be noted that all assumed roadways and intersections or any other transportation circulation improvements will be made a condition of approval for the project to be in place prior to the issuance of building permits. If assumed improvements do not get built on time due to an unforeseeable condition, traffic conditions for a different assumed highway network or other mitigation measures will be considered if a traffic study is submitted with a different assumed network or other measures are recommended to mitigate the traffic impact in question.

C. Analysis and Impact

The following information is required.

1. Trip Generation Analysis

Tabulate the estimated number of daily trips and a.m. and p.m. peak-hour trips generated by the proposed project entering and exiting the site. Trip generation factors and source are to be included. The trip generation rates contained in the latest edition of the Institute of Transportation Engineers Trip Generation manual should generally be used, except in the case of condominiums/townhomes when the following rates should be used per unit.

	ADT	A.M.-Peak	P.M.-Peak
		Outgoing/Incoming	Outgoing/Incoming
Condominiums/ Townhomes	8.0	0.48/0.06	0.26/0.47

There may be a trip reduction due to internal and/or pass-by trips. Internal trip reduction can only be applied for mixed-use types of developments and pass-by trip reduction for retail/commercial types of developments. Internal or pass-by trip reduction assumptions will require analytical support based on verifiable actual similar developments to demonstrate how the figures were derived and will require approval by the County.

2. Trip Distribution

Diagrams showing the percentages and volumes of the project and nearby project's a.m. and p.m. peak-hour trips logically distributed on the roadway system must be provided. The Regional Daily Trip Distribution Factors (Exhibit D-3) contained in the Congestion Management Program (CMP) Land Use Analysis Guidelines shall be referenced for regional trip distribution assumptions. If it is assumed that new routes will alter traffic patterns, adequate backup including traffic distribution maps must be provided showing how and why these routes will alter traffic patterns.

The study area should include arterial highways, freeways, and intersections generally within a one-mile radius of the project site.

Note: This distance may be greater than one-mile for rural areas depending on the: proximity to nearby signalized intersections and the availability of master plan access routes.

3. Related Projects List

A list of related projects that are approximately within a one-and-a-half mile radius of the project site and would reasonably be expected to be in place by the project's build out year must be included in the report. Related projects shall include all pending, approved, recorded, or constructed projects that are not occupied at the time of the existing traffic counts.

The County of Los Angeles Department of Regional Planning (DRP) and other public agencies (if necessary) should be contacted to obtain the latest listings. A table and a map showing the status, project/zone change/conditional use permit/parcel map/tract number, and the location of each project must be provided. For a computer printout of the listing of all filed projects within the County, Land Development Management Section of the DRP, at (213) 974-6481 can be contacted.

4. LOS Analysis

If it appears that the project's generated traffic alone or together with other projects in the area could worsen the LOS of an intersection or roadway, a "before" and "after" LOS analysis is necessary. The Intersection Capacity Utilization (ICU) or Critical Movement Analysis are two methods often used to assess existing and future LOS at intersections.

If the ICU planning method is used, a maximum of 1,600 vehicles per hour per lane should be used (2,880 vehicles per hour should be used for dual left-turn lanes) and a ten percent yellow clearance cycle should be included. Intersection LOS analysis and calculation work sheets, as well as diagrams showing turning volumes shall be included in the report for the following traffic conditions.

(a) Existing traffic;
(b) Existing traffic plus ambient growth to the year the project will be completed (preproject);
(c) Traffic in (b) plus project traffic;
(d) Traffic in (c) with the proposed mitigation measures (if necessary);
(e) Traffic in (c) plus the cumulative traffic of other known developments; and
(f) Traffic in (e) with the proposed mitigation measures (if necessary).

The project's impact on two-lane roadways should also be analyzed for all of the above traffic conditions if those two-lane roadways are used for access. LOS service analysis contained in the Highway Capacity Analysis, Chapter 8, Two-Lane Highways, should be used to evaluate the project's impact. For simplified analysis, use the established significant impact thresholds for two-lane roadways as shown on page 7.

5. Significant Impact Threshold

For intersections, the impact is considered significant if the project related increase in the volume to capacity (v/c) ratio equals or exceeds the threshold shown below.

INTERSECTIONS		
Pre-Project		Project v/c Increase
LOS	v/c	
C	0.71 to 0.80	0.04 or more
D	0.81 to 0.90	0.02 or more
E/F	0.91 or more	0.01 or more

The project is deemed to have a significant impact on two-lane roadways when it adds the following percentages based on LOS of the preproject conditions.

TWO-LANE ROADWAYS				
Directional Split	Total Capacity (pcph)	Percentages Increase in Passenger Car Per Hour (pcph) by Project		
		Pre-Project LOS		
		C	D	E/F
50/50	2,800	4	2	1
60/40	2,650	4	2	1
70/30	2,500	4	2	1
80/20	2,300	4	2	1
90/10	2,100	4	2	1
100/0	2,000	4	2	1

6. Analysis Discussion

Discuss conclusions regarding the adverse impacts caused by the proposed project on the roadway system. If the cumulative traffic impact of this and other projects require mitigation measures, such as traffic signals, then estimate the percent share using the project percent share formula given in the Section III D of the TIA Guidelines. When the proposed project and other nearby developments are expected to significantly impact adjacent roadways, the developer may be required to enter into a secured agreement to contribute to a benefit district to fund major roadway and bridge improvements in the region. Also, for all recommendations to increase the number of travel lanes on a street or at an intersection as a mitigation measure, the report must clearly identify the impacts associated with such a change such as whether or not additional right of way will be required and whether it is feasible to acquire the right of way based on the level of development of the adjacent land and buildings (if any).

Discuss other possible adverse impacts on traffic. Examples of these are: (1) the limited visibility of access points on curved roadways; (2) the need for pavement widening to provide left-turn and right-turn lanes at access points into the proposed project; (3) the impact of increased traffic volumes on local residential streets; and (4) the need for road realignment to improve sight distance.

Projects which propose to amend the County's General Plan Land Use and substantially increase potential traffic generation must provide an analysis of the project at current planned land use versus proposed land use in the build out condition for the project area. The purpose of such analysis is to provide decision makers with the understanding of the planned circulation network's ability to accommodate additional traffic generation caused by the proposed General Plan Land Use amendments.

D. Traffic Models and Model Generated TIA's

Computerized traffic models are planning tools used to develop future traffic projections based on development growth patterns. The Department currently operates two traffic models, one for the Santa Clarita Valley and another for the Ventura Corridor area. The Department can test proposed development project traffic impacts for the public in these areas for a fee. For assistance in the traffic modeling, the Planning Division, Transportation Planning/Assessments Section, can be contacted at (818) 458-4351.

For TIA's prepared using data from outside traffic modeling, the following information is required.

1. The type of modeling software used to generate the traffic analysis report data (i.e., TRANPLAN, EMME/2, etc.).

2. The list of land use assumptions by traffic analysis zones (TAZ's) and their sources used in the traffic model in lieu of a related projects list.

3. A copy of the computerized roadway network assumed to be in place at the time of the project. Streets should be color-coded by street type. Also, TAZ's and their corresponding centroidal connectors, as well as number of lanes should be displayed.

4. The list of trip generation rates used in the traffic model and their sources.

5. Model runs (plots) identifying both the With and Without project scenarios. The volumes displayed on the plots should be in 100's for Average Daily Vehicle Trips (ADT) and 10's for peak-hour plots.

E. Traffic Signals

The following information is required.

Traffic signal warrant analysis using the State of California Department of Transportation (Caltrans) Peak-Hour (Figures 9-8 and 9-9 of Caltrans Traffic Manual) and Estimated Average Daily (Figure 9-4 of Caltrans Traffic Manual) Traffic Warrant Analysis should be provided. If the installation of signals is warranted with the addition of the project's traffic, then the installation will be the sole responsibility of the project. If it is warranted with cumulative traffic of the project and other related projects, the following formula should be used to calculate the project percent share.

$$\text{Project Percentage Share} = \frac{\text{Project Traffic}}{\text{Project+Other Related Projects Traffic}}$$

The project percent share should be based on the peak-hour volumes that warrant signals. If both peak hours satisfy the installation of signals, the average of the two peak-hour volumes should be used in the percent share analysis.

F. Mitigation Measures

The following information is required.

Identify feasible mitigation measures which would mitigate the project and/or other related projects' significant impacts to a level of insignificance. Also, identify those mitigation measures which will be implemented by others. Those mitigation measures that are assumed to be implemented by others will be made a condition of approval for the project to be in place prior to issuance of building permits. Mitigation measures may include, but are not limited to, the following.

1. Traffic Engineering Techniques.

a. Locate access points to optimize visibility and reduce potential conflict.
b. Design parking facilities to avoid queuing into public streets during peak arrival periods.
c. Provide additional off-street parking.
d. Dedicate visibility easements to assure adequate sight distance at intersections and driveways.
e. Signalize or modify traffic signals at intersections.
f. Install left-turn phasing and/or multiple turning lanes to accommodate particularly heavy turning movements.
g. Widen the pavement to provide left- or right-turn lanes to lessen the interference with the traffic flow.[1]
h. Widen intersection approaches to provide additional capacity.
I. Prohibit left turns to and from the proposed development.
j. Restrict on-street parking during peak hours to increase street capacity.[1]

2. Contribute to a benefit district to fund major capital improvements

a. Construct a grade separation.
b. Improve or construct alternate routes.
c. Complete proposed routes shown on the Los Angeles Highway Plan.
d. Improve freeway interchanges (bridge, widening, modifications, and etc.).

[1] Physical roadway improvements to improve capacity should be considered before considering parking restrictions.

3. Transportation System Management (TSM) Techniques[2]

a. Establish flexible working hours.
b. Encourage employee use of carpools and public transportation (specific measures must be indicated).
c. Establish preferential parking for carpools.

d. Restrict truck deliveries to Major and Secondary highways and encourage deliveries during the off-peak hours.
e. Establish a monitoring program to ensure that project traffic volumes do not exceed projected traffic demand.

Note: When it appears that other jurisdictions will be impacted by a development, the Department will request that the involved jurisdiction also review the TIA. A written response from that jurisdiction should be provided with appropriate follow-up to the lead County agency.

G. CMP Guidelines

The following information is required.

Where the project meets the criteria established in the County of Los Angeles' CMP Land Use Analysis Guidelines, a CMP analysis must be provided. A copy of the latest Guidelines will be available upon request. A CMP TIA is required for all projects required to prepare an Environmental Assessment based on local determination or projects requiring a traffic study. The geographic area examined in the TIA must include the following, at a minimum.

- All CMP arterial monitoring intersections (see Exhibit B of the Guidelines), including freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. peak hours.

- Main line freeway monitoring locations (see Exhibit C of the Guidelines) where the project will add 150 or more trips, in either direction, during the a.m. or p.m. weekday peak hours.

[2] Contributions to a benefit district and/or TSM techniques may not be used to lower LOS in the capacity calculations.

- Caltrans must also be consulted to identify other specific locations to be analyzed on the State highway system.

If, based on these criteria, the TIA identifies no facilities for study, no further traffic analysis is required.

JHC:lg
T-3/ACCESS
(11/20/96 Rev.)

Attach.

EXHIBIT A
TRAFFIC IMPACT ANALYSIS REPORT CONTENTS CHECK LIST

Note: Before a full review is conducted, the County staff will check the completeness of the Traffic Impact Analysis report. If the report is missing any of the items listed below, it will be returned for revision.

CONTENT	YES/NO	COMMENT
Site Plan •Access locations •Interior circulation		
Trip Generation Rates •ITE trip generation rates •Documentation for alternate rates		
Trip Distribution •Regional •Local project (am/pm) •Local related projects(am/pm)		
Traffic Counts •Taken within one year •Date/Time		
Discounting •Internal trip discounts for mixed use developments •Pass-by trip discounts for commercial/retail developments •Backup		
Level of Service Calculations •ICU or CMA •10% yellow clearance for ICU planning methods •1600 vph; 2880 vph for dual left turn lanes for ICU planning method •Calculation sheets •Scenarios as required per Guidelines •Existing/future lane configurations		
Signal Warrant Analysis •Peak hour/ADT per Caltrans standards		
Mitigation Measures •Project impacts •Cumulative developments impacts •Projects % share of the cost to mitigate cumulative development impacts		
Congestion Management Program Analysis		

JHC:mcp
T-3/ACCESS2
12/06/96

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
SAM L. FURUTA
CITY ENGINEER

650 SOUTH SPRING ST., SUITE 200
LOS ANGELES, CA 90014-1911

July 22, 1997

Mr. Jack Graham
Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Subject: LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN

Dear Mr. Graham:

Thank you for the opportunity to comment on the Notice of Preparation/Notice of Intent (NOP/NOI) for the above captioned project. The Los Angeles City Department of Public Works, Bureau of Engineering, specifically want to bring the following issues to your attention;

1. Population (11, c). Population increases cumulatively exceeding the regional population projections is an issue checked as "No" (impact) in the NOP/NOI which states the unsupported assumption that enhanced economic activity associated population growth or redistribution would be expected to remain within the overall growth projections for the region. This issue needs to be discussed in detail in the EIR/EIS with specific data and references supporting this conclusion. Additionally, air quality related issues should be discussed as they relate to conformity with Federal Clean Air Act and its amendments.

2. Transportation/Circulation. (14, a). Generation of Additional Vehicular Movement. The impact of traffic specifically on Pershing Drive and Imperial Highway which are routes taken by the biosolids carrying trucks from the City's Hyperion Treatment Plant should be analyzed in detail, and appropriate mitigation measures must be adopted. As far as effects on new parking facilities (14, b) and new or expanded runways and taxiways are concerned, please note that the Bureau of Engineering is responsible for City drainage infrastructure and implementation of the stormwater Municipal NPDES permit which sets forth watershed management activities for the control of urban runoff pollution. The project's new land acquisition provisions should look into both flood hazard and runoff quality management.

3. Utilities, Sewer or Septic Tanks (17, e). The preparer of the EIR/EIS should check with the Bureau of Engineering's West Los Angeles Design District for capacity of sewers serving the various alternative sites to be covered in the EIR/EIS, and proper mitigation must be adopted to alleviate impacts on the City's sewer system serving the project area.

Again, thank you for sending the NOP/NOI for review and comment. We are looking forward to reviewing the Draft EIR/EIS. If you have any questions, please contact me at (213) 847-8815.

Sincerely,

Sam L. Furuta
City Engineer

By A. Kasparian.

Ara Kasparian
Environmental Affairs Officer

ADDRESS ALL COMMUNICATIONS TO THE CITY ENGINEER
AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Date: July 31, 1997

To: John L. Graham, Chief of Airport Planning
Los Angeles Department of Airports

From: Allyn D. Rifkin, Principal Transportation Engineer FOR
Department of Transportation

Subject: **NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE LOS ANGELES INTERNATIONAL AIRPORT (LAX) MASTER PLAN**

The Department of Transportation (DOT) has reviewed the Notice of Preparation (NOP) for the draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Master Plan dated June 11, 1997. The NOP identifies four alternative plans for the proposed LAX expansion to accommodate up to 96 Million Annual Passengers (MAP), 4.2 million (annual) tons of air cargo and 980,000 annual aircraft operations by the year 2015. The existing (1996) demand at the airport is 58.0 MAP, 1.9 million tons of air cargo and 763,000 aircraft operations.

The Department of Transportation concurs in the initial assessment regarding possible impacts as noted in the NOP. DOT offers the following comments in the preparation of the DEIR for the LAX Master Plan to ensure that all of the traffic/transportation issues are adequately addressed in the document:

TRANSPORTATION IMPACT SCOPE OF ANALYSIS

1. Study Links and Intersections

   There are 30 key links and 61 key intersections adjacent to LAX that should be analyzed to determine any significant traffic impacts (Attachment I).

2. Existing Conditions Report

   The DEIR should document the existing traffic volumes and the existing roadway/ intersection capacities to determine the existing levels of service for the study links and the study intersections.

3. Travel Demand Forecasting Model

   DOT recommends the use of a forecast model based on SCAG projections, such as EMME2. The socio-economic data and land use assumptions for the model should be documented along with the mode split and occupancy assumptions. The travel demand forecasting model should analyze the project-related traffic impacts of the LAX expansion during the weekday a.m. and p.m. peak hours for Year 2005 and Year 2015. In addition, the model should analyze the project-related traffic impacts during the airport's peak hours (typically, during the noon hour in the summer).

4. Related Projects List

   To evaluate background traffic, the Department, in cooperation with the Department of City Planning, has compiled a preliminary list of potential development projects adjacent to LAX (Attachment II). There may be overlap with SCAG projections. The development potential of these identified projects should be analyzed and compared to the SCAG's future land use growth projections and to City adopted forecasts embodied in the Citywide General Plan Framework.

5. Highway and Transit Improvements

   In the forecast model simulation, networks for the year 2005 should include the highway and transit improvements that are currently programmed and scheduled for completion by 2005. The year 2015 network should include additional highway and transit improvements that are planned and programmed in currently adopted transportation program documents (e.g. STIP, RTIP, CIP).

6. Trip Generation

   An inventory of existing vehicle trips that are generated by various airport activity centers including the Central Terminal Area (CTA), air cargo facilities, rental car agencies, on-airport employee and passenger parking lot facilities, off-airport parking lots etc., should be conducted to establish the total vehicular trips associated with the current airport demand. This inventory should be the basis for future forecasts of LAX related traffic.

7. Impact Analysis

   The circulation analysis in the access study should calculate the project-related impacts by comparing the levels of service between the "with project" and "without project" scenarios for the Year 2005 and Year 2015. The criteria and thresholds for "Significant Impacts" at links and intersections are outlined in Attachment III.

8. Mitigation Measures

- The ground access and mitigation plan should mitigate project-related traffic impacts, including impacts on local streets to levels of insignificance, as feasible.
- When intersection improvements are suggested, the Department requests that scaled drawings (1 inch = 40 feet) be submitted to verify feasibility (City of Los Angeles intersections only).
- Mitigation proposals for corridor improvements may be conceptual drawings.
- When the appropriate mitigation measures have been identified, a general schedule for the implementation of the measures should be developed.

GROUND ACCESS AND MITIGATION PLAN

It is our understanding that the LAX Master Plan will include a Ground Access and Mitigation Plan (GAMP).

1. Connections to the Regional Highway System

The GAMP should maximize direct connections to the regional highway system to minimize use of the local street system. The plan should evaluate critical regional improvements including:

- the proposed "Ring Road" that will circle the airport and connect LAX to the I-405 and I-105 freeways
- improved I-105 access from Pershing Drive along Imperial Highway
- a new freeway interchange at I-405 and Arbor Vitae St.
- improvements to Arbor Vitae St. with connections through to Westchester Parkway
- grade separations necessary for the Ring Road, such as at Sepulveda Bl. and Westchester Parkway
- HOV (carpool) lanes on the I-405
- possible HOV connections from the I-405 to Arbor Vitae St. or Century Bl.

2. Connections to the Regional Public Transit System

The GAMP should seek opportunities to connect to the regional public transit system. The plan should discuss connections to the Metro Green Line, the proposed future Crenshaw-Prairie light rail (LRT) line and the proposed ground transportation center, as well as the Automated People Mover system.

3. Transportation Demand Management (TDM) and Intelligent Transportation Systems (ITS) Measures

The GAMP should consider Transportation Demand Management (TDM) solutions (carpool, vanpool, shuttles, transit buses, rail, etc.) as well as comprehensive multi-agency Intelligent Transportation Systems (ITS) to manage traffic and parking in the greater LAX area.

4. Mitigating Impacts on Arterial Streets

In evaluating the impacts to surface arterial streets, the plan should include specific measures to ensure that impacts are mitigated, as feasible, for major arterial streets immediately adjacent to LAX such as Sepulveda Boulevard, Arbor Vitae Street, Century Boulevard, Imperial Highway, La Tijera Boulevard, La Cienega Boulevard, Pershing Drive, Westchester Parkway, Aviation Boulevard, Lincoln Boulevard and Vista del Mar.

5. Protecting Local Neighborhoods

The ground access and mitigation plan should include features that will protect local neighborhoods from airport related traffic and make every effort to minimize the use of local residential streets as access routes to LAX. Neighborhood protection programs should be discussed to prevent the diversion of airport traffic onto neighborhood streets.

6. Congestion Management Program

The GAMP should address the congestion on the future regional highway system as defined by the adopted CMP network. Several CMP routes may be impacted by the proposed expansion, including Sepulveda Bl., Lincoln Bl., Manchester Bl., SR-90, I-405 and I-105. The plan should also discuss and detail the airport's CMP credits generated in past years or to be generated by the Master Plan project, as well as how those credits apply as mitigation as part of the overall LAX Master Plan CMP component.

7. Coastal Transportation Corridor Specific Plan

The proposed airport expansion is located within the boundaries of the Coastal Transportation Corridor Specific Plan (Ordinance No. 168,999). The DEIR needs to address conformity to this Specific Plan. The purpose of the Specific Plan is to continuously review the area's traffic levels, assess transportation fees on the new development and require the development to mitigate its traffic impacts. The ordinance serves as a mechanism to fund specific transportation improvements due to transportation impacts generated by the new development in the Specific Plan area. A Traffic Impact Assessment Fee of $5,260 per p.m. peak hour trip has been established.

8. Inter-agency Coordination

Mitigation measures proposed as part of the ground access and mitigation plan may require coordination with other agencies. DOT will provide a major role in assisting with that coordination. In addition, DOT will provide input relating to Intelligent Transportation Systems (ITS) and to taxi-cab/shuttle circulation. Proposed freeway connections, HOV connections and freeway changeable message signs should be discussed with the California Department of Transportation (Caltrans). Connections to the Metro Green Line or the proposed future Crenshaw-Prairie LRT and the relationship to the proposed ground transportation center should be discussed with the Los Angeles County Metropolitan Transportation Authority (MTA). It should be noted that the existing LAX Master Plan ground access task force, chaired by the California Transportation Commission (CTC) and including DOT, SCAG, MTA, Caltrans and the Department of Airports, is an appropriate forum for coordination and consultation on these issues.

We look forward to working with you on this important project. If you have any questions please contact me at (213) 580-1195, or Jay Kim of my staff at (213) 485-1062.

ADR/JK/MM
lax-nop.ltr

Attachments

cc: Councilmember Ruth Galanter, CD 6
Con Howe, City Planning
Thomas K. Conner, DOT
Frances Banerjee, DOT

ATTACHMENT I

July 31, 1997

STUDY INTERSECTIONS

1. Airport Bl. & Arbor Vitae St.
2. Airport Bl. & Century Bl.
3. Airport Bl. & La Tijera Bl.
4. Airport Bl. & Manchester Av.
5. Aviation Bl. & Arbor Vitae St.
6. La Cienega Bl. & Arbor Vitae St.
7. Aviation Bl. & 111th St.
8. Aviation Bl. & Century Bl.
9. Aviation Bl. & El Segundo Bl.
10. Aviation Bl. & Imperial Hwy.
11. Aviation Bl. & Manchester Av.
12. Aviation Bl. & Rosecrans Av.
13. Jefferson Bl. & Centinela Av.
14. Sepulveda Bl. & Centinela Av.
15. La Cienega Bl. & Century Bl.
16. Sepulveda Bl. & Century Bl.
17. Culver Bl. & Jefferson Bl.
18. Culver Bl. & Vista Del Mar
19. Douglas St. & Imperial Hwy.
20. Sepulveda Bl. & El Segundo Bl.
21. Vista Del Mar & Grand Av.
22. La Cienega Bl. & Florence Av.
23. Highland Av. & Rosecrans Av.
24. Sepulveda Bl. & Howard Hughes Pkwy.
25. Continental City Dr. & I-105/Imperial Hwy.
26. Imperial Hwy. & I-405 NB Ramps
27. Main St. & Imperial Hwy.
28. Nash St/I-105 WB Off-Ramp & Imperial Hwy.
29. Pershing Dr. & Imperial Hwy.
30. Sepulveda Bl. & Imperial Hwy.
31. Vista del Mar & Imperial Hwy.
32. La Cienega Bl. & Imperial Hwy.
33. I-405 NB Ramps & Jefferson Bl.
34. I-405 SB Ramps & Jefferson Bl.
35. Lincoln Bl. & Jefferson Bl
36. La Cienega Bl. & 111th St.

STUDY INTERSECTIONS (continued)

37. La Cienega Bl. & I-405 SB Ramps S/O Century Bl.
38. La Cienega Bl. & I-405 SB Ramps N/O Imperial Hwy.
39. La Cienega Bl. & Lennox Bl.
40. La Cienega Bl. & Manchester Av.
41. La Tijera Bl. & I-405 NB Ramps
42. La Tijera Bl. & I-405 SB Ramps
43. Lincoln Bl. & La Tijera Bl.
44. La Tijera Bl. & Manchester Av.
45. Sepulveda Bl. & La Tijera Bl.
46. Lincoln Bl. & 83rd St.
47. Lincoln Bl. & Manchester Av.
48. Sepulveda Bl. & Lincoln Bl.
49. Lincoln Bl. & Teale St.
50. Pershing Dr. & Manchester Av.
51. Sepulveda Bl. & Manchester Av.
52. Mariposa St. & Sepulveda Bl.
53. Pershing Dr. & Westchester Pkwy.
54. Sepulveda Bl. & Rosecrans Av.
55. Sepulveda Bl. & I-105 Off-Ramp N/O Imperial Hwy.
56. Sepulveda Bl. & 76th St./77th St.
57. Sepulveda Bl. & Westchester Pkwy.
58. La Cienega Bl. & I-405 SB Ramps N/O Century Bl.
59. Century Bl. & I-405 NB Off-Ramp
60. La Cienega Bl. & El Segundo Bl.
61. La Cienega Bl. & 120th St.

STUDY LINKS

1. Lincoln Bl. s/o Venice Bl.
2. Centinela Av. s/o Venice Bl.
3. Sawtelle Bl. s/o Venice Bl.
4. Sepulveda Bl. s/o Venice Bl.
5. Overland Av. s/o Venice Bl.
6. Stocker St. e/o La Brea Av.
7. Slauson Av. e/o La Brea Av.
8. Centinela Av. e/o La Brea Av.
9. La Cienega Bl. s/o Slauson Av.
10. Manchester Bl. w/o La Brea Av.
11. Arbor Vitae St. w/o La Brea Av.

STUDY LINKS (continued)

12. Century Bl. w/o La Brea Av.
13. Imperial Hwy. w/o La Brea Av.
14. Aviation Bl. n/o Rosecrans Av.
15. Sepulveda Bl. n/o Rosecrans Av.
16. Pacific Av. s/o Venice Bl.
17. Washington Bl. e/o Lincoln Bl.
18. Marina Freeway e/o Lincoln Bl.
19. Culver Bl. e/o Lincoln Bl.
20. Jefferson Bl. e/o Lincoln Bl.
21. Lincoln Bl. s/o Jefferson Bl.
22. Culver Bl. w/o Jefferson Bl.
23. Vista del Mar s/o Culver Bl.
24. La Brea Av. s/o Slauson Av.
25. Jefferson Bl. s/o Rodeo Rd.
26. Sepulveda Bl. s/o Slauson Av.
27. Centinela Av. w/o Sepulveda Bl.
28. El Segundo Bl. w/o Hawthorne Bl.
29. Inglewood Bl. n/o Rosecrans Av.
30. Vista del Mar s/o Grand Av.

attach1.nop

	PROJECT NAME	ADDRESS	DESCRIPTION
1	Air Cargo Facility (Building 2)	5353 Imperial Highway	155,135 SF air cargo facility
2	Marina Pointe/Channel Gateway	4251 Lincoln Bl.	812 condominium units
3		13355 Muscle Av.	123 unit apartment complex
4	Playa Vista - Phase 1 (2005)	Lincoln Bl./Jefferson Bl.	3,246 MFDU; 1.8 million SF office; 26,000 SF retail; 65,000 SF community serving; 85,000 SF movie studio
5	Playa Vista - Phase 2 (2015)	Lincoln Bl./Jefferson Bl.	9,839 MFDU; 3,775,000 SF office; 560,000 SF retail; 750 hotel rooms; 520,000 SF community serving; 700 boat slips
6	McDonald's	7900 La Tijera Bl.	3,791 SF fast food
7		9320 Lincoln Bl.	47,000 SF church
8		6259 87th St.	5,000 SF retail
9		6303 Manchester Av.	12 pump gas station; 1,500 SF carwash; 2,012 SF food mart; 22,500 SF total
10		8040 Manchester Bl.	20,000 SF office
11		12205 Jefferson Bl.	auto repair expansion from 7 bays to 16 bays
12	In-N-Out Burger parking	9001 Sepulveda Bl.	1,640 space parking lot
13	Longs Drug Store	8837 Sepulveda Bl./89 th St.	20,240 SF retail
14	Lincoln/FB Apartments	4750 Lincoln Bl.	500 unit apartment complex
15	Howard Hughes Center - Phase II (2005)	Sepulveda/N. Hughes Pkwy.	5,000 seat cinema; 160,000 SF retail/restaurant
16	Howard Hughes Center - Phase III (2015)	Sepulveda/N. Hughes Pkwy.	1,090,000 SF office/retail
17	Kerlan-Jobe Orthopaedic Clinic	Sepulveda/N. Hughes Pkwy.	90,507 SF hospital
18	Sinai Temple Expansion	10400 Wilshire Bl.	82,000 SF school addition
19	Chevron/McDonald's	10867 Santa Monica Bl.	2,210 SF fast food addition to gas station
20		12425 Wilshire Bl.	4 bay auto repair
21	Wilshire Bl. Temple School	Barrington Av./Olympic Bl.	32,000 SF office; 69,150 SF school; 25,150 SF synagogue; 5,500 SF gym; 4,250 SF dining
22	Archer School	11725 Sunset Bl.	95,500 SF school
23	J. Paul Getty Museum/Getty Villa	17985 Pacific Coast Highway	96,000 SF museum addition; 600 seat theater
24		11711 San Vicente Bl.	54,313 SF retail
25	Mobil Oil Station	11675 Pico Bl.	12 pump gas station with food mart; 1804 SF total
26	Century City Center	10270 Constellation Av.	930,000 SF office
27	Bob Champion (3)	11937 Wilshire Bl.	70,115 SF retail
28		2215 Westwood Bl.	7,306 SF retail
29		3065 Overland Av.	4,556 SF child care facility
30		10867 Wilshire Bl.	187 unit condominium complex
31	Village Westwood	1000 Glendon Av.	206,150 SF retail; 26,000 SF restaurant; 3400 seat theater; 164 unit apt.; 12,000 SF library
32		6780 Pico Bl.	60,000 SF school addition
33	20th Century Fox Expansion	10201 Pico Bl.	771,000 SF movie studio expansion
34	Getty Center Museum	1200 Monte Cario Way	450,000 SF art museum
35	Regent Mann Westwood II	1045 Broxton Av.	3,000 seat theater; 25,000 SF supermarket; 20,000 SF retail; 16,000 SF restaurant
36		Olympic Bl./Centinela Av.	250,000 SF retail
37	UCLA Long Range Development Plan		SEE ATTACHMENT
38	UCLA Housing	Sepulveda Bl./National Bl.	392 unit apartment complex
39	West Bluff	7400 West 80th St.	120 single family homes
40	LMU Expansion - Phase 1 (2005)	7101 West 80th St.	90,000 SF campus building; 262,000 SF campus housing
41	LMU Expansion - Phase 2 (2015)	7101 West 80th St.	25,000 SF campus building; 158,000 SF campus housing
42	Continental City - Phase 1 (2005)	Aviation Bl./Imperial Hwy.	50 retail employment; 3,270 non-retail employment
43	Continental City - Phase 2 (2015)	Aviation Bl./Imperial Hwy.	100 retail employment; 6,540 non-retail employment
44	LAX Northside	Westchester Pkwy./Loyola Bl.	9000 retail employment

ATTACHMENT III

POTENTIAL SIGNIFICANT TRAFFIC IMPACT THRESHOLDS

For Intersections

An increase in the V/C ratio at an intersection is described as "significant" in accordance with the following table:

Level of Service	Final V/C Ratio	Project-Related Increase in V/C
C	> 0.700 - 0.800	Equal to or greater than 0.040
D	> 0.800 - 0.900	Equal to or greater than 0.020
E, F	> 0.900	Equal to or greater than 0.010

For Links

An increase in the V/C ratio for street links is described as "significant" in accordance with the following table:

Level of Service	Final V/C Ratio[1]	Project-Related Increase in V/C
C	> 0.700 - 0.800	Equal to or greater than 0.060
D	> 0.800 - 0.900	Equal to or greater than 0.040
E, F	> 0.900	Equal to or greater than 0.020

#Back3.
7/31/97

Department of Water and Power the City of Los Angeles

RICHARD J. RIORDAN
Mayor

Commission
CAROLYN L. GRIMM, President
MARCIA P. WOLFERT, Vice President
RICK J. CARUSO
[illegible]
JUDY M. MILLER
IRENE H. KING, Secretary

HARRY M. SIZEMORE, General Manager
KENNETH S. MIYOSHI, Assistant General Manager and Chief Engineer
VACANT, Assistant General Manager – Energy Services
JAMES F. WICKISER, Assistant General Manager – Water Services
THOMAS M. McCLOSKEY, Assistant General Manager – Marketing & Customer Service
M. FAYE WASHINGTON, Assistant General Manager/Chief Administrative Officer
PHYLLIS H. CURREY, Chief Financial Officer

July 30, 1997

Mr. John Graham
Chief of Airport Planning
LAX Master Plan
City of Los Angeles
Department of Airports
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham:

Notice of Intent/Notice of Preparation (NOI/NOP)
Joint Environmental Impact Statement/Environmental Impact Report
Los Angeles International Airport (LAX) Master Plan Project

The Los Angeles Department of Water and Power (LADWP) welcomes the opportunity to provide comments on the NOI/NOP as requested.

LADWP is looking forward to working with the developer to provide the electrical and water services needed for the project.

Electrical Service

LADWP's Energy Services Organization provides the following discussion for your consideration:

Electrical service will be provided in accordance with LADWP's rules and regulations. Facility construction may cause limited temporary impacts on the surrounding communities in the form of unavoidable noise, air pollution, and traffic congestion during construction.

Many of the expansion alternatives to accommodate the additional new runways, as well as the relocation extension of existing runways, may impact LADWP's existing subtransmission and distribution systems. The developer shall be responsible for the costs to relocate or modify LADWP's power facilities that are in conflict with the project.

Since the electrical service requirements of the LAX Master Plan have not been revealed to LADWP, we cannot assess if the existing facilities will adequately serve the new projects. Even though LADWP does not anticipate service problems for the area, additional circuits and power facilities will still need to be constructed to adequately serve this project due to the sizable increase in demand. A detailed electrical requirement and load schedule for the LAX Master Plan should be provided to assist LADWP in its long-term electrical planning for this area.

Airport Expansion

Each alternative and its potential impact on the underground transmission is discussed below. The concerns are outlined during construction and normal operation of the system. In each case, a general remedy is suggested.

Alternatives Nos. 1 and 2:

a) Construction along Imperial Highway and Aviation Boulevard will be in the proximity of our 138-kV Scattergood-Olympic Cables. Each of these cables can transmit 251 megawatts of electrical power referred to as power. These cables are low pressure, fluid filled, inside polyvinyl chloride conduit. Excavating near these cables or otherwise shifting the duct bank may result in loss of fluid which causes failure. Plans to protect the cables during construction will have to be developed with LADWP's Underground Transmission Business Support Team (UTBST).

b) Accessibility: There are 11 maintenance holes (MHs) on Aviation boulevard and 16 MHs on Imperial Highway. LADWP needs to have access to these structures for maintenance, repair, and modification of equipment inside these holes during and after construction. To meet this condition, the portion of the cables in conflict may have to be relocated.

c) Power Transfer Capacity: Increasing burial depth will decrease power transmission capacity of these cables. If construction results in significant change in depth of burial, the cables may have to be relocated so that the transmission capacity out of our Scattergood Generating Station is not compromised.

Alternatives Nos. 3 and 4:

This option proposes construction along Pershing Drive. This cable is high pressure, fluid filled, inside a steel pipe. The pipe is surrounded with special sand and gravel which is a good thermal conductor. The cable has 400 megawatts of power transmission capacity.

a) Construction: In order to protect the cable, LADWP has specific guidelines when working in proximity of the pipe. These guidelines include no machine-operated excavation within 4 feet of the pipe and supporting the pipe every 12 feet. A construction plan will be devised with the approval of UTBST.

b) Accessibility: there are four maintenance holes along Pershing Drive. The requirements outlined in Part b) of Alternatives 1 and 2 apply for this alternative.

c) Power Transmission Capacity: See Part c) of Alternatives 1 and 2.

Water Service

The Water Services Organization (WSO) provides the following discussion for your consideration:

WSO owns, maintains, and operates various large and small potable and reclaimed water mains in the vicinity of this project.

Please refer to the enclosed report for general comments about water supply and conservation. Historically, 65 percent of Los Angeles' water has come from the Eastern Sierra Nevada watershed through the Los Angeles Aqueduct System, 15 percent is from local groundwater sources, and 20 percent has been purchased from the Metropolitan Water District of Southern California (MWD). These proportions are not typical during periods of drought, such as California recently experienced when MWD water made up the majority of our water supply. A return to the above historical proportions is not anticipated in the near future, if ever. MWD, along with reclaimed water, will become an increasingly important source of water for Los Angeles. MWD's ability to deliver water to Southern California has the potential to be severely affected by an extended drought, and more stringent water conservation measures should be anticipated.

The existing infrastructure system can accommodate anticipated domestic and fire flow requirements for the proposed development with no significant impact on the existing water supply.

If you have any questions regarding the aforementioned comments, please contact Ms. Araks Hunter at (213) 367-2947.

Sincerely,

Charles C. Holloway

CHARLES C. HOLLOWAY
Supervisor of
Environmental Assessment and EMF

Enclosure

c: Ms. Araks Hunter w/Enclosure

IMPACT OF THE PROPOSED PROJECT ON THE
WATER SYSTEM AND METHODS OF CONSERVING WATER
DEPARTMENT OF WATER AND POWER

IMPACT ON THE WATER SERVICES SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in the mid 1970's and the late 1980's dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

WATER CONSERVATION

The Water System will assist residential, commercial and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction.

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty", pp. 76-85, or consult a landscape architect.

4. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.

5. Lower-volume water closets and water saving showerheads must be installed in new construction and when remodeling.

6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Water Conservation Office by calling (213) 367-0944.

(106)

Comment Sheet

You may use these categories to organize your comments about what to include in the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) or add categories of importance to you.

Air Quality	Traffic/Circulation	Land Use	Public Services/Utilities
Noise	Employment	Energy Conservation	Population
Housing	Water Quality	Safety/Risk of Upset	Cultural Resources
Visual/Aesthetics	Biotic Resources	Light/Shadow Effect	Geologic/Grading Issues

Please study mitigation for Culver City area in the increase in ground and air traffic with the attendant noise and congestion impacts.

Please study circulation (flow) of traffic considering the increase in land development in the surrounding west side development (ex: Playa Vista; Howard Hughes Center etc.)

Please consider in EIR process the viable use of other regional airports for passenger and cargo use (ex: Burbank, Ontario, El Toro, San Bernardino and Palmdale as well as others)

Thank you for your consideration

[signature]

Name: Theodore T. Smith III Phone/FAX: (310) 838 8266 / (213) 848 1357 FAX

Organization (if applicable): Planning Commissioner, City of Culver City

Address: 11260 Overland Ave Unit 11B

City/State/Zip Code: Culver City, CA. 90230

Please submit your written comments today or mail them no later than July 31, 1997 to one of the following people:

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

David Kessler, Environmental Protection Specialist Planner
Federal Aviation Administration - AWP-611, P.O. Box 92007
World Way Postal Center, Los Angeles, CA 90009

SHUTE, MIHALY & WEINBERGER
ATTORNEYS AT LAW
396 HAYES STREET
SAN FRANCISCO, CALIFORNIA 94102
TELEPHONE: (415) 552-7272
TELECOPIER: (415) 552-5816

E. CLEMENT SHUTE, JR.
MARK I. WEINBERGER
MARC B. MIHALY, P.C.
FRAN M. LAYTON
RACHEL B. HOOPER
ELLEN J. GARBER
CHRISTY H. TAYLOR
TAMARA S. GALANTER
ELLISON FOLK
RICHARD S. TAYLOR
SUSANNAH Y. FRENCH
WILLIAM J. WHITE
SUSAN A. ARSTEIN
AARON S. SHERWOOD
ROBERT S. PERLMUTTER

LAUREL L. IMPETT, AICP
URBAN PLANNER

ELIZABETH M. DODD
OF COUNSEL

July 30, 1997

Via Federal Express

Mr. Jack Graham
City of Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, California 90045-5803

Mr. David Kessler, AICP
Environmental Protection Specialist
AWP-611.2
Planning Section, Airport Division
Federal Aviation Administration
Western-Pacific Region
15000 Aviation Blvd., Ste. 3012
Lawndale, CA 90261

Re: Comments on Notice of Preparation and Notice of Intent for Environmental Impact Report/Statement for Los Angeles International Airport (LAX) Master Plan

Dear Mr. Graham and Mr. Kessler:

This firm has been retained to represent and advise the City of El Segundo (City) in connection with the various proposals by the Los Angeles Department of Airports (DOA) and the Federal Aviation Agency (FAA) for expansion at Los Angeles International Airport (LAX). A representative of the City testified at a scoping meeting conducted by the DOA and FAA on July 16, 1997. This letter is submitted on behalf of the City to supplement that testimony in response to the Notice of Preparation (NOP) issued by DOA on June 11, 1997 and the Notice of Intent (NOI) published in the Federal Resister by the FAA on the same date. Given the limited nature of the environmental and project design information that has been made available to the public the issues identified in this letter are not intended to be exhaustive. The City may raise other issues during the environmental review process.

The City, its residents and businesses are already heavily impacted by the current facilities and operations at LAX. The tremendous scope of expansion contemplated by any of the four development alternatives proposed would only lead to much more severe impacts on all aspects of City life. Given the present impacts the City experiences from LAX and the difficulty the City has had over the years in securing cooperation from LAX in taking reasonable steps to reduce existing impacts, the City can only adopt a skeptical point of view concerning the expansion proposals.

In this regard, as a general matter, the City requests that the Environmental Impact Report/Environmental Impact Statement (EIR/S) be prepared to do all of the following:

1. Thoroughly document the existing level of impacts which occur as a result of the existing facilities and operations at LAX. This discussion must explain how these existing impacts can be mitigated in an effective and enforceable manner prior to embarking on any expansion program.

2. Thoroughly establish that existing facilities, perhaps utilized more efficiently or with modest changes, can not serve reasonably projected future passenger and cargo demand.

3. Identify alternatives and mitigation measures which are specifically defined, feasible and enforceable for each significant impact which may result from the expansion proposals.

The City's specific comments follow:

Project Description

The project as described by the NOP/NOI is a Master Plan and Airport Layout Plan for LAX. The NOP/NOI does not state whether the EIR/S is to be a program level document with further environmental impact reports/environmental impact statements to be prepared prior to any construction or implementation of the two plans. This leads to three comments. First, the draft environmental document should identify whether it is intended to be a project or program level evaluation. Second, in either event, the draft environmental document should identify in detail each and every component needed for each alternative; otherwise, the analysis in each impact category will be incomplete. Third, all of the studies, reports and other background information which are utilized in formulating the various alternatives

should be identified and either incorporated by reference or information provided as to where these documents are available for review.

The project description is also vague with respect to existing improvement/expansion plans at LAX. At page 12 of the NOP the No Project Alternative is defined to include conditions that would occur without the Master Plan improvements. There is a hint in the language used that some, or perhaps substantial, improvements are contemplated even under the No Project alternative. This is borne out by the Notice of Intent which, under discussion the No Action Alternative, states that some improvements to taxiways are contemplated. The City requests that there be a clear description in the No Project Alternative of any and all improvements to LAX which are contemplated even without the Master Plan.

Finally, as noted at the outset, an explanation of how LAX and the FAA intend to remedy the wide range of existing impacts to El Segundo and other nearby cities must be a central component of the project description. The most severe impacts experienced by the City under existing conditions are in many cases clear violations of either state law or express commitments by DOA to the communities surrounding the airport. These impacts are clearly avoidable and must be eliminated prior to expansion at LAX. The issues to be addressed in this regard include the following:

- **Illegal Operations** -- The DOA has not complied with state law and court orders requiring it to reasonably reduce the airport's noise impact area. Instead, just the opposite has occurred:
  - ► During the last three years alone, the amount of land subject to legally unacceptable levels of airport noise has *increased* by almost 20 percent.
  - ► The number of residents subject to legally unacceptable levels of airport noise has risen by almost 20,000 -- from roughly 62,000 to 81,000 -- between 1985 and 1996.
  - ► The number of dwelling units subject to legally unacceptable levels of airport noise has risen by almost 5,000 -- from roughly 26,000 to 31,000 -- between 1985 and 1996.
  - ► The DOA has failed to provide timely reports on LAX's noise impacts. The DOA has not submitted 40 percent of the quarterly reports required since December 1993. Of the reports that were submitted, only one was submitted on time.

- **Unfulfilled Promises** -- The DOA has not satisfied its prior commitments to reduce noise impacts in El Segundo:
  - ► LAX collected more than $160 million in Passenger Facility Charges intended to fund, in part, a Residential Sound Insulation ("RSI") program and then abruptly canceled both the RSI program and the PFC collection.
  - ► The DOA has substantially increased the severe late night/early morning noise impact on El Segundo residents by disregarding the Over-Ocean Operations procedure approved by the Board of Airport Commissioners and allowing over 95 percent of the airport's departures to be staged at the south complex. This has caused stress, discomfort, and health risks for the citizens of El Segundo between midnight and 6:30 a.m.
  - ► LAX has failed to enforce its "Inboard-Outboard" preferential runway use policy to reduce noise impacts between 10:00 p.m. and 7:00 a.m.
- **Ignoring Local Concerns** -- LAX has been generally unresponsive to the concerns expressed by El Segundo and its residents.
  - ► In the past three years alone, noise complaints have risen by approximately 30 percent. DOA has not yet offered any meaningful response to these complaints.
  - ► DOA modified the one RSI program in which all jurisdictions were participating to mandate easements in exchange for RSI funds. This is in direct conflict with the City of El Segundo's Resolution 3679 which states clearly that the City will not participate in a program that limits the legal rights of its citizenry.

Initial Study Checklist

The Initial Study Checklist does not identify many of the issues of greatest concern to the people most severely affected by the airport and the proposed expansion. In addition to the issues noted in the initial study, the EIR/S must consider the following:

- **Sensitive Receptors** -- In El Segundo alone there are more than a dozen schools and parks subject to the adverse effects of aircraft overflights. Noise and air quality impacts are of particular concern in light of the results of recent studies on the deleterious effects of noise and air pollution on a child's ability to learn in schools and recreational facilities located near airports. Accordingly, the EIR/S must disclose and carefully evaluate the project's adverse effects on children's health. The EIR/S must also consider the adverse effects of the project's impacts on the City's significant population of older citizens.

- **Noise** -- The City is severely impacted by aircraft noise from current LAX operations. As stated above, the City's experience has been that long term and enforceable provisions to reduce noise impacts have been elusive. The prospect of substantial additional aircraft noise is disheartening. Therefore, the City requests that the draft EIR/EIS adopt and apply significance criteria which is more in keeping with the impacts of aircraft noise as it is experienced by people. The usual noise impact criterion, community noise equivalent levels (CNEL), is based on average noise which is experienced by no one. There is reference in the Initial Study Checklist to some use of single event noise analysis. The City urges that this be the primary significance criterion. Moreover, there is more and more scientific information which indicates that prolonged exposure to aircraft noise can have adverse human health consequences. This also should be part of the significance standard. The importance of utilizing appropriate significance standards is found in the legal requirement of identifying alternatives and mitigation measures which would lessen the anticipated impacts. (See, e.g., 14 Cal. Code Regs. § 15126.) In this regard, the draft EIR/S should include all the alternatives and mitigation measures available to reduce noise impacts including operational modifications such as eliminating offsets, modifying the published missed approach procedure, and requiring straight out departures and power cut-backs.

- **Air Quality** -- In light of the airport's already significant emissions (in excess of the combined emissions of several of the region's largest oil refineries) and the high concentration of residents within the immediate vicinity of the airport, the air quality analysis is particularly important. The EIR/S must evaluate: (1) the effect of the project on the region's ability to comply with federal air quality mandates; (2) the project's emissions of hazardous air pollutants; (3) alternatives and mitigation measures that substantially reduce the project's emissions; and (4) the impacts that would be likely to occur if, as a result of the airport's failure to reduce emissions, the federal government withdraws

funding for programs such as the Southern California Association of Government's Regional Transportation Plan.

- **Public Safety** -- The City is very concerned about the public safety risks attendant to the existing operational levels at LAX. Although the City does not lie within any established airport air traffic patterns, the City is already subjected to the risks posed by 300-500 overflights each month. Such risks to the public safety can only be increased by the substantial increases in flights called for in each of the development alternatives. For example, at peak periods, LAX already operates with less than a seventy second separation between aircraft; the proposed expansion could add a third approach corridor thereby exacerbating this already risky situation. Yet, the Initial Study Checklist includes no heading for evaluation of the risks to public safety from aircraft accidents. It is ironic that the checklist acknowledges that increased airport activity could expose people to air quality related health hazards but there is no mention of the impacts to human health from being underneath a falling aircraft. The subject of aircraft safety must be the subject of substantial analysis together with proposed alternatives and mitigation measures.

- **Traffic** -- The proposed expansion's effects on traffic will extend far beyond the airport itself. The roadway system surrounding the airport was designed and built before LAX became a regularly scheduled jet aircraft airport. The EIR/S must analyze the full range of the expansion's impact on traffic in the communities surrounding LAX. The EIR/S must also explain how LAX and the DOA will finance the traffic improvements in El Segundo and elsewhere necessary to accommodate the increased traffic volumes attributable to the airport.

- **Project Design** -- Many of the expansion alternatives seek to focus expansion in the southern portion of the airport: moving runways and taxiways further south, placing almost twice as many central terminal passenger gates in the south complex as the north complex, and concentrating new cargo facilities in the southern portion of the airport. These elements of expansion design are likely to have a wide range of significant adverse impacts on El Segundo that must be fully analyzed and avoided. For example, because airport runways, like freeways, are only used at capacity levels during peak periods the vast majority of time the existing runway system at LAX is sufficient. Accordingly, the EIR/S should consider an alternative which addresses the prospect of extending peak hour periods to make more efficient use of existing runway capacity.

Conclusion

Thank you for your serious consideration of this letter and of the City's concerns. We look forward to reviewing an adequate and objective EIR/S that fully analyzes the complete range of the expansion project's environmental impacts.

Very truly yours,

SHUTE, MIHALY & WEINBERGER

E. CLEMENT SHUTE, JR. RICHARD S. TAYLOR

cc: El Segundo City Council
South Bay Council of Governments
Councilwoman Ruth Galanter
Congresswoman Jane Harman
Assemblywoman Debra Bowen
FAA Aviation Noise Ombudsman William Alber
Supervisor Don Knabe

ECS/RST:kl

CITY of GARDENA
1700 WEST 162nd STREET / GARDENA, CALIFORNIA 90247-3778 / (310) 217-9500

July 25, 1997

Mr. Jack Graham
Chief of Airport Planning
City of Los Angeles Department of Airports
One World Way
Los Angeles, CA 90045

Dear Mr. Graham:

As Mayor of the City of Gardena, I would like to present input to the EIR/EIS scoping process and ask that these concerns regarding the proposed expansion of Los Angeles International Airport (LAX) be considered in those reports.

While I understand that demand for air transportation in the LAX service area has grown in the recent past and its continued growth is forecast, I believe that the proposed expansion concepts do not provide for sufficient mitigation of the effects of noise, traffic/ground access and other issues which will affect the quality of life in Gardena.

Noise: Because the prospect of an increased number of flights raises the probability of higher levels of runway noise, it is imperative that any increase in noise levels be mitigated.

Traffic: The EIR/EIS must directly address concerns of increased traffic, traffic congestion and the concomitant air pollution. Additionally, the reports must require the implementation of a comprehensive program to reduce surface congestion and the upgrading of the regional roadway grid in the South Bay cities. Also, a comprehensive rail connection program should be mandatory before any expansion program is permitted to proceed.

Proposed use of Hawthorne Airport for commuter traffic: We expect a full disclosure of the noise and traffic impact of the Hawthorne alternative for both propeller-driven and jet aircraft.

Lack of alternatives: All variations of potential growth have not been presented. Aside from a no-expansion alternative, possibilities such as a new terminal, a people mover and a ground access upgrade (no new runways) should be considered. Another consideration should be utilization of other regional airports e.g. Ontario, El Toro, Long Beach (after 2001).

Continued...

MAILING ADDRESS: P.O. BOX 47003, GARDENA, CALIFORNIA 90247-0003 FAX (310) 217-9664

Gardena is very concerned about the impact on the quality of life in our City based on the limited options and plans that have been offered regarding the LAX expansion. While there may be benefits from the growth of LAX, it must not be at price of this quality of life. It is expected that the concerns outlined above and those voiced by our neighboring cities be seriously considered and incorporated into any final plans for expansion.

Sincerely

Donald L Dear

DONALD L. DEAR
Mayor

DLD/ghb

cc: City Council

CITY OF HAWTHORNE

4455 West 126th Street • Hawthorne, California 90250

CITY COUNCIL

"CITY OF GOOD NEIGHBORS"

(310) 970-7900

Mark E. Schoenfeld, Councilman

John L. Graham,
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
1 World Way, Room 218
Los Angeles, California 90045

July 22, 1997

Dear Mr. Graham,

I have attended several of your department's "Public Hearings" relative to the five separate plans being considered for expansion of the LAX Airport facility.

I have not heard anyone in support of your Plan 4, from any City, which includes acquisition of the Hawthorne Municipal Airport, "Jack Northrop Field", and makes 90 families homeless immediately west of the field, by condemnation of their homes.

I have heard many individuals opposed to the plan, and none in favor of your plan, at your own hearings.

Since your meetings have begun, I have been, and continue to be contacted by my constituents from all parts of the City of Hawthorne, and other Cities relative to concerns of air pollution, ground pollution, (fallout), noise pollution, loss of residences, concerns of Health issues included but not limited to asthma, airspace safety issues, "jamming" of already designated and finite airspace, concerns of increased ground transportation causing further gridlock to the community, and the accompanying pollution from those trucks and other ground vehicles, and associated activity.

Hawthorne's Mayor and City Council have already passed a resolution opposing your current plan of expansion, and I am going to personally oppose your # 4 plan based on the following grounds:

1. The Los Angeles Department of Airports has not considered moving all freight operations out of the LAX existing facility, thereby increasing the usable space for existing international and domestic passengers, eliminating the need for local expansion and unnecessary condemnation actions, and the creation of damages in an amount to remaining residents and business, that would cost probably in the billions of dollars.
2. There has not been any public evaluations, trials or hearings resulting in any findings of fact, relative to the effect of additional ground traffic, air traffic, or pollution within the geographical traffic area of expansion, including but not limited to those Cities which the Department has named, but other Cities that may be impacted but not specifically named in the expansion plan.
3. There has not been a geographical definition of areas that could, would, or in fact be impacted by increased air, and ground traffic, pollution, "fallout" pollution, (that material which settles on homes, business, persons), including children, vehicles, and the risks associated therewith, including but not limited to health and safety issues.
4. The Los Angeles Department of Airports has not considered the effects of increased ground traffic, noise, pollution, or density traffic problems associated with those vehicles necessary to implement their plan, as the plan relates to surrounding and neighboring Cities, and the City of Los Angeles, or Los Angeles Departments of Airport's plan to allocate the necessary funds to maintain the infrastructure from your increased use of our roads, and other facilities, and your ability to fund the increased uses of our infrastructures to support the additional demands of your traffic on our ground.
5. The Los Angeles Department of Airports has not held any public hearings to weigh the gravity of harm to the entire South Bay, and City and County of Los Angeles area, versus the benefit to the Los Angeles Department of Airports.
6. The Department of Airports has failed to propose use of existing property in Palmdale which is of sufficient size, proximity, and previous allocation of use as an airport, to mitigate all impacts of other expansion, and or condemnation of other South Bay facilities, and City's who will be asked to pay for LAX's ill conceived expansion.
7. The Los Angeles Department of Airports, The City of Los Angeles, and their agents, employees, representatives, associated agencies failed to adequately inform the public by actual notice, mailed to their homes and businesses of the possible consequences, including but not limited to pollution of air and ground, noise which is and has the potential of creating a continuous nuisance, noise which exceeds statutory noise limitations of the communities this project will affect, traffic gridlock, loss of property values, loss of jobs, loss of housing, and general detrimental effect on every affected City's ability to create and collect revenue in its current form.
8. The Los Angeles Department of Airports, the City of Los Angeles, and their representatives, employees, agents, and others, have neglected to properly address protection of the noise, pollution, traffic, and other relevant ordinances or resolutions adopted by the Governing Bodies of each Municipality, County or City in any area affected by the proposed expansion, whether express or impacted in fact.
9. The Los Angeles Department of Airports has failed to notify any property owners, business owners, persons with potential interests in the airport expansion, of any benefit or detriment to their property interests.
10. The Los Angeles Department of Airports, the City of Los Angeles, and their agents, representatives, employees, and others made only the "transparent" attempt to include the public in the decision to expand LAX, but failed to give actual notice as required by law, hoping lack of public interest would allow them to proceed in diluting interested parties rights, to their actual detriment.
11. All input that is to be included in the Department of Airport plan, must supposedly be submitted in writing prior to July 31, 1997, to be included in the E.I.R., Enviornmental Impact Report, which will be prepared by the Los Angeles Department of Airports. The entire proposal fails to state the cost of compensating all affected individuals the cost of reimbursing their fair market damages relative to decreased property values, relocation, health issues, etc, including but not limited to obvious damages.
12. "The" proposed plan fails to state how the Los Angeles Department of Airports, The City of Los Angeles, their representatives, agents, or employees will finance and post with the Court, in advance of this ill conceived plan, the funds necessary to make

victims of the entire Southbay, and the City and County of Los Angeles whole.

13. The Los Angeles Department of Airports, the City of Los Angeles, their agents, Representatives, have failed to present a budget which reflects the cost of acquistion of any property, reimbursement of damages to property owners, business owners, renters, lessees, or anyone injured by the proposed expansion, whether by property injuries or personal injuries.
14. The Los Angeles Department of Airports has failed to do any studies which will adequately describe the amount of loss of property values, health costs, and infrastructure
improvement costs, which will be necessary as an incidental detriment of the expansion.
15. The method, or previously committed funds, that the Los Angeles Department will use to fund local governments to accommodate the increased usage of that adjoining infrastructure.
16. Generally, I don't believe the Los Angeles Department of Airports, their agents, employees, and associated agencies have realistically evaluated the actual costs of damages to the entire, South Bay, County of Los Angeles, City of Los Angeles, nor have you demonstrated allocating anywhere near the amount of funds, or any funds, to adequately redress the damaged parties, whether named or not named. Further, the Los Angeles Department of Airports, their agents, employees, and or Associated Agencies, have failed to present an adequate plan, or any plan, to address the increased use of already overcrowded airspace, above the residents, business, and schools attended by millions of children, nor have you, your agents, employees, or associated agencies assessed the impacts of increased traffic which will affect physical education, classroom education, and of loss grant monies currently available but will fail to be available because schools under your plan will be destroyed as unfit for public, and or private education.
17. The Los Angeles Departments of Airports has failed to propose anything that would help Cities and Municipalities, and others in meeting mandates of Federal State and Local requirements clean and decrease the amount of air pollution, such as the unfunded Federal Mandate pursuant to the "clean air act", and others. In fact, the current expansion plan will interfere with and prevent those agencies from complying, resulting in fines, sanctions, and or other penalties.
18. The Los Angeles Department of Airports has failed to propose any plan that will protect agricultural areas, water tables, lakes, rivers and oceans, from pollution from the expanded aircraft traffic.
19. The Los Angeles Department of Airports has failed to propose any plan which will fundamentally, and fairly, seek a local area of relocation of families, and businesses that will not substantially affect other areas, and their ability to handle expansion of that infrastructure.
20. The Los Angeles Department of Airports has failed to propose a plan that will replace existing housing, especially affordable housing.
21. The Los Angeles Department of Airports has failed to address any possible geographical problems potentially caused by vibration, weight, or increase occurrences as a result of both of the above.
22. The Los Angeles Department of Airports has failed to propose or provide an analysis of the amounts of jet fuel dumped as a result of contemplated emergencies and the effects of that fuel being absorbed into the water table, agricultural areas, schools, homes, business, or the erosion of asphalt, sidewalks, buildings, paint damages, roof damage, and other foreseeable and unforseeable damages that may occur.
23. The Los Angeles Department of Airports has failed to propose any plan, or analysis of the effect of the airflow caused by aircraft, or deflection of air by their engines, may have on normal air flow which could affect climate, and or force pollutants into areas like the Hollypark area of Hawthorne, unincorporated areas of the County, and the City of Los Angeles, and others.
24. The Los Angeles Department of Airports has failed to address the possibility of unpleasant or objectionable odors associated with the running of engines, run-up itself of aircraft, and the effect on local residents, from both their right of quiet enjoyment of their property, as well as associated health risks.
25. The Los Angeles Department of Airports has failed to provide an analysis, or any plan to protect endangered species native to the affected areas such as, but not limited to, the blue butterflies of the City of El Segundo.
26. The Los Angeles Department of Airports has failed to provide an analysis, or any plan to mitigate traffic so as not to impair emergency vehicles from reaching their destinations in their current response times, as a result of inherent increased ground traffic.
27. The Los Angeles Department of Airports has failed to provide a plan to cut waste, and trash pursuant to A.B. 939 in the Cities and areas that would be affected by the expansion plan, with the associated increases in passengers and traffic.
28. The Los Angeles Departments of Airports has failed to provide a plan to reimburse all affected areas for the necessary increases in Fire Protection, Police Services, and maintenance of other public facilities including but not limited to School Districts.
29. The Los Angeles Department of Airports has failed to address every affected Cities ability to maintain, and or install, necessary pipelines for fuel, sewer, and or waste.
30. The Los Angeles Department of Airports has failed to address the cost of increased sewer and storm drain usage's which affects every City they locate within.
31. The Los Angeles Department of Airports has failed to address any plan of increasing aesthetics in the affected areas, or the effect of decreasing aesthetics in those areas.
32. The Los Angeles Department of Airports has failed to address the issue of "Isolation of Hollypark", from the remainder of the City limits of Hawthorne. Plan 4 would effectively isolate Hollypark by creating specific geographical boundaries, which would deprive Hawthorne of the cultural benefits currently enjoyed by Hawthorne as a result of Hollyparks diverse cultural background.
33. The Los Angeles Department of Airports has failed to address the benefits of their "short term" plan of expansion, versus the long-term damage to the South Bay Cities, the County of Los Angeles, the City of Los Angeles, and others.
34. The Los Angeles Department of Airports has failed to provide an analysis or plan, to protect recreation areas, parks, and other land enjoyed by the residents that will be affected by the plan of expansion.
35. The Los Angeles Department of Airports has failed to propose any plan of mitigation; to offset the cost of the aforementioned effects of every City, Municipality, and other affected persons.

This document is intended to represent persons, Muncipalities, Counties, Cities, School Districts, Private Schools, and associated Plaintiffs, identified and not identified, but with tangible interests that are described herein, as well as damages that may occur but have not have been forseeable.

It has been said, "history repeats itself". I think even the Los Angeles Airport Department would agree that the Los Angeles Department of Airports is not, and has not been a good neighbor, as evidenced by the testimony of their immediate adjacent neighbors in Westchester, Playa Del Rey, Marina Del Rey, West Los Angeles, Westwood, Culver City, the South Bay Cities, Inglewood, Gardena, and others whom I may have failed to mention but who will join me in opposing this ridiculous plan.

The Los Angeles Department of Airports has been a neighbor who takes, and takes, and takes, leaving devastation in their wake.

As someone who grew up in Culver City prior to the 405 being built, and someone who remembers LAX being built, I can only question why it took over a quarter of a century for the Los Angeles Department of Airports to finally offer to install noise insulation on homes their department began destroying 30 years ago. I remember the ones they couldn't insulate and those were taken from the residents by condemnation.

Is the Los Angeles Department of Airport's now offering to insulate El Segundo because they want to expand their Department, by destroying the remainder of the South Bay?

In my opinion, the Department of Airports has not used their current assets economically, wisely, or practically, and I therefore suggest again, that the Department of Airports remove all freight from the existing LAX operations, to areas more suited to freight operations, and leave LAX to be one of the finest international passenger airports currently existing, serving international and domestic passengers.

Freight can be trucked hourly, as close as 40 minutes east of here, from airfields already built and existing, and abandoned by the governmental agencies that built them., and there are more on the list of closures. Hawthorne Airport is at best, only a band-aid fix with their 4900 foot runway, which 96 months from now, probably won't be usable.

The closed airfields with 10,000 and 12,000 feet to our east, are what should be the airports the Department looks at to acquire, and have us join you as partners along with the communities you could benefit, by reopening those airports and putting those residents and citizens back to work.

Because of your great political strength, and your lack of vision, I am as of the date of this letter, going to form a Committee of South Bay City Mayor's and Councilmembers, to independently evaluate your plan, and jointly consider the effects your plan will have on all Southern California Cities, and oppose your current plan.

Further, I am going to invite the "inland empire" independent Mayors and Councilmembers to attend and give us some input on how the LAX Expansion could benefit their communities by taking over already abandoned airfields, moving freight out of LAX, to allow international and domestic passengers to best utilize the existing facilities, and still allow LAX to expand into 2015 without negatively impacting their South Bay and Los Angeles neighbors, and completely destroying the South Bay, and the City of Los Angeles.

Further, the Los Angeles Department of Airports currently owns, and is lessor, for a Palmdale Airport paid for by tax dollars, which is allegedly leased to pistachio nut farmers, rather than being used what is was intended for. Make the assets the taxpayers paid for work.

Additionally, your, (our Palmdale facility,) is already targeted for a rail hookup. Make that one work; we already paid for it.

Authored by and respectfully Submitted by,

Mark E. Schoenfeld, Councilman

In concurrence with, and respectfully joined by:

Mayor Larry Guidi

Councilman Steve Andersen

Councilman Chuck Bookhammer

Councilwoman Ginny Lambert

cc: Hawthorne City Manager
El Segundo Mayor and City Council
Manhattan Beach Mayor & City Council
Hermosa Beach Mayor & City Council
Redondo Beach Mayor & City Council
Rancho Palos Verdes Mayor and Council
Rolling Hills Estates Mayor & Council
Inglewood Mayor & City Council
Culver City Mayor & City Council
Gardena Mayor & City Council
Lomita Mayor and City Council
Torrance Mayor and City Council
West Hollywood Mayor & City Council
L.A. County Board of Supervisors representing unincorporated areas of Los Angeles County.
L.A. City Council representing all areas affected by the Los Angeles Department of Airports.
Inland Empire Cities of Orange, Riverside, San Bernardino, San Diego
United States Secretary of the Navy
United States Secretary of the Army
United States Secretary of the Air Force

City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, California 90254-3885

July 28, 1997

Jack Graham, Chief of Airport Planning
Department of Airports
LAX Master Plan Project
One World Way, Room 218
Los Angeles, California 90012

Dear Mr. Graham:

The Hermosa Beach City Council, at its meeting of July 22, 1997, adopted the attached resolution expressing its concerns about the proposed expansion of Los Angeles International Airport. The City Council is concerned that any of the proposed options for expansion will have a negative impact on the residents, business owners and visitors to Hermosa Beach. Specifically, the City Council is concerned that increased traffic, noise air pollution and crime will result from any of the proposed options.

In addition, the City Council is concerned about the changes in the lowering of the ceiling for planes approaching LAX.

Sincerely,

J. R. Reviczky
Mayor

JR:reb

cc: Congresswoman Jane Harman
Senator Ralph Dills
Assemblywoman Debra Bowen
Supervisor Don Knabe

RESOLUTION NO. 97-5878

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HERMOSA BEACH, CALIFORNIA, DEMANDING FUNDS TO MITIGATE THE NEGATIVE IMPACTS LAX HAS ON THE CITY AND THE SOUTHERN CALIFORNIA REGION

WHEREAS, the City of Los Angeles Department of Airports is developing a Master Plan for LAX to guide the development and operation of the airport through the year 2015; and,

WHEREAS, the impacts of LAX on the SCAG region are substantial and multifaceted, including economic, safety, noise, crime, vehicular traffic, and air quality, to mention a few; and,

WHEREAS, the impacts of safety, noise, crime, vehicular traffic and air quality on the South Bay region of SCAG and, in particular, the communities that adjoin LAX are often given secondary consideration by the City of Los Angeles and the Department of Airports in their desire to maximize the economic returns from LAX; and,

WHEREAS, those communities that are not directly impacted by the negative operational aspects of LAX, including safety, noise, crime, vehicular traffic, and air quality, to mention a few, are also concerned with these issues and want these concerns addressed and mitigated as part of the LAX master plan; and,

NOW, THEREFORE, BE IT RESOLVED, that the City of Hermosa Beach City Council demands that the LAX master plan provide specific actions and funding to mitigate the current and future negative operational impacts of LAX on the SCAG region and specifically on those communities that are impacted by safety, noise, crime, vehicular traffic and air quality issues.

The City Clerk shall certify to the passage and adoption of this Resolution; shall enter the same in the book of original Resolution of said City; and, shall make a minute of the passage and adoption thereof in the records of the proceedings of the City Council of said City, in the minutes of the meeting at which the same is passed and adopted.

PASSED, APPROVED AND ADOPTED this 22nd day of July, 1997.

PRESIDENT of the City Council and MAYOR of the City of Hermosa Beach, California

ATTEST:

City Clerk

APPROVED AS TO FORM:

City Attorney

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF HERMOSA BEACH

I, Elaine Doerfling, City Clerk of the City of Hermosa Beach, California, do hereby certify that the foregoing Resolution No. 96-5878 was duly and regularly passed, approved and adopted by the City Council of the City of Hermosa Beach at a Regular Meeting of said Council at the regular place thereof on July 22, 1997.

The vote was as follows:

AYES:	Benz, Bowler, Edgerton, Oakes, Mayor Reviczky
NOES:	None
ABSTAIN:	None
ABSENT:	None

Dated: July 28, 1997

Elaine Doerfling, City Clerk

CITY OF INGLEWOOD CALIFORNIA
ONE MANCHESTER BOULEVARD / INGLEWOOD, CALIFORNIA 90301-1750
FAX (310) 412-8760

July 24, 1997

Mr. Jack Graham
City of Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
PO Box 92216
Los Angeles, CA 90045-5803

Subject: Notice of Preparation -- Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS)

This letter is to convey the City of Inglewood's comments regarding the scope of the environmental analysis to be performed in the preparation of the joint EIR/EIS for the proposed LAX Master Plan.

HISTORY

The City's current working relationship with the City of Los Angeles Department of Airports predates 1981 when the collaborative process that produced the Airport Noise Control and Land-Use Compatibility study was completed. In accordance with the agreements initiated over twenty years ago, the City has engaged in several land use policies to reduce noise incompatible conditions through the acquisition and recycling of noise incompatible structures and through the provision of sound insulation. As extensively documented, there are 10,000 housing units adversely affected by LAX aircraft operations. This number of housing units represents over 26% of the City's housing stock and nearly 40% of all the properties adversely affected by LAX aircraft noise. This condition has persisted for over two decades because just as newer, quieter jets have been introduced, their number has increased 100% during this period.

CURRENT IMPACTS

This historical context places the City in a unique position to continue to work with Los Angeles World Airports to remedy existing conditions and to remain wary of unbridled, continuing expansion. We would expect that mitigating current impacts would be of paramount consideration. This environmental review presents an opportunity to recommit to the policies and programs that have relieved noise conditions for over 1,000 housing units to date.

Generally, the subject environmental review process should rectify the analyses performed from the early 1980's with the cumulative impacts that have occurred since this period. In other words, what are the baseline conditions that will be used to measure impacts since the environmental record has not been updated for the impacts associated with the overall growth of operations at LAX (including ground circulation, risk of upset and other environmental areas of concern)?

OFFICE OF
JACQUELYNNE J. CORBY
CITY ADMINISTRATIVE OFFICER
TELEPHONE: (310) 412-5381

NOISE CONTOURS

The impacts to noise and air quality were summarily considered in 1991 with the issuance of a Final EIR regarding the phase-out of Stage II aircraft in an assumed operational mix. However, since the early 1980's the other areas of concern have not been analyzed in a cumulative, systemic manner as is being considered currently. Nowhere have the impacts of growth over 40 million annual passengers (MAP) been assessed. The subject environmental analysis must acknowledge and evaluate all of the environmental impacts resulting from the growth of LAX operations from 40 MAP established as the cap in the 1980's to over 57 MAP today. Only then can a reasonable impact assessment of the projected growth to 98 MAP be conducted. The significance of noise and its impacts should be disclosed as early as possible in order to assess cumulative effects upon our community.

LAND USE AND OVER-OCEAN OPERATIONS

The Initial Study for the Notice of Preparation indicates 21 topical areas of concern to the residents of the City of Inglewood. In particular, land use impacts may significantly affect numerous parcels in the City should they be acquired as indicated in two of the proposed schemes. This scenario will have a serious, detrimental effect upon these land uses and the revenues these activities contribute to the City unless they can be relocated and remain in the City. The analysis of land use impacts must also clearly indicate the ramifications of mandated clear-zones from the end of the proposed run-way configurations. In addition, over-ocean operations must be maintained, at minimum, at current levels to mitigate adverse night time noise impacts.

INCREASED RISK

Another topical area of importance to the residents of the City is the risk of upset. With the prospect of increased operations over the City, what is the increased potential for risk? Increased flights over the City not only affect the housing stock with noise but heightened potential for hazards including debris and mid-air collisions or other incidents. Increased attention to the coordination of emergency services and response in which the City will be expected to be involved should be delineated, as well as the increased hazard potential.

AIR QUALITY

The City is also concerned with the long-term, cumulative effects to human health and air quality associated with aircraft emissions. It is acknowledged that current Environmental Protection Agency standards for particulate matter have yet to be promulgated. There is an opportunity however for the City of Los Angeles Department of Airports to elicit the support of neighboring communities and supply leadership in the consultative process now being undertaken by the South Coast Air Quality Management District relative to aircraft regulations. The health, safety and welfare impacts of aircraft emissions must be thoroughly evaluated. If these significant effects are not adequately documented and mitigated, the significant adverse impacts upon property and human life will have been overlooked and a deleterious condition may provide a catalyst for legal challenges to the airport's objectives.

TRAFFIC

The City of Inglewood has worked diligently this last decade to secure recognition of the need and funding for freeway access at Arbor Vitae Street. The proposed schemes have brought renewed regional and state interest in this project. While it is good for LAX traffic circulation, it is mutually beneficial to our City in managing traffic on our streets and to provide access to neighborhoods and major venues in our community. The environmental record should document the traffic impacts to surrounding communities and identify existing resources available for collaborative solutions to satisfy mutually beneficial aims and to mitigate impacts.

SUMMARY

The City of Inglewood's Noise Mitigation Program has taken many years and patient effort to accomplish nominal achievements. Just as patient have been the City of Inglewood residents. As previously indicated in the introduction to this letter and a letter to Administrative Law Judge Paul Hogan dated July 9, 1997 regarding the LAX Variance hearing concerning present operations, the City sees a potential for the City of Los Angeles to inequitably distribute funds to its own residents prior to the allocation of mitigation resources in our City. Proportionate distribution is a significant mitigation measure that must be clearly shown to address the adversely affected properties within our City.

While the Initial Study establishes topical areas of concern elaborated in this letter that will be addressed in the subject environmental review, to summarize in a concise manner the issues which must be adequately evaluated in respect to the City of Inglewood are the effects associated with:

- mitigating current impacts;
- disclosing the noise contours of the various proposals and alternatives;
- soot, debris and particulates;
- maintaining over-ocean operations as a noise mitigation measure;
- risks and hazards.

We are prepared to continue to work with the representatives of the City of Los Angeles Department of Airports under current arrangements. We also see that the LAX Master Plan is an opportunity to renew a commitment to provide solutions to the existing and future effects of the operation of LAX.

We appreciate the opportunity to provide these comments to you.

Sincerely,

Jacqueline Conley

City Administrative Officer

1

LENNOX COORDINATING COUNCIL
10927 Grevillea
Lennox, CA 90304

August 1, 1997

Mr. John Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
One World Way, Room 218
Los Angeles, CA 90012

To Whom It May Concern:

Please consider this letter from the Lennox Coordinating Council to you to be a statement of great concern in respect to the proposed airport expansion that is currently under discussion. The Lennox Coordinating Council is a group of concerned citizens in the Lennox community . . . businessmen, homeowners, and representatives of community organizations, whose sole purpose is to improve the quality of life in Lennox and to share information and efforts so that activities and planning can be done in a united way in our small community.

There is no issue that has come forward through the years that affects our community more than the issue of aircraft overflight. For an extended period of time, this has been the major issue that has affected our community in a negative way. The proposed expansion of the airport, and specifically, Concept 2 and Concept 3 which are currently under discussion, would again increase the negative impact of aircraft overflight noise and its ironmental impact upon our community.

The community has had to deal with the issue of ever increasing numbers of flights. We know that efforts have been made through the years for quieting jet engine noise. The ratio of the positive steps in technology in engines certainly has not balanced the increased number of flights that has come over the community. Air pollution and chemical pollution continue to be a part of the life of every single individual who lives in the community.

The proposed expansion, especially Concepts 2 and 3, would only increase the noise and chemical pollution that would rain down upon our community. We understand the economic interests in airport expansion; however, that certainly would be at the expense of the thousands of people who live in this community, and that issue certainly needs to be considered as the concept is discussed and decisions are being made. Recently there has been a small effort to begin a sound attenuation for a few homes in Lennox. This sound attenuation project is an acknowledgment that even the **current** situation with aircraft overflight does very negatively affect our people living in our community. We wish to stress that only a very few homes would be positively affected by this project, and it in fact involves millions of dollars even for those few homes. The proposed expansion would **greatly increase** noise and chemical pollution over our community and would bring the necessity of this kind of sound attenuation to a even a higher level.

Again, we wish to be on record as to pointing out the negative impact that the proposed expansion has upon our community and to specifically voice our opposition to Concepts 2 and 3 because of their extreme negative impact on our community.

Respectfully,
Maria T. Verduzco

ria Verduzco
sident

/ba

CC Supervisor Yvonne Braithwaite-Burke

CITY OF LOMITA

July 31, 1997

John L. Graham, Chief of Airport Planning
Department of Airports
LAX Master Plan Project
1 World Way - Room 218
Los Angeles, CA 90012

Dear Mr. Graham:

RE: Response to Notice of Preparation for the LAX Master Plan

The City of Lomita requests that the following considerations be included in the Environmental Evaluations.

Cumulative Actions. The Joint EIS/EIR should examine all of the development which may result form the Master Plan and not limit examination to the major improvements specifically delineated in the Notice. The Attachment to Notice of Preparation describes elements such as "ancillary uses", "support facilities" and "airport-related business activities" which appear to be critical in the development of the airport which are not addressed.

Funding. The airport has indicated it will pursue several types of funding, including competitive sources. The Joint EIS/EIR should examine the impact on other agencies if the airport receives the requested funding.

The City also submits the following comments with regards to the Initial Checklist:

Question 14-f. It is felt that the increase in traffic hazards to motor vehicles. bicyclists, or pedestrians was understated.

The correct response is "yes".

Question 14-g. It appears that the airport is desiring to take a narrow view on how the proposed plan will conflict with adopted policies supporting alternative transportation. A broader perspective is warranted.

The correct response is "yes".

Question 15-e. Given the increases use of the airport as identified in the concepts 1-4, "maybe" understates the anticipated impact on roads.

The correct response is "yes".

Question 18-a. It appears that increased airport activity could create potential health hazards such as noise or air quality.

The correct response is "yes".

Question 22-d. The higher activity levels associated with the airport development plans could lead to increased human exposure to noise and air pollutant emissions.

The correct response is "yes".

Sincerely,

Gary D. Irwin
Assistant City Administrator

lax.1

City Hall 1400 Highland Avenue Manhattan Beach, CA 90266-4795
Telephone (310) 545-5621 FAX (310) 545-5234 TDD (310) 546-3501

July 17, 1997

City of Los Angeles
Department of Airports
Attn: John L. Graham, Chief of Airport Planning
One World Way - Room 218
Los Angeles, CA 90012

RE: Written Comments Regarding LAX Master Plan Project

Dear Sirs:

The City of Manhattan Beach respectfully submits the enclosed written testimony regarding the appropriate scope and content of the environmental review for the Los Angeles World Airport (LAX) Master Plan to the City of Los Angeles Department of Airports (LA DOA) and the Federal Aviation Administration (FAA). The City expects that these concerns, as well as the concerns submitted independently by Manhattan Beach residents, will be addressed in detail in the draft Environmental Impact Report (EIR) and Environmental Impact Statement (EIS).

The City is concerned that the underlying assumptions, by which the need for airport expansion is based, maybe overstated and/or inaccurate. The DOA is prohibited under EIR/EIS guidelines from defining a proposal such that a given outcome (i.e. LAX expansion) is preordained. Therefore, the City requests that an independent authority verify and validate the assumptions regarding the demand for air service for passengers, air service for cargo, and the number of flight operations needed to meet these demands.

In addition, the City requests that during the environmental review process the City of Los Angeles and the FAA evaluate and quantify the individual and cumulative environmental and economic impacts of the proposed LAX expansion concepts on the entire South Bay region and specifically Manhattan Beach. Also, the EIR/EIS must consider all direct and indirect impacts of the proposed concepts as well as all other reasonable alternatives including but not limited to expansion of additional airports within the Southern California region.

Also, since the current operations at LAX exceed the capacity of the airport and negatively impact the surrounding area, the EIR/EIS should not use the present conditions as the baseline by which all additional impacts are measured. Rather the EIR/EIS must address the existing impacts of the additional

Fire Department Address: 400 15th Street, Manhattan Beach, CA 90266 FAX (310) 545-8925
Police Department Address: 420 15th Street, Manhattan Beach, CA 90266 FAX (310) 545-7707
Public Works Department Address: 3621 Bell Avenue, Manhattan Beach, CA 90266 FAX (310) 546-1752

18 million annual passengers (MAP) by which the airport currently exceeds its 40 MAP designed capacity as well as the additional impacts of the expansion concepts.

Complementing these general concerns, the City requests that the City of Los Angeles and the FAA address the specific concerns outlined below.

NOISE

All noise related impacts must be considered by LAX and the FAA as they relate to all airport operations including but not limited to ground operations, off-loading of passengers and cargo, aircraft maintenance, takeoffs, landings, arrivals and departures of all aircraft including helicopters. Also, as a result of federal legislation mandating that older "stage 2" aircraft be phased out by 2001, all noise impacts should be shown, measured and evaluated against current conditions, conditions as they would exist in the future (all stage 3 aircraft) without the expansion, and the resulting noise impacts of the expansion concepts. Also, the airport and FAA should develop noise contour maps for each of the conditions listed above. The noise contour maps should be extended beyond 65 dbl to show noise levels and the areas impacted by noise levels as low as 45 dbl. The EIR/EIS should specifically address whether LAX, and/or airline companies operating at LAX, plan to comply with the mandate to eliminate stage 2 aircraft or seek extensions or variances.

In addition, the noise analysis must include an analysis of impacts within the 65 Ldn contour and the noise impacts outside the 65 Ldn contour on sensitive areas including but not limited to residential communities, outdoor space, recreational areas, educational facilities, libraries, and high technology industries located in and around the LAX area and specifically those in Manhattan Beach. During the examination and analysis of noise impacts, LAX and the FAA should examine and evaluate changes in single event noise levels, seasonal fluctuations, and the potential number of aborted landings which result in low flying aircraft over the surrounding communities. The impact of noise upon surrounding residential communities and other noise sensitive areas can not be accomplished by measuring annual average noise levels only. To adequately address the noise impacts, an analysis must be completed that examines the amount of time and number of incidents that noise is above a certain threshold which would impact the quality of life for the surrounding residential communities and noise sensitive areas. The FAA and LAX should pay particular attention to noise levels during overnight flight operations and the impacts to the surrounding residential communities, specifically to Manhattan Beach.

The airport and the FAA should also examine and quantify the additional noise and other impacts of any change in flight patterns including but not limited to changes in departure and approach patterns, increased utilization of departure and approach patterns, and cumulative and indirect effects from the number of additional flights. The EIR/EIS must specifically explore and describe the noise impact of any additions or changes to the southern runways of LAX.

Since LAX has routinely violated the noise standards for airport operations and continually seeks a noise variance, the EIR must address how LAX will remain within the noise standards without such a variance. Also, there should be a commitment from LAX that no additional noise variances will be requested. Mandatory fines should be established for each day LAX operates in violation of noise restrictions. These fines should be of a substantial nature and the funds should be available to local agencies for noise

mitigation purposes. Also, the EIR/EIS should address whether the home noise reduction installation program will be expanded to include residences in Manhattan Beach.

The EIR/EIS must also address whether noise monitoring stations will be installed, at LAX expense, in Manhattan Beach to measure on-going and single event noise impacts on Manhattan Beach.

Finally, the Department of Airports and the FAA should examine all other direct, indirect, cumulative and singular impacts of the expansion concepts with respect to noise.

TRAFFIC

The City of Manhattan Beach requests that LAX and the FAA examine, analyze and present findings for all traffic related impacts including but not limited to vehicular traffic, pedestrian traffic, and traffic caused by all other alternative modes of transportation. Similarly, these impacts must be examined and analyzed independently as well as cumulatively and should include consideration of all other known development projects within the South Bay region especially projects within a 15 mile radius of LAX.

Currently many of the surface streets and freeways surrounding LAX including but not limited to Aviation Blvd., Sepulveda Blvd., Marine Avenue, and Rosecrans Avenue can not accommodate the existing vehicular traffic. The proposed expansion of LAX will increase vehicular traffic on both surface streets and local freeways. Any increase in vehicular traffic will negatively impact the surrounding communities. Also, the proposed western terminal and western access will negatively impact the City of Manhattan Beach by creating additional vehicular traffic on streets within the City. LAX and the FAA must examine, analyze, quantify and provide mitigation measures for the resulting increased traffic on all streets within the City of Manhattan Beach including but not limited to Manhattan Beach Boulevard, Aviation Blvd, Sepulveda Blvd., Marine Avenue, Rosecrans Avenue, and Highland Avenue.

It is of great concern to the City of Manhattan Beach, our residents, and other local government agencies that the proposed traffic and ground access mitigation measures including the proposed "ring road", improvements to 105 and 405 freeways, and other mitigation measures on surface streets such as Aviation Blvd, Sepulveda Blvd., Marine Avenue, and Rosecrans Avenue will compete for limited funding which local agencies use for other important roadway projects. Funding for all traffic mitigation measures should be independent of monies which local agencies compete for and use to enhance roadways within their jurisdictions. The cost of mitigation as well as all other traffic related aspects of the proposed expansion concepts should be identified and the necessary funding sources should be identified and secured prior to any approval of the LAX Master Plan.

AIR QUALITY

As part of the environmental review process, LAX and the FAA should examine, analyze and quantify any and all increases in air pollution that will result from any expansion of the airport including the four concepts initially presented as well as all other reasonable alternatives. The scope of such analysis should not be limited to aircraft operations alone but should account for all sources, point and non-point sources, of air pollution including but not limited to construction activity, any increase in vehicular traffic, and resulting roadway congestion.

LAX is currently exempt from many federal air pollution standards but the surrounding communities are not. Communities which exceed the federal pollution standards may lose federal funding for local projects. The EIR/EIS should address how LAX will mitigate the burden placed on surrounding communities to meet federal pollution standards or lose federal funding.

WATER QUALITY

The FAA and LAX should address all issues related to, and appropriate mitigation measures for, maintaining and enhancing water quality including but not limited to the following:

- All impacts of the increased flight operations which will deposit additional particulate material, kerosene, and other hazardous material into the Santa Monica Bay. The impacts of such additional material as well as all other impacts to the ecosystem of the Santa Monica Bay should be examine, analyzed and quantified. Mitigation measures should also be identified and quantified as to their effectiveness. The EIR/EIS should address the economic impact to the South Bay and specifically Manhattan beach if the area loses tourism dollars due to increased water pollution.

- All impacts resulting from an increase in non-absorbent surfaces such as roadways, taxiways, etc. and the elimination of natural surfaces which absorb rain water and replenish the naturally occurring aquifer. This analysis should examine all impacts including but not limited to the additional hazardous materials which will be carried by storm water runoff and deposited in the Santa Monica Bay, the associated impacts to the natural environment and ecosystem of the Santa Monica Bay, effects on groundwater contamination, and any potential impact the additional surface water may have on the operations of the nearby sewage treatment plant.

The examination and analysis of water quality issues should include all point and non-point sources of water quality contamination.

FLIGHT OPERATIONS

The City of Manhattan Beach and its residents are concerned that any expansion of Los Angeles World Airport will result in changes in aircraft approach and departure practices. The City requests that the FAA and LAX present all anticipated changes in aircraft approach and departure policies and procedures in the draft Environmental Impact Report. This includes but is not limited to any change in aircraft flight patterns for approach and/or departure with respect to airspace, timing between aircraft landings and departures, changes to minimum and maximum altitudes and minimum/maximum distances an aircraft must attain before circling back over the coastline, fluctuations in usage of existing flight patterns as well as anticipated usage of any new or alternative flight paths.

The City would request that minimum flight altitudes be established for all aircraft that depart LAX and then "u" turn and cross back over the coastline and nearby residential communities. The minimum altitude at the time a commercial aircraft crosses the coastline should be such that there is no impact on residents and business establishments. In addition, the City requests that mandatory fines and/or penalties be established for the airlines and/or air crew members responsible for deviating from the established practices listed above. The FAA and/or LAX should implement an aircraft tracking system which should

track each departing aircraft with respect to the airline company, the individual aircraft, its altitude and location and, upon request, such information shall be made available for public review.

ECONOMIC
Another area of significant concern to the residents of Manhattan Beach is economic impacts of each of the proposed concepts including but not limited to the affect of any expansion of flight operations at Los Angeles World Airport on property values for both residential and commercial properties within the City of Manhattan Beach and the surrounding communities.

The EIR/EIS must include an analysis of the cumulative effects of the master plan with respect to the region's economy this should include but is not limited to a economic analysis analyzing the negative and positive economic impacts of expanding other airports in Southern California.

SAFETY
The impact upon flight safety due to any expansion of the airport and resulting increase in the number of flight operations must be examined and quantified in the EIR/EIS.

QUALITY OF LIFE
The impact of the LAX Master Plan on the quality of life for the surrounding communities must be addressed in the EIR/EIS including but not limited to the potential increase in crime as a result of the devaluation of property and loss of viable commercial property.

HEALTH
The EIR/EIS must address the health impacts as a result of the proposed master plan including but not limited to the health effects on people exposed to jet exhaust, additional noise, and vehicular exhaust.

PLANT & WILDLIFE
All impacts on plant and wildlife including but not limited to impacts on migratory nesting birds, the El Segundo Blue Butterfly, and marine life including marine mammals must be examined in the EIR/EIS document.

GENERAL AVIATION
All impacts associated with removing all general aviation (corporate jets & private planes) from operating at Los Angeles World Airport should be examined and included as a possible alternative for increasing capacity of LAX without additional runways.

ADDITIONAL CONCERNS
In addition, the City of Manhattan Beach expects that the EIR/EIS should investigate and explore all alternatives to meet the region's demand for air service and the associated impacts of these alternatives. To date, the information provided by both LAX and the FAA relate to four variations of the same theme, namely expansion of LAX. It is the City's opinion that the demand for air services is a regional demand and that all regional solutions should be given serious consideration including but not limited to the expansion and development of all other airports such as Palmdale, Long Beach, El Toro and March Air Force Base. The review and analysis of these options should include the tremendous economic benefit

these communities, and indeed the entire region, would receive as a result of the development of infrastructure and creation of jobs. It would be unfair to burden the communities surrounding LAX with the negative impacts of airport expansion to meet the region's needs and to economically benefit the City of Los Angeles when reasonable alternatives for meeting the air service needs exist elsewhere in the region.

In addition, the City is concerned that since LAX currently exceeds its operating capacity by 45% or 18 MAP, there is no guarantee that, after the expansion is complete, the airport will not exceed the established 98 MAP capacity. There should be a guaranteed maximum capacity identified in the EIR that LAX can not exceed without incurring mandatory fines & penalties. These fines and penalties should be of a substantial nature and the money should be used by local agencies to mitigate the additional negative impacts of such operations. In addition, no increase in flight operations should be allowed prior to completion of the infrastructure and implementation of identified mitigation measures.

CONCLUSION
The City of Manhattan Beach appreciates the opportunity to provide these comments to the Los Angeles World Airport and the FAA with respect to the draft Environmental Impact Report for the proposed expansion of LAX. The City Council and the residents of Manhattan Beach fully expect that these concerns as well as the concerns of surrounding communities will be addressed during the environmental review process.

In addition, the City hereby requests that, upon completion, a copy of the draft EIR/EIS document be sent to the City of Manhattan Beach for review and comment.

Sincerely,

JOAN JONES
Mayor

cc: Members of the City Council
Geoff Dolan, City Manager
Honorable Jane Harman, Member of Congress 36th District, California
South Bay Council of Governments

RESOLUTION NO. 5343

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MANHATTAN BEACH, CALIFORNIA IDENTIFYING AREAS OF CONCERN WHICH NEED TO BE ADDRESSED IN THE ENVIRONMENTAL REVIEW PROCESS FOR THE LAX MASTER PLAN

WHEREAS, the City of Los Angeles Department of Airports is developing a Master Plan for LAX to guide the development and operation of the airport to meet the demands for aviation services through the year 2015; and

WHEREAS, the anticipated demand for aviation services in the southern California region is expected to significantly increase through the year 2015 including a 69% increase in the number of air passengers and a 121% increase in the amount of air cargo; and

WHEREAS, the City of Los Angeles Department of Airports expects the annual number of aircraft operations at Los Angeles World Airport to increase 30% or from 763,000 to 1 million aircraft operations annually to accommodate this demand for aviation services; and

WHEREAS, the Los Angeles World Airport is currently considering four (4) concepts which would significantly expand the operations of the airport to accommodate the increase in aircraft operations; and

WHEREAS, the expansion of the Los Angeles World Airport and the associated impacts of the proposed expansion will have a significant affect on the City of Manhattan Beach; and

WHEREAS, the Los Angeles World Airport and the Federal Aviation Administration will be conducting an environmental review process and drafting an Environmental Impact Report concerning the LAX Master Plan; and

WHEREAS, the Airport is in close proximity to the City of Manhattan Beach and the impacts of its operation are of critical interest to the citizens of Manhattan Beach.

NOW, THEREFORE, BE IT RESOLVED that the City of Manhattan Beach City Council expects the Environmental Impact Report regarding the LAX Master Plan to

Certified to be a true copy of said document on file in my office.

City Clerk of the City of Manhattan Beach

address the environmental and economic impacts of each of the four proposed concepts with regards to several issues including but not limited to vehicular traffic including surface streets within the City of Manhattan Beach such as Aviation Boulevard, Sepulveda Boulevard, Rosecrans Avenue and Highland Avenue, noise, air quality, safety, utilization of existing flight patterns, changes in flight patterns and/or development of new flight patterns and the impacts of such changes, watershed changes and associated impacts, groundwater quality, plant and animal wildlife, light and glare, and crime.

The City Clerk shall make this Resolution reasonably available for public inspection within thirty (30) days of the date this Resolution is adopted.

The City Clerk shall certify to the adoption of this Resolution and thereafter and thereafter the same shall be in full force and effect.

PASSED, APPROVED and ADOPTED this 15th day of July, 1997.

Ayes: Cunningham, Napolitano, Wilson, Mayor Jones
Noes: None
Absent: Lilligren
Abstain: None

/s/ Joan Jones
Mayor, City of Manhattan Beach, California

ATTEST:

/s/ Liza Tamura
City Clerk

Certified to be a true copy of the original of said document on file in my office.

City Clerk of the City of Manhattan Beach, California

CITY OF PALMDALE
INCORPORATED AUGUST 24, 1962
FIRST CITY OF ANTELOPE VALLEY

City of Palmdale

July 22, 1997

Mr. Jack Graham
Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Dear Mr. Graham:

This is in response to the Notice of Preparation (NOP) dated June, 11, 1997 for the Environmental Impact Report for the LAX Master Plan. Members of my staff have reviewed the NOP and generally agree with the analysis contained in the initial study. As is often the case, though, NOP's rarely discuss issues such as the range of cumulative impacts generated by a project. However, with a regional project of this magnitude, a discussion of the cumulative impacts imposed on the region is essential.

Future expansion of LAX to serve roughly 70% of the regional air traffic demand represents a major shift from LADOA's previous plans, from providing regional services from "decentralized" regional facilities to a "centralized" form in which the major share of air service is provided at LAX. Therefore, much of the analysis contained in the Draft EIR should be oriented toward the region-wide cumulative impacts to economic development, housing, transportation and the like, along with the localized issues addressed in the NOP and initial study. Questions such as, "How does the LAX Master Plan fit in with LADOA's regional master plan to provide air service for the SCAG region?" and "Does the project conform to SCAG's Regional Comprehensive Plan, Regional Mobility Element, and Regional Housing Needs Assessment?" should be addressed. Also, the project will, by its regional nature, affect the local General Plans of cities throughout the region, and a discussion of the project's conformity with these documents should be included in the Draft EIR, pursuant to CEQA Guidelines Section 15125.

38300 NORTH SIERRA HIGHWAY, PALMDALE, CALIFORNIA 93550-4798 • 805/267-5100 • FAX 805/267-5122

As I am sure that you anticipated, the City urges you to include a "Regional Airport Expansion Alternative" in the Draft EIR. Although LADOA's annual projected demand for 2015 is 98 million annual passengers (MAP), none of the four LAX Master Plan Alternatives identified to date meet the total need (providing service to only 92-96 MAP). Therefore, LADOA should plan for some expansion of the regional system to meet projected demand, and to accomplish the following goals: to provide greater convenience to North Los Angeles County and North San Fernando Valley; to provide additional opportunities for expansion of regional commuter airline service to meet projected trends, while minimizing impacts of these "smaller, slower aircraft on LAX runways," (see page 26 of the NOP); and, to meet additional capacity needs (the extra 2-6 MAP which will not be served through LAX expansion).

The City believes that this alternative meets the rule of reason established in CEQA Guidelines Section 15126(d)(5), because expansion of PMD as well as other regional airports is feasible, and alternative locations are already available in Palmdale and elsewhere.

The City is not opposed to the planned expansion of LAX. We strongly support expansion of the region's air services, in order to ensure the region's continued economic edge in the Pacific Rim. However, we encourage LADOA to take another look at the potential to increase air service to PMD. According to the LAX 2015 Newsletter Vol.2 No.1, "...14% of the region's passengers live within 90 miles of Palmdale." Yet, Chapter III of the Draft LAX Master Plan, dated February 26, 1996 indicates that under any of LADOA's "Future Air System Service Scenarios," PMD will capture only one (1) percent of the air service market (Fig III-5.12). This seems to be counter-intuitive. We feel that PMD can help to accommodate more of the region's air service demand if additional planning efforts could be jointly run by LADOA, the U.S. Air Force and the City of Palmdale to determine the range of airside and landside improvements that are necessary to bring the existing facility up to regional standards, and identify ways to implement those improvements.

My staff and I are available to meet with you at any time to discuss the future of PMD. We appreciate the opportunity to review the NOP and provide you our thoughts on these important issues. If you have any questions on the

information contained in this letter, please contact me at (805) 267-5100 or Planning Director Molly Bogh at (805) 267-5211.

Sincerely,

Robert W. Toone
City Manager

cc: Mayor and Members of the City Council
Molly Bogh

RANCHO PALOS VERDES

July 30, 1997

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218
Los Angeles, CA 90045

Dear Mr. Graham,

The City of Rancho Palos Verdes acknowledges the potential adverse environmental impacts to the City as a result of the airport expansion. In response to the "Notice of Preparation" for the LAX Master Plan, the City would like to address its concerns as follows:

1. Noise and air pollution due to possible changes in flight patterns and increased operations.
2. Human health hazards due to possible increase in environmental pollution and higher risk of upset.
3. Recently disclosed neurotoxicity of jet fuel by the United Stated Air Force requires that a study be done to determine the health effects on the thousands of children and adults living in proximity to LAX and its approach and departure paths.
4. Emergency access from the LAX may be affected in the case of a seismic catastrophe, threatening the lives of the residents.
5. Plant and animal life may be affected and migration may occur as a result of pollution and reduced habitat and land use change. As a result, biotic resources of the city may be threatened. In turn, it may have a negative impact on the scenic views of the City.
6. The overall quality of life of the City's residents may be reduced due to the possible impacts addressed in 1, 2, 3, 4 and 5.

30940 Hawthorne Boulevard / Rancho Palos Verdes, CA 90275-5391 / (310) 377-6960 / FAX (310) 377-9668

In addition, the City of Rancho Palos Verdes is concerned about the negative impacts that may result to the South Bay region as a whole. Therefore, the City supports the response of the South Bay Cities Council of Governments to the City of Los Angeles regarding the "Notice of Preparation" for the LAX Master Plan.

If you have any questions, please feel free to contact Joel Rojas at (310) 377-6008 extension 223.

Sincerely,

John McTaggart
Mayor

cc: Paul D. Bussey
David Kessler, Federal Aviation Administration

SANTA MONICA

CITY OF CALIFORNIA

Office of the City Manager

1685 Main Street
P.O. Box 2200
Santa Monica, CA 90407-2200
Office: 310/458-8301
Fax: 310/917-6640

July 25, 1997

Mr. John L. Graham
Chief of Airport Planning
Department of Airports
LAX Master Plan Project
1 World Way - Room 218
Los Angeles, California 90012

Dear Mr. Graham,

The City of Santa Monica wishes to have the following comments included in the LAX Master Plan Draft Environmental Impact Statement / Environmental Impact Report.

Comments

The following issues must be adequately addressed in the LAX EIS/EIR:

Aviation Issues:

Air Space

- A full and complete analysis must be made of the impact on Visual Flight Rules (VFR) and Instrument Flight Rules (IFR) aircraft arrivals and departures at Santa Monica Airport (SMO) as a result of the projected increase in flight operations that will occur in the course of the full build out of LAX and appropriate mitigation measures to negate negative impacts must be recommended.

  The City of Santa Monica believes that any increase in air traffic at LAX will lengthen delays of IFR and VFR operations at SMO due to an increase in air space congestion. These delays will adversely affect the residential areas of West Los Angeles and Santa Monica surrounding the Airport by subjecting them to an inordinate amount of air and noise pollution as aircraft await departure release. Santa Monica Airport has already experienced a tremendous increase in IFR departure delays as a direct result of the severely congested air space at LAX. The projected increase in aircraft operations at LAX will only serve to exacerbate the situation.

Fixed Base Operator Facilities

- The Los Angeles Department of Airports should include, maintain, and expand facilities for General Aviation aircraft in addition to providing for expansion of full service Fixed Base Operator(s) in the LAX Master Plan. If that is not provided for, a full analysis must be made of the impact the exclusion of such facility enhancements would have on SMO and the surrounding general aviation airports and appropriate mitigation measures recommended.

  The four future LAX improvement concept plans (including the "No Project" alternative) currently being considered do not include the development and enhancement of general aviation fixed base operator (FBO) facilities at LAX. If fixed base operator facilities are diminished in the LAX Master Plan, SMO will experience an increase in corporate jet aircraft activity creating additional noise and pollution adversely affecting the neighbors living in West Los Angeles and Santa Monica. Corporate and business aircraft operators frustrated by the lack of facilities at LAX will search out alternative airports such as Santa Monica, Hawthorne and Torrance. Santa Monica Airport currently bears an unwarranted burden of relocation of jet traffic due to its proximity to downtown Los Angeles, Century City, and the West Side.

  The City of Santa Monica requests that the Board of Airport Commissioners provide strengthened and enhanced general aviation facilities that will accommodate business and corporate jet aircraft operators in all LAX Master Plan development alternatives.

Regional Airport Improvements

- The LAX Master Plan EIR/EIS analysis must fully explore the impact of developing El Toro Marine Corps Air Station in Orange County, and Point Mugu Naval Air Station in Ventura County, into fully operational air-carrier airports capable of serving domestic and international flights. The EIR/EIS must also justify why developing these valuable airports should or should not occur and quantify the impacts accordingly.

  The development of Point Mugu and El Toro will reduce traffic congestion on Los Angeles freeways, reduce air pollution and noise impact in and around LAX, reduce air traffic and improve air safety within the LAX airspace, and provide improved and expanded air service to the people living in Ventura and Orange County. Enhanced air carrier service at these airports will also diminish the need to expand LAX by developing capacity at airports within the region to accommodate the projected future growth in passenger activity.

RELATED PROJECT/CUMULATIVE ANALYSIS

- The analysis should use the most recent cumulative project list that the City of Santa Monica has available. We have attached a copy of the most recent cumulative project list for your use.

- The EIS/EIR should use a realistic build-out year to accurately reflect ambient traffic growth and development in the region. This analysis should also include all proposed projects in the City of Los Angeles, including the Playa Vista Master Plan and the approximately 2 million square foot project often referred to as the north side LAX project on Lincoln Boulevard.

TRAFFIC

- The City of Santa Monica has been working with the traffic consultant on the Playa Vista/LAX Master Plan Traffic Study. To reiterate comments previously made to the consultant, we are very concerned about the traffic impacts from the project to many corridors in Santa Monica. The following intersections should be analyzed, along with a realistic distribution of traffic along the corridors. The analysis should include the diversion of traffic off Lincoln Boulevard to Neilson Way, Main Street, 4th Street and the Walgrove/23rd Street corridors:

• Lincoln Boulevard/Ocean Park Boulevard	• Lincoln Boulevard/Pico Boulevard
• Lincoln Boulevard/I-10 eb on-ramp	• Lincoln Boulevard/I-10 wb on/off ramp
• Lincoln Boulevard/Wilshire Boulevard	• Main Street/Ocean Park Boulevard
• Main Street/Pico Boulevard	• Neilson/Ocean Park Boulevard
• Ocean Avenue/Pico Boulevard	• Ocean Avenue/PCH
• Ocean Avenue/Wilshire Boulevard	• 4th Street/Ocean Park Boulevard
• 4th Street/Pico Boulevard	• 4th Street/Colorado Avenue
• 4th Street/Wilshire Boulevard	• 23rd Street/Ocean Park Boulevard
• 23rd Street/Pico Boulevard	• Cloverfield Blvd./Ocean Park Blvd.
• Cloverfield Boulevard/Pico Boulevard	• Cloverfield Boulevard/I-10 on-ramp
• Cloverfield Boulevard/I-10 off-ramp	• 26th Street/Wilshire Boulevard

- Determination of existing traffic conditions in the EIS/EIR for Santa Monica should rely upon the April 1996 Master Environmental Assessment (MEA), a copy of which is attached. This provides recent traffic counts and the operating levels of service for the intersections under existing conditions and in the year 2005 with cumulative projects.

- The analysis for intersections in Santa Monica should be done using the HCM methodology adopted by the City of Santa Monica and described in the MEA. In addition, the City's significance criteria should be used, at least as an information source, since it is more strict than the significance criteria used by the City of Los Angeles.

- The City of Los Angeles General Plan Framework and Marina del Rey Local Coastal Plan Amendment must both be analyzed in conjunction with the proposed project in order to accurately reflect the cumulative impacts of these plans at build out on the surrounding area and the region.

- The impacts to the Santa Monica Municipal Bus service along Lincoln Boulevard and in other areas should be well documented. Any proposed additional transit service should be well

coordinated with the Santa Monica Municipal Bus lines as well as other transit providers in the area.

- We are prepared to discuss any proposed mitigation measures for impacts in the City of Santa Monica, and strongly recommend that an emphasis be placed on decreasing the number of automobile trips generated by the project and promoting effective and enforceable alternative transportation modes including transit, carpooling, bicycling, parking pricing and other TDM strategies.

AIR QUALITY

- The EIS/EIR should fully analyze the air quality impacts to the local area and the region of the development project. At a minimum, this should include air quality impacts associated with the increase in traffic along the traffic corridors in Santa Monica identified above, and the air quality impacts caused by the construction of the development in addition to any impacts attributable to aircraft operations.

GROWTH INDUCING IMPACTS

- The discussion of growth inducing impacts must be thorough in the EIS/EIR due to the regional significance of this project which will have a wide variety of impacts on the surrounding areas. For instance, we expect that there will be an increase in demand for affordable housing, open space, and impacts to the circulation network in Santa Monica due to commutes to and from the project site.

City of Santa Monica staff is available to discuss these issues in greater detail with you and/or your consultant team. Additionally, we would welcome the opportunity to participate in the early review of information related to Santa Monica-specific issues that is to be included in the EIS/EIR to assure that the information is accurate. Please do not hesitate to contact Bob Trimborn, Airport Manager should you have further questions.

Sincerely,

John Jalili
City Manager

Enclosures: Cumulative Projects List
1996 MEA

cc: Jeff Mathieu
Suzanne Frick
Paul Casey
Bob Trimborn
Karen Ginsberg

Rec'd 7/30/97 original was given directly to LSB. No copies have been made. LSB will return it to LAWA.
[illegible]

CITY OF SANTA MONICA
PLANNING DIVISION
CUMULATIVE DEVELOPMENT PROJECTS LIST
July 10, 1997

Key:
- AA - Administrative Approval
- ARB - Architectural Review Board
- CC - City Council
- DA - Development Agreement
- DEIR - Draft Environmental Impact Report
- EIR - Environmental Impact Report
- IS - Initial Study
- PC - Planning Commission
- PSP - Performance Standards Permit
- SEIR - Supplemental Environmental Impact Report
- ZA - Zoning Administrator

* Commercial or industrial projects consisting of 15,000 square feet or more of new floor area and/or new non-discretionary buildings with 15 or more units, and new discretionary projects with five or more units.

** Numbers correspond to project map on file in City Planning Division, Planning and Community Development Department.

Project/Type of Development	Location	Square Feet	Status
Arboretum Contact: Robert Bisno 551-1010	2000-2224 Colorado Avenue	945,490 total 25,000 restaurant 10,000 retail 60,000 health club 35,000 medical office 20,000 banks & S&Ls 475,490 general comm. 50,000 market 270,000 residential	DA approved by CC, 1987 Project expected to proceed in phases 1st phase completed; amendment filed 5/21/93; EIR released 7/28/94 CC approved Building Permit for market issued 12/27/95; Temp. C/O issued August 22, 1996.
4 Story Retail/Office/ Restaurant Contact: John Cope (213) 613-4598	1733 Ocean Avenue	72,353 total 58,330 office 8,040 retail 3,717 restaurant 2,266 support retail	filed 11/17/87 Development Agreement approved by CC 8/7/90 D.A Amendment approved by CC 11/7/95

CITY OF SANTA MONICA
PLANNING DIVISION
CUMULATIVE DEVELOPMENT PROJECTS LIST
July 10, 1997

Project/Type of Development	Location	Square Feet	Status
6 Story Hotel/ Restaurant/Retail Contact: John Cope (213) 613-4598	1746 Ocean Avenue	138,219 s.f. 175 room hotel, 5,000 restaurant 190 retail	filed 11/17/87, CC approved 8/22/89 under construction
Carlthorp School Expansion Contact: Kenneth Kutcher 451-3669	424 San Vicente Blvd.	28,923 s.f. school expansion	filed 6/15/95 PC approved 6/12/96
Crossroads School Expansion Contact: Jean Campbell (310) 829-7391	1649 17th Street	29,337 s.f. elementary school gymnasium and outdoor pool	filed 4/1/96 Pending Environmental Review
Santa Monica Studios Contact: Susan Budd The Landau Pertnership	3025 Olympic Blvd.	111,930 sf. Res. 265,010 sf. Film Produc. Studio & other 17,250 sf. Restaurant Total 394,290 sf.	filed 5/1/96 Pending Environmental Review
The Water Garden/ Office Development Contact: Michael B. Williams 829-9882	2425 Olympic Avenue	Phase I Completed: Phase II- 629,788 total s.f. 503,788 office 20,000 med. office 28,000 retail 41,500 restaurant 6,500 health club 30,000 banks/S&L's	Phase II 2-7 year start date

CITY OF SANTA MONICA
PLANNING DIVISION

CUMULATIVE DEVELOPMENT PROJECTS LIST
July 10, 1997

Project/Type of Development	Location	Square Feet	Status
2 story 301 space garage with ground floor retail & 4 levels of subterranean parking Contact: Kenneth Kutcher 393-1007	120 Wilshire	25,722 s.ft.	Filed 12/22/94 Pending Environmental Review PC hearing 3/5/97
Affordable Housing	2807-2809 Lincoln	40 units Senior Hsng.	AA approved
Condominium Complex Contact: Tom Miller	1206-1218 Ocean Park Boulevard	20 Units	Filed 7/2/90 PC approved 10/31/90 bldg. permit issued 11/94 Under Construction
Upward Bound House Contact: Paul Ballmer 395-5075	1011 11th Street 1020 12th Street	83 unit senior housing project and 24 unit community care facility	filed 1/7/92 Approved by PC Community Care Facility Under Construction
St. John's Hospital Master Plan Contact: Ken Kutcher 393-1007	1328 22nd Street		Filed 5/22/96 Deemed Incomplete Pending Env. Review
100% Affordable Apts. Contact: Mehrdad Amanat 451-8060	1144-1148 12th St.	17 unit	PC approved 9/21/94 Building Permit Issued

CITY OF SANTA MONICA
PLANNING DIVISION

CUMULATIVE DEVELOPMENT PROJECTS LIST
July 10, 1997

Project/Type of Development	Location	Square Feet	Status
Condominium Complex Contact: Howard Poyourow 278-1830	951 Ocean Avenue Condominium	16 unit	PC approved 5/19/93 Permit expire 9/2/95 Building Permit Issued Under construction
100% Affordable Apartments Contact: Walter Pinel (213) 580-9977	1637 Appian Way	25 units	RPP approved 12/15/95 AA approved 2/8/96,
100% Affordable Apartments Contact: Craig Jones 260-1236	1422 7th Street	24 units and 4 senior units	AA Approved 3/31/94 Building Permit Issued 1/12/96 Under construction
100% Affordable Apartments Contact: Craig Jones 260-1236	1430 7th Street	24 units and 4 senior units	AA Approved 3/31/94 Building Permit Issued 1/12/96 Under construction
100% Affordable Apartments Commercial Contact: Craig Jones 260-1236	1441 5th Street	1207 s.ft. commercial 33 units	AA filed 9/13/94 Withdrawn
100% Affordable Apts. Community Corp. of Santa Monica. Contact: Alex Wong 394-8487	708 Pico Blvd.	20 units underground parking & community room	AA 96-032 Filed 7/18/96; AA Approved

CITY OF SANTA MONICA
PLANNING DIVISION

CUMULATIVE DEVELOPMENT PROJECTS LIST
July 10, 1997

Project/Type of Development	Location	Square Feet	Status
100% Affordable Apartments Commercial Contact: David Stearn 395-3066	1445 5th Street	1207 s.ft. commercial 33 units	AA filed 9/13/94 Withdrawn
100% Affordable Apartments Craig Jones 260-1236	1422 6th Street	28 units	AA approved 10/6/95
100% Affordable Senior Units Jewish Federation 225 N. Crescent Dr. Beverly Hills, CA 90210 247-8030	1136-1144 4th Street	66 units + 165 public parking spaces	DR filed 4/17/95 Pending Environmental Review

CITY OF SANTA MONICA
PLANNING DIVISION
July 10, 1997

Project/Type of Development			Status
RESIDENTIAL			
CUP 95-007 Iraj Sarvian 451-9224	1043-1045 11th Street		Modifications to previously approved plans filed 3/22/95 Pending CC appeal 7/9/96 (G. Szilak)
CUP 95-015 Shahab Ghods 478-6149	1217 Yale Street	11 Unit Condo	Filed 7/5/95 PC hearing 8/7/96 (L. Beck)

CITY OF SANTA MONICA
PLANNING DIVISION
July 10, 1997

Project/Type of Development	Status
Ongoing Santa Monica Policy Planning Projects*	
Auto Dealership Standards: C4, C6 Review standards	Met with Auto dealer reps. 6/27/95 follow up meetings held on 10/5/95, 1/25/96 and 3/18/96 to discuss dealer position paper; Reso. of Intention on proposed text amendments to PC 7/17/96; public hearing at PC 9/96. (Paul F)
Beach Improvement Project Environmental	EIR and Initial Study scopes of work prepared. Staff awaiting revised work scope from Myra Frank & Associates. Section 106 consultant contract underway. (A. Anderson)
Circulation Element	PC Visioning workshop July 17, 1996 (Paul C)
Downtown Urban Design Plan	Council Award of Contract to Roma Design Group on 1/23/96. Public Workshop 6/15/96. Next Steering Committee Mtg. 8/8/96 (David)
Housing Element Update	Update to cover the 1998-2003 period. Public meetings held August, 1995. Draft Housing Element Update due Fall 1996 (Amy).
Main Street Parking Study	Wilbur Smith hired to perform analysis; Study underway; anticipated completion March 1997. (Sarah L.)
Main Street Streetscape Plan	City Council approval in concept 11/14/95. Establishment of Assessment District underway; 2nd Council Hearing postponed until Fall 96. RFQ withdrawn.

CITY OF SANTA MONICA
PLANNING DIVISION
July 10, 1997

Project/Type of Development	Status
Main Street Incidental Entertainment	City Council review of Ordinance Amendment April 22, 1997
Marine Park Lighting Project - IS	Pending Engineering Scheduling City Council Review (Paul F.)
Montana Avenue Streetscape Improvements	Planning Commission hearing held on conceptual plan prepared by Jeff Oberdorfer 3/15/95. PC action continued to after trial period of restriping Plan. Report on restriping to be prepared by transportation staff. (DM)
Open Space Element/Parks & Recreation Master Plan	Joint PC & Parks & Rec. Commission mtg. on conceptual framework 6/12/96. Award of Phase II contract scheduled for end of July. Draft OSE scheduled for Dec. '96. (Karen/Amy w/CCS)
Pico Boulevard Streetscape Plan	Information Gathering Meetings began March, 1995. Community wide workshop held May 18, 1995. EDA grant to fund improvements. RFQ to be issued Aug. 1996. (David)
Regional Comprehensive Plan (RCP)	Santa Monica working with other westside cities and SCAG on this regional plan. Most chapters of RCP now adopted. Studies of mixed use success stories, L.A. Framework, traffic analysis, and shuttle programs completed. SCAG revising growth forecast and preparing 1996 Regional Transportation Plan.
Conservation Element	(Project Scope in preparation.)

CITY OF SANTA MONICA
PLANNING DIVISION
July 10, 1997

Project/Type of Development	Status
Transportation Management Plan Nexus Study	First Draft due 4 weeks after completion of MEA. (Paul Casey)

* Includes major plans which may affect scope, nature or impacts of development in Santa Monica.

F:\ppd\share\ppddocs\current

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Mixed Use, Office/ Residential Contact: William Brantley 393-2930	1447-1451 Cloverfield 2,000 residential (4 units)	34,000 office	Withdrawn
4 Story Commercial Building-Retail	900 Wilshire Blvd.	37,178 s.f.	Denied 1/4/89
Retail/Office	1500 Wilshire Blvd.	24,286 s.f.	Denied 1/4/89
5 Story Hotel	1760 Ocean Avenue	70,790 s.f.	Withdrawn 3/2/89
Retail, Restaurant, Residential	2201 Wilshire Blvd.	54,961 total	Withdrawn 4/89
Mixed Use Development Retail/Residential	234 Pico Blvd.	96,425 total 61,125 residential (75 units) 20,300 commercial	Withdrawn 4/89
Contractor Offices & Showroom	2601 Pico Blvd.	48,451 s.f.	Withdrawn 5/89
Comfort Inn 66-rm motel expansion	2801 Santa Monica Boulevard	35,484 s.f.	PC denied 4/25/89
2 Story Retail	2233 Pico Blvd.	63,419 s.f.	CC denied 7/25/89
Office/Retail	1447-1453 Lincoln	33,750 total	Withdrawn 7/89
6 Story Office 2 Story Residential	2900 Wilshire Blvd. 1217 Yale Street	76,983 s.f. Office	CC denied 9/26/89

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Colorado Place Phase II: Movie Theaters	2320-2550 Broadway	1500-seat movie Theater (4 screens)	Withdrawn
DR 95-004 Pending TTM 51967 Davidian Development Karim Bagheri-Pard (818) 346-3422	838-844 17th Street	10 Unit Condo	Filed 6/1/95 Environmental Review (G. Szilak)
Airport Residual Land Development Project/ Santa Monica Common	Santa Monica Airport/ Bundy Drive	822,000 (net) s.f. 793,400 office 21,826 retail 8,042 restaurant 9,000 child care center 3,276 parking spaces Phase 1-366,000 total Phase 2-371,000 total Phase 3-85,000 total	filed 4/14/88 CC approved 10/10/89 rescinded 1/90
Visitor-Oriented Retail/Office	1828 Ocean Avenue	89,000 total 55,600 office 23,400 retail 10,000 restaurant	filed 7/22/88 PC denied 12/6/89 CC denied
Main Street Parking Structure	2700-2900 Neilson Way		TBD Withdrawn 6/90
Santa Monica Beach	415 Pacific Coast Hwy.		160 room hotel Dev. Agreement

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Hotel and Community Center	15,825 s.f.	(173,283 s.f.), Approval repealed Community Center 189,108 s.f.	approved by CC by initiative 11/6/90
3 Story Office Bldg.	1654, 60, 62, 64, 70 20th Street	42,000 s.f.	Permits expired 3/91
Office Building	2301 Pico Blvd.	18,000 s.f. addition to 37,108 s.f. bldg (old office)	Permits expired 4/91
Office Building	2411 Pico Blvd.	23,624 s.f.	Permits expired 4/91
4 Story Commercial, 7 Unit Condo	2919-2923 Wilshire Blvd.	62,196 total 47,990 office 7 residential units	Permits expired 4/91
2 Story Commercial Office bldg. & 2 levels subt. parking	2201 Pico Blvd.	25,200 s.f.	Withdrawn 5/91
Mixed Use Development	1452 16th Street	34,000 total 26,395 office 7,380 retail 37 rental units	Permits expired 6/91
Mixed Use Commercial/Hotel	3105 Main Street	70,570 s.f. 1800 s.f. restaurant (150 seat), 69 room hotel, 4800 s.f. retail, 1750 s.f. office	Permits expired 6/91

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Retail/Office/ Residential (4 story)	135, 137, 145 & 147 Bay Street, 1920 Main Street	6,400 retail 35,900 office 10,580 apts. (20 units)	Permits expired
Office Building Sports Connection	2940 31st Street 2929 31st Street	157,500 s.f. 71,000 s.f.	Withdrawn 8/91
Automotive Service Facility	1801 Santa Monica Blvd.	52,875 s.f.	Permits expired 9/91
Mixed use Office/Retail	401-415 Santa Monica Blvd., 1341-1357 4th Street	99,000 total 15,000 retail 84,000 office 6 stories	Permits expired 9/91
3/4 Story Office Bldg.	2320 Wilshire Blvd.	81,287 total	Permits expired 10/91
4 Story Office/Retail	1401 3rd St. Prom.	56,020 total 39,185 office 10,835 retail 6,000 restaurant	Permits expired 11/91
3 Story Office Bldg.	1654 20th Street	15,000 s.f.	Withdrawn 8/16/91
Office Addition to existing building	2800 Donald Douglas Loop North	15,100 s.f.	Withdrawn 8/16/91
Mixed Use, retail, Office, Residential	1343 3rd Street Prom.	55,600 s.f. 9,400 retail 28,700 office 14 residential	Permits expired 12/91

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Unity by the Sea Office/Retail	1245 4th Street	33,645 s.f. 4,068 retail 21,284 office 8,294 sanctuary	Withdrawn 1/92
3 Story Commercial Building	2215 Wilshire Blvd.	61,650 s.f. 39,767 office 14,389 retail 1,800 residential (3 units) 4,000 restaurant 1,594 parking	Permits expired 3/92
Office/Retail Fred Segal Expansion	502 Broadway	65,300 total 29,460 retail 6,230 office 2,000 restaurant 6,000 storage 6 apartment units	CC denied 12/16/88
Mixed Use 3 Story Development	1422-1430 1/2 7th Street	29,995 s.f. 8,000 residential 8,000 medical 13,264 office	Permits expired 7/92
Office Building	1437 5th Street	18,750 s.f.	permits withdrawn 7/92

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
Santa Monica Aquarium by Underwater World	1500 Block of Appian Way (Deauville property & beach maintenance yards)	65,200 total 49,000 display tanks 2,000 restaurant 7,000 retail 7,200 mechanical/ service/misc.	Withdrawn 9/92
3 Story Retail/Office	1426-28 3rd Street	18,183 s.f.	Withdrawn 10/92
4 Story	120-130 Wilshire	41,000 s.f. 10,250 retail/restaurant 10,250 office 20,500 of 12 condominiums	Withdrawn
Condominium Complex	1527-33 14th Street	16 units	Withdrawn 6/93
Apartment Building	1940 Cloverfield	22 units	Permits Expired
St. John's Outpatient Facility	1400 21st Street Phase I Phase II	152,427 total 96,385 56,042	Withdrawn 4/94
Mixed Use Commercial/Residential Medical offices, senior group housing	1107 S.M. Blvd.	36 unit Sr. Housing 9661 s.f. med. off. 571 s.f. retail 19,630.00 total s.f.	Withdrawn 4/94

CITY OF SANTA MONICA
PLANNING DIVISION

DENIED/WITHDRAWN PROJECTS

Project/Type of Development	Location	Square Feet	Date Denied/ Withdrawn
24 room "Bed & Breakfast" And Text Amendment Contact: Rosario Perry 394-8931	1703 Ocean Front Walk	19,000 s.f.	Filed 1/4/93 Denied by PC 9/1/93 Appealed to CC, remanded to PC PC hearing 4/5/95 Project redesigned as 3 separate, 4 room, bed and breakfasts of 2,500 sq.ft. each.

f:\ppd\share\ppddocs\current

CITY OF
TORRANCE

DEE HARDISON
MAYOR

July 29, 1997

Mr. Jack Graham
Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Dear Mr. Graham:

The City of Torrance has reviewed the Notice of Preparation/Notice of Intent for the preparation of the Environmental Impact Report/Environmental Impact Statement for the draft Master Plan for Los Angeles International Airport. The City Council unanimously adopted the following comments which we wish to submit for consideration.

The presence of LAX and its continuing growth have long had important impacts on the City of Torrance and our residents. As the LAX Master Plan is expected to guide the growth of the Airport through the year 2015, it is imperative that it address the needs of the citizens of Torrance and the other communities in the South Bay.

The City of Torrance is working with the other cities in the South Bay Cities Council of Governments to submit a joint response to the NOP. We are also submitting our own comments via this letter to insure that our specific concerns are included in the scope of the EIR/EIS.

The general areas of concern that have been expressed by the communities in the South Bay include, but are not limited to, impacts of noise and pollution from current and all additional overflights, increased traffic and ground transportation demand (including expanded trucking and rail operations connecting LAX to the ports and points outside of the area), and funding for mitigations that will be necessitated by the growth. For several jurisdictions directly adjacent to the airport, there are additional considerations relative to land use issues, expanded cargo facilities, and provision of adequate public services. Throughout the South Bay, there are serious issues to be resolved with any expansion of air and ground operations at LAX.

3031 Torrance Boulevard • Torrance, California 90509-2970 • Telephone 310/618-2801 • Facsimile 310/618-5841

The immediate issues for the City of Torrance include the noise and pollution impacts of expanded overflights on our residents, the additional congestion on our arterial streets as a result of higher demand to access the airport, and the possibility that any linkage of Hawthorne Airport to LAX for air commuter traffic may result in a concurrent shift of general aviation demand to Torrance's Zamperini Field. In addition, we share the concerns of our neighboring communities that the infrastructure improvements necessitated as a result of the Master Plan implementation may be competing for the very same funds that we will need to maintain our transportation facilities.

Following are details on the specific issues of concern to the City of Torrance. These responses to the NOP apply to each and all of the proposed concepts for the LAX expansion, regardless of which is adopted by the City of Los Angeles.

Airport Operations

1. A recent revision of the LAX traffic control area (TRACON) by the FAA has had a significant impact on Torrance and the subregion. Aircraft departing LAX are now allowed to fly closer to the ground for a greater distance before increasing altitude. Moving the boundary of this airspace closer to the beach cities and Torrance has resulted in more noise. All of the draft Master Plan concepts would exacerbate this noise intrusion.

   Response: The Master Plan EIR/EIS must consider the impacts of the current TRACON area as it is defined by the most recent configuration when analyzing the noise impacts of all expansion options. This means that, in defining current conditions, the EIR/EIS must revert back to the previous TRACON definition in order to gauge the noise impacts of the recent change.

2. If Concept 4 is adopted for implementation via the Master Plan, Hawthorne Airport will become the base for LAX's commuter operations. Many general aviation pilots do not like to share airspace with larger and significantly faster commercial aircraft. As a result, it is possible that general aviation demand for Torrance Airport would increase as greater numbers of general aviation pilots look for other bases of operation.

   Response: The EIR/EIS must assess the spillover effects on general aviation operations at nearby airports if commuter flights are moved to Hawthorne Airport.

Ground Access

1. With few exceptions, the South Bay's surface transportation facilities are built to their maximum physical capacities. With the near-term completion of the high occupancy vehicle (HOV) lanes on the San Diego Freeway, there will be no more new or expanded freeways in our subregion. The same is true for cross-jurisdictional arterial roadways. As future travel demand increases for all trip purposes, the South Bay's streets and roads will experience greater congestion.

   The analysis for the LAX Master Plan anticipates a significant increase in ground access demand by the horizon year, far above expected ambient growth in our area. This increased traffic volume will place further burden on our currently overloaded highways, making mitigations necessary not only in the areas adjacent to LAX, but also well beyond the airport to the north, south, and east. The analysis of future transportation needs must identify the impact area in an inclusive enough scope to account for all necessary mitigations.

   Response: The LAX Master Plan EIR/EIS analysis must include the broadest definition of impact area as is reasonable, and it must insure that all ground access impacts of expanded operations are identified wherever they occur throughout the South Bay and beyond.

   Response: In determining which roadways to analyze, the EIR/EIS should include in its criteria of significance concepts such as adjacent land uses, connectivity between major activity centers, and the unique geography of the South Bay.

2. Between now and the year 2015, it is not likely that the South Bay will see the installation of new long-haul or fixed guideway transit systems, other than short extensions of the Green Line. As a result, buses and demand-response services are expected to remain the mainstay of our transit capacities. The Green Line currently does not connect to LAX, an oversight that creates a disincentive to using it as a mode of access to LAX. Whether or not LAX is expanded, transit will need to continue taking on a greater mode split share to accommodate current and future travel demand.

   Response: The EIR/EIS analysis must determine the maximum opportunity for transit to carry a greater share of trips in the area of the airport. It will need to identify a plan for coordinated transportation facilities as well as integrated TDM strategies.

3. The popularity of Southern California as a world port and major entry point for Pacific Rim goods has inspired serious debate over how the ports of the Los Angeles area will accommodate increased cargo carrying needs. Because of its proximity to the airport, the South Bay plays a pivotal role in transferring goods from air to land, rail or sea, and vice versa. Given the limitations on the subregion's capacity to expand its roadway network, the Master Plan will need to develop methodologies for moving goods out of LAX and through the South Bay. The EIR/EIS will need to be specific relative to the impacts of competing demands of growing goods movements and other travel purposes on our transportation facilities.

   Recommendation: The EIR/EIS must identify the true impacts of expanded cargo handling at LAX, including competition between trucks and other vehicles on regionally significant roadways, effects of rail movements on roadway operations, and the viability of existing truck routes. The Master Plan must contain strategies that will accommodate the loading, unloading, and movement of goods to and from LAX via the surface transportation system throughout the South Bay.

Funding for Future Mitigations

1. All of the four concepts currently included in the Master Plan draft include an extension of the Green Line to the airport and a limited-access perimeter road. Concept 4 also promotes a roadway linkage to commuter operations at Hawthorne Airport. In addition, however, the traffic impacts of any expanded operations at LAX will necessitate major improvements to the roadways and transit systems throughout the subregion. Funding for these improvements will be critical.

   Many improvements which will directly benefit current and expanded operations at LAX are already being programmed by the City of Los Angeles. For example, in the 1997 Call for Projects, the MTA awarded the City of Los Angeles over $1.7 million for the construction of an interchange at Arbor Vitae and the San Diego Freeway. As always, these projects compete with those of other subregions for scarce funds.

   An issue of equity arises from the economic growth opportunities presented by the expansion of operations at LAX. Since this growth will occur at the expense of neighboring cities and subregions, it is not unreasonable to expect that mitigations necessitated by the airport's operations should be funded by the airport itself. Furthermore, it is also incumbent upon the Master Plan to identify funding sources for these mitigations, and to insure that the financing of all such projects does not siphon funds away from critical transportation programs in other areas.

Recommendation: The EIR/EIS must include a funding program that specifies how mitigations will be paid for. This financing plan must show that these mitigation projects will be funded out of the airport's own resources, whether private or public.

Recommendation: The funding program of the EIR/EIS must insure that mitigations to airport expansion will not compete for the same public funds that are critical to surrounding jurisdictions and subregions.

Please contact Ms. Helene Buchman, Transportation Planner for the City of Torrance, with any questions or for more information on the above responses to the NOP. Ms. Buchman can be reached at (310) 618-5990.

We appreciate the opportunity to submit our concerns. We look forward to your response and to working closely with the Los Angeles Department of Airports and the Federal Aviation Administration on the LAX Master Plan.

Sincerely yours,

Dee Hardison

Dee Hardison

HB:dma

South Bay Cities COUNCIL OF GOVERNMENTS

P.O. Box 102
Hermosa Beach
California 90254

July 29, 1997

Mr. Jack Graham
City of Los Angeles
Department of Airports
LAX Master Plan
One World Way, Room 218
Los Angeles, CA 90045-5803

Subject: Response to Notice of Preparation of Draft Environmental Impact Report - LAX Master Plan

Dear Mr. Graham:

At its meeting on Thursday, July 24, 1997, the South Bay Cities Council of Governments discussed the subject Notice of Preparation relating to the proposed LAX Master Plan. Upon completion of the discussion, the COG approved the attached South Bay Cities Council of Governments Response to the City of Los Angeles Notice of Preparation for the LAX Master Plan and authorized the forwarding of this document to your agency.

The South Bay Cities COG is very interested in the continued development of the LAX Master Plan and requests that we be kept informed of its progress and be provided an opportunity to participate. If you have any questions concerning the COG's submittal, please feel free to call me at (310) 618-2801.

Sincerely,

Dee Hardison

Dee Hardison
Mayor, City of Torrance
Chair, South Bay Cities Council of Governments

dma
Enclosure

SOUTH BAY CITIES COUNCIL OF GOVERNMENTS
RESPONSE TO CITY OF LOS ANGELES
NOTICE OF PREPARATION
FOR THE
LAX MASTER PLAN

(28 July 1997)

In addition to responses to specific items contained in the Initial Study and Checklist, the SBCCOG requests that the following considerations be included in the Environmental Studies:

1. **Cumulative Actions.** The Joint EIS/EIR should examine all of the development which may result from the Master Plan and not limit examination to only the major, easily quantifiable improvements specifically delineated in the Notice. All but ignored are connected, cumulative and similar actions. For example, the Attachment to the Notice of Preparation describes elements such as "ancillary uses", "support facilities" and "airport-related business activities" which appear to be critical in the development of the airport. The cumulative effect of these and any other improvements must be addressed.

2. **Funding.** The airport has indicated it will pursue several types of funding, including competitive fund sources. The Joint EIR/EIS should examine the impact on other agencies if the airport receives the requested funding.

3. **Alternatives.** In response to the Initial Study and Checklist, the SBCCOG notes that alternatives 1 - 4 are not actually alternatives, rather, they are variations on the same theme. An alternative would be other "reasonable courses of action" according to NEPA guidance. Since the purpose of the expansion is to serve anticipated "regional growth" more thought should be given to regional alternatives. True alternatives must be made available to decision makers and to the public.

4. **Impacts.** The authors of the Initial Study and Checklist have generally avoided addressing indirect and cumulative impacts of the proposed project. A project of this magnitude will produce multiple actions, each with a ripple effect of impacts. These must be examined in detail.

As a starting point the SBCCOG concurs with the "yes" responses of the authors of the Initial Study and Checklist, and requests the following considerations be included in the Environmental Studies:

1. **Earth.**

   Question 1-g. The location of LAX makes it a primary entry for emergency supplies and an primary exit for medical emergencies should a major seismic event occur resulting in significant damage and injury. The proximity of the airport to active fault zones makes it susceptible to sustaining major damage in such an event. Over development of this facility at the expense of underdevelopment of others degrades the potential for effective regional emergency response. This issue is not examined and must be.

   The correct response is "yes".

2. **Air.**

   Question 2 - b. The burning of nearly any form of kerosene, including jet fuels, produces objectionable odors. Given the vast amounts of such fuels being consumed in the confined area of the airport there can be no question that objectionable odors will be created. The various impacts of these odors must be studied.

   The correct response is "yes".

   Question 2 - c. There is insufficient data to indicate that the tons of pollution, heat and turbulence produced by air operations at LAX has no impact on local climatological conditions. This issue requires further study.

   The correct response is "maybe".

   Question 2 - d. There is no doubt that the pollutants currently produced at LAX negatively impact receptors sensitive to severe air pollution conditions. Adding significant quantities of CO, NOX, PM10, and/or other pollution cannot but increase the severity of an existing problem.

   The correct response is "yes".

3. **Water.** The impact of the massive amounts of hard surfacing the airport plans is underestimated in that loss of percolation, significantly increased, polluted runoff, the effect of this increased runoff on low lying roadways and adjacent residential construction, impact of airport flooding on existing or planned surface bodies of water in the area, sea water intrusion due to loss of percolation, elimination of the complex network of arroyos and other surface water ways that characterize the western half of airport property, increased airport runoff impact on beach flooding and contamination, any impact due to pumping well water from of site to support the airport, the effect of prioritization of water customers during sever droughts, and movement of existing

subterranean pollution plumbs are just some of the impacts that one can expect and which are minimally addressed, if addressed at all.

The correct responses for items 3.a., c., d., e., f., g., h., and k., is "yes".
The correct responses for items 3.i., is "maybe".

4. **Plant Life.** As indicated in the Notice of Proposal's Initial Study and Checklist, responses to potential impacts on existing fauna and the potential for introducing new fauna can only be determined after study by the appropriate agencies. Until these studies are made available to the public there is little basis for predicting the impact of doubling operations and concrete surfaces at LAX. However, it is naive to presume that the planned growth of this airport, with its emphasis on expanding its port-of-entry role by an even greater percentage than its domestic role, will not introduce new plant life into the area.

The correct response to item 4.c. is "maybe".

5. **Animal Life.** Reducing habitat has the effect of reducing species populations. Covering the surface of dunes, arroyos, and ancient alluvial plain with concrete, asphalt and the kerosene spray of partially burned fuel will impact the species that inhabit those ecosystems.

The correct response to item 5.b., c., and d. is "yes".

6. **Noise.** The three most politically probable of the four concepts presented by the airport management all call for moving runways closer to El Segundo. The southern-most runway is now only 1000 feet from the nearest homes. Executing any of the three proposed concepts will move that runway to within 700 or 800 feet of the nearest home. Additionally, the detail-less "ring road" proposed will presumably add numerous high speed lanes between that southern-most runway and the adjacent homes.

The correct response to item 6.b., is "yes".

7. **Light and Glare.** Not all light sources are addressed in 7.a.

8. **Land Use.** Some of the development proposed is incompatible with existing adjacent residential land use.

The correct response to item 8.b., is "yes".

9. **Natural Resources.** Natural resources including fresh air, freedom from annoying and disruptive noise events, abundant fresh water, and existing quality of life may all be impacted by the size and nature of the LAX expansion.

The correct response to item 9.b., is "maybe".

10. **Risk of Upset.**

Question 10 - a. Expanding the number of LAX gates from 145 to 245 along with other significant capital improvements will result in a dramatic increase in aircraft operations at LAX over the next few years. With operations approaching 1,000,000 per year by 2015, statistical analysis makes clear that the question is not "if" an accident or upset will occur, rather, it is "when" will it occur.

The correct response to item 10.a. is "yes".

Question 10 - b. In considering possible interference with an emergency plan/evacuation plan the "maybe" response appears inadequate if one considers the high probability of an area-wide seismic catastrophe. See our response to 1-g. above.

The correct response to item 10.b. is "yes".

11. **Population.** The doubling of operations at LAX will have profound impact on the economy and environment of the area and therefore on the population.

The correct response to item 11.b., is "yes".
The correct response to item 11.c., is "maybe".

12. **Housing.** Concur with "yes" responses.

13. **Right of Way.** What about land acquisition that will be executed by agencies other than LAX as a result of the airport's expansion? What of known, or highly probable roadway truncations and reroutes? What of the expansion's impact on existing off airport parking? Airport expansion planners need to look well beyond the airport boundary when assessing impact.

The correct response to items 13. a., b., c., and d., is "yes".

14. **Transportation/Circulation.**

Question 14-f. Given the growth predictions presented to the public in LAX Master Plan Concepts 1 - 4, the increase in traffic hazards to motor vehicles, bicyclists, or pedestrians is understated.

The correct response is "yes".

Question 14-g. It appears that the airport is desiring to take a narrow view on how the proposed plan will conflict with adopted policies supporting alternative transportation. A broader perspective is warranted.

The correct response is "maybe".

15. **Public Services.** The airport has taken a narrow view of impact on public services, addressing the issue only from an economic growth impact point of view. The airport will impact the various public services, in greater or lesser degree, in numerous other ways. These must be addressed.

The correct response is "yes" to items 15.c., d., e. and f.

16. **Energy.** Of concern is not only the exceptional consumption of energy by the expanded airport's activity but also its sourcing, provision, transportation, control and risks associated with its movement, storage, and use. In addition, the impact of the airport's energy consumption with respect to the region's efforts to improve air and water quality.

The correct response is "yes" to items 16.b and c.

17. **Utilities.** As discussed in item 3 above, the peripheral actions and impacts of the planned expansion, particularly the hard surfacing of hundreds of acres, will have a profound effect on surface water behavior.

The correct response is "yes" to items 17. e. and g.

18. **Human Health.** The pollution produced at the airport associated with air operations and the pollution associated with related ground transportation already result in potential health hazards. Any of the proposed expansion concepts would nearly double air and surface operations.

The correct response is "yes" to items 18. a., and b.

19. **Aesthetics.** The airport has limited its view of the potential of the airport's proposed expansion to produce a negative aesthetic impact on the area. The issue of the intrusion of the multitude of capital improvements at the airport into the current view is nearly ignored. Only the possible intrusion of a runway into a dune area is addressed.

The correct response is "yes" to items 19. a., b., c., and d.

20. **Recreation.**

Question 20. a. Doubling flight operations, increasing air pollution, increasing surface traffic and its pollution will have a negative impact on recreation to the extent that it may make outdoor recreation in the vicinity of the airport impossible to enjoy.

The correct response is "yes" to item 20.a.

Question 20. b. The airport's expansion will demand like expansions and increased numbers of "green belt" buffer zones.

The correct response is "yes" to item 20.a.

21. **Cultural Resources.** Clearly, further excavations are needed to establish the existence of yet to be discovered archaeological sights, similar to those discovered in the southwest area of the dunes. Additionally, modification of surface routes, land acquisition and land use in the vicinity of the airport must be examined in terms of their impact on accessibility to existing cultural and religious sites.

22. **Mandatory Findings of Significance.**

Question 22.b. Airport has already created long term, negative environmental impacts. Expansion will exacerbate and add to this list of impacts.

The correct response is "yes" to item 22.b. and d.

-- END --

Law Office of
RICHARD D. JONES

CALIFORNIA STATE BANK BUILDING
390 NORTH BREA BOULEVARD, SUITE A • BREA, CALIFORNIA 92821
TELEPHONE (714) 529-9482 • (310) 697-1731 • FAX (714) 529-0338

RICHARD D. JONES
KIMBERLY HALL BARLOW
HAROLD W. POTTER
MARIANNE MILLIGAN
DAVID H. K. HUFF
THOMAS P. DUARTE

August 1, 1997

John Graham
Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Re: LAX Master Plan/EIS/EIR

Dear Mr. Graham:

Please be advised that I am the City Attorney for the City of Whittier.

On behalf of the City of Whittier, we have certain concerns with respect to the potential expansion of the Los Angeles International Airport and it is our understanding that you are in the process of accepting comments with respect to the EIS/EIR. We would ask that our concerns be incorporated within the draft EIR with respect to potential consequences of that expansion and potentially mitigating those consequences.

The issues that the City of Whittier and the City Council are concerned with include the following:

1. Potential increase of noise as a result of the increased air traffic over the City of Whittier as a result of the expansion of the airport.

2. Reduced flying heights and changes in the flight patterns over the City of Whittier which place airplanes in a closer proximity to the citizens to the City of Whittier.

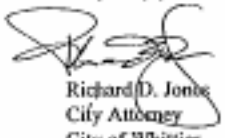
3. Whether the proposed expansion addresses long-term solutions or is simply a short-term approach to a long-term problem.

As an explanation of the concerns of the citizens of the City of Whittier, there appears to be an increased amount of traffic at this time which is louder and closer to the residents of the City of Whittier, which also seems to incorporate changes in the flight pattern. With the increased traffic the citizens of the City of Whittier are concerned that there will be additional changes in the flight patterns and increased traffic which will generate not only more flights which means generally more noise, but also would create flights which are closer in proximity to the citizens of Whittier.

In addition, the expansion of the airport appears to address some certain short-term needs relative to L.A. Airport and air traffic in the near future. However, the solution appears to exclusively emphasize LAX and its immediate surrounding properties. The City of Whittier would like the potential exploration of other alternative sites such as Palmdale or other areas which would move air traffic further away from the citizens of Whittier, thus reducing the noise and the potential impact to them with respect to such long-term air traffic increases.

We would ask you to consider this in the preparation of your environmental analysis.

Very truly yours,



Richard D. Jones
City Attorney
City of Whittier

RDJ/sgp

cc: Thomas Mauk, City Manager

D:\WHITTIER\CITY\MG\RGRAHAM.LTR

Gateway Cities
Council of Governments
Southeast Los Angeles County

July 28, 1997

Mr. Jack Graham
Los Angeles Department of Airports
LAX Master Plan
1 World Way, Room 218
Los Angeles, CA 90045-5803

Re: LAX Master Plan Draft EIR/EIS
Notice of Preparation

Dear Mr. Graham:

At its July 14, 1997 meeting, the Executive Committee of the Gateway Cities Council of Governments (COG), which includes 27 cities with a population of 1.7 million people, discussed the issue of the proposed expansion of Los Angeles International Airport. The Gateway Cities recognize the importance of our airports in supporting economic development in Southern California, and we are generally supportive of responsible and balanced strategies for accommodating passenger and freight growth at LAX and other regional airports.

We are concerned, however, that transportation-related mitigation measures required by LAX expansion not be a drain on regional transportation funds which are desperately needed by our cities if they are to meet their mobility and economic development challenges. It is our view that all such mitigation measures should be paid for using revenues generated by the Department of Airports, such as passenger facility charges. Mitigation measures should not be funded via the MTA Call-for-Projects, or through other subventions or earmarks of Federal, state or local transportation funds.

Accordingly, the Gateway Cities Council of Governments believes that the EIR/EIS should examine the funding plan for LAX expansion, including mitigation measures, and the potential impact of that funding plan on other agencies' (including cities, the MTA and Caltrans) transportation investment plans.

Sincerely,

Douglas S. Drummond, Chairman
Gateway Cities Council of Governments Executive Committee

Councilmember, Third District
City of Long Beach

DSD/neb

11111 Brookshire Avenue Downey, CA 90241 (562) 904-0876

(85)

COUNCILMEMBER
BOB PINZLER
DISTRICT 4

TEL. (310) 372-1171
FAX: (310) 379-9268

CITY OF REDONDO BEACH
CALIFORNIA

415 DIAMOND STREET
POST OFFICE BOX 270
REDONDO BEACH, CALIFORNIA 90277-0270

July 10, 1997

Mr. Jack Graham
Chief of Airport Planning
City of Los Angeles Department of Airports
One World Way
Los Angeles, CA 90045

Dear Mr. Graham:

The City Council of the City of Redondo Beach has authorized me to present our input to the EIR/EIS scoping process and ask that our concerns regarding the proposed expansion of Los Angeles International Airport (LAX) be considered in those reports.

Since an agency is prohibited from defining the goals of a proposal so that the outcome of these reports is preordained, we expect that our concerns will be seriously explored and detailed responses be delivered without prejudice. While we understand that demand for air transportation in the LAX service area has grown in the recent past and is forecast to continue to grow, we believe that the proposed expansion concepts do not provide for sufficient mitigation of the effects of noise, traffic/ground access and other issues which will dramatically affect the quality of life in our City.

NOISE

Over the past few years, the number of complaints lodged by our residents from overflights over Redondo Beach as well as from runway noise has increased dramatically. The prospect of an increased number of flights raises the specter of higher levels of runway noise as well as of greater opportunities for routing planes over Redondo Beach particularly during evening hours, when the expected quiet of our neighborhoods is often disturbed.

We must be satisfied that not only any increase in noise level from the proposed expansion of service is mitigated, but that steps are taken to reduce the volume and frequency of these events already causing significant disturbance.

TRAFFIC/GROUND ACCESS

The present configuration of ground access to LAX is already causing disruption to the flow of traffic, often beyond Artesia Blvd. to the south, due to the limited capacity of tunnels that serve the primary southern entrance to the airport. This situation was exacerbated by the

poorly designed exit from I-105 to Sepulveda Blvd. going north. The prospect of dramatically increased traffic loads are of great concern to Redondo Beach in that it will cause an increase in the time spent in traffic, thus causing:

a. increases in air pollution;
b. increases in vehicle emissions (including dripping fluids) landing on roadways, which are then washed through the storm drain system to Santa Monica Bay;
c. higher and unnecessary levels of driver stress, which could lead to increased rates and severity of traffic incidents, including more traffic fatalities.

We believe that the EIR/EIS must directly provide mitigation of these concerns as well as provide a rationale for why the approval and full funding of a comprehensive ground access plan by all necessary agencies (e.g., CalTrans, MTA, etc.) should not be obtained before any growth operation be permitted to proceed. In fact, any mitigation program must have a concurrent identified source of funding which would not come from sources of funds now (which we generally compete.

In addition, the EIR/EIS must require the implementation of a comprehensive program to reduce surface congestion and the upgrading of the regional roadway grid in the South Bay cities. Also, a comprehensive rail connection program, including approval and full funding of the extension of the Green Line into LAX should be mandatory before any expansion program is permitted to proceed.

OTHER ISSUES

While the above are our primary concerns regarding the overall proposed expansion plan for LAX, the City of Redondo Beach does have others including:

a. The proposed use of Hawthorne Airport for commuter traffic. The routing of takeoff traffic from Hawthorne will be over the Beach Cities. The noise level would be bad enough with the present generation of commuter planes, but, as the short strike at American Airlines has shown, it is the goal of these commuter carriers to move to jets. This will dramatically increase the potential for disturbance over Redondo Beach. We expect a full disclosure of the noise impact of the Hawthorne alternative for both propeller-driven and jet aircraft.

b. Air safety. With an increasing number of aircraft comes an increasing number, as shown by NTSB statistics, of in-air mishaps and near-mishaps. More "aborted" landings, missed approaches, side steps and overflights to the south have been noticed by both passengers and viewers on the ground. As these incidents grow in number, the potential for disaster increases for those who are under the flight patterns. A full review of the potential for disaster as well as a complete and fully-funded response program should be made a part of the EIR/EIS document.

c. Lack of alternatives. All variations of potential growth have not been presented. Aside from a no expansion alternative, scenarios including just a new terminal, a West entrance, a people mover and a ground access upgrade (no new runways) should be completed, reviewed and considered.

d. Regional alternatives. An additional scenario which "off-loads" passenger traffic to Ontario, El Toro, and Long Beach (post-2001) as well as cargo to those airports and the former March and George AFBs should be completely studied.

Redondo Beach is very concerned about the impact on the quality of life in our City from the limited options/plans offered by your Department for the expansion of LAX. We believe you have not been completely forthcoming with all the options which are available to meet the growing demand for air traffic in the entire region. We expect you to complete the job thoroughly and honestly so that we can all be satisfied that whatever alternative is chosen is the best for all involved, not just for your Department or for the City of Los Angeles.

While there may be benefits to be derived from the growth of LAX, it must not be at the high price of the destruction of the quality of life of our residents. You are charged with the responsibility of creating a reasonable plan for the good of all the affected areas. We do not believe you have yet achieved that goal. These comments and those of our colleagues in the South Bay, will hopefully restore you to that proper path.

None of us will gain from a protracted legal argument about the expansion of LAX. However, those of us who are not in the decision-making process must protect our rights when they are violated. We expect you will take this into account when you are deciding how to revise your plans to meet our concerns, objections and needs.

Yours truly,

CITY OF REDONDO BEACH

BOB PINZLER
Councilman, District 4

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO

SANTA BARBARA · SANTA CRUZ

DEPARTMENT OF GEOGRAPHY
1255 BUNCHE HALL
405 HILGARD AVENUE
LOS ANGELES, CALIFORNIA 90095-1524
(310) 825-9971 FAX (310) 206-5976

July 25, 1997

City of Los Angeles, Department of Airports
LAX Master Plan
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Re: Scoping for Preparation of EIS/EIR for LAX Master Plan Project

Dear Sir or Madam:

The Urban Wildlands Group is an informal group organized within the UCLA Department of Geography for the purpose of conducting applied and theoretical research on species and habitats in the urbanized and urbanizing environment of southern California. The senior scientist for the group is Dr. Rudi Mattoni, who is the leading authority on the species and habitats of the El Segundo dunes and Los Angeles coastal prairie, especially the El Segundo blue butterfly and other invertebrates (Mattoni 1990, 1992, 1993a, 1993b; Mattoni and Murphy 1984; Mattoni et al. 1997). Dr. Mattoni also directed the revegetation of the El Segundo dunes at LAX until 1994, successfully increasing the population of El Segundo blue butterflies from an estimated adult population of 500 to over 3,000 individuals (Mattoni et al., unpub. ms.; Longcore, Mattoni, Pratt and Rich 1997). The comments expressed herein were prepared in consultation with Dr. Mattoni and reflect his professional judgment and those of his collaborators in the Urban Wildlands Group.

The proposed expansion of the Los Angeles International Airport has potentially devastating effects on native wildlife and habitats. Our comments here are divided into the two habitats that would be affected by one or more of the currently proposed expansion plans: the El Segundo dunes (Cooper 1967; Pierce 1938) and the Los Angeles coastal prairie (Mattoni 1993).

El Segundo Dunes

The last undeveloped contiguous fragment of the El Segundo dune system lies at the end of LAX's runways. Although most of the approximately 300 acres of open space was once a

residential neighborhood, its natural diversity has recovered significantly since housing was removed (Mattoni 1990). Concept 3 presented in the LAX Master Plan would result in the destruction of the northern portion of this open space area. Implementation of this option would result in irrevocable harm to the native species of the dunes. There is a direct relationship between habitat area and species diversity (MacArthur and Wilson 1967),[1] a relationship so fundamental that it has become the basis of the science of conservation biology. From the reality of the species-area relationship one can predict that some native species on the El Segundo dunes will be extirpated if Concept 3 is implemented. The EIS/EIR should consider this unavoidable significant impact of any reduction in the area of the dunes. In addition, the EIR/EIS should discuss effects on the following species:

El Segundo Blue Butterfly (ESB) (*Euphilotes bernardino allyni*). The recovery of the El Segundo blue butterfly, a federally endangered species, depends on the preservation of a protected population on the entire remaining fragment of the El Segundo dunes at LAX. Although a portion of this area has been set aside as a butterfly reserve, the area to be destroyed by Concept 3 is potential ESB habitat. This area may even be occupied if natural recruitment of *Eriogonum parvifolium* has occurred. Recovery of the ESB depends on the preservation of the entire LAX dunes; any development west of Pershing Drive will jeopardize the long-term persistence of the ESB. We are concerned that the consulting firm preparing the biological assessment of the dunes for the Master Plan (Sapphos Environmental) is seeking a permit to allow ESB surveys to be conducted by nine staff whose vitae show no evidence of training in field entomology or experience in insect identification (Sapphos Environmental 1997). To provide useful comparisons to data gathered during the period from 1984 to 1994, transect walks should be made along the established transect (Mattoni 1990), by a single, experienced observer. Transect survey data collected by multiple, unqualified personnel will be useless for purposes of comparing the current ESB population to previous years. We are further concerned that unqualified observers will not provide an accurate description of ESB distribution. To obtain an accurate measure of ESB abundance on the LAX dunes the Urban Wildlands Group hereby offers, free of charge, to survey the ESB at LAX according to the same protocols used to survey the population from 1986 to 1994. We possess the appropriate permits from the U.S. Fish and Wildlife Service (which Sapphos does not currently hold), and could begin immediately so that not all information from the current flight season is lost.

[1] This relationship is expressed by the equation $S=cA^z$, where S is species number, A is area and c and z are empirically defined constants.

Other Endemic Insect Species. There are ten other species known to be endemic to the El Segundo dunes (Table 1; Mattoni 1990, 1992).

Table 1. Species Endemic to the El Segundo Dunes

Common Name	Scientific Name	Ecology Notes	Status
El Segundo crab spider	*Ebo* new species	Hunt on *Eriogonum* and *Haplopappus* flowerheads	abundant
El Segundo goat moth	*Comadia hirtuse*	Larval foodplant is *Lupinus chamissonis*	holding
Ford's sand dune moth	*Psammobotys fordi*	Adults nectar at *Gnaphalium*	extinct?
El Segundo scythrid moth	*Scythris* new species 1	Generalist	abundant
Lesser dunes scythrid moth	*Scythris* new species 2	Generalist	rare
El Segundo jerusalem cricket	*Stenopelmatus* new species	Unknown	decreasing?
Dorothy's El Segundo dune weevil	*Trigonoscuta dorotheae dorotheae*	Found on *Lupinus*?	very common
Lange's El Segundo dune weevil	*Onychobaris langei*	Unknown	very rare
no common name weevil	*Cylindrocupturus* new species	Unknown	rare

We recommend that surveys be conducted for theses species and that any impacts to their range be considered significant environmental impacts. They are all at least as biologically endangered as the ESB. In theory, the ESB serves as an "umbrella species" to protect the other dune endemics; by protecting the habitat of the ESB, the other species are protected under its habitat "umbrella." This mechanism will have failed if Concept 3 is implemented because although parts of the area that would be destroyed my not be directly occupied by the ESB, it is all appropriate ESB habitat, and is occupied by the other dune endemic species.

Bird Species. The birds of the El Segundo dunes were rather thoroughly described by Jack von Bloeker in the 1940s (von Bloeker 1943a, 1943b). Many of the species listed by von Bloeker continue to use the dunes as residents or migrants. Surveys should be made for all species listed by von Bloeker as occurring on the dunes. Burrowing Owls were observed on the LAX dunes as recently as January 1997, and a drive around the perimeter reveals the presence of Western Meadowlark, and Loggerhead Shrike, both of which are currently declining due to habitat loss. Loss of any of the current area of the dunes will almost inevitably result in the loss of one or more native bird species. This will constitute a significant impact to native wildlife populations. Environmental documentation for the project should also assess the effects of air pollution from overflying jets on native bird populations.

Mammal Species. As of 1994 the native small mammal population on the dunes was known to include *Neotoma fuscipes*, *Peromyscus maniculatus*, and *Reithrodontomys megalotus*. A

relatively complete list of native mammals (Table 2) is compiled here from Jack von Bloekers's field notes (deposited in the Los Angeles County Museum of Natural History) and Mattoni (1990).

Table 2. Mammals of the El Segundo Dunes

Scientific Name	Common Name	Status (B, breeding; F, foraging)
Sorex ornatus californicus	Ornate Shrew	B
Scapanus latimanus occultus	Broad-footed Mole	B
Macrotus californicus californicus	California Leaf-nosed Bat	F
Myotis californicus californicus	California Bat	F
Eptesicus fuscus bernardinus	Big Brown Bat	F
Lasiurus borealis teliotis	Red Bat	F
Lasiurus cinereus cinereus	Hoary Bat	F
Antrozous pallidus pacificus	Pallid Bat	F
Tadarida brasiliensis mexicana	Mexican Free-tailed Bat	F
Eumops perotis californicus	Western Mastiff Bat	F
Sylvilagus audubonii sanctidiegi	Desert Cottontail	B
Lepus californicus bennettii	Black-tailed Jackrabbit	B
Spermophilus beecheyi beecheyi	California Ground Squirrel	B
Thomomys bottae bottae	Botta's Pocket Gopher	B
Perognathus longimembris pacificus	Pacific Pocket Mouse	B; type Palisades del Rey
Dipodomys agilis agilis	Pacific Kangaroo Rat	B
Reithrodontomys megalotus limicola	Western Harvest Mouse	B; type Hyperion
Peromyscus maniculatus gambelli	Deer Mouse	B
Onychomys torridus ramona	Southern Grasshopper Mouse	B
Neotoma fuscipes	Dusky-footed Woodrat	B
Microtus californicus stephensi	California Meadow Vole	B
Canis latrans ochropus	Coyote	B?
Urocyon cinereoargenteus californicus	Gray Fox	B
Vulpes macrotis macrotis	Kit Fox	?
Mustela frenata latirostra	Long-tailed Weasel	B
Taxidea taxus jeffersonii	Badger	F?
Spilogale putorius phenax	Western Spotted Skunk	F
Mephitis mephitis holzneri	Striped Skunk	B?
Lynx rufus californicus	Bobcat	F
Ursus arctos californicus	California Grizzly Bear	F?
Odocoileus hemionus californicus	Mule Deer	F

The environmental documentation should be based on adequate surveys for theses species, especially the Pacific Pocket Mouse (PPM). The PPM was described from the dunes and may well persist. It is notoriously difficult to trap, sometimes requiring special traps (not Sherman) or only showing up after as many as seven consecutive trap nights (J. Maldonado, pers. comm.; C. Nagano, pers. comm.). Surveys for PPM should be conducted by an expert who has trapped for the species before, because correct trap placement can determine whether or not individuals are captured. We are concerned that Sapphos Environmental and its consultants do not have

sufficient experience with this species to detect its presence and recommend that small mammal trapping be completed by a mammalogist with direct experience trapping PPM.

Reptile and Amphibian Species. Jack von Bloeker (1942) also described the reptile and amphibian fauna of the El Segundo dunes and the adjacent Los Angeles coastal prairie (Table 3). The EIR/EIS should show results of surveys for these species and assess the impacts of the Master Plan Concepts on their survival.

Table 3. Reptiles and Amphibians of the El Segundo Dunes and Los Angeles Coastal Prairie

Batrachoseps attenuatus attenuatus	Slender Salamander
Bufo boreas halophilus	California Toad
Scaphiopus hammondi	Western Spade-footed Toad
Hyla regilla	Pacific Treefrog
Uta stansburiana hesperis	California Brown-shouldered Lizard
Sceloporus occidentalis biseriatus	Western Fence Lizard
Phrynosoma blainvillii blainvillii	Southern California Horned Lizard
Gerrhonotus multicarinatus webbii	San Diegan Alligator Lizard
Anniella pulchra	Silvery Footless Lizard
Eumeces skiltonianus	Western Skink
Lichanura roseofusca	California Rosy Boa
Diadophis amabilis modestus	Southern Ring-necked Snake
Coluber constrictor mormon	Western Yellow-bellied Racer
Masticophis flagellum frenatus	Red Racer
Pituophis catenifer annectens	San Diegan Gopher Snake
Lampropeltis getulus boyli	Boyle Kifg Snake
Thamnophis sirtalis infernalis	Pacific Garter Snake
Thamnophis hammondi	California Garter Snake
Crotalus viridis oreganus	Pacific Rattlesnake
Clemmys marmorata	Pacific Mud Turtle

Los Angeles Coastal Prairie

Although largely developed, the Los Angeles coastal prairie was the vegetation type that was historically found in the areas inland from the El Segundo dunes, underlain by the consolidated dunes of the pre-Flandrian. This distinct habitat type was characterized by a preponderance of annual plant species and a rich vernal pool system (Mattoni 1993b, Mattoni et al. 1997). The entire area to be developed by the Master Plan was either dunes or coastal prairie. Therefore, in addition to surveys for dune species, surveys should be made (at appropriate times of the year) for the coastal prairie plants listed below (Table 3). There may remain some remnant patches of vernal pool species (e.g., *Orcuttia californica*) at LAX or the areas into which the Master Plan

proposes to expand. Please note that the species documented from the coastal prairie include several federally listed species. Adequate surveys for these species must be made to support assessments made in the EIR/EIS.

Table 4. Plants of the Los Angeles Coastal Prairie.

Scientific Nomenclature	Common Name	Habitat	Authority
DICOTYLEDONES			
AIZOACEAE			
Sesuvium verrucosum Raf. [*S. sessile* auth., not Pers.]	WESTERN SEA-PURSLANE	V	Occasional on the borders of brackish pools from Gardena to Wilmington (Davidson & Moxley 1923). "Nigger Slough," A. Davidson, June 14, 1891, I. Johnston, April 11, 1917 (RSA).
APIACEAE			
Apiastrum angustifolium Nutt.		P	Common in sandy soils in the valleys and foothills (Davidson & Moxley 1923). Manhattan Beach, Hills, Effie S. Spaulding, May 3, 1924 (RSA).
Eryngium aristulatum var. *parishii* (J. Coulter & Rose) Jepson	SAN DIEGO BUTTON-CELERY	V[1]	Sandy ground, Redondo (Davidson & Moxley 1923). On low heavy ground toward the coast. First collected by Parish near Oceanside (Abrams 1904).
ASTERACEAE			
Athysanus pusillus Schauer	BLOW-WIVES	P[1]	In open grassy places in the coastal valleys, south to San Diego (Davidson & Moxley 1923). Cultivated ground west of Los Angeles, A. Davidson, 1930 (RSA).
Ambrosia acanthicarpa Hook.	ANNUAL BUR-SAGE	P	Drier slopes (Pierce notes).
Ambrosia psilostachya DC.	WESTERN RAGWEED	P	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). A common weed in low ground, especially in our coast valleys (Abrams 1904).
Aster subulatus Michaux var. *parviflorus*	ASTER	V	"Nigger Slough," I. Johnston, April 11, 1917. Moist ground, near Mesmer, LeRoy Abrams, August 24, 1902 (RSA).
Baccharis emoryi A. Gray		V	Gardena, "Nigger Slough," dry bottom of slough, F.R. Fosberg, October 18, 1930 (RSA). Most places of Upper and Lower Sonoran Zones, Los Angeles (Davidson & Moxley 1923).
Blennosperma nanum (Hook.) S.F. Blake [*B. californicum*]		V[1]	In moist places; not common in southern California. Wilmington, Los Angeles County; Gardena, McClatchie (Davidson & Moxley 1923).
Chaenactis glabriuscula DC.	YELLOW PINCUSHION	D[1]	Pierce (notes). Generally distributed over the dunes and on the meadow (Pierce 1938). Common on sandy soil or rocky ground in the lower hills and along the coast (Abrams 1904). Sand Hills and flats, between Del Rey and El Segundo (O.H. Eppler, April 30, 1940, UCLA Herbarium).

Corethrogyne filaginifolia (Hook. & Arn.) Nutt. var. *virgata* (Benth.) A. Gray [*Lessingia f.* (Hook. & Arn.) M.A. Lane var. *f., C. virgata*]	CALIFORNIA-ASTER	D	Pierce (notes). Sparingly distributed over the dunes, common on meadow (Pierce 1938). Common in sandy soil near the coast (Abrams 1904). Waste land, Culver City, Fay A. MacFadden, November 18, 1934 (RSA). El Segundo, A. Davidson, 1930 (RSA). Los Angeles near Soldier's Home, Playa del Rey, Ballona Harbor (Canby 1927).
Filago californica Nutt.	RESIN BAPA	D?	Ballona Harbor, LeRoy Abrams, April 1, 1901 (RSA).
Gnaphalium decurrens		D	Meadow and dunes (Pierce 1938).
Gnaphalium canescens DC. ssp. *microcephalum* (Nutt.) Sichb. & Keil [*G. m.*]	CUDWEED, EVERLASTING	P	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). Frequent in dry washes and in the chaparral belt (Abrams 1904; Davidson & Moxley 1923).
Gnaphalium palustre Nutt.		V[1]	Inglewood, L.R. Abrams, April 2, 1901 (RSA). Sink at Inglewood, F.W. Pierson, 1951 (RSA). Occasional along river bottoms and on the margins of ponds (Abrams 1904; Davidson & Moxley 1923)
Grindelia camporum E. Greene var. *bracteosa* (J. Howell) M.A. Lane	GUMPLANT	P[4]	Open ground about Los Angeles and along the coast to San Francisco (Davidson & Moxley 1923). Wiesbum, LeRoy Abrams, June, 1901 (RSA). Los Angeles, mesas and open ground west of city, E. Kline, June 9, 1924 (RSA).
Hemizonia fasciculata (DC.) Torrey & A. Gray [*Deinandra f.*]	TARPLANT, TARWEED	P*[3]	Hills near Playa del Rey, LeRoy Abrams, 1902 (RSA). Del Rey between sand dunes and salt marsh, just above supralittoral, F.R. Fosberg, June 23, 1930 (RSA). Playa del Rey, F.W. Pierson, 1951 (RSA). Very common and general on the plains and lower hills (Abrams 1904).
Heterotheca grandiflora Nutt.	TELEGRAPH WEED	D	Pierce (notes). In stabilized areas, ravines, at both slope bases, and sparingly on the dunes (Pierce 1938). Frequent in waste places in sandy soil (Abrams 1904).
Heterotheca villosa (Pursh) Shinn. [*Chrysopsis foliginosa* Greene]		D	Common in dry plains or washes throughout intermontane region below 3,000 ft. Santa Monica, *Hasse*, Los Angeles, *Davidson*, Pasadena, *McClatchie* (McClatchie 1899).
Isocoma menziesii (Hook. & Arn.) G. Nesom var. *vernonioides* (Nutt.) G. Nesom [*Haplopappus venetus* (Kunth) S.F. Blake ssp. *vernonioides* (Nutt.) H.M. Hall]	GOLDENBUSH	P	Redondo Beach, Palos Verdes cliffs, sand and dirt, July 1943 (RSA). Growing as weed in open field, Compton, F.W. Gould, October 26, 1943 (RSA).
Lasthenia californica Lindley	GOLDFIELDS	P*	Vermont and Western, hills north between, Helen Otter, April 27, 1924 (RSA). Playa del Rey, C.B. Grant, May 14, 1904 (RSA).
Lasthenia glabrata Lindley ssp. *coulteri* (A. Gray) Ornd.	COULTER GOLDFIELDS	V*	Salt marsh, Del Rey Hills. In dense patches in old ploughed ground now overgrown (A.M. Johnson, 1934, UCLA Herbarium). Common in saline marshes, especially along the coast (Abrams 1904).
Layia platyglossa (Fischer & C. Meyer) A. Gray	TIDY-TIPS	P*	Common throughout western California (Davidson & Moxley 1923). Frequent in sandy soil, especially along the coast (Abrams 1904). Near "Nigger Slough," field, I. Johnston, April 11, 1917 (RSA).
Malacothrix saxatilis (Nutt.) Torrey & A. Gray		D	Playa del Rey, I. Johnston, June 10, 1910 (RSA). Hillsides and canyons from Santa Barbara to San Diego (Davidson & Moxley 1923).

Microseris californica Fischer & C. Meyer	SUNDRIS COTTONWEED	P	Santa Monica, F.W. Pierson, April 11, 1951 (RSA). Low hills, Los Angeles, G.L. Moxley, May 9, 1915 (RSA).
Psilocarphus brevissimus Nutt.	WOOLLY-HEADS	V[1]	Frequent on the plains and hills, especially in concreted places (Abrams 1904; Davidson & Moxley 1923). Not uncommon in desiccated pools in the coastal district of Los Angeles County (Parish 1917). Sink at Inglewood, F.W. Pierson, 1951 (RSA). Hills and dry grounds, Los Angeles, H.E. Hasse, July 1890 (RSA).
Psilocarphus tenellus Nutt.		V[1]	In the coastal subregion, probably not uncommon. Glendale, near Los Angeles, *Braunton* (Parish 1904; Davidson & Moxley 1923).
Rafinesquia californica Nutt.	CALIFORNIA CHICORY	D	Pierce (notes). Common on rather shady slopes in the foothills and in the chaparral belt of all the mountains (Abrams 1904).
Senecio californicus DC.	GROUNDSEL, RAGWORT, BUTTERWEED	D	Pierce (notes). Meadow slope of sand dunes, Playa del Rey to El Segundo, B.C. Templeton, April 10, 1939 (RSA). Culver City, sandy hillside, Frances M. Morey, April 14, 1922 (RSA). Foothills near end of Vermont Ave., Helen M. Aster, April 27, 1924 (RSA). Common in sandy soil in dry places in our interior valleys and foothills, and on the sand-dunes along the seashore (Abrams 1904).
Stebbinsoseris heterocarpa (Nutt.) Chambers [*Microseris h.* (Nutt.) Chambers]		P	Photograph, Pierce (1938).
Stephanomeria exigua Nutt. ssp. *coronaria* (E. Greene) Gottlieb		D	On meadow, stabilized areas of foredune, and in dune ravines (Pierce 1938). Swale behind sand dunes, El Segundo, F.R. Fosberg, August 30, 1931 (RSA). On dry mesas, Inglewood, L. Abrams, August 25, 1902 (RSA).
Stephanomeria virgata Benth. [*Prenia v.*]		D	From meadow onto the dune, only in stabilized areas, especially on seaward side (Pierce 1938). Pierce (notes). Common on dry ground, especially toward the coast (Abrams 1904).
BORAGINACEAE			
Amsinckia spectabilis Fischer & C. Meyer	FIDDLENECK	D*	Pierce (notes). Common in sandy soil near the coast (Abrams 1904). Redondo Beach, Emily M. Bradford, March 17, 1904 (RSA).
Cryptantha clevelandii E. Greene var. *florosa* I.M. Johnston		D*	Hills between Del Rey and El Segundo, open fields, F.R. Fosberg, March 28, 1932 (RSA).
Cryptantha intermedia (A. Gray) E. Greene		P*	Pierce (notes). Open field, Sand Hills and flats, between Del Rey and El Segundo (O.H. Kappler, April 30, 1949, UCLA Herbarium).
Cryptantha muricata (Hook. & Arn.) Nelson & J.F. Macbr.		D*	Hills between Del Rey and El Segundo, open fields, F.R. Fosberg, March 28, 1932 (RSA). El Segundo, sand dunes, Robert M. Perkins, April 16, 1936 (RSA).
Heliotropium curassavicum L. var. *oculatum* (A.A. Heller) I.M. Johnston	HELIOTROPE	D	Palisades along railroad at foot of bluff, Hollenberg, July 24, 1918 (RSA). Redondo Beach, sandy fields south end of town around sea level, Tom Burch, June, 1940 (RSA).
Pectocarya linearis (Ruiz Lopez & Pavon) DC. ssp. *ferocula* (I.M. Johnston) Thorne		P	Inglewood, LeRoy Abrams, April, 1899 (RSA).

Plagiobothrys canescens Benth.	POPCORNFLOWER	P*	Frequent on grassy foothills and mesas (Davidson & Moxley 1923).
Plagiobothrys nothofulvus (A. Gray) A. Gray	POPCORNFLOWER	P*	Frequent on rather moist grassy hillsides about Los Angeles and on mesas in the coast region (Abrams 1904). Frequent on grassy foothills and mesas (Davidson & Moxley 1923).
Plagiobothrys tenellus (A. Gray) I.M. Johnston [*Allocarya t.* Greene]	POPCORNFLOWER	V*	In moist ground near Inglewood (Abrams 1903).
BRASSICACEAE			
Erysimum texilore E. Greene [*E. angustatum* auth. unknown]		D	Sand Hills and flats, between Del Rey and El Segundo (O.H. Kappler, April 30, 1949, UCLA Herbarium).
Hymenolobus procumbens [*Hutchinsia p.* (L.) Desv.]		V	Redondo, A. Davidson, March, 1894 (RSA).
Lepidium dictyotum A. Gray [*L. acutidens* Howell]	PEPPERGRASS	V	In saline places toward the coast. Cienega; Santa Monica (Abrams 1904). Occasional in alkaline soils on the coastal plains (Davidson & Moxley 1923).
Lepidium lasiocarpum Hook.	PEPPERGRASS	V*	In saline places near the coast, not common (Davidson & Moxley 1923).
Lepidium nitidum Torrey & A. Gray	PEPPERGRASS	P*	Common on grassy slopes (Davidson & Moxley 1923). Very common on grassy plains and hills (Abrams 1904). Ballona Hills, March, 1927 (RSA).
Sibara virginica (L.) Rollins [*Arabis v.*]		V*	Inglewood in low ground (Abrams 1904).
CALLITRICHACEAE			
Callitriche marginata Torrey	WATER-STARWORT	V*	Soldier's Home, *Hasse* (Abrams 1904). In pools near Santa Monica, *Hasse* (Parish 1917).
CARYOPHYLLACEAE			
Cardionema ramosissimum (J.A. Weeks.) Nelson & J.F. Macbr.		P	Santa Monica, fields near city, Crawford & Hatt, March 30, 1916 (RSA). Near Mesmer, dry sandy cliffs, I. Johnston, June 10, 1917 (RSA). Manhattan Beach, Effie S. Spaulding, May 9, 1924 (RSA).
Loeflingia squarrosa Nutt.		D	Near Redondo (McClatchie 1894).
Polycarpon depressum Nutt.	POLYCARP	V	Redondo Beach, in sandy fields near sea level, Tom Burch, March 9, 1940 (RSA).
Spergularia marina (L.) Griseb.	SAND-SPURREY	D*	Ballona wetlands, R. Gustafson, March 26, 1981 (RSA). Del Rey, dried mud flats, F.R. Fosberg, June 23, 1930 (RSA).
CHENOPODIACEAE			
Atriplex lentiformis (Torrey) S. Watson [*A. breweri* Wats.]	BIG SALTBUSH	P	Del Rey, bluffs at Palisades, Hollenberg, July 24, 1928 (RSA). On bluffs of the seashore, San Juan, *Anderson*, Santa Monica, *Hasse*, *Parish* (McClatchie 1899).
CONVOLVULACEAE			
Calystegia macrostegia (E. Greene) Brummitt [*Convolvulus m.* Greene]	MORNING-GLORY	D	Pierce (notes).
Cressa truxillensis Kunth	ALKALI WEED	V*	Culver City, waste land, F.A. MacFadden, September 10, 1934 (RSA). Common in hard subsaline soils along the coast and on the deserts (Davidson & Moxley 1923). Frequent in saline places throughout our range (Abrams 1904).

CRASSULACEAE			
Crassula connata (Ruiz Lopez & Pavon) A. Berger [*C. aquatica* Hook. & Arn., *Tillaea minima* Hook. & Arn.]	PYGMY-WEED	D	Pierce (notes). Manhattan Beach, Mrs. E.S. Spaulding, May 3, 1924 (RSA). Not uncommon on the coast sands, rarer inland (Davidson & Moxley 1923). Common on sandy ground throughout the valley region (Abrams 1904).
CUCURBITACEAE			
Cucurbita foetidissima Kunth	CALABAZILLA	D	Pierce (notes). Frequent on dry sandy soil throughout our range (Abrams 1904).
CUSCUTACEAE			
Cuscuta californica Hook. & Arn.	DODDER	D	From meadow onto dune. Parasitic on various plants on the dune, but especially on *Croton* and *Cneoridium* (Pierce 1938). Pierce (notes). Occasional along the coast and in the interior, growing on various low shrubs.
ELATINACEAE			
Elatine brachysperma A. Gray	WATERWORT	V*	Inglewood, L. Abrams, April 1, 1899 (RSA). On the borders of pools near the coast in Los Angeles and San Diego Counties (Davidson & Moxley 1923). Occasional along borders of ponds toward the coast (Abrams 1904).
EUPHORBIACEAE			
Chamaesyce albomarginata (Torrey & A. Gray) Small [*Euphorbia a.* Torrey & A. Gray]	RATTLESNAKE WEED	D	Railroad embankment, Inglewood, LeRoy Abrams, May 31, 1902 (RSA).
Croton californicus Muell. Arg.		D	Pierce (notes). Common on dry ground throughout our range (Abrams 1904).
Ericameria arrigens (Hook.) Benth.	TURKEY MULLEIN	P*1	Pierce (notes). To edge of dune but not on to sandy slopes (Pierce 1938).
FABACEAE			
Astragalus didymocarpus Hook. & Arn.	TWO-SEEDED MILKVETCH	P*	Playa del Rey, A. Davidson, 1920 (RSA).
Astragalus pycnostachyus A. Gray var. *lanosissimus* (Rydb.) Munz	VENTURA MARSH MILKVETCH	Y*	Near Santa Monica, L.A. County, September 2, 1900 (RSA). Playa del Rey, F.W. Pierson, July 19, 1951 (RSA). Ballona harbor, LeRoy Abrams, August 1901 (RSA). In low grounds near the sea in Los Angeles County (Davidson & Moxley 1923). Extinct.
Astragalus tener A. Gray var. *tener* (Eastw.) Barneby	COASTAL DUNES MILKVETCH	P*	Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean, 50 feet or lower, rare and seldom collected. Coast of Los Angeles plain (Santa Monica; Hyde Park) — probably extinct (Barneby 1964:1048).
Astragalus trichopodus (Nutt.) A. Gray var. *lonchus* (M.E. Jones) Barneby [*A. leucopsis* (Torrey) Torrey & A. Gray]		D*	Pierce (notes). Very common along the coast (Davidson & Moxley 1923).
Lotus purshianus (Benth.) Clements & E.G. Clements [*L. unifoliolatus*, *L. americanus*]		P*	To edge of dune but not on sandy slopes (Pierce 1938).
Lotus salsuginosus E. Greene [*L. maritimus* Nutt.]		P*	Widely distributed on coast and interior (Davidson & Moxley 1923).
Lotus scoparius (Nutt.) Ottley	DEERWEED	D*	All over dune and meadow (Pierce 1938). Pierce (notes).
Lotus strigosus (Nutt.) E. Greene		D*	Pierce (notes). Common on sandy soils in plain and mountains (Davidson & Moxley 1923).
Lupinus bicolor Lindley	MINIATURE LUPINE	D*	Pierce (notes).
Lupinus truncatus Hook. & Arn.		D*	Pierce (notes).

Trifolium gracilentum Torrey & A. Gray		P^{*}	Inglewood, L. Abrams, April 1, 1899 (RSA). Grassy hills near Inglewood, L. Abrams, April 10, 1903 (RSA).
FRANKENIACEAE			
Frankenia salina (Molina) I.M. Johnston [*F. grandifolia* Cham. & Schltdl.]	ALKALI HEATH	V^{c}	Common in saline marshes (Abrams 1904). Common on alkaline flats near the coast (Davidson & Moxley 1923).
HYDROPHYLLACEAE			
Phacelia distans Benth.		P^{*}	Pierce (notes). Very common in the plains and foothills (Abrams 1904).
Phacelia stellaris Brand [*P. douglasii* Torr. var. *cryptantha* Brand]	BRAND'S PHACELIA	P^{*}	Pierce (notes). Frequent near the coast along the borders of the sand-dunes (Abrams 1904). On a few subalkaline places on the plains; Los Angeles and San Bernardino Counties (Davidson & Moxley 1923).
LAMIACEAE			
Salvia carduacea Benth.	THISTLE SAGE	D	El Segundo, established portion of the lee slope, Jack Rempel, May 16, 1932 (RSA). Occasional in sandy soil in all the valleys and in the foothills (Abrams 1904).
Salvia columbariae Benth.	CHIA	P	
Stachys ajugoides Benth.	HEDGE NETTLE	V^{c}	Playa del Rey (Davidson & Moxley 1923).
LIMNANTHACEAE			
Limnanthes douglasii R.Br.	MEADOWFOAM	V	Pierce (notes). Growing in wet places. Reported from Los Angeles and San Bernardino (Abrams 1904).
LOASACEAE			
Mentzelia affinis E. Greene	BLAZING STAR	D	Redondo Beach, sandy fields, elevation near sea level, Tom Burch, March 9, 1940 (RSA). Rancho Palos Verdes, Tim Ross, March 28, 1994 (RSA). El Segundo, sand dunes near strand, Jack Rempel, April 10, 1932 (RSA).
MALVACEAE			
Malvella leprosa (Ortega) Krapov. [*Sida hederacea* Torr.]	ALKALI-MALLOW	V^{c}	Common in subalkaline places (Abrams 1904). West Los Angeles (O.H. Kappler, June 13, 1944, notes, UCLA Herbarium). On compact ground in subalkaline soils (Davidson & Moxley 1923).
Sidalcea malviflora (DC.) Benth. ssp. *malviflora*	CHECKER MALLOW	P^{*}	Pierce (notes). To edge of dune but not on to sandy slopes (Pierce 1938). Frequent on the grassy hills and mesas (Abrams 1904).
Sidalcea neomexicana A. Gray [*S. parviflora* Greene]		V	Between West Adams and Culver City, Hillside, Frances M. Morey, May, 1922 (RSA). In low subsaline places throughout our range (Abrams 1904). In subalkaline meadows from Los Angeles to San Bernardino (Davidson & Moxley 1923).
ONAGRACEAE			
Camissonia bistorta (Torrey & A. Gray) Raven [*Oenothera b.* Nutt. ex T. & G.; *Sphaerostigma b.* Walp.]	CALIFORNIA SUN CUP	P^{*}	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). Very common in sand-washes about San Diego, extending north to Santa Barbara (Abrams 1904).
Camissonia cheiranthifolia (Sprengel) Raim.	BEACH EVENING PRIMROSE	D^{*}	Pierce (notes).
Camissonia lewisii Raven	LEWIS' EVENING PRIMROSE	D^{*}	Pierce (notes). Bordering sand dunes at Ballona Harbor, Abrams, 1901 (RSA). Inglewood, Abrams, 1903 (RSA).

Camissonia micrantha (Sprengel) Raven		D^{*}	Pierce (notes). Frequent on the sand dunes along the seashore, but not strictly maritime as reported by some, for it is also frequent in sandy soil in all our valleys (Abrams 1904).
Epilobium pygmaeum (Speg.) P. Hoch & Raven [*Boisduvalia glabella* (Nutt.) Walp.]	FIREWEED	V^{4}	Sink near Inglewood, F.W. Pierson, July 19, 1906 (RSA). Low ground. Santa Monica; Mesmer; San Diego (Abrams 1904). Low ground, Santa Monica to San Diego (Davidson & Moxley 1923).
Oenothera elata Kunth ssp. *hirsutissima* (S. Watson) W. Dietr.	EVENING PRIMROSE	P	Ballona wetlands, R. Gustafson, July 15, 1981 (RSA).
PAPAVERACEAE			
Eschscholzia californica Cham.	CALIFORNIA POPPY	D^{*}	Rosenberg (1938).
Platystemon californicus Benth.	CREAM CUPS	P^{*}	Common in sandy soil throughout our range below 3,000 feet altitude (Abrams 1904).
PLANTAGINACEAE			
Plantago elongata Pursh [*P. bigelovii* A. Gray]	PLANTAIN	P^{*3}	Inglewood (Davidson & Moxley 1923). In moist ground near Inglewood (Abrams 1903).
Plantago erecta E. Morris [*P. hookeriana* Fisher & C. Meyer]	PLANTAIN	P^{*3}	Pierce (notes). Very common on dry plains and in the foothills throughout our range (Abrams 1904).
POLEMONIACEAE			
Gilia capitata Sims ssp. *abrotanifolia* (E. Greene) V. Grant		P	Playa del Rey, A. Davidson, 1930 (RSA). Common and generally distributed on sandy plains (Davidson & Moxley 1923).
Linanthus dianthiflorus (Benth.) E. Greene		P^{*}	Pierce (notes). Common in sandy soil in the coast and interior valleys (Abrams 1904). Common and general on sandy soils, more abundant towards the coast (Davidson & Moxley 1923).
Navarretia prostrata (A. Gray) E. Greene		V^{1}	Sink near Inglewood, F.W. Pierson, July 19, 1906 (RSA). On margin of vernal pool; near junction of Sepulveda Blvd. and W. Railroad, Manhattan Beach vicinity, Frank W. Gould, April 13, 1944 (RSA). In low adobe places on the mesas of the coast valley. Inglewood. (Abrams 1904). Not uncommon in desiccated pools in the coastal district of Los Angeles county (Parish 1917). Abundant in restricted localities, near Downey, Bixby, Inglewood (Davidson & Moxley 1923).
POLYGONACEAE			
Eriogonum gracile Benth.		P^{*}	Pierce (notes). Sparse on dune, common at meadow base (Pierce 1938). Common in sandy soil, especially toward the coast (Abrams (1904).
Mucronea californica Benth. [*Chorizanthe c.* (Benth.) A. Gray var. *suksdorfii* J.F. Macbr.]	CALIFORNIA SPINEFLOWER	D^{*}	Pierce (notes). Common on sandy soil along the coast and in the interior valleys (Abrams 1904).
Rumex hymenosepalus Torrey	WILD-RHUBARB	D	Del Rey Hills, marshy ground (O.H. Kappler, March 19, 1944, notes, UCLA Herbarium). Frequent in dry sandy soil (Abrams 1904). Common on sandy plains in the counties of San Bernardino, Los Angeles, and Orange (Davidson & Moxley 1923).
PORTULACACEAE			
Calandrinia ciliata (Ruiz Lopez & Pavon) DC. [*C. caulescens* var. *menziesii* Gray; *C. menziesii* Torrey & Gray]	RED MAIDS	P^{*}	Pierce (notes). Common on grassy mesas especially near the coast (Davidson & Moxley 1923). Common on the mesas, especially in the coast region (Abrams 1904).

RANUNCULACEAE

Ranunculus californicus Benth.	BUTTERCUP	P[*3]	Grassy hills, Inglewood, L. Abrams, March 8, 1903 (RSA). Del Rey Hills, moist hillside (O.H. Kappler, March 19, 1944, UCLA Herbarium).

ROSACEAE

Horkelia cuneata Lindley		D	Pierce (notes). At the very edge of the dune only, we find a thin line (Pierce 1938).

SCROPHULARIACEAE

Antirrhinum nuttallianum Benth.	SNAPDRAGON	P	Venice, Hollenberry, July 10, 1928 (RSA). Ballona Harbor, LeRoy Abrams, June 6, 1901 (RSA). Playa del Rey, LeRoy Abrams, June 8, 1902 (RSA).
Castilleja exserta (A.A. Heller) Chuang & Heckard [*Orthocarpus purpurascens* Benth.]	PURPLE OWL'S CLOVER	P*	To edge of dune but not onto sandy slopes (Pierce 1938). Common in sandy soils in the valleys and hills (Abrams 1904).
Linaria canadensis (L.) Dum.-Cours. var. *texana* (Scheele) Pennell	BLUE TOADFLAX	P	Pierce (notes). Occasional in cultivated fields, especially in sandy soil (Abrams 1904).
Veronica peregrina L.	PURSLANE SPEEDWELL	P[2]	Occasional along the margins of streams and in the dry beds of winter pools (Abrams 1904).

SOLANACEAE

Datura wrightii Regel [*D. meteloides* A.DC.]	JIMSON WEED	D	Pierce (notes). On meadow and is established zones (Pierce 1938). Frequent in sandy soil throughout our range (Abrams 1904).
Petunia parviflora A.L. Juss		V*	Occasional on margins of ponds and along streams, especially in subsaline places (Abrams 1904). Extant, Ballona wetlands.

VERBENACEAE

Verbena bracteata Lagasca & J.D. Rodriguez		V	Inglewood, LeRoy Abrams, June 6, 1901 (RSA). Gardena, "Nigger Slough," slough edge among grass, prostrate on ground, L. Johnston, April 11, 1917 (RSA).

MONOCOTYLEDONES

CYPERACEAE

Cyperus eragrostis Lam.	NUTSEDGE	V	El Segundo dunes, scarce in wet soil. A.C. Sanders, September 18, 1987 (RSA).
Cyperus esculentus L.	NUTSEDGE	V	Ballona wetlands, ditch. R. Gustafson, July 15, 1989 (RSA). Vacant lots, Los Angeles, Edwin Klatt, September 15, 1924 (RSA).
Eleocharis acicularis (L.) Roemer & Schultes	SPIKERUSH	V[2]	Inglewood, L. Abrams, April, 1901 (RSA). Frequent in moist places along streams and on borders of ponds (Abrams 1904)
Eleocharis macrostachya Britton	SPIKERUSH	V[2]	"Nigger Slough," marshy ground, L. Johnston, April 11, 1917 (RSA). Santa Monica, swamp near road, P.A. Munz, R.D. Harwood, May 15, 1920 (RSA).

IRIDACEAE

Sisyrinchium bellum S. Watson	BLUE-EYED-GRASS	P	In grassy field dominated by *Phalaris lemmonii*, Sepulveda Boulevard northwest of Los Angeles Airport. Flowers white. F.W. Gould, April 15, 1944 (RSA).

JUNCACEAE

Juncus balticus Willd.	RUSH	V	Frequent along streams and in low ground generally throughout range (Abrams 1904). Brackish marsh, Los Angeles Co., H.E. Hasse, May, 1892 (RSA).
Juncus bufonius L.	TOAD RUSH	V[2]	"Nigger Slough." Occasional on slough edge. I.M. Johnston, April 17, 1917 (RSA).

Juncus mexicanus Willd.	RUSH	V[2]	Frequent along streams and in low ground generally throughout range (Abrams 1904). Wilmington, mud dunes. I. Johnston, April 11, 1917 (RSA). Extant, Ballona wetlands.
Juncus phaeocephalus Engelm.	RUSH	V[2]	Frequent along streams and in low brackish places (Abrams 1904). Baldwin Hills, lowlands, Mr. and Miss Dayton, April 15, 1925 (RSA).

LEMNACEAE

Lemna gibba L.	DUCKWEED	V[2]	Abundant at Pasadena, at Compton, near San Pedro, in Santa Monica Canyon, and near San Juan. "In a ditch at Compton I found it fruiting abundantly on September 2nd" (McClatchie 1896).

LILIACEAE

Bloomeria crocea (Torrey) Cov. [*B. aurea* Ktell.]	COMMON GOLDENSTAR	P*	Frequent in the foothills and on the plains (Abrams 1904).
Calochortus catalinae S. Watson	CATALINA MARIPOSA LILY	P	
Dichelostemma capitatum (Benth.) A.W. Wood [*Brodiaea pulchella* (Salisb.) E. Greene]	BLUE DICKS	D*	Pierce (notes). Common on the plains and foothills (Abrams 1904).

POACEAE

Alopecurus saccatus Vasey [*A. howellii* Vasey, *A. californicus* Vasey]	FOXTAIL	V*	Meadows and wet places along the coast to San Diego (Davidson & Moxley 1923).
Bromus carinatus Hook. & Arn.	CALIFORNIA BROME	D	Santa Monica roadside, Crawford & Hinit, March 28, 1918 (RSA). El Segundo dunes, A.C. Sanders February 18, 1988 (RSA).
Deschampsia danthonioides (Trin.) Munro	ANNUAL HAIRGRASS	V*	"Nigger Slough," dump pasture, L. Johnston, April 11, 1917 (RSA). Occasional on dry foothill slopes Los Angeles and Orange Counties (Davidson & Moxley 1923).
Distichlis spicata (L.) E. Greene	SALTGRASS	P[2]	Very common in low subsaline places along the coast and our interior valleys (Abrams 1904). Common in subalkaline places especially near the coast (Davidson & Moxley 1923).
Elymus triticoides Buckley [*Leymus t.* (Buckley) Pilger]		D	Pierce (notes). Common in low ground, especially in the coast valleys (Abrams 1904).
Festuca megalura Nutt. [*Vulpia microstachys* (Nutt.) Munro var. *hirsuta* (Hack.) Asch. & Graebner]	FESCUE	D[2]	Pierce (notes).
Hordeum intercedens Nevski [*H. pusillum* Nutt. in part]	BARLEY	V	In subsaline soils near the coast from Los Angeles to San Diego (Davidson & Moxley 1923).
Koeleria macrantha (Ledeb.) J.A. Schultes [*K. cristata* (L.) Pers.]	JUNE GRASS	P*	Baldwin Hills, Mr. and Miss Dayton, April 15, 1925 (RSA). Beetle range map (1947). Common on grassy hills (Abrams 1904).
Leptochloa uninervia (C. Presl) A. Hitchc. & Chase	MEXICAN SPRANGLETOP	V	Ballona wetlands, R. Gustafson, May 15, 1981 (RSA). Also W. Adams Street (RSA).
Nassella cernua (Stebb. & Love) Barkworth [*Stipa c.* Stebb. & Love]	NODDING NEEDLEGRASS	P*	Pierce (notes).
Orcuttia californica Vasey	CALIFORNIA ORCUTT GRASS	V*	In dry ditches assimilating vernal pools, around airport at corner of South Western Avenue and Rosecrans Avenue (A.A. Beetle, June 11, 1946, UCLA Herbarium). Old Municipal Airport, Rosecrans Avenue, Bellue and Henson, October 1944 (RSA).

Pholistoma lasiocarpum Vasey	V[1]	Abundant in meadow near corner of Western Ave. and 131st Street (Frank W. Gould, April 12, 1946, UCLA Herbarium). In ensiccated places, Inglewood (LeRoy Abrams, April 9, 1903, UCLA Herbarium). Meadow lands from South Los Angeles to Inglewood (Davidson & Moxley 1923).

Habitats: D, dunes *and* prairie; P, prairie (*not* dunes); V, vernal pools. [1]Southern California vernal pool indicator species. [2]Vernal pool associates, found also in aquatic, marsh, or seepage areas. [3]Found in vernal pool basins, but common in other habitats (Zedler 1987). [4]Species or examples of genera listed by Keeley (1989) as composing pristine native California grasslands. Nomenclature follows *The Jepson Manual* (Hickman 1993); synonymies are given for deviations. Text from herbarium labels (UCLA or Rancho Santa Ana, RSA) or references that indicate presence on the prairie are presented in full.

In sum, the area of LAX and its proposed expansion was, and remains, a valuable biological habitat for native flora and fauna. We urge the Department of Airports to ensure that these values not be overlooked in the preparation of the EIR/EIS for the Master Plan. Biological surveys are difficult and time-consuming and require experienced experts to perform them correctly. We hope that the Department of Airport will contract with truly qualified biologists, or peer review conclusions made by consulting biologists, to ensure that the assessment of impacts to biological resources is based on full and complete information.

Sincerely,

Travis Longcore

Travis Longcore
Urban Wildlands Group

cc: interested parties

Literature Cited

Abrams, LeRoy. 1903. Additions to the Flora of Los Angeles County, II. *Bulletin of the Southern California Academy of Sciences* 2(1):157–158.

Abrams, LeRoy. 1904. *Flora of Los Angeles and Vicinity*. Stanford University Press, Stanford, California. 474 pp.

Barneby, Rupert C. 1964. *Atlas of North American Astragalus. Part II*. Memoirs of the New York Botanical Garden, Volume 13.

Beetle, Alan A. 1947. Distribution of the Native Grasses of California. *Hilgardia* 17(9):309–357.

Canby, Margaret L. 1927. The Genus *Corethrogyne* in Southern California. *Bulletin of the Southern California Academy of Sciences* 26:8–16.

Cooper, William Skinner. 1967. *Coastal Dunes of California*. The Geological Society of America Memoir 104. 131 pp.

Davidson, Anstruther, and Moxley, George L. 1923. *Flora of Southern California*. Times-Mirror Press, Los Angeles. 452 pp.

Hickman, James C. ed. 1993. *The Jepson Manual: Higher Plants of California*. University of California Press, Berkeley. 1400 pp.

Keeley, Jon E. 1989. The California Valley Grassland. Pp. 2–23 in Schoenherr, Allan A., ed. *Endangered Plant Communities of Southern California*. Proceedings of the 15th Annual Symposium, Southern California Botanists, Special Publication Number 3.

Longcore, Travis, Rudi Mattoni, Gordon Pratt and Catherine Rich. On the Perils of Ecological Restoration: Lessons from the El Segundo Blue Butterfly. 1997. Paper presented at *2nd Interface Between Ecology and Land Development in California*, Occidental College, Los Angeles, California, April 18–19.

MacArthur, Rober H. and E. O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press, Princeton, N.J. 203 pp.

Mattoni, R. H. T. 1990. *Species Diversity and Habitat Evaluation Across the El Segundo Sand Dunes at LAX*. Report to the LAX Board of Airport Commissioners.

Mattoni, R. H. T. 1992. The Endangered El Segundo Blue Butterfly. *Journal of Research on the Lepidoptera* 29(4):277–304.

Mattoni, R. H. T. 1993a. The El Segundo Blue, *Euphilotes bernardino allyni* (Shields). Pp. 133–134 in New, T. R., ed. *Conservation Biology of Lycaenidae (Butterflies)*. Occasional Paper of the IUCN Species Survival Commission, No. 8.

Mattoni, R. H. T. 1993b. Natural and Restorable Fragments of the Former El Segundo Sand Dunes Ecosystem. Pp. 289–294 in Keeley, J. E., ed. *Interface Between Ecology and Land Development in California*. Los Angeles, Southern California Academy of Sciences.

Mattoni, Rudi, Travis Longcore, Jeremiah George and Catherine Rich. 1997. Down Memory Lane: the Los Angeles Coastal Prairie and Its Vernal Pools. Poster presented at *2nd Interface Between Ecology and Land Development in California*, Occidental College, Los Angeles, California, April 18–19.

Mattoni, R. H. T. and Murphy, D. D. 1984. *Review of the Interim Report on theDistributional and Ecological Studies on the El Segundo Blue Butterfly*. Report to the Los Angeles City Department of Airports, Environmental Management Bureau.

Mattoni, Rudi, Voitech Novotny and Travis Longcore. Population Changes of the El Segundo Blue Butterfly and a Simple Model That Estimates Population Size. Unpublished manuscript.

McClatchie, Alfred Jones. 1894. Additions to the Flora of Los Angeles County. –I. *Erythea* 2:76–80.

McClatchie, Alfred Jones. 1896. *Lemna gibba* in Southern California. *Erythea* 4:195.

Parish, S. B. 1917. The Red Hill pools. *Bulletin of the Southern California Academy of Sciences* 16:51–52.

Pierce, W. Dwight. 1938. The Fauna and Flora of the El Segundo Sand Dunes: 1. General Ecology of the Dunes. *Bulletin of the Southern California Academy of Sciences* 37(3):93–97.

Sapphos Environmental. 1997. Recovery Permit Application 10(a)(1)(A) for On-Going Monitoring and Maintenance at the El Segundo Blue Habitat Restoration Area.

von Bloeker, Jack C., Jr. 1942. The Fauna and Flora of the El Segundo Sand Dunes: 13. Amphibians and Reptiles of the Dunes. *Bulletin of the Southern California Academy of Sciences* 41(1):29–38.

von Bloeker, Jack C., Jr. 1943a. The Fauna and Flora of the El Segundo Sand Dunes: 14. Birds of El Segundo and Playa del Rey. *Bulletin of the Southern California Academy of Sciences* 42(1):1–30.

von Bloeker, Jack C., Jr. 1943b. The Fauna and Flora of the El Segundo Sand Dunes: 15. Birds of El Segundo and Playa del Rey. *Bulletin of the Southern California Academy of Sciences* 42(2):90–103.

Zedler, Paul H. 1987. The Ecology of Southern California Vernal Pools: A Community Profile. *U.S. Fish and Wildlife Service Biological Report* 85(7.11). 136 pp.

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO

SANTA BARBARA · SANTA CRUZ

Date: 7/29/97

Time: 12:03 PM

To: David Kessler

Office Of Executive Education
The Anderson School at UCLA
Collins Center Ste. 101d
110 Westwood Plaza
Los Angeles, CA 90095

From: Debra-Lynne Solis

Pages: 2

Reference: 45049.39568

Subject: LAX 2015 EIS/EIR

Fax No.: 96461891

July 29, 1997

David Kessler
Environmental Protection Specialist Planner
Federal Aviation Administration
AWP-611
P.O. Box 92007
World Way Postal Center
Los Angeles, CA 90009

Dear Mr. Kessler:

I want to thank you and the FAA for requesting input from residents and businesspersons in the LAX area.

While it might benefit the Southern California region to increase its air traffic capacity, an expanded LAX would create a serious, negative environmental impact on the immediate area.

As a resident of the area, I am concerned about the worsening of the following problems:

1. Visual/Aesthetics - Trash (The high level of activity around the airport brings additional people into our area. They carelessly throw trash on to our streets. The streets most severly impacted are Imperial, Nicholson and Culver. If the expansion is conducted, the problems will increase and our living areas will become even more blighted.)

2. Noise (Early turns by pilots create a significant amount of noise in our homes. Complaints appear to fall on deaf ears. I do not know if the pilots are cited and/or if the respective airlines incur fines when violations are recorded. If the current situation is allowed to continue, the problems will make living in our homes unbearable.)

3. Near Misses (Both my husband and I are former employees of a major airline. The carrier has some of the best pilots in the business, and we respect their opinions. They contend that LAX is a very dangerous airport, and the expansion is likely to worsen the situation. I know that the expansion will increase the probability that an aircraft will crash into my home, and that as a passenger, my safety will be compromised. Like any business, life and death decisions are made by financial ramifications, but I think that there needs to be room for moral considerations, too.)

4. Cultural Resources (Increased traffic around the airport will make it more difficult to travel in the vicinity. As an area resident, it will be more difficult to travel to cultural resources, and the use of them by my family is likely to decrease.)

5. Safety (Increased traffic around the airport will make driving more difficult. The likelihood of accidents will increase, and I would expect that our personal car insurance premiums will increase.)

6. Safety (The number of transitory people in the area will increase as the size of the airports increase. The "safety net" of recognizable people in the neighborhood will decrease, and it will become a more dangerous place for our children to freely play. In addition, as crime becomes a more frequent occurrence, it is likely that our home insurance premiums will increase.)

7. Employment (The number of low-skilled jobs is likely to increase, but the people who live in the immediate area are employable at considerably higher

levels. If the airport expansion were to be situated in an area with better accessibility to a low-skilled population, it would give them opportunities for employment.)

8. Population (The current population in the El Segundo and Playa del Ray areas is stable, but the problems associated with airport expansion will generate a destablization because families who can afford it will leave the area. The moves are particularly destructive for children and senior citizens.)

In recent years, the City of Los Angeles tried to siphon funds away from the Airport for general City use instead of applying them for Airport improvement. This matter has been rectified, but I am concerned that the City has demonstrated such an insistence about expansion of the LAX facility, that it will try to reposition itself at a future time to recapture those funds. The City of Los Angeles has been totally unresponsive to concerns expressed by citizens of the area, and it appears that we have been sacrificed for the promise of future financial benefit.

These benefits could be realized for all of the citizens of Southern California (not just the City of Los Angeles) if the airport expansion were to be positioned in an area which could better accommodate it. The City of Los Angeles should follow the model of a city like Denver.

The Denver model works, while the future LAX expansion at the current site will fail.

Thank you,

Debra-Lynne Terrill
340 Fowling Street
Playa del Rey, CA 90293
310/821-9763
310/206-1450

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO

SANTA BARBARA · SANTA CRUZ

DEPARTMENT OF GEOGRAPHY
1255 BUNCHE HALL
405 HILGARD AVENUE
LOS ANGELES, CALIFORNIA 90095-1524
(310) 825-1071 FAX (310) 206-5976

August 15, 1997

City of Los Angeles, Department of Airports
LAX Master Plan
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Dear Sir or Madam:

I am writing at the request of Marie C. Campbell of Sapphos Environmental who has asked that I clarify a July 27, 1997 letter sent to you by Mr. Travis Longcore, a doctoral student in the Department of Geography at UCLA. In this letter Mr. Longcore comments on the proposed expansion of the Los Angeles Airport and its potential impact on native wildlife and habitats.

The letter presents the professional opinions of Mr. Longcore and Dr. Rudi Mattoni based upon their ongoing research efforts. Mr. Longcore is a full-time graduate student in the Geography Department, and Dr. Mattoni has served as a temporary lecturer, who has been hired by the Department on a course by course, or quarterly basis. Also, as Mr. Longcore states in his letter, the Urban Wildlands Group is an informal group of individuals with common research interests. The group has no official status within the Department of Geography or the University. Dr. Mattoni and Mr. Longcore are the only members of the group who have ongoing academic connections to the department.

The statements in the letter represent neither an official Departmental position, nor an official University position, on the environmental issues associated with the proposed airport expansion.

Sincerely,

J. Nicholas Entrikin
Professor and Chair

cc: Bob James, U.S. Fish and Wildlife, Carlsbad Ecological Survey
Erika Smith, Office of L.A. City Councilmember Ruth Galanter
Marie Campbell, Sapphos Environmental
Rudi Mattoni
Travis Longcore

SAPPHOS ENVIRONMENTAL
environmental compliance
resource management planning

August 8, 1997

Dr. Nicolas Entrikin
Chairman
Department of Geography
1255 Bunche Hall
405 Hilgard Avenue
Los Angeles, CA 90095-1524

SUBJECT: University of California, Los Angeles, Department of Geography Letter Dated July 25, 1997, *Re: Scoping for Preparation of EIS/EIR for LAX Master Plan Project*

Dear Dr. Entrikin:

This letter serves as a request for clarification regarding a letter received by the City of Los Angeles, Department of Airports on University of California, Los Angeles, Department of Geography letterhead dated July 25, 1997, *Re: Scoping for Preparation of EIS/EIR for LAX Master Plan Project*. The letter was transmitted to Sapphos Environmental by the City of Los Angeles, Department of Airports. Sapphos Environmental is the environmental consulting firm acting as a subcontractor to Landrum & Brown who is the prime consultant to the City of Los Angeles, Department of Airports and the Federal Aviation Administration for preparation of a joint environmental impact report and environmental impact statement in support of the Los Angeles International Airport 2015 Expansion Master Plan. Sapphos Environmental is responsible for the evaluation of biological resources, including endangered species. The July 25, 1997 letter makes disparaging and erroneous comments regarding the field work undertaken by Sapphos Environmental and the qualifications of the technical specialists completing the work. Sapphos Environmental has reason to believe that this letter was prepared by a graduate student who purports to represent an official position of the University of California, Los Angeles and the Geography Department. I greatly appreciate the time you took to discuss this matter with me via telephone on August 7, 1997. As agreed in our discussion, I am transmitting to you a copy of the referenced letter (Enclosure 1).

Contrary to comments made in the letter, Sapphos Environmental has the appropriate experience and qualifications to complete the field work required to prepare a technically and procedurally adequate environmental impact report and environmental impact statement to fulfill the requirements of the California Environmental Quality Act and the National Environmental Policy Act. Sapphos Environmental is a small woman- and minority-owned business enterprise specializing in environmental compliance and resource management planning (Enclosure 2). The firm was established approximately five years ago and has completed over two million dollars worth of contracts on similar efforts. Sapphos Environmental is on the County of Los Angeles "List of Certified Biologists." In particular, Sapphos Environmental has extensive experience with the Los Angeles/El Segundo Dunes. In 1994, Sapphos Environmental prepared the *Long-term Habitat Management Plan for the Los Angeles Airport/El Segundo Dunes* (Enclosure 3). Sapphos Environmental has been retained by the City of Los Angeles, Department of Airports to supervise the maintenance and monitoring of the Dunes and the El Segundo blue butterfly since 1994.

50 S. Delacey, Suite 210 • Pasadena, California 91105 • P.O. Box 50241 • Pasadena, California 91115-0241
Tel 818/683-3547 Fax 818/683-3548

Sapphos Environmental uses individuals with the appropriate qualifications to manage and implement all work efforts. The letter states on page 2:

> "We are concerned that the consulting firm preparing the biological assessment of the dunes for the Master Plan (Sapphos Environmental) is seeking a permit to allow ESB surveys to be conducted by nine staff whose vitae show no evidence of training in field entomology or experience in insect identification. To provide useful comparisons to data gathered during the period from 1984 to 1994, transect walks should be made along the established transect (Mattoni 1990), by a single experience observer. Transect survey data collected by multiple, unqualified personnel will be useless for purposes of comparing the current ESB population to previous years. We are further concerned that unqualified observers will not provide and accurate description of ESB distribution."

Sapphos Environmental is managed and owned by Marie Campbell who holds two degrees from the University of California, Los Angeles, Department of Geography (Bachelors Degree in Ecosystems: Conservation of Natural Resources and Master's Degree in Geography (Biogeography and Geomorphology). She spent four and a half years with the U.S. Army Corps of Engineers culminating in the position of Environmental Protection Specialist. She has received graduate level training in environmental laws and regulations and is a member of the Association of Environmental Professionals. Dr. Richard Arnold is the lead scientist for work on the El Segundo blue butterfly. He is listed on the U.S. Fish and Wildlife Service permit as a subpermittee for the performance of directed surveys for the El Segundo blue butterfly. Dr. Arnold is solely responsible for completing the transect surveys. Dr. Arnold holds a doctorate degree in Entomology from the University of California, Berkeley. The historic transect line is limited to a distance of less than a linear mile within an isolated area of habitat that was occupied by the El Segundo blue butterfly between 1984 and 1993. Efforts initiated in the early 1990s have restored an additional 137 acres of suitable habitat for the El Segundo blue butterfly. The linear transect while important from a historic standpoint provides coverage for less than an acre of habitat within the Dunes and in no way is capable of characterizing the current distribution of El Segundo blue butterfly within the 200-acre El Segundo Blue Butterfly Preserve. In 1995, Sapphos Environmental initiated additional transects in newly restored habitat and determined that the El Segundo blue butterfly had expanded their distribution at the Dunes. Sapphos Environmental recommended completion of a distribution survey throughout the 200-acre reserve in 1996. These surveys were completed and verified that El Segundo blue butterfly was present wherever coast buckwheat had been successfully established within the 200-acre restoration area. Dr. Richard Arnold, assisted by Dr. Oakley Shields recently completed distribution surveys throughout the 300 acre Dune complex. Dr. Shields holds a doctorate degree in entomology from the University of California, Davis. Dr. Shields was responsible for the description of the El Segundo blue butterfly as a separate subspecies.

Dr. Irena Mendez is the lead scientists for assessing the habitat characteristics at the Dunes. She holds a doctorate degree from the University of California, Riverside. Dr. Mendez served as Chief Project Scientist under Dr. Mattoni during the 1993/1994 restoration efforts at the Los Angeles/El Segundo Dunes. Since that time, she has been employed at Sapphos Environmental. She is project manager for the maintenance and monitoring of the Dunes, and has logged approximately 6,000 hours at the Dunes since 1993. Dr. Mendez prepared a Memorandum for the Record describing the status of Dunes at the end of the first year of monitoring (Enclosure 3). Dr. Mendez is being assisted by other Sapphos Environmental staff members including Dr. Brad Blood and Mr. Rob Witthaus. Dr. Blood holds a doctorate degree in biology from the University of Southern California

in association with the Natural History Museum of Los Angeles County. Dr. Blood's professional speciality is mammalogy. He is also trained in entomology and insect ecology at California State University at Long Beach. Mr. Witthaus holds a Bachelor of Science degree in Biological Sciences from California Poyltechnic University, San Luis Obispo. Mr. Witthaus has performed field work, including small mammal trapping for The Nature Conservancy. His training at California Polytechnic University at Long Beach includes general entomology field sampling and identification. Sapphos Environmental has retained Mr. Frank Hovore to assist in the identification of other sensitive invertebrate species at the Dunes. Mr. Hovore is currently a candidate for the doctorate degree in biology at the University of California, Los Angeles. His specialty is evolutionary biology and biodiversity of insects.

Sapphos Environmental has completed directed surveys for Pacific pocket mouse at the Los Angeles/El Segundo Dunes. The letter states on pages 4 and 5:

> "We are concerned that Sapphos Environmental and its consultants do not have sufficient experience with this species to detect its presence and recommend that small mammal trapping be completed by a mammalogist with direct experience trapping PM."

Sapphos Environmental retained Mr. William Vanherweg who holds the appropriate permits from the U.S. Fish and Wildlife Service. Pacific pocket mouse is believed to be extirpated from the Dunes.

Sapphos Environmental would like the Chairman of the University of California, Department of Geography to provide a written statement to City of Los Angeles, Department of Airports, Federal Aviation Administration, Landrum & Brown, and Sapphos Environmental clarifying whether or not the July 25, 1997 letter represents an official position of the University of California or the Department of Geography. Specifically, clarification is requested regarding Mr. Longcore's relationship to the University of California, Los Angeles and his authorization to act as a representative of the Department with respect to ongoing planning efforts on Los Angeles International Airport 2015 Expansion Master Plan. Page 15 of the letter indicates it was copied to "interested parties," but does not provide a list of those parties. If the letter does not represent an official position of the University of California or the Department of Geography, Sapphos Environmental would respectfully request that the University of California, Department of Geography provide a letter to all parties who received the letter clearly stating that the letter was erroneously issued on Department letterhead and contains numerous incorrect statements related to Sapphos Environmental and the ecology of the Los Angeles/El Segundo Dunes. It would be appropriate for Sapphos Environmental to receive a list of all parties who received the letter, so that every effort can be made to correct misinformation provided in the letter.

As a graduate of the University of California, Department of Geography, I am dismayed by the unprofessional and inaccurate nature of the July 25, 1997 letter. At no time did Mr. Longcore consult myself or any member of my staff regarding the work that we are doing in support of the environmental impact report and environmental impact statement. To my knowledge, Mr. Longcore has never submitted a written request to the City of Los Angeles Department of Airports to obtain access to the Dunes. Mr. Longcore's cavalier comments regarding the superior qualifications of the Urban Wildlands Group are unprofessional and unsubstantiated. To date, Sapphos Environmental has enjoyed an excellent relationship with the Department of Geography. We currently employ Dr. Steven Patterson who holds a doctorate degree in Geography (Biogeography)

from the Department. Phelicia Gomes, a graduate student in the Department is currently completing an internship with Sapphos Environmental. I can only hope this letter was an unfortunate mistake. Your timely response to this inquiry would be greatly appreciated.

Respectfully submitted,

SAPPHOS ENVIRONMENTAL

Marie C. Campbell
Principal

Enclosures:
1. University of California, Department of Geography Letter Dated July 25, 1997, Re: Scoping for Preparation of EIS/EIR for LAX Master Plan Project signed by Travis Longcore
2. Sapphos Environmental Statement of Qualifications
3. *Long-term Habitat Management Plan for Los Angeles Airport/El Segundo Dunes*
4. Sapphos Environmental Memorandum for the Record Dated May 5, 1995, Subject: State of Dunes and Recommendations for Management

CF: Ms. Sheila Murphy
City of Los Angeles, Department of Airports
1 World Way, Room 218
Los Angeles, CA 90045
Enclosures Not Provided

Mr. David Kessler
Federal Aviation Administration AWP-611.2
P.O. Box 92007
Worldway Postal Center
Los Angeles, CA 90009-2607
Enclosures Not Provided

Mr. Rich Macias
Landrum & Brown
6151 West Century Boulevard, Suite 1000
Los Angeles, CA 90045
Enclosures Not Provided

Dr. Antony Orme
Department of Geography
1255 Bunche Hall
405 Hilgard Avenue
Los Angeles, CA 90095-1524
Enclosure 1 Provided

Dr. Richard Arnold
Entomological Consulting Services, Ltd.
104 Mountain View Court
Pleasant Hill, CA 94523
Enclosure 1 Provided

Dr. Oakley Shields
6506 Jerseydale Road
Mariposa, CA 95338
Enclosure 1 Provided

Mr. William Vanherweg
332 North Stine Road
Bakersfield, CA 93309
Enclosure 1 Provided

Mr. Frank Hovore
Frank Hovore & Associates
14734 Sundance Place
Santa Clarita, CA 91351-1542

Mr. Lawrence Cox
Arnold and Porter
777 South Figueroa, 44th Floor
Los Angeles, CA 90017-2513
Enclosure 1 Provided

File: 1067-004.L08

304

UNIVERSITY OF CALIFORNIA, LOS ANGELES UCLA

BERKELEY • DAVIS • IRVINE • LOS ANGELES • RIVERSIDE • SAN DIEGO • SAN FRANCISCO SANTA BARBARA • SANTA CRUZ

DEPARTMENT OF GEOGRAPHY
1255 BUNCHE HALL
405 HILGARD AVENUE
LOS ANGELES, CALIFORNIA 90095-1524
(310) 825-1071 FAX (310) 206-5976

July 25, 1997

City of Los Angeles, Department of Airports
LAX Master Plan
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Re: Scoping for Preparation of EIS/EIR for LAX Master Plan Project

Dear Sir or Madam:

The Urban Wildlands Group is an informal group organized within the UCLA Department of Geography for the purpose of conducting applied and theoretical research on species and habitats in the urbanized and urbanizing environment of southern California. The senior scientist for the group is Dr. Rudi Mattoni, who is the leading authority on the species and habitats of the El Segundo dunes and Los Angeles coastal prairie, especially the El Segundo blue butterfly and other invertebrates (Mattoni 1990, 1992, 1993a, 1993b; Mattoni and Murphy 1994; Mattoni et al. 1997). Dr. Mattoni also directed the revegetation of the El Segundo dunes at LAX until 1994, successfully increasing the population of El Segundo blue butterflies from an estimated adult population of 500 to over 3,000 individuals (Mattoni et al., unpub. ms.; Longcore, Mattoni, Pratt and Rich 1997). The comments expressed herein were prepared in consultation with Dr. Mattoni and reflect his professional judgment and those of his collaborators in the Urban Wildlands Group.

The proposed expansion of the Los Angeles International Airport has potentially devastating effects on native wildlife and habitats. Our comments here are divided into the two habitats that would be affected by one or more of the currently proposed expansion plans: the El Segundo dunes (Cooper 1967; Pierce 1938) and the Los Angeles coastal prairie (Mattoni 1993).

El Segundo Dunes

The last undeveloped contiguous fragment of the El Segundo dune system lies at the end of LAX's runways. Although most of the approximately 300 acres of open space was once a

residential neighborhood, its natural diversity has recovered significantly since housing was removed (Mattoni 1990). Concept 3 presented in the LAX Master Plan would result in the destruction of the northern portion of this open space area. Implementation of this option would result in irrevocable harm to the native species of the dunes. There is a direct relationship between habitat area and species diversity (MacArthur and Wilson 1967),[1] a relationship so fundamental that it has become the basis of the science of conservation biology. From the reality of the species-area relationship one can predict that some native species on the El Segundo dunes will be extirpated if Concept 3 is implemented. The EIS/EIR should consider this unavoidable significant impact of any reduction in the area of the dunes. In addition, the EIR/EIS should discuss effects on the following species:

El Segundo Blue Butterfly (ESB) (*Euphilotes bernardino allyni*). The recovery of the El Segundo blue butterfly, a federally endangered species, depends on the preservation of a protected population on the entire remaining fragment of the El Segundo dunes at LAX. Although a portion of this area has been set aside as a butterfly reserve, the area to be destroyed by Concept 3 is potential ESB habitat. This area may even be occupied if natural recruitment of *Eriogonum parvifolium* has occurred. Recovery of the ESB depends on the preservation of the entire LAX dunes; any development west of Pershing Drive will jeopardize the long-term persistence of the ESB. We are concerned that the consulting firm preparing the biological assessment of the dunes for the Master Plan (Sapphos Environmental) is seeking a permit to allow ESB surveys to be conducted by nine staff whose vitae show no evidence of training in field entomology or experience in insect identification (Sapphos Environmental 1997). To provide useful comparisons to data gathered during the period from 1984 to 1994, transect walks should be made along the established transect (Mattoni 1990), by a single, experienced observer. Transect survey data collected by multiple, unqualified personnel will be useless for purposes of comparing the current ESB population to previous years. We are further concerned that unqualified observers will not provide an accurate description of ESB distribution. To obtain an accurate measure of ESB abundance on the LAX dunes the Urban Wildlands Group hereby offers, free of charge, to survey the ESB at LAX according to the same protocols used to survey the population from 1986 to 1994. We possess the appropriate permits from the U.S. Fish and Wildlife Service (which Sapphos does not currently hold), and could begin immediately so that not all information from the current flight season is lost.

[1] This relationship is expressed by the equation $S=cA^z$, where S is species number, A is area and c and z are empirically defined constants.

City of Los Angeles, Department of Airports
July 25, 1997
Page 3

Other Endemic Insect Species. There are ten other species known to be endemic to the El Segundo dunes (Table 1; Mattoni 1990, 1992).

Table 1. Species Endemic to the El Segundo Dunes

Common Name	Scientific Name	Ecology Notes	Status
El Segundo crab spider	*Ebo* new species	Hunt on *Eriogonum* and *Haplopappus* flowerheads	abundant
El Segundo goat moth	*Comadia intrusa*	Larval foodplant is *Lupinus chamissonis*	holding
Ford's sand dune moth	*Psammobotys fordi*	Adults nectar at *Gnaphalium*	extinct?
El Segundo scythrid moth	*Scythris* new species 1	Generalist	abundant
Lesser dunes scythrid moth	*Scythris* new species 2	Generalist	rare
El Segundo jerusalem cricket	*Stenopelmatus* new species	Unknown	decreasing?
Dorothy's El Segundo dune weevil	*Trigonoscuta dorothea dorothea*	Found on *Lupinus*?	very common
Lange's El Segundo dune weevil	*Onychobaris langei*	Unknown	very rare
no common name weevil	*Cylindrocopturus* new species	Unknown	rare

We recommend that surveys be conducted for theses species and that any impacts to their range be considered significant environmental impacts. They are all at least as biologically endangered as the ESB. In theory, the ESB serves as an "umbrella species" to protect the other dune endemics; by protecting the habitat of the ESB, the other species are protected under its habitat "umbrella." This mechanism will have failed if Concept 3 is implemented because although parts of the area that would be destroyed my not be directly occupied by the ESB, it is all appropriate ESB habitat, and is occupied by the other dune endemic species.

Bird Species. The birds of the El Segundo dunes were rather thoroughly described by Jack von Blocker in the 1940s (von Blocker 1943a, 1943b). Many of the species listed by von Blocker continue to use the dunes as residents or migrants. Surveys should be made for all species listed by von Blocker as occurring on the dunes. Burrowing Owls were observed on the LAX dunes as recently as January 1997, and a drive around the perimeter reveals the presence of Western Meadowlark, and Loggerhead Shrike, both of which are currently declining due to habitat loss. Loss of *any* of the current area of the dunes will almost inevitably result in the loss of one or more native bird species. This will constitute a significant impact to native wildlife populations. Environmental documentation for the project should also assess the effects of air pollution from overflying jets on native bird populations.

Mammal Species. As of 1994 the native small mammal population on the dunes was known to include *Neotoma fuscipes*, *Peromyscus maniculatus*, and *Reithrodontomys megalotis*. A

City of Los Angeles, Department of Airports
July 25, 1997
Page 4

relatively complete list of native mammals (Table 2) is compiled here from Jack von Blocker's field notes (deposited in the Los Angeles County Museum of Natural History) and Mattoni (1990).

Table 2. Mammals of the El Segundo Dunes

Scientific Name	Common Name	Status (B, breeding F, foraging)
Sorex ornatus californicus	Ornate Shrew	B
Scapanus latimanus occultus	Broad-footed Mole	B
Macrotus californicus californicus	California Leaf-nosed Bat	F
Myotis californicus californicus	California Bat	F
Eptesicus fuscus bernardinus	Big Brown Bat	F
Lasiurus borealis teliotis	Red Bat	F
Lasiurus cinereus cinereus	Hoary Bat	F
Antrozous pallidus pacificus	Pallid Bat	F
Tadarida brasiliensis mexicana	Mexican Free-tailed Bat	F
Eumops perotis californicus	Western Mastiff Bat	F
Sylvilagus audubonii sanctidiegi	Desert Cottontail	B
Lepus californicus bennetti	Black-tailed Jackrabbit	B
Spermophilus beecheyi beecheyi	California Ground Squirrel	B
Thomomys bottae bottae	Botta's Pocket Gopher	B
Perognathus longimembris pacificus	Pacific Pocket Mouse	B, type Palisades del Rey
Dipodomys agilis agilis	Pacific Kangaroo Rat	B
Reithrodontomys megalotis limicola	Western Harvest Mouse	B, type Hyperion
Peromyscus maniculatus gambelii	Deer Mouse	B
Onychomys torridus ramona	Southern Grasshopper Mouse	B
Neotoma fuscipes	Dusky-footed Woodrat	B
Microtus californicus stephensi	California Meadow Vole	B
Canis latrans ochropus	Coyote	B?
Urocyon cinereoargenteus californicus	Gray Fox	B
Vulpes macrotis macrotis	Kit Fox	†
Mustela frenata latirostra	Long-tailed Weasel	B
Taxidea taxus jeffersonii	Badger	F?
Spilogale putorius phenax	Western Spotted Skunk	F
Mephitis mephitis holzneri	Striped Skunk	B?
Lynx rufus californicus	Bobcat	F
Ursus arctos californicus	California Grizzly Bear	F?
Odocoileus hemionus californicus	Mule Deer	F

The environmental documentation should be based on adequate surveys for theses species, especially the Pacific Pocket Mouse (PPM). The PPM was described from the dunes and may well persist. It is notoriously difficult to trap, sometimes requiring special traps (not Sherman) or only showing up after as many as seven consecutive trap nights (J. Maldonado, pers. comm.; C. Nagano, pers. comm.). Surveys for PPM should be conducted by an expert who has trapped for the species before, because correct trap placement can determine whether or not individuals are captured. We are concerned that Sapphos Environmental and its consultants do not have

City of Los Angeles, Department of Airports
July 25, 1997
Page 5

sufficient experience with this species to detect its presence and recommend that small mammal trapping be completed by a mammalogist with direct experience trapping PPM.

Reptile and Amphibian Species. Jack von Bloeker (1942) also described the reptile and amphibian fauna of the El Segundo dunes and the adjacent Los Angeles coastal prairie (Table 3). The EIR/EIS should show results of surveys for these species and assess the impacts of the Master Plan Concepts on their survival.

Table 3. Reptiles and Amphibians of the El Segundo Dunes and Los Angeles Coastal Prairie

Batrachoseps attenuatus attenuatus	Slender Salamander
Bufo boreas halophilus	California Toad
Scaphiopus hammondi	Western Spade-footed Toad
Hyla regilla	Pacific Treefrog
Uta stansburiana hesperis	California Brown-shouldered Lizard
Sceloporus occidentalis biseriatus	Western Fence Lizard
Phrynosoma blainvillii blainvillii	Southern California Horned Lizard
Gerrhonotus multicarinatus webbii	San Diegan Alligator Lizard
Anniella pulchra	Silvery Footless Lizard
Eumeces skiltonianus	Western Skink
Lichanura roseofusca	California Rosy Boa
Diadophis amabilis modestus	Southern King-necked Snake
Coluber constrictor mormon	Western Yellow-bellied Racer
Masticophis flagellum frenatus	Red Racer
Pituophis catenifer annectens	San Diegan Gopher Snake
Lampropeltis getulus boylii	Boyle King Snake
Thamnophis sirtalis infernalis	Pacific Garter Snake
Thamnophis hammondii	California Garter Snake
Crotalus viridis oreganus	Pacific Rattlesnake
Clemmys marmorata	Pacific Mud Turtle

Los Angeles Coastal Prairie

Although largely developed, the Los Angeles coastal prairie was the vegetation type that was historically found in the areas inland from the El Segundo dunes, underlain by the consolidated dunes of the pre-Flandrian. This distinct habitat type was characterized by a preponderance of annual plant species and a rich vernal pool system (Mattoni 1993b, Mattoni et al. 1997). The entire area to be developed by the Master Plan was either dunes or coastal prairie. Therefore, in addition to surveys for dune species, surveys should be made (at appropriate times of the year) for the coastal prairie plants listed below (Table 3). There may remain some remnant patches of vernal pool species (e.g., *Orcuttia californica*) at LAX or the areas into which the Master Plan

City of Los Angeles, Department of Airports
July 25, 1997
Page 6

proposes to expand. Please note that the species documented from the coastal prairie include several federally listed species. Adequate surveys for these species must be made to support assessments made in the EIR/EIS.

Table 4. Plants of the Los Angeles Coastal Prairie.

Scientific Nomenclature	Common Name	Habitat	Authority
DICOTYLEDONES			
AIZOACEAE			
Sesuvium verrucosum Raf. [*S. sessile* auth., not Pers.]	WESTERN SEA-PURSLANE	V	Occasional on the borders of brackish pools from Gardena to Wilmington (Davidson & Moxley 1923). "Nigger Slough," A. Davidson, June 14, 1891, I. Johnston, April 11, 1917 (RSA).
APIACEAE			
Apiastrum angustifolium Nutt.		P	Common in sandy soils in the valleys and foothills (Davidson & Moxley 1923). Manhattan Beach, Hills, Effie S. Spalding, May 3, 1924 (RSA).
Eryngium aristulatum var. *parishii* (J. Coulter & Rose) Jepson	SAN DIEGO BUTTON-CELERY	V[1]	Sandy ground, Redondo (Davidson & Moxley 1923). On low heavy ground toward the coast. First collected by Parish near Oceanside (Abrams 1904).
ASTERACEAE			
Achyrachaena mollis Schauer	BLOW-WIVES	P[1]	In open grassy places in the coastal valleys, south to San Diego (Davidson & Moxley 1923). Cultivated ground west of Los Angeles, A. Davidson, 1930 (RSA).
Ambrosia acanthicarpa Hook.	ANNUAL BUR-SAGE	P	Drier slopes (Pierce notes).
Ambrosia psilostachya DC.	WESTERN RAGWEED	P	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). A common weed in low ground, especially in our coast valleys (Abrams 1904).
Aster subulatus Michaux var. *parviflorus*	ASTER	V	"Nigger Slough," I. Johnston, April 11, 1917. Moist ground, near Mesmer, LeRoy Abrams, August 24, 1902 (RSA).
Baccharis emoryi A. Gray		V	Gardena, "Nigger Slough," dry bottom of slough, F.R. Fosberg, October 18, 1930 (RSA). Moist places of Upper and Lower Sonoran Zones, Los Angeles (Davidson & Moxley 1923)
Blennosperma nanum (Hook.) S.F. Blake [*B. californicum*]		V[1]	In moist places, not common in southern California. Wilmington, Los Angeles County, Gardena, *McClatchie* (Davidson & Moxley 1923).
Chaenactis glabriuscula DC.	YELLOW PINCUSHION	D[1]	Pierce (notes). Generally distributed over the dunes and on the meadow (Pierce 1938). Common on sandy soil or rocky ground in the lower hills and along the coast (Abrams 1904). Sand Hills and flats, between Del Rey and El Segundo (D.H. Keppler, April 30, 1940, UCLA Herbarium).

Corethrogyne filaginifolia (Hook. & Arn.) Nutt. var. virgata (Benth.) A. Gray [Lessingia f. (Hook. & Arn.) M.A. Lane var. f., C. virgata]	CALIFORNIA-ASTER	D	Pierce (notes). Sparingly distributed over the dunes, common on meadow (Pierce 1938). Common in sandy soil near the coast (Abrams 1904). Waste land, Culver City, Fay A. MacFadden, November 18, 1934 (RSA). El Segundo, A. Davidson, 1930 (RSA). Los Angeles near Soldier's Home, Playa del Rey, Ballona Harbor (Geshy 1927).
Filago californica Nutt.	HERBA IMPIA	D^{2}	Ballona Harbor, LeRoy Abrams, April 1, 1901 (RSA).
Gnaphalium decurrens		D	Meadow and dunes (Pierce 1938).
Gnaphalium canescens DC. ssp. microcephalum (Nutt.) Stebb. & Keil [G. m.]	CUDWEED, EVERLASTING	P	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). Frequent in dry washes and in the chaparral belt (Abrams 1904; Davidson & Moxley 1923).
Gnaphalium palustre Nutt.		V^{1}	Inglewood, L. R. Abrams, April 2, 1901 (RSA). Sink at Inglewood, F.W. Pierson, 1951 (RSA). Occasional along river bottoms and on the margins of ponds (Abrams 1904; Davidson & Moxley 1923)
Grindelia camporum E. Greene var. bracteosum (J. Howell) M.A. Lane	GUMPLANT	F^{3}	Open ground about Los Angeles and along the coast to San Francisco (Davidson & Moxley 1923). Windham, LeRoy Abrams, June, 1901 (RSA). Los Angeles, mesas and open ground west of city, E. Kline, June 9, 1924 (RSA).
Hemizonia fasciculata (DC.) Torrey & A. Gray [Deinandra f.]	TARPLANT, TARWEED	F^{23}	Hills near Playa del Rey, LeRoy Abrams, 1902 (RSA). Del Rey between dead dunes and salt marsh, just above saguaritoad, F.R. Fosberg, June 23, 1930 (RSA). Playa del Rey, F.W. Pierson, 1951 (RSA). Very common and general on the plains and lower hills (Abrams 1904).
Heterotheca grandiflora Nutt.	TELEGRAPH WEED	D	Pierce (notes). In stabilized areas, ravines, at both slope bases, and sparingly on the dunes (Pierce 1938). Frequent in waste places in sandy soil (Abrams 1904).
Heterotheca villosa (Pursh) Shinn. [Chrysopsis fastigiata Greene]		D	Common in dry plains or washes throughout intermontane region below 1,000 ft. Santa Monica, Hasse, Los Angeles, Davidson, Pasadena, McClatchie (McClatchie 1895).
Isocoma menziesii (Hook. & Arn.) G. Nesom var. vernonioides (Nutt.) G. Nesom [Haplopappus venetus (Kunth) S.F. Blake ssp. vernonioides (Nutt.) H.M. Hall]	GOLDENBUSH	P	Redondo Beach, Palos Verdes cliffs, sand and dirt, July 1943 (RSA). Growing as weed in open field, Compton, F.W. Gould, October 26, 1943 (RSA).
Lasthenia californica Lindley	GOLDFIELDS	F^{*}	Vermont and Western, hills north between, Helen Oster, April 27, 1924 (RSA). Playa del Rey, C.B. Grant, May 14, 1904 (RSA).
Lasthenia glabrata Lindley ssp. coulteri (A. Gray) Ornd.	COULTER GOLDFIELDS	V^{*}	Salt marsh, Del Rey Hills. In dense patches in old ploughed ground now overgrown (A.M. Johnson, 1934, UCLA Herbarium). Common in saline marshes, especially along the coast (Abrams 1904).
Layia platyglossa (Fischer & C. Meyer) A. Gray	TIDY-TIPS	F^{*}	Common throughout western California (Davidson & Moxley 1923). Frequent in sandy soil, especially along the coast (Abrams 1904). Near "Nigger Slough," field, I. Johnston, April 11, 1917 (RSA).
Malacothrix saxatilis (Nutt.) Torrey & A. Gray		D	Playa del Rey, I. Johnston, June 10, 1910 (RSA). Hillsides and canyons from Santa Barbara to San Diego (Davidson & Moxley 1923).

Micropus californicus Fischer & C. Meyer	[illegible] COTTONWEED	P	Santa Monica, F.W. Pierson, April 11, 1951 (RSA). Low hills, Los Angeles, G.L. Moxley, May 9, 1915 (RSA).
Psilocarphus brevissimus Nutt.	WOOLLY-HEADS	V^{1}	Frequent on the plains and hills, especially in cultivated places (Abrams 1904; Davidson & Moxley 1923). Not uncommon in dedicated pools in the coastal district of Los Angeles County (Parish 1917). Sink at Inglewood, F.W. Pierson, 1951 (RSA). Hills and dry grounds, Los Angeles, H.E. Hasse, July 1890 (RSA).
Psilocarphus tenellus Nutt.		V^{1}	In the coastal subregion, probably not uncommon. Glendale, near Los Angeles, Braunton (Parish 1904; Davidson & Moxley 1923).
Rafinesquia californica Nutt.	CALIFORNIA CHICORY	D	Pierce (notes). Common on rather shady slopes in the foothills and in the chaparral belt of all the mountains (Abrams 1904).
Senecio californicus DC.	GROUNDSEL, RAGWORT, BUTTERWEED	D	Pierce (notes). Meadow slope of sand dunes, Playa del Rey to El Segundo, B.C. Templeton, April 10, 1939 (RSA). Culver City, sandy hillside, Frances M. Marcy, April 14, 1932 (RSA). Foothills near end of Vermont Ave., Helen M. Arter, April 27, 1924 (RSA). Common in sandy soil in dry places in our interior valleys and foothills, and on the sand-dunes along the seashore (Abrams 1904).
Stylocline heterocarpa (Nutt.) Chambers [Microseris h. (Nutt.) Chambers]		P	Photograph, Pierce (1938).
Stephanomeria exigua Nutt. ssp. coronaria (E. Greene) Gottlieb		D	On meadow, stabilized areas of foredune, and in dune ravines (Pierce 1938). Swale behind sand dunes, El Segundo, F.R. Fosberg, August 30, 1931 (RSA). On dry mesas, Inglewood, L. Abrams, August 25, 1902 (RSA).
Stephanomeria virgata Benth. [Ptiloria v.]		D	From meadow onto the dune, only in stabilized areas, especially on leeward side (Pierce 1938). Pierce (notes). Common on dry ground, especially toward the coast (Abrams 1904).
BORAGINACEAE			
Amsinckia spectabilis Fischer & C. Meyer	FIDDLENECK	D^{*}	Pierce (notes). Common in sandy soil near the coast (Abrams 1904). Redondo Beach, Emily M. Bradford, March 17, 1904 (RSA).
Cryptantha clevelandii E. Greene var. florosa I.M. Johnston		D^{*}	Hills between Del Rey and El Segundo, open fields, F.R. Fosberg, March 28, 1932 (RSA).
Cryptantha intermedia (A. Gray) E. Greene		F^{*}	Pierce (notes). Open field, Sand Hills and flats, between Del Rey and El Segundo (D.H. Keppler, April 30, 1949, UCLA Herbarium).
Cryptantha muricata (Hook. & Arn.) Nelson & J.F. Macbr.		D^{*}	Hills between Del Rey and El Segundo, open fields, F.R. Fosberg, March 28, 1932 (RSA). El Segundo, sand dunes, Robert M. Perkins, April 16, 1936 (RSA).
Heliotropium curassavicum L. var. oculatum (A.A. Heller) I.M. Johnston	HELIOTROPE	D	Palisades along railroad at foot of bluff, Hollenberg, July 24, 1928 (RSA). Redondo Beach, sandy fields south end of town around sea level, Tom Burch, June, 1940 (RSA).
Pectocarya linearis (Ruiz Lopez & Pavon) DC. ssp. ferocula (I.M. Johnston) Thorne		P	Inglewood, LeRoy Abrams, April, 1899 (RSA).

Plagiobothrys canescens Benth.	POPCORNFLOWER	P^*	Frequent on grassy foothills and mesas (Davidson & Moxley 1923).
Plagiobothrys nothofulvus (A. Gray) A. Gray	POPCORNFLOWER	P^*	Frequent on rather moist grassy hillsides about Los Angeles and on mesas in the coast region (Abrams 1904). Frequent on grassy foothills and mesas (Davidson & Moxley 1923).
Plagiobothrys trachycarpus (A. Gray) I.M. Johnston [*Allocarya t.* Greene]	POPCORNFLOWER	V^*	In moist ground near Inglewood (Abrams 1923).
BRASSICACEAE			
Erysimum insulare E. Greene [*E. angustatum* auth. unknown]		D	Sand Hills and flats, between Del Rey and El Segundo (G.H. Kappler, April 30, 1948, UCLA Herbarium).
Hymenolobus procumbens [*Hutchinsia p.* (L.) Desv.]		V	Redondo, A. Davidson, March, 1894 (RSA).
Lepidium dictyotum A. Gray [*L. acutidens* Howell]	PEPPERGRASS	V	In saline places toward the coast, Cienega, Santa Monica (Abrams 1904). Occasional in alkaline soils on the coastal plains (Davidson & Moxley 1923).
Lepidium latipes Hook.	PEPPERGRASS	V^1	In saline places near the coast, not common (Davidson & Moxley 1923).
Lepidium nitidum Torrey & A. Gray	PEPPERGRASS	P^1	Common on grassy slopes (Davidson & Moxley 1923). Very common on grassy plains and hills (Abrams 1904). Ballona Hills, March, 1927 (RSA).
Sibara virginica (L.) Rollins [*Arabis v.*]		V^1	Inglewood in low ground (Abrams 1904).
CALLITRICHACEAE			
Callitriche marginata Torrey	WATER-STARWORT	V^1	Soldier's Home, *Hasse* (Abrams 1904). In pools near Santa Monica, *Hasse* (Parish 1917).
CARYOPHYLLACEAE			
Cardionema ramosissimum (J.A. Weinm.) Nelson & J.F. Macbr.		P	Santa Monica, fields near city, Crawford & Hiatt, March 30, 1916 (RSA). Near Mesmer, dry sandy cliffs, I. Johnston, June 10, 1917 (RSA). Manhattan Beach, Effie S. Spalding, May 9, 1931 (RSA).
Loeflingia squarrosa Nutt.		D	Near Redondo (McClatchie 1894).
Polycarpon depressum Nutt.	POLYCARP	V	Redondo Beach, in sandy fields near sea level, Tom Burch, March 5, 1940 (RSA).
Spergularia marina (L.) Griseb.	SAND-SPURREY	D^2	Ballona wetlands, R. Gustafson, March 26, 1981 (RSA). Del Rey, dried mud flats, F.R. Fosberg, June 23, 1930 (RSA).
CHENOPODIACEAE			
Atriplex lentiformis (Torrey) S. Watson [*A. breweri* Wats.]	BIG SALTBUSH	P	Del Rey, bluffs at Palisades, Hollenberg, July 24, 1928 (RSA). On bluffs of the seashore. *San Juan, Anderson*, Santa Monica, *Hasse*, *Parish* (McClatchie 1895).
CONVOLVULACEAE			
Calystegia macrostegia (E. Greene) Brummitt [*Convolvulus m.* Greene]	MORNING-GLORY	D	Pierce (notes).
Cressa truxillensis Kunth	ALKALI WEED	V^2	Culver City, waste land, F.A. MacFadden, September 10, 1934 (RSA). Common in hard subsaline soils along the coast and on the deserts (Davidson & Moxley 1923). Frequent in saline places throughout our range (Abrams 1904).

CRASSULACEAE			
Crassula connata (Ruiz Lopez & Pavon) A. Berger [*C. erecta* Hook. & Arn., *Tillaea minima* Hook. & Arn.]	PYGMY-WEED	D	Pierce (notes). Manhattan Beach, Mrs. E.S. Spalding, May 3, 1924 (RSA). Not uncommon on the coast sands, rare inland (Davidson & Moxley 1923). Common on sandy ground throughout the valley region (Abrams 1904).
CUCURBITACEAE			
Cucurbita foetidissima Kunth	CALABAZILLA	D	Pierce (notes). Frequent on dry sandy soil throughout our range (Abrams 1904).
CUSCUTACEAE			
Cuscuta californica Hook. & Arn.	DODDER	D	From meadow onto dune. Parasitic on various plants on the dune, but especially on Croton and Camissonia (Pierce 1938). Pierce (notes). Occasional along the coast and in the interior, growing on various low shrubs.
ELATINACEAE			
Elatine brachysperma A. Gray	WATERWORT	V^1	Inglewood, L. Abrams, April 1, 1899 (RSA). On the borders of pools near the coast in Los Angeles and San Diego Counties (Davidson & Moxley 1923). Occasional along borders of pools toward the coast (Abrams 1904).
EUPHORBIACEAE			
Chamaesyce albomarginata (Torrey & A. Gray) Small [*Euphorbia a.* Torrey & A. Gray]	RATTLESNAKE WEED	D	Railroad embankment, Inglewood, LeRoy Abrams, May 31, 1902 (RSA).
Croton californicus Muell. Arg.		D	Pierce (notes). Common on dry ground throughout our range (Abrams 1904).
Eremocarpus setigerus (Hook.) Benth.	TURKEY MULLEIN	P^{*1}	Pierce (notes). To edge of dune but not on to sandy slopes (Pierce 1938).
FABACEAE			
Astragalus didymocarpus Hook. & Arn.	TWO-SEEDED MILKVETCH	P^*	Playa del Rey, A. Davidson, 1920 (RSA).
Astragalus pycnostachyus A. Gray var. *lanosissimus* (Rydb.) Munz	VENTURA MARSH MILKVETCH	T^*	Near Santa Monica, L.A. Greata, September 2, 1900 (RSA). Playa del Rey, F.W. Peirson, July 19, 1931 (RSA). Ballona harbor, LeRoy Abrams, August 1901 (RSA). In low grounds near the sea in Los Angeles County (Davidson & Moxley 1923). Extinct.
Astragalus tener A. Gray var. *titi* (Eastw.) Barneby	COASTAL DUNES MILKVETCH	P^*	Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean, 50 feet or lower, rare and seldom collected. Coast of Los Angeles plain (Santa Monica; Hyde Park) — probably extinct (Barneby 1964:1068).
Astragalus trichopodus (Nutt.) A. Gray var. *lonchus* (M.E. Jones) Barneby [*A. leucopsis* (Torrey) Torrey & A. Gray]		D^*	Pierce (notes). Very common along the coast (Davidson & Moxley 1923).
Lotus purshianus (Benth.) Clements & E.G. Clements [*L. unifoliolatus*, *L. americanus*]		P^*	To edge of dune but not on sandy slopes (Pierce 1938).
Lotus salsuginosus E. Greene [*L. maritimus* Nutt.]		P^*	Widely distributed on coast and interior (Davidson & Moxley 1923).
Lotus scoparius (Nutt.) Ottley	DEERWEED	D^*	All over dune and meadow (Pierce 1938). Pierce (notes).
Lotus strigosus (Nutt.) E. Greene		D^*	Pierce (notes). Common on sandy soils in plain and mountains (Davidson & Moxley 1923).
Lupinus bicolor Lindley	MINIATURE LUPINE	D^*	Pierce (notes).
Lupinus truncatus Hook. & Arn.		D^*	Pierce (notes).

Trifolium gracilentum Torrey & A. Gray		F*	Inglewood, L. Abrams, April 1, 1899 (RSA). Grassy hills near Inglewood, L. Abrams, April 10, 1903 (RSA).
FRANKENIACEAE			
Frankenia salina (Molina) I.M. Johnston [*F. grandifolia* Cham. & Schltdl.]	ALKALI HEATH	V²	Common in saline marshes (Abrams 1904). Common on alkaline flats near the coast (Davidson & Moxley 1923).
HYDROPHYLLACEAE			
Phacelia distans Benth.		F*	Pierce (notes). Very common in the plains and foothills (Abrams 1904).
Phacelia stellaris Brand [*P. douglasii* Torr. var. *cryptantha* Brand]	BRAND'S PHACELIA	F*	Pierce (notes). Frequent near the coast along the borders of the sand-dunes (Abrams 1904). On a few subalkaline places on the plains; Los Angeles and San Bernardino Counties (Davidson & Moxley 1923).
LAMIACEAE			
Salvia carduacea Benth.	THISTLE SAGE	D	El Segundo, established portion of the lee slope, Jack Rempel, May 16, 1932 (RSA). Occasional in sandy soil in all the valleys and in the foothills (Abrams 1904).
Salvia columbariae Benth.	CHIA	P	
Stachys ajugoides Benth.	HEDGE NETTLE	V²	Playa del Rey (Davidson & Moxley 1923).
LIMNANTHACEAE			
Limnanthes douglasii R.Br.	MEADOWFOAM	V	Pierce (notes). Growing in wet places. Reported from Los Angeles and San Bernardino (Abrams 1904).
LOASACEAE			
Mentzelia affinis E. Greene	BLAZING STAR	D	Redondo Beach, sandy fields, elevation near sea level, Tom Burch, March 9, 1940 (RSA). Rancho Palos Verdes, Tim Ross, March 28, 1994 (RSA). El Segundo, sand dunes near strand, Jack Rempel, April 10, 1932 (RSA).
MALVACEAE			
Malvella leprosa (Ortega) Krapov. [*Sida hederacea* Torr.]	ALKALI-MALLOW	V¹	Common in subalkaline places (Abrams 1904). West Los Angeles (O.H. Keppler, June 13, 1944, notes, UCLA Herbarium). On compact ground in subalkaline soils (Davidson & Moxley 1923).
Sidalcea malviflora (DC.) Benth. ssp. *malviflora*	CHECKER MALLOW	F*	Pierce (notes). To edge of dune but not on to sandy slopes (Pierce 1938). Frequent on the grassy hills and mesas (Abrams 1904).
Sidalcea neomexicana A. Gray [*S. parviflora* Greene]		V	Between West Adams and Culver City, hillside, Frances M. Morey, May, 1912 (RSA). In low subsaline places throughout our range (Abrams 1904). In subalkaline meadows from Los Angeles to San Bernardino (Davidson & Moxley 1923).
ONAGRACEAE			
Camissonia bistorta (Torrey & A. Gray) Raven [*Oenothera b.* Nutt. ex T. & G.; *Sphaerostigma b.* Walp.]	CALIFORNIA SUN CUP	F*	Pierce (notes). To edge of dune but not on sandy slopes (Pierce 1938). Very common in sand-washes about San Diego, extending north to Santa Barbara (Abrams 1904).
Camissonia cheiranthifolia (Sprengel) Raim.	BEACH EVENING PRIMROSE	D*	Pierce (notes).
Camissonia lewisii Raven	LEWIS' EVENING PRIMROSE	D*	Pierce (notes). Bordering sand dunes at Ballona Harbor, Abrams, 1901 (RSA). Inglewood, Abrams, 1903 (RSA).

Camissonia micrantha (Sprengel) Raven		D*	Pierce (notes). Frequent on the sand dunes along the seashore, but not strictly maritime as reported by some, for it is also frequent in sandy soil in all our valleys (Abrams 1904).
Epilobium pygmaeum (Speg.) P. Hoch & Raven [*Boisduvalia glabella* (Nutt.) Walp.]	FIREWEED	V¹	Sink near Inglewood, F.W. Pierson, July 19, 1906 (RSA). Low ground. Santa Monica; Mesmer; San Diego (Abrams 1904). Low ground, Santa Monica to San Diego (Davidson & Moxley 1923).
Oenothera elata Kunth ssp. *hirsutissima* (S. Watson) W. Dietr.	EVENING PRIMROSE	P	Ballona wetlands, R. Gustafson, July 15, 1981 (RSA).
PAPAVERACEAE			
Eschscholzia californica Cham.	CALIFORNIA POPPY	D'	Rosenberg (1938).
Platystemon californicus Benth.	CREAM CUPS	F*	Common in sandy soil throughout our range below 3,000 feet altitude (Abrams 1904).
PLANTAGINACEAE			
Plantago elongata Pursh [*P. bigelovii* A. Gray]	PLANTAIN	F*¹	Inglewood (Davidson & Moxley 1923). In moist ground near Inglewood (Abrams 1903).
Plantago erecta E. Morris [*P. hookeriana* Fisher & C. Meyer]	PLANTAIN	F*¹	Pierce (notes). Very common on dry plains and in the foothills throughout our range (Abrams 1904).
POLEMONIACEAE			
Gilia capitata Sims ssp. *abrotanifolia* (E. Greene) V. Grant		P	Playa del Rey, A. Davidson, 1930 (RSA). Common and generally distributed on sandy plains (Davidson & Moxley 1923).
Linanthus dianthiflorus (Benth.) E. Greene		F*	Pierce (notes). Common in sandy soil in the coast and interior valleys (Abrams 1904). Common and general on sandy soils, more abundant towards the coast (Davidson & Moxley 1923).
Navarretia prostrata (A. Gray) E. Greene		V¹	Sink near Inglewood, F.W. Pierson, July 19, 1906 (RSA). On margin of vernal pool, near junction of Sepulveda Blvd. and W. Redondo, Manhattan Beach vicinity, Frank W. Gould, April 15, 1944 (RSA). In low adobe places on the mesas of the coast valley, Inglewood (Abrams 1904). Not uncommon in desiccated pools in the coastal district of Los Angeles county (Parish 1917). Abundant in restricted localities, near Downey, Bixby, Inglewood (Davidson & Moxley 1923).
POLYGONACEAE			
Eriogonum gracile Benth.		F*	Pierce (notes). Sparse on dune, common at meadow base (Pierce 1938). Common in sandy soil, especially toward the coast (Abrams (1904).
Mucronea californica Benth. [*Chorizanthe c.* (Benth.) A. Gray var. *suksdorfii* (F. Macbr.)]	CALIFORNIA SPINEFLOWER	D*	Pierce (notes). Common on sandy soil along the coast and in the interior valleys (Abrams 1904).
Rumex hymenosepalus Torrey	WILD-RHUBARB	D	Del Rey Hills, marshy ground (O.H. Keppler, March 19, 1944, notes, UCLA Herbarium). Frequent in dry sandy soil (Abrams 1904). Common on sandy plains in the counties of San Bernardino, Los Angeles, and Orange (Davidson & Moxley 1923).
PORTULACACEAE			
Calandrinia ciliata (Ruiz Lopez & Pavon) DC. [*C. caulescens* var. *menziesii* Gray; *C. menziesii* Torrey & Gray]	RED MAIDS	F*	Pierce (notes). Common on grassy mesas especially near the coast (Davidson & Moxley 1923). Common on the mesas, especially in the coast region (Abrams 1904).

RANUNCULACEAE			
Ranunculus californicus Benth.	BUTTERCUP	P[*1]	Grassy hills, Inglewood, L. Abrams, March 8, 1903 (RSA). Del Rey Hills, moist hillside (G.H. Kappler, March 19, 1944, UCLA Herbarium).
ROSACEAE			
Horkelia cuneata Lindley		D	Pierce (notes). *At the very edge of the dune only, we find a thin line* (Pierce 1938).
SCROPHULARIACEAE			
Antirrhinum nuttallianum Benth.	SNAPDRAGON	P	Venice, Hollenbeck, July 10, 1928 (RSA). Ballona Harbor, LeRoy Abrams, June 6, 1901 (RSA). Playa del Rey, LeRoy Abrams, June 8, 1902 (RSA).
Castilleja exserta (A.A. Heller) Chuang & Heckard [*Orthocarpus purpurascens* Benth.]	PURPLE OWL'S CLOVER	P*	To edge of dune but not onto sandy slopes (Pierce 1938). Common in sandy soils in the valleys and hills (Abrams 1904).
Linaria canadensis (L.) Dum. -Cours. var. *texana* (Scheele) Pennell	BLUE TOADFLAX	P	Pierce (notes). Occasional in cultivated fields, especially in sandy soil (Abrams 1904).
Veronica peregrina L.	PURSLANE SPEEDWELL	p[1]	Occasional along the margins of streams and in the dry beds of winter pools (Abrams 1904).
SOLANACEAE			
Datura wrightii Regel [*D. meteloides* A.DC.]	JIMSON WEED	D	Pierce (notes). On meadow and in established zones (Pierce 1938). Frequent in sandy soil throughout our range (Abrams 1904).
Petunia parviflora A.L. Juss		V[1]	Occasional on margins of ponds and along streams, especially in subsaline places (Abrams 1904). Estuar, Ballona wetlands.
VERBENACEAE			
Verbena bracteata Lagasca & J.D. Rodriguez		V	Inglewood, LeRoy Abrams, June 6, 1901 (RSA). Gardena, "Nigger Slough," slough edge among grass, prostrate on ground, I. Johnston, April 11, 1917 (RSA).
MONOCOTYLEDONES			
CYPERACEAE			
Cyperus eragrostis Lam.	NUTSEDGE	V	El Segundo dunes, scarce in wet soil. A.C. Sanders, September 18, 1917 (RSA).
Cyperus esculentus L.	NUTSEDGE	V	Ballona wetlands, ditch. R. Gustafson, July 15, 1919 (RSA). Vacant lots, Los Angeles, Edwin Kline, September 15, 1924 (RSA).
Eleocharis acicularis (L.) Roemer & Schultes	SPIKERUSH	V[1]	Inglewood, L. Abrams, April, 1901 (RSA). Frequent in moist places along streams and on borders of ponds (Abrams 1904)
Eleocharis macrostachya Britton	SPIKERUSH	V[1]	"Nigger Slough," marshy ground, I. Johnston, April 11, 1917 (RSA). Santa Monica, swamp near road, P.A. Munz, R.D. Harwood, May 15, 1920 (RSA).
IRIDACEAE			
Sisyrinchium bellum S. Watson	BLUE-EYED GRASS	P	In grassy field dominated by *Phalaris lemmoni*, Sepulveda Boulevard northwest of Los Angeles Airport, Flowers white. F.W. Gould, April 15, 1944 (RSA).
JUNCACEAE			
Juncus bolanderi Wilk.	RUSH	V	Frequent along streams and in low ground generally throughout range (Abrams 1904). Hawkins marsh, Los Angeles Co., H.E. Hasse, May, 1892 (RSA)
Juncus bufonius L.	TOADRUSH	V[1]	"Nigger Slough." Occasional on slough edge. I.M. Johnston, April 17, 1917 (RSA).

Juncus mexicanus Willd.	RUSH	V[2]	Frequent along streams and in low ground generally throughout range (Abrams 1904). Wilmington, canal dunes. I. Johnston, April 11, 1917 (RSA). Estuar, Ballona wetlands.
Juncus phaeocephalus Engelm.	RUSH	V[2]	Frequent along streams and in low brackish places (Abrams 1904). Baldwin Hills, lowlands, Mr. and Miss Dayton, April 15, 1925 (RSA).
LEMNACEAE			
Lemna gibba L.	DUCKWEED	V[1]	Abundant at Pasadena, at Compton, near San Pedro, in Santa Monica Canyon, and near San Juan. "In a ditch at Compton I found it fruiting abundantly on September 2nd" (McClatchie 1896).
LILIACEAE			
Bloomeria crocea (Torrey) Coy. [*B. aurea* Kell.]	COMMON GOLDENSTAR	P*	Frequent in the foothills and on the plains (Abrams 1904).
Calochortus catalinae S. Watson	CATALINA MARIPOSA LILY	P	
Dichelostemma capitatum (Benth.) A.W. Wood [*Brodiaea pulchella* (Salisb.) E. Greene]	BLUE DICKS	D*	Pierce (notes). Common on the plains and foothills (Abrams 1904).
POACEAE			
Alopecurus saccatus Vasey [*A. howellii* Vasey, *A. californicus* Vasey]	FOXTAIL	V	Meadows and wet places along the coast in San Diego (Davidson & Moxley 1923).
Bromus carinatus Hook. & Arn.	CALIFORNIA BROME	D	Santa Monica roadside, Crawford & Hurt, March 28, 1918 (RSA). El Segundo dunes, A.C. Sanders February 18, 1918 (RSA).
Deschampsia danthonioides (Trin.) Munro	ANNUAL HAIRGRASS	V*	"Nigger Slough," damp pasture, I. Johnston, April 11, 1917 (RSA). Occasional on dry foothill slopes Los Angeles and Orange Counties (Davidson & Moxley 1923).
Distichlis spicata (L.) E. Greene	SALTGRASS	p[2]	Very common in low subsaline places along the coast and our interior valleys (Abrams 1904). Common in subsaline places especially near the coast (Davidson & Moxley 1923).
Elymus triticoides Buckley [*Leymus c.* (Buckley) Pilger]		D	Pierce (notes). Common in low ground, especially in the coast valleys (Abrams 1904).
Festuca megalura Nutt. [*Vulpia microstachys* (Nutt.) Munro var. *hirsuta* (Hack.) Arch. & Goodrich]	FESCUE	D[1]	Pierce (notes).
Hordeum leporinum Nevski [*H. pusillum* Nutt. in part]	BARLEY	V	In subsaline soils near the coast from Los Angeles to San Diego (Davidson & Moxley 1923).
Leptochloa uninervia (J.Presl) A. Hitchc. & Chase	MEXICAN SPRANGLETOP	V	Ballona wetlands, R. Gustafson, May 15, 1981 (RSA). Also W. Adams Street (RSA).
Nassella cernua (Stebb. & Love) Barkworth [*Stipa c.* Stebb. & Love]	NODDING NEEDLEGRASS	P*	Pierce (notes).
Orcuttia californica Vasey	CALIFORNIA ORCUTT GRASS	V[1]	In dry ditches assimilating vernal pools, around airport at corner of South Western Avenue and Rosecrans Avenue (A.A. Beetle, June 11, 1946, UCLA Herbarium). Old Municipal Airport, Rosecrans Avenue, Belfair and Hooven, October 1944 (RSA).

Phalaris lemmonii Vasey	V[5]	Abundant in meadow near corner of Western Ave. and 131st Street (Frank W. Gould, April 12, 1944, UCLA Herbarium). In enclosed places, Inglewood (*LeRoy Abrams*, April 9, 1903, UCLA Herbarium). Meadow lands from South Los Angeles to Inglewood (Davidson & Moxley 1923).

Habitats: D, dunes *and* prairie; P, prairie (*not* dunes); V, vernal pools. [5]Southern California vernal pool indicator species. [6]Vernal pool associates, found also in aquatic, marsh, or seepage areas. [7]Found in vernal pool basins, but common in other habitats (Zeitler 1987). [8]Species or examples of genera listed by Keeley (1989) as composing pristine native California grasslands. Nomenclature follows *The Jepson Manual* (Hickman 1993); synonymies are given for deviations. Text from herbarium labels (UCLA or Rancho Santa Ana, RSA) or references that indicate presence on the prairie are presented in full.

In sum, the area of LAX and its proposed expansion was, and remains, a valuable biological habitat for native flora and fauna. We urge the Department of Airports to ensure that these values not be overlooked in the preparation of the EIR/EIS for the Master Plan. Biological surveys are difficult and time-consuming and require experienced experts to perform them correctly. We hope that the Department of Airport will contract with truly qualified biologists, or peer review conclusions made by consulting biologists, to ensure that the assessment of impacts to biological resources is based on full and complete information.

Sincerely,

Travis Longcore

Travis Longcore
Urban Wildlands Group

cc: interested parties

Literature Cited

Abrams, LeRoy. 1903. Additions to the Flora of Los Angeles County, II. *Bulletin of the Southern California Academy of Sciences* 2(1):157–158.

Abrams, LeRoy. 1904. *Flora of Los Angeles and Vicinity*. Stanford University Press, Stanford, California. 474 pp.

Barneby, Rupert C. 1964. *Atlas of North American Astragalus. Part II*. Memoirs of the New York Botanical Garden, Volume 13.

Beetle, Alan A. 1947. Distribution of the Native Grasses of California. *Hilgardia* 17(9):309–357.

Cashy, Margaret L. 1927. The Genus *Carethrogyne* in Southern California. *Bulletin of the Southern California Academy of Sciences* 26:8–16.

Cooper, William Skinner. 1967. *Coastal Dunes of California*. The Geological Society of America Memoir 104. 131 pp.

Davidson, Anstruther, and Moxley, George L. 1923. *Flora of Southern California*. Times-Mirror Press, Los Angeles. 452 pp.

Hickman, James C. ed. 1993. *The Jepson Manual: Higher Plants of California*. University of California Press, Berkeley. 1400 pp.

Keeley, Jon E. 1989. The California Valley Grassland. Pp. 2–23 in Schoenherr, Allan A., ed. *Endangered Plant Communities of Southern California*. Proceedings of the 15th Annual Symposium, Southern California Botanists, Special Publication Number 3.

Longcore, Travis, Rudi Mattoni, Gordon Pratt and Catherine Rich. On the Perils of Ecological Restoration: Lessons from the El Segundo Blue Butterfly. 1997. Paper presented at *2nd Interface Between Ecology and Land Development in California*, Occidental College, Los Angeles, California, April 18–19.

MacArthur, Robert H. and E. O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton University Press, Princeton, N.J. 203 pp.

Mattoni, R. H. T. 1990. *Species Diversity and Habitat Evaluation Across the El Segundo Sand Dunes at LAX*. Report to the LAX Board of Airport Commissioners.

Mattoni, R. H. T. 1992. The Endangered El Segundo Blue Butterfly. *Journal of Research on the Lepidoptera* 29(4):277–304.

Mattoni, R. H. T. 1993a. The El Segundo Blue, *Euphilotes bernardino allyni* (Shields). Pp. 133–134 in New, T. R., ed. *Conservation Biology of Lycaenidae (Butterflies)*. Occasional Paper of the IUCN Species Survival Commission, No. 8.

Mattoni, R. H. T. 1993b. Natural and Restorable Fragments of the Former El Segundo Sand Dunes Ecosystem. Pp. 289–294 in Keeley, J. E., ed. *Interface Between Ecology and Land Development in California*. Los Angeles, Southern California Academy of Sciences.

Mattoni, Rudi, Travis Longcore, Jeremiah George and Catherine Rich. 1997. Down Memory Lane: the Los Angeles Coastal Prairie and its Vernal Pools. Poster presented at *2nd Interface Between Ecology and Land Development in California*, Occidental College, Los Angeles, California, April 18–19.

Mattoni, R. H. T. and Murphy, D. D. 1984. *Review of the Interim Report on theDistributional and Ecological Studies on the El Segundo Blue Butterfly*. Report to the Los Angeles City Department of Airports, Environmental Management Bureau.

Mattoni, Rudi, Vojtech Novotny and Travis Longcore. Population Changes of the El Segundo Blue Butterfly and a Simple Model That Estimates Population Size. Unpublished manuscript.

McClatchie, Alfred Jones. 1894. Additions to the Flora of Los Angeles County. –I. *Erythea* 2:76–80.

McClatchie, Alfred Jones. 1896. *Lemna gibba* in Southern California. *Erythea* 4:195.

Parish, S. B. 1917. The Red Hill pools. *Bulletin of the Southern California Academy of Sciences* 16:51–52.

Pierce, W. Dwight. 1938. The Fauna and Flora of the El Segundo Sand Dunes: 1. General Ecology of the Dunes. *Bulletin of the Southern California Academy of Sciences* 37(3):93–97.

Sapphos Environmental. 1997. Recovery Permit Application 10(a)(1)(A) for On-Going Monitoring and Maintenance at the El Segundo Blue Habitat Restoration Area.

von Bloeker, Jack C., Jr. 1942. The Fauna and Flora of the El Segundo Sand Dunes: 13. Amphibians and Reptiles of the Dunes. *Bulletin of the Southern California Academy of Sciences* 41(1):29–38.

von Bloeker, Jack C., Jr. 1943a. The Fauna and Flora of the El Segundo Sand Dunes: 14. Birds of El Segundo and Playa del Rey. *Bulletin of the Southern California Academy of Sciences* 42(1):1–30.

von Bloeker, Jack C., Jr. 1943b. The Fauna and Flora of the El Segundo Sand Dunes: 15. Birds of El Segundo and Playa del Rey. *Bulletin of the Southern California Academy of Sciences* 42(2):90–103.

Zedler, Paul H. 1987. The Ecology of Southern California Vernal Pools: A Community Profile. *U.S. Fish and Wildlife Service Biological Report* 85(7.11). 136 pp.

Sign-In Sheets for Agency Scoping Meeting
Wednesday, July 16, 1997

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
Robert Lum	DWP	111 N. Hope St #1018 L.A. CA 90012	(P)213-367-0166 (F)213-367-0059		
Araks Hunter	LADWP	111 N Hope St. Rm 841 LA CA 90012	(213) 367-0147 (213) 367-0146		
Mark Wirth	Rep Jane Harman	1217 El Prado Torr 90501	310 873 8420		
Laurie Lile	City of Palmdale	38300 9th St. E/Palmdale CA	805 267-5400		
Joan Jones	City Man Beach		310 545-5621		
Brian Szabo	B Szabo Inc	8845 Olympic Blvd Suite 710 LA 90064	(310)472-3575		
Mike Bahn	STECO	429 Santa Monica Blvd Santa Monica	310 260-8800		
Kevin Mosley	Rep Maxine Waters	10124 S. Broadway #1 LA 90003	213-757-8900 / 213-757-9506		
Anna Soto	Sup Burke LA County	500 W. Temple Rm [illegible] L.A.	213 974-2222		
Michael Estrada	City of Inglewood	One Manchester Blvd. Ste 700	310/412-5230		

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
Jason Morgan	Santa Monica Airport	3223 Donald Douglas Loop So.	(310)458-8591		
Carl Jacobson	LAC West Vector Control Dist	6750 Centinela Ave L.A. 90230	(310) 915-7370		
Pat Blakeslee	Lawndale	2461 Lucille Ave HV	310 [illegible]-7461		
Brian Rosenthal	Hawthorne (Jr. Chamber)	879 W. 190th St #400 LA 90248	538-9100		
Mike Agaibi	FAA	P.O. Box 92007, WPC, LA, CA 90009	725-3611		
Bruce McDaniel	Lennox School District	10319 Firmona Ave Lennox 90304	310 330-4950		
Hector Perez	"	" "	"		
Jim Gregoris	LAX Master Plan Council	1601 Dove Street Ste 105 Newport Beach, CA 92660	714/253-8016		
Deanna Vatarah	" "	[illegible] Manchester Bl 90301	310 412-5220		
Debbie Linthorst	El Segundo Employers Assoc	c/o Rubicon, Inc 9911 Washington Blvd #400 Culver City 90232	310 815-2100 ext 108		

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
Norman Coleman	IUOE Local #12	150 E Corson Pasadena Ca 91103	818 792-2519		
Steve Gerhardt	Culver City	9770 Culver Blvd, CC 90230	310/253-5738		
[illegible]	[illegible]	824 [illegible] St., [illegible] 90403	310-[illegible]		
Chris Bunbine	CALSTART	3601 Empire Ave, CA 91505	(818) 565 5657		
[illegible]	[illegible]	50 S. De Lacey, Suite 211 Pasadena CA [illegible]	(818) [illegible]		
JAY KIM	LADOT	7166 W. Manchester Ave	(213) 485-1062		
[illegible] Kim	LADOT	"	"		
MICHAEL MAY	"	"	"		
Tom [illegible]	MTA	One Gateway Plz LA, CA 90012	213-922-[illegible]		

Arcadia 7-16-97

LAX Master Plan EIS/EIR Scoping Meetings
Sign-In Sheet

Please submit comments no later than July 31, 1997 to one of the following people:

David B. Kessler, AICP, Environmental Protection Specialist Planner
U.S. Department of Transportation, Federal Aviation Administration - AWP-611.2
P.O. Box 92007, World Way Postal Center, Los Angeles, CA 90009-2007

John L. Graham, Chief of Airport Planning
Department of Airports, LAX Master Plan
One World Way, Suite 218, Los Angeles, CA 90045

Name	Organization/Company	Address and Zip Code	Phone/Fax		
JOSE SANTOS	[illegible]	15260 Ventura Blvd Suite 800 - Sherman Oaks CA 91403	(818) 501-2560 [illegible] FAX		
MAURO DARZO	" " "	" " "	" "		
[illegible]	City of Hermosa Beach		310 [illegible]-6267		
A.T. [illegible]	A.C.S.C.	2001 S. Alameda St, H213 LA CA 90058	213 741 4420		
Bob Shorr	SAIC/NISC/[illegible]	203 Valley Drive, Hermosa Beach 90254	310/216-2321		
JARED A. FAWCETT	L.A. CO. DEPT. OF BEACHES & HARBORS	13837 FIJI WAY MARINA DEL REY, CA 90292	310-305-9559 310-821-6345 FAX		
MARK DRAYSE	ECONOMIC DEVELOPMENT	315 W. 9th St. Ste 1209 LA, CA 90015	213-892-0154 [illegible]		
[illegible] Wyatt	LA City Planning	221 N. Figueroa, Ste. 900, Los Angeles CA 90012	213 580 [illegible]		
[illegible]	LA City Planning	221 N. Figueroa St. #900 LA 90012	213 580-5244		
STEVE MANOVE	IUOE Local 12	150 E Corson St Pasadena 91[illegible]	818 792 8900		

Notice of Intent (1997)
Notice of Preparation and Initial Study(1997)
Supplemental Notice of Preparation (1999)
Agency Coordination Letter
List of Agency Coordination Letter Recipients
Written Agency Comments
Agency Scoping Meeting Registration