

**PC02070      Khoury, Elizabeth      None Provided**

**PC02070-1**

**Comment:**

We do not need LAX to expand any further - They (LAWA) has been doing incremental expansion without an EIR for years.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Also see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX.

**PC02070-2**

**Comment:**

Why not limit the # of passengers to scenario #8 with 78 million passengers and build an airport at El Toro?

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan. Alternative D, which is evaluated in the Supplement to the Draft EIS/EIR, would constrain LAX operations to 78.9 million passengers annually.

**PC02070-3**

**Comment:**

We do not need an interchange on Arbor Vitae/405 Freeway and we do not need an expressway that will take part of the Centinela Adobe.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Alternative D does not include the LAX Expressway. The proposed Arbor Vitae interchange is not a part of the LAX Master Plan and has had the federal funding withdrawn. In addition, please see Topical Response TR-HA-1 regarding potential impacts to the Centinela Adobe.

**PC02071      Miller, Dawn      None Provided**

**PC02071-1**

**Comment:**

Provide a listing of suggestions that have been made by the EJ Task Force. This could provide for easier access by the public to view the suggestions so there wouldn't be duplications and easier than going through the EIR itself.

### **3. Comments and Responses**

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**Response:**

Please refer to Response to Comment PC02063-1 regarding environmental justice-related mitigation and benefits, and also Response to Comment AL00033-255 regarding the availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

**PC02072      Jiminez, Trini      None Provided**

**PC02072-1**

**Comment:**

Want a community center in Lennox & look for empty lots. Inglewood Ave near Imp Hwy (vacant lot) 111th Street & Osage (vacant lots) 111th Place .

**Response:**

Please see Topical Response TR-EJ-2 regarding the environmental justice program and benefits.

**PC02073      No Author Identified,   None Provided**

**PC02073-1**

**Comment:**

- Including soundproofing w/o giving up easement rights

**Response:**

Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program, particularly Subtopical Response TR-LU-3.13, concerning aviation easements.

**PC02073-2**

**Comment:**

- Build Community Centers in Lennox.

**Response:**

Please see Topical Response TR-EJ-2 regarding the environmental justice program and benefits.

**PC02073-3**

**Comment:**

- Give Lennox space for a High School

**Response:**

Please see Response to Comment PC01750-11.

**PC02074      No Author Identified,   None Provided**

**PC02074-1**

**Comment:**

Please keep the planes from taking off East of the Airport. The children in schools and the people who must live in convalescent homes are bothered the most.

**Response:**

Comment noted. Please refer to Topical Response TR-N-3 regarding aircraft flight procedures.

**PC02074-2**

**Comment:**

The planes are coming more to Imperial and the 105 freeway more than last year.

**Response:**

Comment noted.

**PC02075 No Author Identified, None Provided**

**PC02075-1**

**Comment:**

Sound proof everyone's homes in the flight path of the airports. And stop trying to divide the community. Talk is cheap & I know the Federal Gov. is a lots of talk. Help our community by doing what is right.

**Response:**

Comment noted. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

**PC02076 Bradley, Willie None Provided**

**PC02076-1**

**Comment:**

My name is Willie R Bradley, and I live at 1448 W. 79th St, which is out of the boundaries to receive soundproofing, however I am constantly impacted by the noise of the airplanes to the point of my windows vibrating, cant hear TV in the afternoon, conversations being disrupted while on the telephone, and also I am awoken in the middle of the night.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding increase in noise levels at the commentor's property, to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels. As shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, this property is located outside the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), this property is located outside the 94 dBA SEL contour under 1996 baseline and Year 2000 conditions, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. As also analyzed in Sections 4.1.6 and 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the subject property would not be newly exposed to significant noise levels within the 65 CNEL or 94 dBA SEL as a result of developing any of the LAX Master Plan alternatives.

See also Topical Response TR-N-8 regarding noise-based vibration, Subtopical Response TR-N-6.1 regarding existing high noise levels, and Topical Response TR-LU-3 regarding residential sound insulation under the Aircraft Noise Mitigation Program (ANMP).

**PC02076-2**

**Comment:**

Please contact me with new developments at 323-971-3895.

### 3. Comments and Responses

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**Response:**

Comment noted. In accordance with NEPA and CEQA, all comments have been responded to in this Final EIS/EIR.

**PC02077      Jacquet, Joyce      None Provided**

**PC02077-1**

**Comment:**

Please monitor my house. I live at 9431 So. Hobart Blvd.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of monitoring methods used to validate the current 65 CNEL contour.

**PC02078      Williams, Wiley & Nadine      None Provided**

**PC02078-1**

**Comment:**

WHY I AM NOT IN THE NOISE IMPACT AREA.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how the noise impact area is determined.

**PC02078-2**

**Comment:**

FLIGHT PATH OF AA SOUTHWEST UNITED OVER MY HOUSE.

**Response:**

The full text of the commentator's statement indicates that they reside between the approach paths to the north and south runway complexes, just outside the area of eligibility for sound treatment, and are desirous of being included in the Aircraft Noise Mitigation Program. The commentator's concerns are acknowledged. Please see Subtopical Response TR-N-2.3 regarding evaluation of impacts should extend beyond the 65 CNEL to all sensitive areas under flight tracks and Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

**PC02079      Buchanan, Warren      None Provided**

**PC02079-1**

**Comment:**

My name Warren Buchanan. I lived at 10640 S. St Andrews Pl. Where I live we need a noise monitor set up so we can be setup for noise that the planes make all night all day long.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of monitoring methods used to validate the current 65 CNEL contour and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would revise the ANMP, including expanding and upgrading the current monitoring system and incorporating residential dwelling units exposed to single event noise levels into the ANMP.

**PC02079-2**

**Comment:**

We need more tree, better road to drive on. More lighting. More security near our homes so thats we can stay safe. We need less polution. We need more out reach program for our youth. And we need more job thats where our youth can stay out of trouble and to better thereself.

**Response:**

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated with consideration of benefit provided relative to cost, whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. While all recommendations were considered as possible additional components of the Environmental Justice Program, there was a practical limit to the number of benefits that could be selected to help off-set disproportionately high and adverse environmental effects on minority and low-income communities. Furthermore, while LAWA will investigate and pursue environmental justice benefits as feasible and allowable by law, implementation of any programs or measures is dependent upon LAWA's ability to utilize airport revenue funding, or other state or federal funding sources for such implementation. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

**PC02080 Buchanan, Warren None Provided**

**PC02080-1**

**Comment:**

My name is Warren Buchanan I live at 10640 S. St Andrews Pl. LA. CA we are six block out of the area acording shown on your map. So I an asking that the people thats live out of the area. Are we going to received help on sound proofing our homes and neiborhood and if we can'ts received help, who can we ask, help from,

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how the noise impact boundary to receive residential sound insulation is determined, Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP, and Subtopical Response TR-LU-3.11 regarding contact information for questions about soundproofing.

**PC02080-2**

**Comment:**

and we need clean air to live in, and breath in so if you can help us we wood realy of apreciede it thank you for listen.

### **3. Comments and Responses**

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**Response:**  
Comment noted.

**PC02081      No Author Identified,   None Provided**

**PC02081-1**

**Comment:**  
(1) Develop a youth center in the (L.A) area east of Inglewood.

**Response:**  
Please see Topical Response TR-EJ-2 regarding the environmental justice program and benefits.

**PC02081-2**

**Comment:**  
(2) Sound proof the schools that are in the noise area.

**Response:**  
Please refer to Topical Response TR-LU-5 regarding school mitigation.

**PC02081-3**

**Comment:**  
(3) Offer business to come into the area

**Response:**  
Please see Topical Response TR-EJ-2 regarding a detailed description of employment benefits and business opportunities for low income and/or minority communities.

**PC02082      Miller, Dorothy      None Provided**

**PC02082-1**

**Comment:**  
A noise monitor

**Response:**  
Please see Subtopical Response TR-LU-3.4 for a description of monitoring methods used to validate the current 65 CNEL contour and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP, including expanding and upgrading the current monitoring system.

**PC02083      No Author Identified,   None Provided**

**PC02083-1**

**Comment:**  
Most communities have experience trash being discarded any and every where. My suggestion is to have more community large trash pick ups, trash yards (local) or trash bins to limit trash dumping.  
  
Use money to help clean our community.

**Response:**

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated with consideration of benefit provided relative to cost, whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. While all recommendations were considered as possible additional components of the Environmental Justice Program, there was a practical limit to the number of benefits that could be selected to help off-set disproportionately high and adverse environmental effects on minority and low-income communities. Furthermore, while LAWA will investigate and pursue environmental justice benefits as feasible and allowable by law, implementation of any programs or measures is dependent upon LAWA's ability to utilize airport revenue funding, or other state or federal funding sources for such implementation. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

**PC02084          Turner, Mrs.,          None Provided**

**PC02084-1**

**Comment:**

My ideas would be to fix every house or apartment from LAX to Western and from Western to 108st.

**Response:**

Please see Topical Response TR-LU-3 regarding sound insulation mitigation measures for eligible residences that would experience a significant increase in noise levels.

**PC02085          Masion, Gloria          None Provided**

**PC02085-1**

**Comment:**

Out of the area of sound proofing

**Response:**

Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

**PC02085-2**

**Comment:**

Fuel droppings on auto's

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

### 3. Comments and Responses

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**PC02086          Adams, S.C.          None Provided**

**PC02086-1**

**Comment:**

I was told my house is outside of the house (noise) proofing boundaries (8830 Cimarron St.) Therefore I request that the area be expanded to cover my home "please??" I have already mailed in suggestions and complaints to this affect.

**Response:**

The noise impact area which determines residential uses eligible for noise insulation under the ANMP is described in Subtopical Response TR-LU-3.4 and is based on the 1992 fourth quarter 65 CNEL noise contour. Although this is a comment on existing noise levels and conditions, the general focus of the document, pursuant to NEPA and CEQA, is to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts. See Subtopical Response TR-LU-3.4 regarding how eligibility for soundproofing is determined and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP. See also Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels.

**PC02086-2**

**Comment:**

Anyway, why LAX? Why not some other area?

**Response:**

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

**PC02087          No Author Identified,          None Provided**

**PC02087-1**

**Comment:**

Because of the (pain & suffering) noise, pollution etc. of living under the flight path I propose that a special discount or pass be given to those living in this area when we use the airport for traveling. Parking could then be free or discounted.

**Response:**

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated with consideration of benefit provided relative to cost, whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. While all recommendations were considered as



possible additional components of the Environmental Justice Program, there was a practical limit to the number of benefits that could be selected to help off-set disproportionately high and adverse environmental effects on minority and low-income communities. Furthermore, while LAWA will investigate and pursue environmental justice benefits as feasible and allowable by law, implementation of any programs or measures is dependent upon LAWA's ability to utilize airport revenue funding, or other state or federal funding sources for such implementation. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

**PC02088      No Author Identified,    None Provided**

**PC02088-1**

**Comment:**

I attended one of your seminars and was appalled to find out that the area between Western & Van Ness & Manchester & 96th St. are not included in sound proofing.

**Response:**

The noise impact area which determines residential uses eligible for sound insulation under the ANMP is described in Subtopical Response TR-LU-3.4 and is based on the 1992 fourth quarter 65 CNEL noise contour. Although the area within the 65 CNEL noise contour has decreased compared to the 1992 fourth quarter 65 CNEL noise contour, it is still used to define the ANMP boundary. Although this is a comment on existing noise levels and conditions, the general focus of the document, pursuant to NEPA and CEQA, is to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts. See Subtopical Response TR-LU-3.4 regarding how eligibility for soundproofing is determined and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP. See also Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels.

**PC02088-2**

**Comment:**

This area is between both flight patterns and at times the planes are in between and we get noise from both flight patterns, causing a great deal of unrest because you can't hear the person you are talking to and you can't hear your TV.

**Response:**

The full text of the commentator's statement indicates that they reside between the approach paths to the north and south runway complexes, just outside the area of eligibility for sound treatment, and are desirous of being included in the Aircraft Noise Mitigation Program boundary. The commentator's concerns are acknowledged. Please see Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.3.

**PC02089      Stewart, Edward &    None Provided  
                         Berenice**

**PC02089-1**

**Comment:**

We request a portable noise monitor. Airplanes fly over our house at seemingly a low altitude.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how noise levels are currently monitored, Subtopical Response TR-LU-3.12 for procedures on tracking flights and filing noise complaints, and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP, including expanding and upgrading the current monitoring system.

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**PC02090      Wilson, Mrs.,      None Provided**

**PC02090-1**

**Comment:**

I am in District 8 - My address is 8016 S. Normandie LA 90044 - Our club is intersted sound proofing we want noise monitors located on 80th & Normandie. Our area is not included in the program. We want a noise monitor on Normandie and 80th between - Florence & Manchester.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how the noise impact boundary to receive soundproofing is determined and how noise levels are currently monitored, and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP, including expanding and upgrading the current monitoring system.

**PC02091      Baker, Rochelle      None Provided**

**PC02091-1**

**Comment:**

I currently live at 9220 So. Van Ness Ave. L.A. CA, which is out out the boundries to receive soundproofing, however, I am constantly impacted by the noise of the airplanes to the point I cannot hear my television, and being awaken in the middle of the night. For the record!

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding increase in noise levels at the commentor's property, to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels. As shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, this property is located outside the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), this property is located outside the 94 dBA SEL contour under 1996 baseline and Year 2000 conditions, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. As also analyzed in Sections 4.1.6 and 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the subject property would not be newly exposed to significant noise levels within the 65 CNEL as a result of developing any of the LAX Master Plan alternatives. As presented in Section 4.2.6 and the Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR, under Alternative C the subject property may be newly exposed to the 94 dBA SEL noise contour compared to 1996 baseline and Year 2000 conditions. However, as stated in Section 4.2.8 of the Supplement to the Draft EIS/EIR, under mitigation measure MM-LU-2 areas determined to be newly exposed to the 94 dBA SEL noise contour would be eligible for residential sound insulation under the Aircraft Noise Mitigation Program (ANMP).

See also Topical Response TR-N-6 regarding existing high noise levels, and Topical Response TR-LU-3 regarding the ANMP.

**PC02091-2**

**Comment:**

I would like to volunteer to have a portable noise monitor installed in my home to register the level of noise my family and I are subjected, so we otherwise can confirm our home is in fact impacted.



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Plan would revise the ANMP, including incorporating residential dwelling units exposed to single event noise levels that result in nighttime awakenings into the ANMP.

#### **PC02094      No Author Identified,    None Provided**

##### **PC02094-1**

###### **Comment:**

Distribute the airplane traffic to other airports in the LA basin. Ontario & El Toro being the obvious choices. Expansion, focussed on El Toro, would mitigate Environmental Justice concerns.

###### **Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses. Also, please see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### **PC02095      Paige, Barbara            None Provided**

##### **PC02095-1**

###### **Comment:**

I am Barbara H. Paige at 8721 S. Denker Ave. Los Angeles, Ca. 90047. I would like to have a noise person in or out to my address commutity to measure the noise in the area.

###### **Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how the noise impact boundary is determined and how noise levels are currently monitored, and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP, including expanding and upgrading the current monitoring system.

#### **PC02096      Khoury, Elizabeth      None Provided**

##### **PC02096-1**

###### **Comment:**

Morningside High School was a very good location for this E.J. workshop. Also this was a much better format than the first 2 workshops. It would have been a good idea to have a list of the 6 additional public hearings for the workshop! Why not have them for the next one!

###### **Response:**

Comment noted. Please see Topical Response TR-PO-1 regarding the public hearing process.

**PC02096-2**

**Comment:**

Keep the MAP at 78 million and expand the other airports - Ing., Lennox, South Central LA have enough cargo flights and too much pollution -

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-MP-1 regarding air cargo activity and demand. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02097      Borden, Elue &      None Provided**  
**Theodore**

**PC02097-1**

**Comment:**

We would appreciate if something can be done to stop the noise we live near the airport. Lood for the problem to be taken care.

**Response:**

Comment noted. Please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Refer also to Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program and Topical Response TR-LU-5 regarding noise mitigation measures that would be implemented under the LAX Master Plan. Aircraft noise mitigation was described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise were provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02098      Nelson, Laura      None Provided**

**PC02098-1**

**Comment:**

Extend the Boundary for the home owners east of Western Ave.

We need consideration also!

**Response:**

The noise impact area which determines residential uses eligible for noise insulation under the ANMP is described in Subtopical Response TR-LU-3.4 and is based on the 1992 fourth quarter 65 CNEL noise contour. Although the area within the 65 CNEL noise contour has decreased compared to the 1992 fourth quarter 65 CNEL noise contour it is still used to define the ANMP boundary. Although this is a comment on existing noise levels and conditions, the general focus of the document, pursuant to NEPA and CEQA, is to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts. See Subtopical Response TR-LU-3.4 regarding how eligibility for soundproofing is determined and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP. See also Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels.

### 3. Comments and Responses

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**PC02099**      **Wishinger, Robert & Lucille**      **None Provided**

**PC02099-1**

**Comment:**

The present level of noise generated by aircraft utilizing LAX causes a detrimental impact upon our lives. Any increase in air traffic would only cause more of a detrimental impact. At present, aircraft flies over our home approximately every two to five minutes. It is impossible to enjoy our yard and it causes a severe problem with our ability to sleep.

**Response:**

Please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding high noise levels at the commentor's property (located at 10032 South Saint Andrew Place), to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels.

As shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, the subject property is located within the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. Therefore this property is eligible for sound insulation under the Aircraft Noise Mitigation Program (ANMP), as described in Topical Response TR-LU-3. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), the subject property is located within the 94 dBA SEL contour under 1996 baseline conditions and outside the 94 dBA SEL contour under Year 2000 conditions, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. As presented in Section 4.2.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, within the 75 CNEL noise contour, residential properties with exterior private habitable areas are considered to be incompatible with airport uses, even if interior noise levels are reduced to 45 CNEL. Although exposure of noise-sensitive uses to outdoor noise levels in the 65 to 75 CNEL range are considered to be compatible, areas exposed to these noise levels would still have some impact on outdoor speech and the quality of outdoor activities.

As presented in Section 4.2.6 and Technical Report S-1 Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, under all of the build alternatives, the subject property would continue to be exposed to the 65 CNEL noise contour; however this parcel would not be exposed to the 94 dBA SEL contour.

Please see Subtopical Response TR-LU-3.3 regarding the relationship between air traffic and noise, Subtopical Response TR-N-6.1 regarding existing and future noise levels, and Topical ResonseTR-LU-4 regarding outdoor noise levels.

**PC02099-2**

**Comment:**

Expanding the airport will also further reduce the value of our home.

**Response:**

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

**PC02100**      **No Author Identified,**      **None Provided**

**PC02100-1**

**Comment:**

Thank you for this improved program format!! Having attended 2 previous meetings, this was viewed as the most community-oriented format.

**Response:**

Comment noted.

**PC02100-2**

**Comment:**

I suggest that improvements be performed @ LAX to accommodate expediting the safe usage of the airfield. I am not in favor of any expansion. Inglewood is already grossly impacted by air flights.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-3 regarding aircraft flight procedures.

**PC02100-3**

**Comment:**

Mitigations should begin with where Ingl. is currently & improve from that point. RSI program must be increased. CNEL should be lowered to 55. Fines should be levied on air carriers who violate night curfews. Noise monitors should be increased to include a more expanded area as the plane routes have varied greatly.

**Response:**

Please see Topical Response TR-LU-3 for a description of the residential sound insulation program (ANMP) and how approval of the LAX Master Plan would revise the current program. Refer to Topical Response TR-N-2, in particular Subtopical Response TR-N-2.2 and Subtopical Response TR-N-2.3 regarding evaluating impacts beyond the 65 CNEL contour and Topical Response TR-N-7, in particular Subtopical Response TR-N-7.5 regarding fines (including night curfews). Under the LAX Master Plan, Mitigation Measure MM-LU-5 would provide for the upgrade and expansion of the noise monitoring program. Currently, the boundary of the 65 CNEL is validated through continuous noise monitoring and the data collected is used to develop contour maps. These maps are submitted in quarterly reports to Caltrans and the County of Los Angeles and are reviewed with other data to determine any need to adjust the ANMP boundaries. Methodology used to develop flight tracks used in noise modeling for the Master Plan alternatives is described in Topical Response TR-N-1, particularly in Subtopical Response TR-N-1.4.

**PC02101**

**Ostgaard, John**

**None Provided**

**7/20/2001**

**PC02101-1**

**Comment:**

My wife and I have lived in Westchester for 40 years and have seen what the LAX expansion have done to traffic, noise and pollution in our City.

**Response:**

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, traffic impacts in Section 4.3, Surface Transportation, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses is provided in Appendices D and G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and in Appendices S-C and S-E, and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

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#### PC02101-2

**Comment:**

Based on the tremendous growth of Southern California in terms of both Population and Industry as foreseen in the near future, we believe a long term plan must be implemented. Such plan must consider and utilize all the facilities at disposal at Palmdale, Ontario, Burbank, LAX, Long Beach, J. Wayne and El Toro.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

#### PC02101-3

**Comment:**

If such place was incorporated with a comprehensive plan for subway, rail and bus system, then may be our fine City could ultimately be comparing itself among the world leading cities in term of traffic and environmental combat.

Some examples that might be worth looking at are Gallowick, Hong Kong, Oslo, Charles De Gall and what was done at these sites regarding moving main traffic with the airport to remote site from the City.

**Response:**

Comment noted.

#### PC02101-4

**Comment:**

Please stop expansion of LAX Plan.

**Response:**

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



**PC02102 Jones, Ray None Provided 8/27/2001**

**PC02102-1**

**Comment:**

PLEASE DO NOT EXPAND LAX, THE MASTER PLAN IS NOT IN OUR (LA COUNTY CITIZENS) BEST INTREST.

**Response:**

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

**PC02102-2**

**Comment:**

PLEASE DO USE THE EXISTING FACILITIES AND LAND IN PALMDALE.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02103 Lewin, Wilma None Provided 8/31/2001**

**PC02103-1**

**Comment:**

I am writing to share with you my sincere concerns regarding information in the EIR/EIS about continued expansion of LAX. The increases in LAX activity have resulted in more noise, pollution and overcrowding, all of which have affected me, my family and the future of other families in the area.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, air quality in Section 4.6, Air Quality, and population growth in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement). Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02103-2**

**Comment:**

Why can't the current system of airports grow in other areas of the region beyond LAX?

**Response:**

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

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

#### **PC02103-3**

**Comment:**

How will LAW/LAX mitigate the increase in air pollution, and the degradation in air quality that will inevitably result from further major increases in air and road traffic into and out of LAX?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality mitigation measures in Section 4.6.8, Mitigation Measures, with supporting technical data and analyses provided in Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR, and addressed traffic impacts in Section 4.3, Surface Transportation.

#### **PC02103-4**

**Comment:**

How will the growing evacuation of homeowners affect the quality of life of those who, for various reasons, have to remain in this area? How will their quality of life be safe guarded?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed acquisition in Chapter 3, Section 4.2, Land Use (subsection 4.2.6), and Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns. Compatibility with adjacent land uses was analyzed in Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding impacts to the Community of Westchester and Topical Response TR-LU-1 regarding impacts on quality of life. Also note, as was described in Section 4.2.6.5 of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District.

#### **PC02103-5**

**Comment:**

How will the area's infrastructure be protected against further degradation, especially in the partially evacuated areas?

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, water quality impacts in Section 4.7, Hydrology and Water Quality, public utilities impacts in Section 4.25, Public Utilities, public services impacts in Section 4.26, Public Services, and impacts to schools in Section 4.27, Schools, with supporting technical data and analyses provided in Technical Reports 2, 3, 6, 15, 16, 17, S02, S-5, and S-10.

**PC02104**

**Crider, Tammy &  
James**

**None Provided**

**8/24/2001**

#### **PC02104-1**

**Comment:**

I am writing you about the LAX expansion project. We wish to make our opinions known to you and the appropriate committees.

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We are against the expansion project. We believe the traffic will be heightened, not reduced by this endeavor. Thus resulting in greater pollution. And thus impacting the environment and our personal lives.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02104-2**

**Comment:**

We enjoy the Wetlands. We enjoy a 10-20 minute drive to work. We enjoy the wildlife. We enjoy the animosity of Playa Del Rey. It is a hidden treasure in Los Angeles County. Please don't disturb the current structure and culture and ambience of the city we know and love.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Impacts to wetlands and wildlife were addressed in Section 4.10, Biotic Communities, Section 4.11, Endangered and Threatened Species of Flora and Fauna, and Section 4.13, Wetlands, with supporting technical data and analyses in Appendix J and Technical Report 7 of the Draft EIS/EIR and Appendix S-H of the Supplement to the Draft EIS/EIR.

**PC02105**

**Schumaker,  
Florence**

**None Provided**

**8/29/2001**

**PC02105-1**

**Comment:**

My husband and I have been residents of Westchester for 50 plus years. We have seen Westchester and Playa del Rey cut into several times.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02105-2**

**Comment:**

We have also experienced more pollution, more traffic problems and congestion because of the expansion of LAX. Will it ever stop? Is there no other place that could accommodate this increase in air traffic? I think Westchester has done its share. It's time we get help from other areas.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional

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approach to meeting demand and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02105-3**

##### **Comment:**

I would appreciate some response to my questions.

##### **Response:**

Responses to individual comments included in this comment letter are provided above.

#### **PC02106**

**McCarty, John M. & Shirley C.**

**None Provided**

**8/2/2001**

#### **PC02106-1**

##### **Comment:**

As a result of our volunteer work in economic development with the business community in the South Bay, we were invited to attend Mayor Richard Riordan's Kickoff Luncheon for the LAX Expansion in 1996 at the Omni Hotel. As we listened to the briefing, we became increasingly convinced that the LAX planners did not comprehend how changes in aircraft technology - in concert with international deregulation - were about to permanently reconfigure the airline traffic patterns over the Pacific Ocean where the growth projections are the highest. Also they did not seem to understand how the reconfigured traffic patterns would influence the future growth of LAX. Because we were concerned about the huge amount of public funds that the LAX Expansion would require (even back then they were talking a hefty \$8-to-\$12 billion), we went home and set about to analyze what we had heard and to put the emerging traffic projections in proper perspective.

When we had finished our analysis and had arrived at our conclusions, we wrote a paper that was titled: "A Long-Term Analysis of LAX."

The following is a summary of our findings and conclusions:

##### **Response:**

Comment noted. Please see Responses to Comments below.

#### **PC02106-2**

##### **Comment:**

- In the early chapters of the U.S. airline industry's history, the major routes were assigned by planners in the Civil Aeronautics Board in Washington. About twenty years ago, the U.S. market was deregulated, and after a vicious shakeout, the remaining airlines shifted most of their biggest iron birds out to the two coasts where the industry was still tightly controlled by a web of international regulations and agreements. These airliners would fly from hubs-such as New York-to hubs-such as London. So if a woman wanted to go from Philadelphia to Amsterdam, she would first fly to New York, change planes, take a lumbering four-engine widebodied Boeing 747 to London, change planes again, and then fly in a smaller aircraft to Amsterdam. It is important to understand that this is an arrangement that is loved by the airlines (because it allows them to fill up their big birds and make a lot of money) and is despised by the traveling public (because only the intellectually challenged would like changing planes at a huge hub that is congested with wall-to-wall people; in international air travel a "good connection" is a flight of fancy).

- Subsequently, the Atlantic was deregulated, and the airline executives suddenly developed an input channel and started listening to their customers. Surprise! As a consequence, they began adding nimble airliners with just two engines to their Atlantic runs. Notes the English newsmagazine, The Economist:

This taste for smaller international jets reflects the fact that travelers now like to shun big international hubs such as New York or London and fly directly to their destinations. This is changing the international market into a web of direct intercontinental flights rather than one big aerial bridge between London and New York.

In the parlance of the airline industry, this represents a change from hub-to-hub routes to point-to-point routes. The change in the configuration of routes over the Atlantic is reflected in the types of aircraft making the point-to-point hauls. The most common jet found on the Atlantic run is no longer the 747; instead 8 out of ten birds flying between North America and Europe are two engine planes, such as the Boeing 767 or its younger and bigger sister, the 777-the first commercial airliner to be designed on a computer.

- Between 1993 and 1995, Boeing and Airbus Industrie (a European airframe consortium) began working together on a large project with an awkward name: The Very Large Commercial Transport. However, as a result of mutual distrust, this joint venture unraveled. After the breakup, Airbus started to work on its own superjumbo jet, a monster machine that would fly hub-to-hub, particularly to the Orient. It was then called the A3XX.

- The top management of Boeing then faced one of those you-bet-your company kind of questions, the answer to which would affect not only its long-term viability, but also the fortunes of airline companies and airports throughout the world. And that question was this: Would air routes throughout the Pacific fragment in the same manner as they did over the Atlantic? After much analyses, the executives at Boeing answered that question with a resounding YES! As a result of their answer, the company cancelled design work on two extended versions of the 747-400. Because they believed that the future of air travel in the Pacific would be point-to-point, the company then concentrated on producing and selling the 777, a bird designed with direct flights in mind. And they began to explore other configurations for the Pacific run.

- According to the Boeing Company, between 1995 and 2015 (the terminus of the proposed LAX Expansion) the number of planes worldwide with 50-to-90 seats will increase from 6% to 8%; the birds with 91-to-120 seats will decrease from 24% to 15%; those with 121-to-170 seats will decrease from 35% to 30%; those with 171-to-240 will increase from 10% to 17%; those with 241-to-400 (the twin-engine aircraft used on long-haul, point-to-point routes) will increase from 17% to 21%; and those with in excess of 400 seats (the behemoths of the sky, those 4-engine aircraft usually used on long-haul, hub-to-hub routes) will only increase from 8% to 9%.

#### OUR CONCLUSION:

As we examined the design characteristics of the Boeing 777, and as we tracked the U.S. efforts to deregulate the Pacific (including discussing these efforts with the official in the Department of Transportation who was leading the international negotiations), we were inexorably led to two important conclusions:

(1) As a result of new aviation technology, in concert with deregulation, the market for air travel would indeed fragment, as the nations of the Pacific Rim became increasingly opulent and as point-to-point travel became the wave of the future.

(2) As the airline routes moved from hub-to-hub to point-to-point and as time marched toward the year 2015, it would become increasingly apparent that a massive expansion of the facilities at LAX was not required and further would not satisfy the needs of the flying public. We wrote: "In the future, LAX could well be bypassed by flights originating in the heartland and heading for the Orient, in much the same way that the old coaling stations situated throughout the Pacific were bypassed as the freighters that plied the blue waters made the transition from coal to oil."

#### Response:

The emergence of smaller capacity aircraft capable of non-stop service from the Midwestern United States to Europe is acknowledged. However, the commentor's assertion that international gateways will be un-needed by 2015 is misinformed. Even in 2015, only a relative handful of U.S. cities will have sufficient local demand to justify non-stop international service, and even fewer cities will have service to more than one transoceanic market.

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The primary reason that LAX has the level of non-stop international service that it has today is that Los Angeles is the largest O&D market in the United States. LAX, Kennedy, and Miami became international gateways because of negotiated bilaterals. These airports, in particular LAX and JFK, have remained major gateways because they are major point-to-point markets. New York and Los Angeles have large populations with a high propensity to fly; the local demand justifies a large percentage of the non-stop service (point-to-point).

The one glaring fact that appears to have been overlooked in the Boeing analysis included in this comment is the airport congestion and restrictions at the major Pacific Rim airports. Even if the heartland of America could generate sufficient demand for a smaller, ultra-long distance aircraft, the airports of Southeast Asia do not have the capacity to accept smaller aircraft. The A380 being designed by Airbus will be flown primarily within the Pacific Rim and to major air service markets such as LAX to maximize the limited capacity of these airports. Today, LAX has more Boeing 747-400 service than any other U.S. airport. In 2015, LAX will likely have more A380 service than any other U.S. airport.

#### **PC02106-3**

**Comment:**

THE RESULT:

After the paper was finished, we mailed it to many of the policymakers, aviation experts, and business leaders that would be intimately involved in the LAX Expansion's decisions. The list included the heads of the Airport Commission, the Department of Airports, and the Federal Aviation Administration. It also included the South Bay's representative in the U.S. Congress, the South Bay's representatives in both the California Senate and Assembly, and a few members of the L. A. County Board of Supervisors, and City Council Members and Mayors by the score.

We received little feedback, so we don't know if we influenced anyone.

**Response:**

Comment noted. Responses to the findings of the paper referenced in this comment are provided above and below.

#### **PC02106-4**

**Comment:**

A LONG-TERM ANALYSIS OF LAX REVISITED

But we remain undaunted. We both have been in high-tech industries long enough to understand that analysis is not a popularity contest. Success in this endeavor is ultimately measured by only one criterion, and that is the accuracy of one's conclusions. And while we understand that we will not be able to judge the exactitude of our conclusions until the year 2015, there are some pretty strong indications that we are on target. These indications can best be perceived by the answers to the following five questions:

**Response:**

Comment noted. Please see Responses to Comments below.

#### **PC02106-5**

**Comment:**

#1. WILL DEREGULATION OF AIRLINE ROUTES IN THE SKIES OVER THE PACIFIC FOLLOW THE SAME GLIDE PATH AS IT DID IN THE SKIES OVER THE ATLANTIC?

A RESOUNDING YES! In an effort to increase airborne commerce throughout the Pacific Rim, representatives of the Department of Transportation in the Clinton Administration negotiated "open

skies" agreements with a host of Asian countries, including Taiwan and South Korea. According to the open skies agreements, unrestricted air service is permitted by airlines of one nation to, from, and within the borders of another nation. These agreements do not restrict where airliners can fly, how many flights they can make, and how much they can charge for passengers and cargo. In a single week in November 2000, the Department of Transportation negotiated multilateral open skies agreements with New Zealand, Singapore, Chile, and Brunei. According to then U.S. Transportation Secretary, Rodney E. Slater, such agreements "set the terms for the global marketplace and increase the odds that the U.S. open skies approach will become the international standard." There is no question that the Bush Administration will continue to negotiate open skies agreements throughout the Far East in light of its pro-business posture.

Of course, it is very important for American prosperity that there is free trade in aviation travel throughout the Orient, for that is where the action will be during the next two decades. It should come as no great surprise to anyone that there is a direct relationship between increases in Gross Domestic Product and growth in air travel: As a country gets more prosperous, its people fly more often-for business and pleasure. It has been estimated that during the next decade the annual growth in GDP will be about 5% in Southeast Asia and above 7% in China. (According to China's National Bureau of Statistics, GDP increased 7.8% in the second quarter of 2001, down from 8.1% in the first quarter, as the economic slowdown in the U.S. and Japan began to leave its mark.) China's 7% growth rate for the next ten years is significantly greater than the 2-3% rate expected during the same period for the mature economies of the world, such as the U.S. and the countries in Western Europe.

Kenneth Leung, managing director of Investment Banking Strategy in the Tokyo office of Deutsche Bank, said: "Asia will be one of the fastest growing areas of the world, if not the fastest growing over the next two decades, and commercial air travel and air cargo will be both a by-product and a staple of that process." Goaded forward by super-strong growth, air traffic in the Middle Kingdom is expected to increase by almost fivefold in the next two decades. Because increases in air travel and air cargo produce surging demand for aircraft, it logically follows that China's fleet of jet liners should grow the fastest of any country on the globe-increasing from 490 birds at the close of 1999 to 1,600 at the end of 2019.

Many of the new aircraft that will be purchased by the nations on the Pacific Rim will be long-range airliners destined to fly on point-to-point routes, for Asia is ripe for nonstop travel. It has been estimated that today in excess of 85% of the passengers that land at Tokyo's Narita airport (one of Asia's great hubs) are not ultimately bound for Japan, but are heading instead for Singapore, Hong Kong or other places in the Orient.

**Response:**

The purpose and need for the proposed project were addressed in Section 2.2, The Need for the Proposed Project, and Section 2.3, Consequences of Not Improving LAX, of the Draft EIS/EIR and Chapter 2, Purpose and Need for the Proposed Action, of the Supplement to the Draft EIS/EIR.

**PC02106-6**

**Comment:**

#2. ARE THE AIRFRAME MANUFACTURERS MODIFYING THEIR AIRLINERS AND DESIGNING NEW ONES TO SATISFY THE DEMAND FOR POINT-TO-POINT TRAVEL ENGENDERED BY INTERNATIONAL DEREGULATION?

ABSOLUTELY! The main long-range aircraft that is used on point-to-point flights is the Boeing 777. The Triple-7 originally came in two versions. The 777-200 had its first delivery in May of 1995, and the initial models had a range that varied between 4,350 nautical miles and 5,330 naut. mi. When configured in three-class seating, the Dash 200 would carry between 305 and 328 passengers. The second version, the 777-300, was first delivered in May of 1998, with a range of 6,550 naut. mi. With three-class seating, it would carry between 368 and 394 passengers. These are the birds that paved the way for point-to-point routes.

From Day One, the Dash 200 and the Dash 300 had instant sales success, particularly in Asia, where there is usually a long distance between airfields. Japan Airlines, All Nippon Airlines, Thai Airways

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International, Cathay Pacific, China Southern, Japan Air System, Korean Air Lines, Singapore Airlines-all purchased the first two versions of the Triple 7.

As the movement toward deregulation began to take off throughout the world, Boeing began developing two new Longer-Range models of the Triple 7. The 777-200LR will have a range of nearly 9,000 naut. mi. and will carry 301 passengers, and the 777-300LR will have a range of 7,200 naut. mi. and carry 365 passengers. The Dash 200LR will be used on point-to-point routes such as Sydney, Australia, to either Dallas or Denver. (Anyone who has flown over that sheer expanse of water will be mind-boggled by the fact that any bird can make that trip nonstop!) Another option for the Dash 200LR would be Auckland, New Zealand, to New York. The Longer-Range models of the Triple 7 will definitely facilitate the shift away from hub-to-hub air service.

While Airbus, the second company in the international airframe duopoly, has been late to the point-to-point party, the European manufacturer's executives believe that the long-range versions of their A340 will be able to compete handily with the Longer Range Triple 7s. The A340-500 has a range of 8,500 naut. mi. and carries 313 passengers; whereas, the A340-600 has a range of 7,500 naut. mi. and carries 380 passengers. One of the reason that Airbus executives believe that the world's airlines will opt for the Dash 500 and Dash 600 rather than the Longer-Range models of the Triple 7 is that all of the A340s are four-engine airplanes, and passengers would rather fly on birds that have four engines burning and turning than they would two engine birds over long-haul routes. While this remains to be seen, there is no doubt that the rivalry between Boeing's and Airbus's longer range birds will contribute to the transformation from hub-to-hub routes to point-to-point routes on long international runs.

In March of 2001, the case for point-to-point travel received a strong stimulus when Boeing announced that it would design, manufacture, and market a totally new type of airliner-one that was specifically designed for the point-to-point international runs that are known in the industry as "the long, thin routes." Called the Sonic Cruiser, this bird constitutes a major break with Boeing's tradition: Whereas Boeing's 747-the ultimate hub-to-hub airliner-was big and slow, the Sonic Cruiser-the ultimate point-to-point bird-will be small and fast. Indeed, in an artist's rendering, it resembles a hot fighter rather than a transcontinental transport. In many ways, it looks much like the North American B-70, a supersonic bomber that was built in El Segundo and Palmdale during the 1960s, for it has the same thin fuselage, the same two wing-like canards near the nose of the plane, and the same delta-wing configuration with engines mounted on the trailing edge.

As its name would suggest, speed is the Sonic Cruiser's stock in trade, for it is being designed to fly just below the speed of sound-between Mach .95 and Mach .98-which means that it will fly about 20 percent faster than today's fastest jetliners. (Mach number is the ratio of the air speed of an object to the speed of sound in the same region of the atmosphere; Mach 1 is around 740 miles per hour at sea level.) According to executives at Boeing, the Sonic Cruiser will be able to save one hour for every 3,000 miles flown. As a result of its speed, the bird will shave one hour off a transatlantic flight and slice three hours off a transpacific flight. With a capacity of 250 passengers and with a range of 10,000 naut. mi., the Sonic Cruiser is obviously a bird that is designed to cater to the carriage trade: Well-heeled tourists and business travelers who are willing to pay a premium to avoid congested hubs and to get where they're going in a hurry. Boeing forecasts that the Sonic Cruiser will be up and flying by 2007-a full eight years before the proposed completion of the LAX Expansion.

**Response:**

The purpose and need for proposed project were addressed in Section 2.2, The Need for the Proposed Project, and Section 2.3 Consequences of Not Improving LAX, of the Draft EIS/EIR and Chapter 2, Purpose and Need for the Proposed Action, of the Supplement to the Draft EIS/EIR.

**PC02106-7**

**Comment:**

#3. ARE AIRLINE EXECUTIVES AND THEIR STRATEGISTS MAKING PLANS THAT WILL TAKE ADVANTAGE OF THE OPPORTUNITIES PROVIDED BY DEREGULATION AND LONGER-RANGE AIRCRAFT?

INDEED THEY ARE! Donald J. Carty, the CEO of Boeing's biggest commercial customer-AMR Corp., the parent of American Airlines-has commented on the Sonic Cruiser as follows: "We obviously see a



use for that airplane." Carty (an executive with a neat last name) has said that the concept of a near-supersonic aircraft "will probably revolutionize aviation." And Gordon Bethune, who is the chairman and CEO of Continental Airlines, put it bluntly: "If it meets the economics, we're going to buy the airplane." An executive of a major carrier based in Europe has indicated that this airline would like to purchase the equivalent of the entire production run for the first several years after the Sonic Cruiser is launched. Notes he: "Long-distance travelers would prefer traveling point-to-point, which is ideal for a high-speed civil transport. For that reason, we think it has the potential to revolutionize commercial air transport worldwide." And Yap Kim Wah, Senior Vice President of marketing services for Singapore Airlines has observed: "Anytime you can shave off time to travel long distances, that is a definite competitive advantage and the reason we are very interested in Sonic Cruiser."

And the combination of speed and point-to-point travel has first-tier subcontractors dancing with delight. According to Gordon Williams, the President and CEO of the privately-held Vought Aircraft Industries, Inc. (the world's largest independent producer of aerostructures which is owned by The Carlyle Group) has said: "The state of commercial air transportation today is ripe for a point-to-point aircraft like the Sonic Cruiser. If we thought the production rates would remain solid for 5-10 years, we would hock our souls to be part of that program." Just to make sure they would be getting a high price for their souls, the executives at Vought commissioned a market assessment of the Sonic Cruiser that concluded that in the next 5-to-10 years there would probably be in excess of 500 aircraft made. (One of the authors of this paper has participated in many studies on the effects of production quantities on cost, and 500 units would allow an airframe manufacturer to race down the learning curve and to really wring out labor costs.) If Vought-which operates the production facilities previously owned by Northrop Grumman-gets a major piece of the action, the Sonic Cruiser could become a sonic boon for the smaller second- and third-tier subcontractors that are scattered throughout the South Bay.

Also the strategists and planners are enthusiastic about longer-range aircraft. According to Bruce A. Smith, writing in a recent edition of *Aviation Week & Space Technology*, "Many analysts agree Boeing is on the right track in predicting that point-to-point-rather than larger aircraft serving major hubs-is where the bulk of air traffic growth will be in the Asia-Pacific region."

Perhaps the most courageous call on the point-to-point versus hub-to-hub controversy was made late in February of 2001 by Dick Wyatt, head of fleet planning for British Airways in a speech to aircraft finance bankers in Geneva. According to Wyatt, the Airbus A380, a 555-passenger jetliner, did not make economic sense for the British Airway fleet. Said Wyatt: "There are very few routes that suit large aircraft and we believe markets will continue to fragment."

Airbus Industrie, headquartered at Toulouse, in the South of France, was originally spawned as a result of European Industrial Policy some thirty years ago for the purpose of producing jobs as well as aircraft. Indeed, the company has been likened to a "pan-European employment agency." From a financial standpoint, Airbus is structured as a consortium that is 80% owned by the European Aeronautic Defense and Space Co. (which is made up of France's Aerospatiale, Germany's Daimler-Chrysler Aerospace, and Spain's CASA) and 20% owned by England's BAE Systems, Plc.

As previously noted, after Airbus's partnership with Boeing to build The Very Large Commercial Transport dissolved, the Europeans decided to go it alone and build a super-jumbo to haul people from hub-to-hub. Initially, this brute of the skies was known as the A3XX, and it was subsequently named the A380. Because Airbus is tightly tied to European economic development efforts, the consortium's executives went to their friends in the governments of Europe and rattled the cup for support of the A380. Thereafter, France, Germany, Spain, and Britain decided to lend Airbus one third of the development costs at below market rates. (It is estimated that the A380 will cost \$12 billion to build-about the same as the LAX Expansion.) Most importantly, these are "performance loans" that need not be repaid if the project is not a financial success. Such "soft loans" caused Dorothy Robyn, an economist with the Clinton Administration, to opine: "Essentially, that means Airbus has no bottom line." Because the British Government is a major participant in the project, and because the British Government has always had a rather large role to play in Great Britain's domestic economics, it must have taken more than a stiff upper lip to be able to say, "Frightfully sorry, Old Chap, but the A380 is just not our cup of tea," when the marketing manager of Airbus came to the headquarters of British Airways with his order book at the ready. On British Airway's decision to just say "No," Peter Jacobs, a financial analyst with Ragen MacKenzie, a securities firm, observed: "This represents an endorsement of Boeing's market outlook in the face of what has been a lot of fanfare and publicity over the recent Airbus order wins for the A380."

### **3. Comments and Responses**

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**Response:**

Comment noted.

**PC02106-8**

**Comment:**

#4. ARE NATIONAL AND INTERNATIONAL AIRLINES STARTING TO OFFER POINT-TO-POINT TRAVEL ON AIRLINERS THAT WOULD HAVE FORMERLY FLOWN TO THE HUB AT LAX FOR A CONNECTION?

BY THE NUMBERS! There are two instances of this that are symbolic of this transformation in route structures.

In March of 2001, Continental Airlines launched a new nonstop air service between New York and Hong Kong. Prior to the advent of Boeing's 777, this flight would have required a connection at LAX.

Also in March of 2001, British Airways began a nonstop service between San Diego and London-Gatwick. The inauguration of this daily flight made history since it was the first nonstop transcontinental service in the history of San Diego. The aircraft of choice: The Boeing 777. It is important to understand that this service not only chops a flight from LAX, it also tears into the regional service (the "spoke" in the hub-and-spoke system) that would have flown from San Diego to LAX.

**Response:**

Comment noted.

**PC02106-9**

**Comment:**

#5. ARE THERE INDICATIONS THAT THE SHIFT TO POINT-TO-POINT FLIGHTS IS STARTING TO CUT INTO THE GROWTH RATES AT THE BIG HUBS THROUGHOUT THE WORLD?

MOST DEFINITELY! When using passenger data for the year 2000-so the data are not skewed by the downturn in economic activity that has plagued many of the developed nations in 2001-it is obvious that growth rates are being lowered in the hubs of the major cities around the globe.

The worldwide growth rate in passenger travel was 8%. If the hubs had received their fair share of this activity, then their increase would closely approximate the worldwide rate. Amsterdam and Frankfurt had a little less than 8%; LAX had about 5%; London (Heathrow) and Tokyo had a bit less than 4%; Atlanta had a tad less than 3%; San Francisco had about 2%; Dallas/Fort Worth had 1%; and Chicago had about minus 1%-"negative growth" in Greenspan's newspeak. ("Negative growth" is one of the great oxymorons-in the same class as "creative destruction," "organized anarchy," and "jumbo shrimp.") The only airport to beat the rate of worldwide growth was Paris - Charles de Gaulle; it had an almost 12% increase. While all roads lead to Rome, all air routes over the Atlantic lead to the City of Light. But there is more to it than that. By the middle of 2001, the U.S. had negotiated bilateral "open skies" agreements with 53 countries; however, the open skies agreement with France does not go into effect until 2003. As a consequence, U.S. flights into France must follow Gallic rules and regulations, which tend to be restrictive.

It is important to understand that much of the airborne cargo that moves throughout the globe is carried in "the belly of the beast"-in the cargo holds of the passenger aircraft. For instance, the 777-200 has cargo capacity of 5,656 cu. ft., and the Dash 300 has 7,080 cu. ft. Because of this link between passengers and cargo, the change from hub-to-hub to point-to-point passenger flights will make major modifications in cargo projections as well.

In 1996, Jack Driscoll, who was then the executive director of the Los Angeles Department of Airports and who functioned as the guiding light for the LAX Expansion, was quoted by the Los Angeles Times as saying:

LAX has consistently seen an 8% to 9% increase in aviation activity in recent years, and forecasts show this demand will continue for the next twenty years.

We don't think that it will.

In 2000, LAX served 68 million passengers-in spite of the fact that it was originally designed to serve only 40 million. In July of 2001, Warren Valdry, the senior airport commissioner who had served since 1993 and who had just been retained by L.A.'s new Mayor, James Hahn, was quoted by the Daily Breeze:

If you look at 2015, 2020, you're going to have 165 million (air passengers) coming into this region and there's no way LAX can handle that.

We don't think that it will have to.

**Response:**

Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in a regional approach to meeting demand and Attachment 2 of this Final EIS/EIR regarding "open skies" agreements.

**PC02106-10**

**Comment:**

We stand by our original conclusions:

(1) As a result of new aviation technology, in concert with deregulation, the market for air travel will indeed fragment, as the nations of the Pacific Rim become increasingly opulent and as point-to-point travel becomes the wave of the future.

(2) As the airline routes move from hub-to-hub to point-to-point and as time marches toward the year 2015, it will become increasingly apparent that a massive expansion of the facilities at LAX is not required and further does not satisfy the needs of the flying public.

As currently conceived, the LAX Expansion is a faith-based undertaking: The planners have faith that, if they build it, the planes will come. This approach might work for a Field of Dreams, but it won't for the airfield of the future. Between 2001 and 2015, advancements in aircraft technology, in deregulation, and in economic development throughout the globe will generate new routes that will carry smaller aircraft to smaller airfields outside smaller cities.

**Response:**

In response to the direction of Mayor Hahn, LAWA has developed a new alternative for consideration as part of the LAX Master Plan. Alternative D, Enhanced Safety and Security Plan, is designed to serve aviation activity at LAX consistent with the SCAG 2001 RTP selected aviation scenario. Under Alternative D, the capacity of LAX is limited to 78.9 MAP. This is not a Field of Dreams. LAX, under Alternative D, would handle the same numbers of passengers that it is capable of handling today, with less congestion. No massive expansion of LAX is contemplated.

Please see Response to Comment PC02106-2 that discusses why the service between the Pacific Rim airports and the U.S. will not be dominated by small aircraft.

Despite the apparent success of the point-to-point carriers in the news, the hub-and-spoke system is not going away. Delta's Song, jetBlue, and most of the other point-to-point carriers are serving only a small number of high-density O&D markets in the Northeast, Florida, and the West Coast. Even Southwest, the most successful low-fare carrier, is adding very few new cities to its system. Southwest is already serving most of the cities that it believes generate sufficient demand to warrant service. The only profitable way to serve the majority of the smaller markets in the U.S. is to provide service to a connecting hub airport where the passengers can transfer to another plane that is flying to their destination. Without the hub-and-spoke system, most of these smaller cities would go from limited air service to NO air service.

### 3. Comments and Responses

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**PC02106-11**

**Comment:**

To be in harmony with a decade-and-a-half literally brimming with change-including shifts in the demography of the Los Angeles Basin-the L. A. Mayor, the L. A. City Council, and the L. A. Board of Airport Commissioners should direct the executives and planners at Los Angeles World Airways to work with other organizations and agencies (particularly the Southern California Regional Airport Authority) to develop a regional approach that is predicated on the new reality and that benefits all of the people and cities in the Southland.

**Response:**

Comment noted. The decline in air travel demand due to the economic recession, the events of September 11, 2001, the war in Iraq, and SARS has largely driven the Southern California Regional Airport Authority (SCRAA) back to inactivity. Riverside County voted in July 2002 to withdraw from SCRAA. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02107**

**Maryott, Dorcas**

**None Provided**

**9/3/2001**

**PC02107-1**

**Comment:**

My family has lived in Westchester since 1954 and we currently reside in the Westport Heights home we purchased at that time. If your proposed expansion will remove a third of our business district and more homes, it will certainly affect the quality of life in the community and our family.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed acquisition in Chapter 3, Section 4.2, Land Use (subsection 4.2.6) and Section 4.4.4. Community Disruption and Alteration of Surface Transportation Patterns. Compatibility with adjacent land uses was analyzed in Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding impacts to the Community of Westchester and Topical Response TR-LU-1 regarding impacts on quality of life. Also note, as was described in Section 4.2, Land Use (subsection 4.2.6.5,) of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District. As was described in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA's programs for the acquisition of residences and business properties would conform to governing federal and State requirements for the payment of just compensation for the purchase of any needed property and applicable relocation assistance and payments would be provided to any person displaced from their home or business. Also please see Topical Response TR-RBR-1 with regard to residential acquisition and relocation.

**PC02107-2****Comment:**

My husband and I have never considered moving, and at age 78 and 77, it would be a great hardship. All our doctors are in the area. Our grandson attends Paseo del Rey school. We would hate to be forced to move for many reasons.

**Response:**

The commentor's property is not proposed for acquisition under Alternatives A, B, or C. Under LAVA staff's new preferred Alternative D, no residential acquisition is proposed. Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues, including affordable housing.

**PC02107-3****Comment:**

Further, the value of our property will decrease as we stay on.

**Response:**

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

**PC02107-4****Comment:**

I'd like to see some thought given to improvement of service to passengers. You are the entry to Southern California and we are a major entertainment area. The more positive the reception, the more satisfied the passenger.

**Response:**

The proposed improvements associated with each of the build alternatives being considered for the LAX Master Plan are intended to enhance service to passengers.

**PC02107-5****Comment:**

Would it be possible to make our outlying airports receive the majority of cargo shipments, thus providing our incoming "guests" better service, and creating needed space for passenger traffic, without sacrificing our Westchester neighborhood.

**Response:**

Please see Response to Comment PC00599-54 for more information about cargo activity.

**PC02107-6****Comment:**

I don't envy your position at this time and wish you the best insight into expansion and containment, and I hope for a balanced and fair conclusion.

**Response:**

Comment noted.

### 3. Comments and Responses

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**PC02108**      **Trapnell, Fred**      **None Provided**      **9/3/2001**

**PC02108-1**

**Comment:**

We want to live in a clean atmosphere and not polluted with jet fumes. We also want to live in a free condition and not one that is boxed in ( insulated). We want to see a healthier place for plants and trees. We don't want our lungs to be taxed from polluted air. We also do not want an increase in noise. My breathing is bad enough now and I don't want to aggravate this condition any further.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, impacts to biotic communities in Section 4.10, Biotic Communities, and health and safety impacts in Section 4.24, Human Health and Safety, and noise impacts in Section 4.1, Noise. Supporting technical data and analyses are provided in Appendices D, G, S-C, S-E, and S-H, and Technical Reports 4, 7, 14 S-4, and S-9. In addition, please see Topical Response TR-LU-3 regarding the aircraft noise mitigation program, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, and Topical Response TR-N-6 regarding noise increase.

**PC02108-2**

**Comment:**

We feel 2 million passengers is enough for any airport and we don't want to have more congested traffic where there is an increase to 6 million passengers per year. We don't want to see 50 or more schools and churches demolished. We don't want Inglewood/Westchester area to be a blighted area like Playa Del Rey/

**Response:**

Comment noted. Traffic impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

As stated in Section 4.27, Schools, of the Draft EIS/EIR, under the current Voluntary Residential Acquisition and Relocation Program for the Manchester Square and Belford Area, the 98th Street Elementary School property would most likely be purchased by LAWA (subject to additional discussions between LAWA and the Los Angeles Unified School District) and the existing facility demolished. As summarized in Table S4.2-20, in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, under Alternatives A, B, C, and D, the Westchester Neighborhood School and the vacant LA Community College/Hollywood CPR Training School would be acquired and demolished. Although a Montessori school is listed in Table S4.2-20 as being acquired under Alternatives A, B, and C, only a small portion of the school property and no buildings would be affected (please refer to Response to Comment PC02984-2). As described in Section 4.27, Schools (subsection 4.27.9), of the Draft EIS/EIR, under Alternative B one public school in the Lennox School District (Felton Elementary) would be exposed to significant outdoor noise levels and, as a result, acquisition and relocation of this school may occur, should Master Plan Alternative B be selected and approved. No church structures would be acquired and demolished under Alternatives A, B, C, or D.

In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02109      Border, Claudia      None Provided      9/7/2001**

**PC02109-1**

**Comment:**

The air quality needs to be monitored too! I can not have my windows open at all - I run my air conditioning all year.

**Response:**

Please see Response to Comment PC01947-9 regarding air monitoring.

**PC02109-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

**PC02110      Paredes, Kathleen      None Provided**

**PC02110-1**

**Comment:**

I oppose expansion of LAX on many fronts, but

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02110-2**

**Comment:**

#1: TRAFFIC. The city has taken no reasonable steps (rail line is not reasonable) to bring airport passengers in & out efficiently. With Howard Hughes, aerospace & airport, our quality of life is seriously jeopardized.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed surface transportation impacts in Section 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation. See also Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02110-3**

**Comment:**

LAX should be decreased in size.

**Response:**

Comment noted.

### 3. Comments and Responses

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**PC02111      Myers, Dorothy      None Provided      9/7/2001**

**PC02111-1**

**Comment:**

We live about 4 miles from Palmdale airport. We came here years ago for the peace and quiet.

We do not want an expanded airport!!

**Response:**

Comment noted.

**PC02112      Stefanski, Andrew      None Provided      9/1/2001**

**PC02112-1**

**Comment:**

As a Licensed Civil Engineer and Realtor I want to stress Negative Impact of LAX upon Housing & People's Health.

Recently LA Times analysed these Issues, stating that thousands of homes have been taken by LAX and some 20,000 people were displaced. This includes the condemnations in 1970ies and present "voluntary" acquisitions in East Westchester. This is not the end, Airport wants more. Freeway 405 is under widening scrutiny that would take more homes and businesses to provide (among other things) less conjested access to LAX.

**Response:**

Comment noted. The Drat EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to housing in Section 4.4.2, Relocation of Residences and Businesses, and impacts to human health in Section 4.24.1, Human Health and Safety. Widening of I-405 is not proposed as part of the LAX Master Plan. Moreover, no residential acquisition is proposed under Alternative D.

**PC02112-2**

**Comment:**

Further on tens of thousands of homes located East of the Airport up to Harbour Fwy. and beyond are heavily impacted by noise & pollution.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02112-3**

**Comment:**

Many of the hundreds of thousands of people living there suffer from Asthma, Emphysema and other Lung Deseases.



### 3. Comments and Responses

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**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

**PC02112-4**

**Comment:**

Many do not have Medical Insurance and have to be treated at Countie's Hospitals at Taxpayer's Cost.

**Response:**

Comment noted.

**PC02112-5**

**Comment:**

Unfortunately public officials are complaining about housing shortages, while at the same time approving Airport Expansion, causing further home taking and degradation.

It is bad to build an Airport in a densely populated area, but it is even worse to keep expanding it.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to housing in Section 4.4.2, Relocation of Residences or Businesses. In addition, please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. Alternative D does not include any residential acquisition.

**PC02113**

**Hodgin, Emmalie**

**None Provided**

**9/7/2001**

**PC02113-1**

**Comment:**

I agree with the above statements and support Friends of Sunset Park Airport Comm. and Neighborhood Ass - and do endorse the points set forth.

**Response:**

Comment noted.

**PC02113-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

### 3. Comments and Responses

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**PC02114      Moore, Lori      None Provided      9/6/2001**

**PC02114-1**

**Comment:**

Please do not expand the L.A. Airport. There is enough traffic & airplane noise already.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-6 regarding noise increase. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02115      Buchard, Geraldine      None Provided      9/7/2001**

**PC02115-1**

**Comment:**

I have been in residence at this address 16 years. The noise has increased sense I moved here. There are schools that are affected by noise & pollution. The pollution is very bad.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR.

**PC02115-2**

**Comment:**

Why not Palm Dale a place in need of enterprise & a great deal of land.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02115-3**

**Comment:**

We don't need air lanes in our back yard. Why concider tearing out peoples property just to have surplus of air traffic. L.A. surplus car traffic & air traffic. A great accomplishment (aren't we proud). Hah..

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and residential and business relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. Supporting technical data and analyses are provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. Alternative D does not include any residential acquisition.

**PC02116**

**Coe, Susan**

**None Provided**

**9/4/2001**

**PC02116-1**

**Comment:**

I'm writing to urge a vote AGAINST the planned expansion of Los Angeles International Airport (LAX) for four reasons:

- Local Traffic
- Freeway Traffic
- Airport Traffic
- Local Noise

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02116-2**

**Comment:**

1. Local Traffic. The towns north, east, and south of the airport are densely developed with more structures being built on the remaining open spaces. Traffic is already congested much of the day. Numerous airport visitors already use the surface streets to access the airport. They are even encouraged to by freeway signs promoting five different routes to the airport. Adding the additional millions of passengers planned after expansion will further worsen local commutes and travel.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-6 regarding neighborhood traffic impacts. Note that Alternative D does not include the LAX Expressway or the ring road. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02116-3**

**Comment:**

2. Freeway Traffic. The 405 Freeway is already congested from Manchester to the 10 and El Segundo to the 110 much of the day and night. None of the expansion plans seem to address the increased traffic from additional passengers trying to reach LAX. Not only are we local residents being asked to endure more crowding on our surface streets, we are also being asked to endure more crowding on the only real alternative.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-ST-2 regarding the Congestion Management Program and Topical Response TR-ST-4 regarding airport area traffic concerns.

### **3. Comments and Responses**

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#### **PC02116-4**

**Comment:**

There is little public off-road (i.e., Metro) transportation in South Bay and no expansion planned so we have little choice but use cars for transportation. And since there is little public transportation to LAX and the Metro stops well short of it, cars and other vehicles will have to continue to be used for transportation to LAX.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

#### **PC02116-5**

**Comment:**

3. Airport Traffic. With its current passenger load, the airport is often hopelessly jammed with traffic and has inadequate short term parking. Airport planners suggest using shuttles to out-lying parking lots but this still requires travel on the aforementioned crowded local roads and airport area. It also requires much more time. Third, it is just not a practical idea for picking up or dropping off elderly, infirm, or heavily laden passengers. Asking a 70 year old to climb up and down from buses unaided and carrying a suitcase is not reasonable.

**Response:**

The Master Plan alternatives were developed to improve airport access. Acknowledging that the current system is deficient, the alternatives are designed to alleviate much of the existing congestion and aid all passengers in accessing the airport. For example, the proposed people mover would be designed so that passengers could get on and off easily with their luggage, and would not require a step.

#### **PC02116-6**

**Comment:**

4. Noise. I live about 8 miles south of the airport in the west part of Torrance. However, I can still hear the airport and I very definitely get the noise of low flying jets shaking my house. While I realize that turning inland at low elevation is against flight rules, it doesn't stop every pilot from doing so. It is not an every day occurrence but the more planes flying from LAX, the more will fly low over the local neighborhoods. And my noise doesn't even begin to compare to that of El Segundo, Westchester, Lennox, and Inglewood.

**Response:**

For information regarding the overflight of Torrance and other South Bay communities, please see Topical Response TR-N-3 in particular Subtopical Response TR-N-3.1 and Subtopical Response TR-N-3.3.

#### **PC02116-7**

**Comment:**

Noise reduction retrofitting has been implemented on some houses but will probably never reach all the areas severely affected by the constant noise of planes.

**Response:**

Please see Subtopical Response TR-LU-3.4 for a description of how the noise impact boundary is determined, Subtopical Response TR-LU-3.8 regarding the estimated completion date for sound insulation, and Subtopical Response TR-LU-3.14 for a description of how approval of the LAX Master Plan would affect the ANMP.

**PC02116-8****Comment:**

Also, we live in a place with a wonderful climate so it is not reasonable to ask residents to huddle indoors with the windows closed 365 days a year just to have a conversation at a normal level.

**Response:**

Please see Topical Response TR-LU-4 for a discussion of thresholds used to identify significant noise levels and Topical Response TR-LU-3 for a description of the residential soundproofing program.

**PC02116-9****Comment:**

Studies have shown the long term damaging effects of noise exposure. Why should one group of people be exposed to even more noise?

**Response:**

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

**PC02116-10****Comment:**

Airport capacity is a regional problem. It should have a regional solution. Instead of constantly expanding LAX into an already crowded area, let Long Beach, Orange County, north Los Angeles county, and Riverside County take their fair share of the airport burden. This would provide easy airport access for far more people, reduce traffic load in the South Bay, reduce traffic load in the whole LA area by allowing shorter trips to airports, and spread any detrimental effects of airports over the entire group of people benefiting from the airports.

**Response:**

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

**PC02117      Trousdale, Roberta      None Provided****PC02117-1****Comment:**

SEE ATTACHED LETTER DATED 9/4/01  
PHOTOS - ELEVEN OF PDR AREA.  
LA TIMES ARTICLE - PLAYA DEL REY

**Response:**

Comment noted. Please see Responses to Comments below.

### 3. Comments and Responses

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#### PC02117-2

**Comment:**

I am extremely opposed to the further expansion of LAX due to the following reasons. I have owned my home on the far North end of Playa Del Rey for over 23 years. During that time the Palmdale airport was on the drawing board to handle the anticipated growth of the Los Angeles basin, and outlying areas.

While the suburbs continued to grow and freeway traffic got heavier and heavier, no further plans were prepared by LAX officials who had purchased both Palmdale and Ontario land, to become very large auxiliary sites for increased aircraft flights. Nothing has been done to promote these areas to the airlines and freight and cargo carriers.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

#### PC02117-3

**Comment:**

Instead, we have the smallest property footprint for a major airport surrounded by a long term residential and business community. In fact over the course of the last 30 years, large numbers of homes have been removed to handle more of the airport spread. We have suffered from increased pollution, gridlock, higher noise levels and crime in our surrounding communities during this time.

**Response:**

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, traffic impacts in Section 4.3, Surface Transportation, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses is provided in Appendices D and G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and in Appendices S-C and S-E, and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR.

#### PC02117-4

**Comment:**

I have traveled throughout the world and seen the new larger airports. They are not being built in heavily populated areas like we presently have at LAX. It does not make any sense to enlarge our already overused airport. First because Los Angeles growing population is extending toward outlying new communities. Secondly, from a health and safety issue because the present amount of noise is above the acceptable decibel range, and traffic is already at a standstill.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, traffic in Section 4.3, Surface Transportation, and noise in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, 3, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and Technical

Reports S-1, S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-RC-1 regarding the Master Plan's role in a regional approach to meeting demand.

#### PC02117-5

**Comment:**

Please answer the following questions:

1. Can you please provide me with a list of the present projects underway categorized as "Incremental Modernization for Safety Reasons". When I have called LAWA's Public Relations office and asked them what was being built at certain sites surrounding the airport, they offered "we're always doing something". I want to know if these incremental build outs are exempted by the EIS/EIR.

**Response:**

Comment noted. LAX is a large heavily-used public facility that operates 365/366 days a year. LAWA implements, on an ongoing basis, a very active operations and maintenance (O&M) program to provide a high level of safety, security, efficiency, and convenience for passengers, visitors, and employees at LAX. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed a variety of major improvements to LAX as proposed under four build alternatives designed in light of projected growth and demands at the airport. The on-going O&M program projects form part of the No Action/No Project Alternative in the Draft EIS/EIR.

#### PC02117-6

**Comment:**

2. The attached L. A. Times article was written about the "ghost town" we have been living with over the past thirty years. What is the airport planning to do to clean up the area and make it a more beautiful part of the community? Please see examples of this area with eleven photos attached.

**Response:**

The newspaper article referenced in the comment discusses the former residential tract located at the west end of the LAX runways. The area is subjected to high levels of aircraft noise and the removal of homes in the 1960's and 1970's occurred for noise compatibility purposes. The majority of the area is now the El Segundo Blue Butterfly Habitat Preserve and has been operated by LAWA in the successful reestablishment and increased population of this federally listed species.

#### PC02117-7

**Comment:**

Neighbor Issues

As noted in the Los Angeles Times article, homes were removed by the airport alongside the stretch of the Pacific Ocean and beach areas. During this time, LAX has not enhanced this area but left it fallow to degrade the surrounding neighborhoods and lower property values of the surrounding homes. It is an eyesore that has been totally unacceptable. While the front facing of the airport opposite Century Boulevard has had a \$135 million facelift, the backside adjacent to homes has been left totally unattended.

**Response:**

The area located at the west end of the airport between Pershing Avenue and Vista del Mar was formerly occupied by residential development. The subject area is within a high noise impact area and was cleared of homes many years ago. Much of the subject area is now occupied by the El Segundo Blue Butterfly Habitat Preserve and is maintained for that purpose.

### **3. Comments and Responses**

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#### **PC02117-8**

**Comment:**

Noise levels have increased significantly. Orange County airport has a curfew of 11 p.m., of planes flying into its airport. LAX assumes their overflow, and consequently, the planes are flying loudly over our homes throughout the night. Any further increase in traffic will continue to erode our quality of life which already has been greatly hampered.

**Response:**

Please see Topical Response TR-N-6 regarding noise increase, particularly Subtopical Response TR-N-6.2, Topical Response TR-LU-1 regarding impacts on quality of life, and Topical Response TR-N-4 regarding noise mitigation, particularly Subtopical Response TR-N-4.1.

#### **PC02117-9**

**Comment:**

I just suffered from a respiratory viral infection that put me in emergency hospital twice, and I had my lungs drained four times, which may have been a result of the constant dumping of fuel from the airplanes.

**Response:**

Please refer to Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, TR-HRA-3 regarding human health impacts, and Topical Response TR-AQ-1 regarding fuel dumping.

#### **PC02117-10**

**Comment:**

It is evidenced by the black soot particles are left on my car each night. The streets are all darkened from these particles, and if you compare our streets nearby the airport to others only a few miles away, there is a significant difference.

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

#### **PC02117-11**

**Comment:**

I cannot keep the windows open during a telephone call because the caller cannot hear me with the noise of the aircraft going by.

**Response:**

Please see Topical Response TR-LU-4 regarding outdoor noise levels.

#### **PC02117-12**

**Comment:**

Traffic on the new 105 Freeway is at a standstill at all hours of the day up as it comes from the Norwalk area, and approaches the airport exit.

**Response:**

Comment noted.



**PC02117-13****Comment:**

Century Boulevard exit off the 405 Freeway is always a bottleneck. It is not a matter of opening the roads near the airport. It is a matter of serving people nearer to the areas that they live and not having them drive an hour or two on already over extended freeways to catch a plane. This includes the airport employees who are coming from outlying areas where housing is more affordable.

**Response:**

Comment noted. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4. The Draft EIS/EIR Chapter 1, Regional Context, discusses the allocation of air service among the regional airports.

**PC02117-14****Comment:**

Traffic will increase greatly if the airport is allowed to increase its capacity because more out of area employees will need to be hired.

**Response:**

Employee growth was forecasted and included in trip generation and traffic analyses in both the on-airport and off-airport traffic studies. Specific mitigation steps were developed to minimize the impacts at all locations where there were judged to be significant impacts. The traffic forecasts and impacts were presented in Section 4.3, Surface Transportation, of both the Draft EIS/EIR and Supplement to the Draft EIS/EIR. On-Airport forecast and traffic impacts are presented in Section 2.4, Key Input Assumptions, and Chapter 4, Forecasts and Impacts, of Technical Report 3a, On-Airport Ground Transportation Report and S-2a, Supplemental On-Airport Surface Transportation Technical Report. Off-Airport traffic impacts are presented in Technical Reports 3b, Off-Airport Ground Transportation Report, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report. Also, please see Topical Response TR-ST-2 regarding employee traffic.

**PC02117-15****Comment:**

Trucks presently are transporting cargo great distances from where the goods are to be delivered. A better cargo distribution center of these goods to El Toro and Ontario airports would reduce this truck traffic as well.

**Response:**

Please see Response to Comment PC00599-54 for more information about cargo activity, as well as Topical Response TR-ST-1. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02117-16****Comment:**

There are over 345 apartments being built on Pershing Drive now, and others on the drawing board that were not considered as a traffic impediment to the present EIS/EIR, that will put the traffic flow on Pershing at a total standstill if the Westchester Parkway Ring road is approved.

### **3. Comments and Responses**

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**Response:**

The impacts of all future related projects were closely coordinated with the surrounding jurisdictions and their impacts were fully accounted for in the transportation analysis. This is described in detail in Section 2.3 of Technical Report 3b of the Draft EIS/EIR. Please see Response to Comment AR00003-21 regarding cumulative impacts.

**PC02117-17**

**Comment:**

There have been countless times that people have chosen not to buy in Westchester or Playa Del Rey because of the noise and pollution associated with the airport. The noise level is too high for many people. Right now, I am getting complaints from people as far north of 77th Street in Westchester that the noise level has increased substantially. The same is true in Playa Del Rey with the constant high decibel noise levels.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding high noise levels at 77th Street and Playa del Rey, to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels. As shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, 77th Street in Westchester is located outside the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. As also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 of the Supplement to the Draft EIS/EIR, under 1996 baseline and Year 2000 conditions, the 65 CNEL contour is completely within the 1992 fourth quarter 65 CNEL contour. Portions of Playa del Rey are located within the 1992 fourth quarter 65 CNEL contour and therefore are eligible for sound insulation under the Aircraft Noise Mitigation Program (ANMP) as described in Topical Response TR-LU-3. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), 77th Street is located outside the 94 dBA SEL contour under 1996 baseline and Year 2000 conditions, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. However, portions of Playa del Rey are exposed to high single event noise levels under 1996 baseline and Year 2000 conditions. Overall the areas exposed to high noise levels in Westchester and Playa del Rey have decreased over time. Please see Topical Response TR-LU-2 regarding compatibility of the Westchester and Playa del Rey communities with LAX, Topical Response TR-LU-4 regarding outdoor noise levels, and Subtopical Response TR-N-6.1 regarding existing high noise levels.

**PC02117-18**

**Comment:**

I have seen crime increase due to neighborhoods being dismantled. Being that the airport is a 24/7 facility, with residential neighborhoods close by, these communities have become prime targets.

**Response:**

Please see Response to Comment PC00378-2 regarding crime impacts.

**PC02117-19**

**Comment:**

There are many cars parked long term on La Tijera Boulevard, and other streets nearby the airport. Trash left from these long term parked cars has built up and left the streets looking terrible.

**Response:**

Comment noted. Please note that the maintenance of off-airport streets is not within the jurisdiction or responsibility of LAWA. Each of the build alternatives being considered for the Master Plan include substantial improvements to existing airport facilities, including on-airport roads and parking facilities. Chapter 3, Alternatives, of the Draft EIS/EIR provides a description of the improvements associated with Alternatives A, B, and C, as well as a phasing concept for each. Similar information is provided in

Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR relative to Alternative D. Under Alternative D, improvements to, or addition of, parking facilities would begin in the first year of project construction.

#### PC02117-20

**Comment:**

Westchester, was a beautiful planned community in the 40's. It has been left to deteriorate with long term parking and rental car facilities on Sepulveda. In the highest economic boom in Los Angeles history, there are still many properties vacant with "for lease signs" along Sepulveda. Prospective tenants are fearful of being removed by the airports "long term plan".

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### PC02117-21

**Comment:**

While other adjoining communities have thrived during this time, Westchester and Playa Del Rey for the same square footage and style of homes, has consistently remained at lower property values than their neighboring communities. This is due to the fear of airport expansion as well as increased noise and pollution and an encroaching airport presence.

**Response:**

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

#### PC02117-22

**Comment:**

Quality of life issues have not been addressed by the LAX Expansion and how that expansion will enhance its neighboring communities. These areas have already suffered from the adverse conditions of being close to the airport. LAX has been flying in excess of its legally approved and allowable passenger load for several years now, and the impact has taken a heavy toll on the adjacent communities.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life. In addition, please see Topical Response TR-GEN-3 regarding actual versus projected activity levels.

#### PC02117-23

**Comment:**

There are over 4,500 acres of available open space land in El Toro. An airport in Orange County is a necessity to cover the large population surrounding that growth area whose population is presently using LAX.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

### 3. Comments and Responses

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#### PC02117-24

**Comment:**

It is unconscionable and unrealistic to think LAX can grow larger to handle other regions transportation needs, at the risk of further health and safety concerns to LAX's existing neighbors.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-SAF-1 regarding aviation safety. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR.

#### PC02117-25

**Comment:**

Please respond to my comments and questions directly at the address listed above.

**Response:**

In accordance with the provisions of NEPA and CEQA, written responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR are provided herein as part of this Final EIS/EIR. The Final EIS/EIR has been made available for public review at FAA and LAWA and through distribution to public libraries throughout the area, and is available electronically at [www.laxmasterplan.org](http://www.laxmasterplan.org). Responses to individual comments included in this comment letter are provided above.

**PC02118**

**Kardener, M.D.,  
Sheldon**

**None Provided**

**9/8/2001**

#### PC02118-1

**Comment:**

Pollution affects everyone. The emotional and physical health of individuals, families, and communities is diminished by its presence. A community's psychologic and economic desirability, as a place to live, to work, or to visit is directly affected by it's level of pollution.

There is no doubt that an unavoidable by-product of growth is pollution. The issue is how to limit that unavoidable aspect of a society's development to an acceptable level that allows for such growth without destroying the community.

**Response:**

Please see Topical Response TR-LU-1 regarding impacts on quality of life. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendices G and S-E and Technical Reports 4 and S-4. In addition, please see Topical Response TR-HRA-3 regarding human health impacts.

#### PC02118-2

**Comment:**

NOISE IS A POLLUTANT! THE SANTA MONICA AIRPORT NOISE IS POLLUTING THE COMMUNITY.

### 3. Comments and Responses

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I both live and work in Santa Monica. My office is just north of the airport while my home is in Sunset Park. During the past 17 years the level of noise has increased from the delightful and unobjectionable sound and sight of private pleasure prop aircraft to the disruptive roar of large jets taking off and landing at all hours.

It is for this reason and for the sake of our community's vital integrity that I implore you to adopt the suggestions of the Sunset Park Association. We cannot stop the progress these changes represent, but we certainly must limit their destructive components. Suitable fines against fleet operators on a fleet wide, graduated basis sufficient to motivate compliance with existing rules is vital.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

**PC02118-3**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

**PC02119      Tomeo, Betty      None Provided      9/9/2001**

**PC02119-1**

**Comment:**

We must be concerned about persons living near the Santa Monica airport whose quality of life is being impacted by excessive noise from jet aircraft.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

**PC02119-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

**PC02120      Sinaiko, Joanne      None Provided**

**PC02120-1**

**Comment:**

I am writing this letter in opposition to the LAX MasterPlan in its current form.

**Response:**

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

### 3. Comments and Responses

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#### PC02120-2

**Comment:**

It does not make sense for all the increase in passenger and cargo traffic to come in to LAX. It does not make sense to add two hours travel time, each way, to passengers whose final destination is Orange County or Riverside. It does not make sense to add the additional cost of shipping cargo from LAX to its destination of Orange County or Riverside.

The entire southern California region should share in the responsibility of increased passenger and cargo traffic as well as all the benefits this traffic will bring.

**Response:**

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

#### PC02120-3

**Comment:**

In addition, if the LAX MasterPlan is approved in its current form, my home will become unlivable. I will no longer be able to have a window open, or spend time outside.

**Response:**

As shown on Figure 4.2-5 of the Draft EIS/EIR the commentor's property is within the 1992 Fourth Quarter 65 CNEL noise contour and therefore is eligible for sound insulation under the Aircraft Noise Mitigation Program. As also shown on Figure 4.2-5, the subject property is located within the 65 CNEL under 1996 baseline conditions. As presented in Section 4.2.6 of the Draft EIS/EIR, under Alternatives B and C the subject property would be located within the 65 CNEL contour. Under Alternative A the subject property would not be exposed to the 65 CNEL. As also presented in Section 4.2.6 of the Draft EIS/EIR, the subject property would not be exposed to significant noise level increases of 1.5 CNEL within the 65 CNEL, compared to 1996 baseline conditions. The property would also not be exposed to significant outdoor noise levels of 75 CNEL under Alternatives A, B, and C.

Section 4.2.6 and Technical Report S-1 Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR, presented noise-sensitive uses and land areas that would be exposed to the 65 CNEL contour in Year 2000 conditions, provided a comparison of Alternative D to 1996 baseline conditions, and presented a new analysis of single event noise levels that result in nighttime awakening (defined by the 94 dBA SEL noise contour). As shown on Figures S4.2-2 and S4.2-16, under Year 2000 conditions and under Alternative D the subject property would not be exposed to the 65 CNEL contour. Under all the build alternatives, the property would not experience a significant increase of 1.5 within the 65 CNEL compared to Year 2000 conditions. Under Alternative D the property would not be exposed to significant outdoor noise levels of 75 CNEL. As described in Section 4.2.6 of the Supplement to the Draft EIS/EIR, although the subject property would be exposed to the 94 dBA SEL under 1996 baseline conditions, the property would not experience high single event high noise levels that result in nighttime awakening under any of the build alternatives. Therefore development of the build alternatives would result in similar or reduced outdoor noise levels at the subject property compared to 1996 baseline and Year 2000 conditions.

Please see also Topical Response TR-LU-4 for a discussion of outdoor noise levels and Topical Response TR-LU-3 for additional description of the ANMP.

**PC02120-4**

**Comment:**

The above points do not begin to address the issues of increased traffic, which at this time is nearly unworkable.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

**PC02120-5**

**Comment:**

The LAX MasterPlan in its current form is a very bad idea for many reasons.

**Response:**

Comment noted. Please see Responses to Comments above.

**PC02121 Booth, Mary None Provided 9/10/2001**

**PC02121-1**

**Comment:**

With Playa Vista traffic increasing at Lincoln Bd. & Jefferson Blvd signal it now takes me 8 min longer to get to LAX T-1 each Saturday to serve as Travelers Aid at Terminal 1. Imagine when the project is occupied!

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways and Topical Response TR-ST-4 regarding airport area traffic concerns. Section 4.3.2 of the Draft EIS/EIR addressed potential traffic impacts including future developments such as Playa Vista. For details on how the future traffic demand from the Playa Vista development was incorporated into the Draft EIS/EIR or traffic forecast years or technical details on the traffic analysis methodology, please see Topical Response TR-ST-2.

**PC02121-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

### 3. Comments and Responses

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**PC02122      Denyer, Caroline      None Provided      9/9/2001**

**PC02122-1**

**Comment:**

The neighborhood cannot cope with any more jet traffic here at Santa Monica. Our quality of life is diminished.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

**PC02122-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

**PC02123      Keppel, John      None Provided      9/7/2000**

**PC02123-1**

**Comment:**

The problems at LAX are so many that it seems impossible to solve them all at once. So the idea that I propose is only intended to solve a part of the problem. However it is a simple and flexible plan that could start now and produce results over time. Its purpose is to remove cargo carriers from LAX and have them utilize Palmdale, or other airports, rather than LAX. The proposal is attached.

**Response:**

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

Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. Please see Response to Comment PC00599-54 for more information about cargo activity.

**PC02123-2**

**Comment:**

A PARTIAL SOLUTION TO LAX PROBLEMS

Part One



### 3. Comments and Responses

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Effective January 1, 2002 all aircraft with less than 12 passengers will be diverted to alternate airports of the Pilots choice.

Part Two

Exception to Part One will be granted to all Companies or individuals, who on September 1, 2001 own or have under lease 1000 Sq.Ft., or more, of space at LAX.

**Response:**

There is no federal law or regulation that would allow the FAA or an airport sponsor to restrict the use of a public use airport as suggested in the comment. There are 39 general aviation and reliever airports within the Los Angeles Basin. As the activity at LAX increases, general aviation may look to operate from less active airports.

**PC02123-3**

**Comment:**

Part Three

All Companies who are granted an exception under Part Two, will in 2002, and each year thereafter, reduce their landings at LAX by 10% of the total landings they made at LAX in 2001.

The beauty of this proposal is that it will in five years reduce current landings at LAX by about 20%.. The charm of the proposal is that it allows those whose flights into LAX will be disrupted time to develop other business alternatives. And it is a simple plan that will reduce congestion at LAX and will not effect major passenger carriers operations.

**Response:**

Comment noted.

**PC02124**

**Huben, Dorothy**

**None Provided**

**9/1/2001**

**PC02124-1**

**Comment:**

If the planned expansion were to be approved, it will effectively obliterate our community.

We have already lost far too much in the name of "progress."

We have too much traffic, have lost too many homes and the community has endured too much noise & pollution.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, acquisition impacts in Section 4.4.2, Relocation of Residences or Businesses, noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendices D and G, and Technical Reports 1 through 5 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-1 through S-4 of the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00017-121 regarding impacts of historic activities at LAX and Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

### 3. Comments and Responses

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**PC02124-2**

**Comment:**

Why must Westchester bear the brunt of all this when there are other facilities available?

Other major cities have airports many miles from downtown so why not use Orange Co or Ontario airports to help with this burden?

**Response:**

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

**PC02124-3**

**Comment:**

LAX: NO ON EXPANSION

**Response:**

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

**PC02125**

**Powers, Eileen**

**None Provided**

**9/3/2001**

**PC02125-1**

**Comment:**

We long time Westchester residents, no longer consider the airport a good neighbor for the following reasons -

EXCESSIVE NOISE  
HEAVY TRAFFIC  
HEALTH-SAFETY HAZARDS.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, 3, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

**PC02126      Wennstrom, Creige      None Provided      9/6/2001**

**PC02126-1**

**Comment:**

As a home owner residing in Westchester living adjacent to LAX I feel compelled to reiterate the position of most tax paying home owners in this Airport area: Please regionalize all the increasing airport traffic to other airports, i.e., Ontario Long Beach, El Toro, John Wayne, Etc. in order to balance airport business & decrease LAX's over used, over burdened facility!!!

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02127      Jones, John & Wendy      None Provided      9/12/2001**

**PC02127-1**

**Comment:**

We are 20-year residents of El Segundo, the town just south of LAX. The residents on the north end of town live blocks away, not miles, from the LAX border. The folks who tell us that we knew when we moved to El Segundo that LAX was next door are ignorant of facts. El Segundo was incorporated in 1917. Many residents moved here years before the airport expanded to its present location. Also, the increased number of planes that take off now have nothing at all to do with what the situation was when we moved in. We were told that the maximum capacity was approximately 42,000 passengers per day. As we who are opposed to the expansion have repeatedly stated, you can't put 10 pounds of potatoes in a 5 lb. bag. The capacity is maxed out. LAX acreage in comparison to other major airports is very small. A comparison chart from 1997 indicates LAX acreage to be 3,500 acres. This is 1/5 the size of Dallas/Ft. Worth. It is a little over 1/2 the size of Chicago O-Hare and a little over 1/3 the size of Washington Dulles. Denver International is over 9 times the size of LAX. Our own Palmdale airport is over 5 times the size of LAX. Ontario airport is also much larger and is begging for the air cargo business. A large majority of the cargo's destination is inland.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, and Topical Response TR-MP-1 regarding air cargo activity and demand.

### 3. Comments and Responses

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#### PC02127-2

**Comment:**

This environmental impact report has understated the problems and has not considered reasonable alternatives.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR provides a comprehensive analysis of Alternative D and was circulated for public review and comment.

#### PC02127-3

**Comment:**

The traffic impact studies that were conducted are totally inadequate. The area that was studied was only the area adjacent to the airport. If we are talking about a regional solution, the traffic study should include the entire county of Los Angeles as well as the other involved counties (Orange, San Bernardino, Ventura and Riverside). The entire freeway system should be studied. The 105 freeway, when it opened, had immediate problems. The current daily situation at certain hours has stopped traffic at the LAX exit. It is such a dangerous hazard that a sign on the freeway warns people to watch out for stopped cars.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are program level environmental documents intended to analyze the impacts of a master plan. It is acknowledged that further documentation may be required to address certain environmental issues in a more specific manner, as necessary and appropriate. The study area for the off-airport surface transportation analysis fulfills the requirements of the program level document, per NEPA and CEQA. Please see Topical Response TR-ST-2 regarding the study areas. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

#### PC02127-4

**Comment:**

We're talking about common sense here. We are talking about quality of life. Why are we trying to fit more flights when there is no room to safely and sensibly do so? Doesn't it make sense to spread it around the region? This expansion is not a good idea when you look at air and ground safety, health and environmental issues. It doesn't make sense economically because the area, both on the ground and in the air, is maxed out.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety, Topical Response TR-LU-1 regarding impacts on quality of life, Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, and Response to Comment AL00051-26 regarding air space issues. It should be noted that Alternative D, Enhanced Safety and Security Plan, has been designed to serve a level of future (2015) airport activity

### 3. Comments and Responses

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comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient and efficient. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region.

#### PC02127-5

**Comment:**

Official comments on the Draft LAX Master Plan and/or Draft EIS/EIR must be received no later than July 25, 2001. We understand this date has been extended.

**Response:**

The close of the public comment period for the Draft EIS/EIR was November 9, 2001, for a total of 295 days. In addition, a Supplement to the Draft EIS/EIR was prepared and circulated for public review from July 11, 2003 through November 7, 2003, a period of 120 days. Please see Topical Response TR-PO-1 regarding the public hearing process.

#### PC02127-6

**Comment:**

Problems we have living next to the airport: the noise at the present level is deafening at times. Conversations must cease between people a foot away from each other when planes take off. The ground noise, especially at night is unbearable. We hear ear-piercing high pitches, the whole range, when engines are being revved. To get a continuous night's sleep in our neighborhood is a rare occurrence. We experience innumerable go-arounds and early turns over our town at the present level.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels, Topical Response TR-LU-3 regarding residential sound insulation under the Aircraft Noise Mitigation Program (ANMP), Topical Response TR-LU-4 regarding outdoor noise levels, Topical Response TR-N-5 regarding ground noise at night, Subtopical Response TR-N-3.2 regarding early turns north and south of the airport, and Topical Response TR-N-7 regarding enforcement of noise abatement procedures.

#### PC02127-7

**Comment:**

We experience soot from jet fuel and tire tread that can cover cars, decks, ponds, outdoor, furniture, etc. This is black stuff that we also must be inhaling.

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

#### PC02127-8

**Comment:**

We have installed double-pane wood windows and air cargo planes still frequently awaken us at night. At times we experience the house rattling. We were told that this would go away when the airport went to phase 3 jets. It didn't.

**Response:**

Please see Topical Response TR-N-8 which discusses noise-based vibration. The Draft EIS/EIR addressed noise impacts in Section 4.1, Noise with supporting technical data and analyses provided in Appendix D, Aircraft Technical Noise Report. Vibration has no relationship to whether the aircraft is Stage 2 or Stage 3, but rather to the absolute noise level present. Please see Section 4.1, Noise, and

### 3. Comments and Responses

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Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D. Please see Appendix S-C Supplemental Aircraft Noise Technical Report and Appendix S-1 Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR regarding analysis of single-event noise impacts on nighttime awakenings.

#### PC02127-9

**Comment:**

We were also told when the third (south) runway was added it would only be used for landing and planes would then be towed to their appropriate terminal.

**Response:**

The plans for Alternative B call for the proposed new south runway to be used for landings only in west flow, but to be used for departures only in east flow. After landing, all aircraft would taxi to their appropriate terminal under their own power. Once the aircraft is at the terminal, depending on the gate, they may move to gates under their own power or may need to be towed.

#### PC02127-10

**Comment:**

Is it any wonder the public has no trust in the words of LAX? We didn't have these problems when we bought our property 20 years ago. We have visibly seen out of our north and west windows the increase in early turns over the town and increased flight patterns. At some point, enough is enough. We have passed that point at LAX. The area adjacent to LAX is handling more than it's fair share of traffic (ground and air).

**Response:**

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, traffic impacts in Section 4.3, Surface Transportation, and air quality impacts in Section 4.6, Air Quality. Supporting technical data and analyses is provided in Appendices D and G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and in Appendices S-C and S-E, and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-4 regarding aircraft flight procedures.

#### PC02127-11

**Comment:**

This expansion and the amount of traffic due to the increased cargo is going to have a dramatic effect on the infrastructure of our cities. Not only are we looking at increased cargo flights, which take off at all hours of the night, making it impossible to get a solid nights sleep, there will also be an increase of heavy duty trucks on the road. A fully loaded semi can weigh as much as 90,000 lbs. When compared to a 5,000 car you can figure out the amount of damage it will do to our streets.

**Response:**

Please see Subtopical Response TR-ST-1.1 regarding the truck traffic plan for LAX Master Plan. Also, Alternative D, discussed in the Supplement to the Draft EIS/EIR, would not have any more cargo activity than the No Action/No Project Alternative. The streets around LAX that are designated for truck use are designed to handle the weight of cargo carried by cargo trucks. Also, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

#### PC02127-12

**Comment:**

It seems quite obvious that the amount of information in this study is totally inadequate and incomplete.

**Response:**  
Comment noted.

**PC02127-13**

**Comment:**  
Currently, LAX is the largest polluter in the South Bay.

**Response:**  
Please see Response to Comment PC01186-4.

**PC02127-14**

**Comment:**  
Los Angeles Mayor Hahn is opposed to this expansion as are all of the County supervisors, who unanimously voted to oppose the expansion, saying the plan is "fatally flawed". More and more officials are speaking out against it. LAX can be greatly improved upon without expanding it. It seems to us that greed and shortsightedness has taken over. When the City of Los Angeles acquired Palmdale Airport many years ago, they were wise in thinking long-term. Why don't we consider continuing on with their vision? We will all be better off if we just use reason and common sense.

**Response:**  
Please see Response to Comment PC00578-1 regarding the development of Alternative D - Enhanced Safety and Security Plan, which was developed at the direction of Mayor James Hahn.

**PC02128      Nam, Signe                      None Provided**

The content of this comment letter is identical to comment letter PC02120; please refer to the responses to comment letter PC02120.

**PC02129      Fickenscher, Edgar      None Provided                      9/15/2001**  
**H. & Katherine E.**

**PC02129-1**

**Comment:**  
We are opposed to any further expansion of LAX for a number of reasons. Although we live near to LAX, and it might be thought that propinquity is our major reason for opposition, the NIMBY approach never solves anything. Our primary reason is basically that further expansion is concentrating too many resources in one place, and makes us vulnerable to any kind of calamity, whether natural or manmade. The events of this past week make that argument obvious. The fact that increased concentration of traffic, noise, and air pollution go along with airport expansion is also self-evident.

**Response:**  
Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-SEC-1 regarding security issues. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft

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EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

#### PC02129-2

**Comment:**

The matter of fairness in distributing the load is vital to our thinking as well. Orange County must assume more of the responsibility for air traffic in the Southern California region. While we don't presume to know the best solution for Orange County, the attitude that El Toro and/or John Wayne can't bear any of the load is anathema to us.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

#### PC02129-3

**Comment:**

Westchester has borne its share of dislocation and previous LAX expansion. We now believe that Orange County, Ontario, and Palmdale need their turn to help out.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02130      Ackerson, Beverly      None Provided      9/8/2001**

#### PC02130-1

**Comment:**

I have found the EIR/EIS Draft / LAX Master Plan deeply flawed in many areas. Some of my concerns are as follows:

**Response:**

Comment noted. Please see Responses to Comments below.

#### PC02130-2

**Comment:**

1. Why was Rancho Palos Verdes and the Palos Verdes Peninsula omitted from the EIR/EIS Draft?



### 3. Comments and Responses

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Rancho Palos Verdes and the Peninsula Aircraft Noise/Safety Information Committee have certainly made LAWA aware that we have a noise, pollution, and safety problem with Turbo Props and Jets flying over the Palos Verdes Peninsula!

We attended and contributed to the So. CA. FAA Task Force meetings, took part in a LAWA Community Input Meeting, met with LAWA Staff at LAWA. and worked with TRACON and LAWA. The GAO ask to meet with the Peninsula Aircraft Noise/Safety Information Committee when they were in LA. One of our members published a booklet on the Noise Impact on the Community.

**Response:**

Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the effects of aircraft noise at those areas that may be significantly impacted. Palos Verdes and the Palos Verde Peninsula will not be significantly impacted by aircraft operations at LAX. Please see Topical Response TR-N-3 for additional information regarding LAX aircraft operations and associated noise impacts to south bay cities.

**PC02130-3**

**Comment:**

2. Why did you use a 1996 baseline?

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

**PC02130-4**

**Comment:**

3. How are you going to handle more noise, pollution, safety, health issues, and traffic with the Expansion of LAX?

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, human health and safety in Section 4.24, Human Health and Safety, and traffic in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR.

**PC02130-5**

**Comment:**

4. Have you thoroughly studied a Regional Airport Plan?

**Response:**

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

### 3. Comments and Responses

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**PC02130-6**

**Comment:**

5. How are you going to handle more aircraft in the already over loaded air space?

**Response:**

Please see Response to Comment PC00656-2 regarding the airspace capacity of the Master Plan alternatives. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

**PC02131**

**Snell, Kathy**

**None Provided**

**9/13/2001**

**PC02131-1**

**Comment:**

During the last few years, several flights have been rerouted from flight paths over the beach cities and the north side of the Peninsula to flight paths over the south side of the Peninsula and Catalina Channel. This has caused soot and noise especially when the planes cross over the highest point of the Peninsula affecting the NCCP habitat program and the California Gnatcatcher and Cactus Ren.

**Response:**

Please see Topical Responses TR-N-3 regarding aircraft flight procedures and TR-AQ-1 regarding deposition and soot. Based on the relatively low number and infrequent nature of flights over the South Bay cities, the altitude of aircraft at that point, and the information presented in TR-AQ-1 regarding deposition and soot, it is considered very unlikely that species within the NCCP habitat program at the Palos Verdes Peninsula, including the California gnatcatcher and the cactus wren, are significantly affected by aircraft overflights.

**PC02131-2**

**Comment:**

The EIR needs to address the cumulative impact of soot generated from air traffic flights transiting over the South side of the Palos Verdes Peninsula including the Catalina Channel (between Catalina and the Peninsula) and the increased vessel traffic transiting the channel. What is the cumulative environmental impact of soot, smoke, etc. from vessels in the channel based on future expected volumes of vessel traffic at World Port L.A. and the Port of Long Beach added to the expected soot generated from future expansion at LAX?

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping and Response to Comment AL00018-60 regarding air quality/cumulative impacts. The impacts from soot and other emissions, if any, associated with World Port L.A. and the Port of Long Beach cannot be identified at LAX and visa versa.

**PC02131-3**

**Comment:**

What environmental impact will there be with no parking within the airport, no public driving into the airport, no curb drop off of baggage? What impact to the neighborhoods, traffic and air quality surrounding the airport will occur with these new driving patterns implemented after September 11, 2001?

**Response:**

Alternative D, as described and evaluated in the Supplement to the Draft EIS/EIR, has been developed to respond to your concerns. Alternative D would enhance security while improving traffic conditions especially with respect to neighborhood streets. Refer to Appendix S-9 for discussions regarding Alternative D in comparison to the No Action/No Project Alternative and build Alternatives A, B, and C.

Additionally, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, air quality in Section 4.6, Air Quality, and traffic in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR.

**PC02131-4**

**Comment:**

From a health standpoint, is it less of a health risk for workers and nearby residences at a regional airport or a centralized, larger airport?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR did not provide a comparative analysis of large and small airports, thus the question in the comment cannot be answered directly. The Draft EIS/EIR did evaluate risks and hazards to airport workers for each of the alternatives, with the intent of providing information on changes in impacts associated with No Action/No Project and the build alternatives. Individuals can use this information to assist them in evaluation of the LAX Master Plan, but individuals would need additional information from small airports to make comparisons.

Onsite workers were assumed to be exposed to toxic air pollutants (TAP) emitted by LAX operations for 8 hours a day. Occupational exposures were assessed by comparing maximum 8-hour concentrations of TAPs near gates and aprons, estimated through air dispersion modeling, with Permissible Exposure Limits - Time Weighted Average (PEL-TWAs). Estimated maximum 8-hour concentrations for the build alternatives and the No Action/No Project Alternative were well below PEL-TWAs for all TAPs, indicating that health impacts are unlikely for LAX workers.

Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

**PC02131-5**

**Comment:**

From a catastrophic standpoint, does a regional airport or centralized airport receive a greater impact when catastrophe hits, i.e. plane crashes, hijacking, terrorism, etc.? What additional environmental impacts occur to a centralized airport vs. a regional airport when catastrophes hits.

**Response:**

While the impact could be the same for both a regional airport or a centralized airport if the impact was to a non-critical area, the impact on the centralized airport for a critical area that shut down all or most of the airport would be much greater on the community. If a centralized airport is closed following an attack, the environmental effects of transporting people and goods to a remote community would be greater.

### **3. Comments and Responses**

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Also, please see Topical Response TR-SEC-1 regarding security issues at LAX, both as they exist now and as related to the design of Alternative D, the Enhanced Safety and Security Plan.

**PC02132      Ackerson, Benjamin      None Provided      9/13/2001**

**PC02132-1**

**Comment:**

1. Why were impacts to the Palos Verdes Peninsula and the South Bay omitted from the Draft EIR/EIS report? Los Angeles World Airports personnel are aware of these impacts since they attended the South Bay Task Force meetings where the impacts were discussed at length. The South Bay Task Force was established by the FAA to mitigate the impacts; however, the Task Force was dissolved without accomplishing this goal.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed impacts to surrounding communities and more distant areas to the extent such areas may be significantly impacted. Please see Response to Comment PC02130-2 regarding impacts to Rancho Palos Verdes.

**PC02132-2**

**Comment:**

2. How would the increased quantity of flights be accommodated in the fixed amount of LAX airspace that is already overloaded?

**Response:**

Please see Response to Comment PC00656-2 regarding the airspace capacity of the Master Plan alternatives. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

**PC02132-3**

**Comment:**

Please respond to my questions as soon as possible.

**Response:**

Responses to individual comments included in this comment letter are provided above.

**PC02133      Smith, Judith      P.A.N.I.C.      9/15/2001**

**PC02133-1**

**Comment:**

Arguments against expansion:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02133-2**

**Comment:**

1. Increased emissions means increased health hazards.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

**PC02133-3**

**Comment:**

2. Increased flights at low altitudes over the peninsula presents increased danger to the public.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02133-4**

**Comment:**

3. Increased congestion in and around the airport - snarling the already jammed streets.

**Response:**

Comment noted.

**PC02133-5**

**Comment:**

4. Devastating impact on surrounding communities i.e. enduring more jet noise, more respiratory ailments, and more erosion of quality of life.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, air quality in Section 4.6, Air Quality, traffic in Section 4.3, Surface Transportation, and human health in Section 4.24.1, Human Health Risk Assessment. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, and 14a of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, and S-9a of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts to quality of life, Topical Response TR-N-6 regarding noise increase, and Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects.

**PC02133-6**

**Comment:**

5. Strong impact on resale values - it must be stated that this area is now in a flight pattern. We have all paid premium prices to live in this area, as well as high property taxes and feel these additional flights are unfair to the masses, together with the additional hazards.

### **3. Comments and Responses**

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**Response:**

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

**PC02133-7**

**Comment:**

6. LAX cannot properly handle the air traffic now - there is no space for increased flights.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding airspace capacity and see Response to Comment PC00260-1 regarding physical and activity constraints.

**PC02133-8**

**Comment:**

7. Expansion of air traffic must be shared by other areas

**Response:**

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

**PC02133-9**

**Comment:**

To sum it up - expansion would exacerbate the already unacceptable public health, noise, environmental and quality of life problems that affect millions of people in this area.

There are many, many more arguments against expansion which I am certain others will set forth.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, and 14 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1, S-4, and S-9 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02134      Moradi, Roger      None Provided      9/5/2001**

**PC02134-1**

**Comment:**

My comments are about alternatives to Master-Plan. Instead of spending massive dollars to expand the airport (LAX) externally why not develop the airport internally. That is by blocking the private cars from entering LAX. This will allow you to use the parking Structure and surrounding areas to expand the terminals & runways. You can limit LAX access (to the horseshoe area) to only commercial vehicles. It would improve the traffic dramatically saving time = money. It will also relieve pressures from 405 north & south, 105 and 91 Fwys. It will help resolve the traffic pollution/congestion in the neighboring community. It will help grow the businesses such as parking lots, taxi, buses and shuttles. It will also save a lot of human time/hour spent on bringing relatives to or picking them up from LAX. It will allow major growth and expansion for LAX without massive expenditure. You can duplicate the same Plan in other regional airports at a fraction of the projected Costs. This idea is simple but it works, believe me I have 25 years experience in transportation to/from LAX.

**Response:**

Please see Response to Comment PC01454-1 regarding the Master Plan's project components. In addition, it should be noted that Alternative D would limit vehicle access to the Central Terminal Area to LAWA Flyaway buses and other vehicles that are cleared to drive on the secure airside of the airport, such as airport operations, police, and fire protection vehicles.

**PC02135      Allen, Margaret      None Provided      9/14/2001**

**PC02135-1**

**Comment:**

I hope that this is not too late to be considered. I have been quite ill and unable to get to this before now.

I am not someone who has recently moved to this area. I have lived within 5 miles of here since I was 2 yrs old, and there was no L.A.X. I feel that my objections should carry some weight. The noise here is absolutely ridiculous, only shown more so by the unfortunate tragedy in N.Y., and the grounding of all air traffic. I had forgotten what quiet was.

**Response:**

Comment noted.

**PC02135-2**

**Comment:**

My sleep is interrupted 4-6 times a night by your jets; which more often than not take off over Manchester Blvd. To see a jet cross to the ocean over Manchester or even Culver Blvd is not an unusual occurrence, even late at night, or especially at night.

**Response:**

Please see Subtopical Response TR-N-3.2 regarding early turns over areas north and south of LAX. In addition, please see Section 4.1, Noise, of the Supplement to the Draft EIS/EIR for information regarding single events and nighttime awakenings. When aircraft takeoff to the west, light aircraft are occasionally turned to the north to separate them from heavier aircraft that follow them, or during late night hours to separate them from landings that are approaching from over the ocean.

### **3. Comments and Responses**

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#### **PC02135-3**

**Comment:**

I have not had your windows installed as I spend long hrs outside during the day.

I have been in friends homes that have the windows and don't notice a great deal of difference, especially if one has windows open.

**Response:**

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels, Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels, and Topical Response TR-LU-3 for a description of the residential soundproofing program. To achieve the full benefits of this program, windows and doors need to be closed.

#### **PC02135-4**

**Comment:**

My Camillas and roses are covered with jet fuel at all times.

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

#### **PC02135-5**

**Comment:**

The traffic is horrific mornings and evenings. We don't need closer and more airport traffic from your ring road.

**Response:**

Comment noted.

#### **PC02135-6**

**Comment:**

I bought in P.D.R. for the then quality of life. Your airport has deminished that quality year by year.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

#### **PC02135-7**

**Comment:**

When jets land over your house your windows make no difference.

**Response:**

Please see Subtopical Response TR-LU-3.6 for an explanation of how the effectiveness of sound insulation is verified.



**PC02135-8**

**Comment:**

The expansion of L.A.X. with the accompanying traffic, Pollution and noise pollution will further impact my quality of life, I object, I was here before you were, the cost to my well being is too great.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendix D, Appendix G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02135-9**

**Comment:**

Expand to J. Wayne airport or some of your other airports - share the pollution. You have land in the Antelope Valley, build there.

**Response:**

Comment noted. Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix 6 and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02135-10**

**Comment:**

I realize that this is all about my feelings, but that is what private comments are for. Los Angeles does not need more revenue at the expense of its Citizens and their quality of life.

Pls excuse my scribbling but not my ranting!

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02135-11**

**Comment:**

P.S. The whole South Coast is impacted by L.A.X. What gives you the right!?

**Response:**

Comment noted.

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**PC02136 Booth, Mary None Provided 9/15/2001**

**PC02136-1**

**Comment:**

The master plan for LAX during this past 5 days when the FAA has closed and put in force more stringent plans for security in the country as a whole at its airports, seems to point to a more diverse plan for LAX.

Having more airports for our southern Calif area seems much wiser -- not to have all ones eggs in the same basket, so to speak.

With the occurrence at the Trade Towers on Sept 11 and the incident at the Pentagon on the same day, it seems to point to LAX as a statement that LAX needs to utilize other options to diversify air traffic. The five southern Calif counties need to come together and form safety plans and utilize under-used facilities, e.g. Ontario Airport, Palmdale Airport, and El Toro Airport.

**Response:**

Please see Response to Comments AL00051-93 and PC02131-5. Also, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02136-2**

**Comment:**

I am serving in Terminal-1 at LAX as a TRavelers aid every Saturday night. When I travel down (southbound) on Lincoln Blvd. the travel time has increased by 8 minutes just at Jefferson and Lincoln and Washington and Lincoln due to two enterprises: the Costco Store at Washington Blvd. and the Playa Vista building project at Jefferson Blvd. What will be the increment necessary to travel southbound on Lincoln Blvd. in the coming year I estimate to be another increase in time. It is becoming more and more congested on our surface streets in Santa Monica and Culver City and Westchester just to reach Terminal 1 at LAX.

**Response:**

Please see Subtopical Response TR-ST-4.1 regarding airport area traffic concerns. Also, the analysis shows that on Lincoln south of Jefferson, Alternative D (the staff-preferred alternative) would cause a significant impact, 1) during the morning peak hour in the northbound direction, where the level of service would be C without the project, and F with the project, 2) during the evening peak hour in the northbound direction, where the level of service would be E without the project and F with the project, and during the evening peak hour in the southbound direction, where the level of service would be B without the project and C with. However, the project would fully mitigate these impacts. Unfortunately, the intersection of Lincoln/Jefferson would be impacted by the project and no feasible mitigation measure was found to mitigate that impact.

**PC02136-3**

**Comment:**

Please look for further expansion at outlying airports and redefine the LAX MASTER PLAN to decrease traffic in the western part of Los Angeles County, particularly in those communities adjacent to the LAX north and south runways.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that

### 3. Comments and Responses

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of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR.

**PC02137      Bharadwa, Mina      Beach Cities Realty      9/19/2001**

**PC02137-1**

**Comment:**

Last week's terrorist attacks at World Trade Center should prove beyond doubt to the LAWA, that a Regional Solution is the correct way to go - does there have to be another tragedy e.g. earthquake which may make LAX inoperative for ?, before this point is brought home to the LAWA. LAX does need Modernization to overcome safety issues but not Expansion!

The City of Los Angeles owns two key airports - Ontario and Palmdale - which should be developed as opposed to LAX. El Toro should also be developed. Orange County needs to partner Los Angeles County (especially have another international airport in light of last week's terrorist attacks), rather than burden Los Angeles County with Orange County's need for air commerce.

**Response:**

Comment noted. Please see Response to Comments AL00051-93 and PC02131-5. Also, please refer to Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02137-2**

**Comment:**

When LAX had closed down for a few days last week, you could see the difference in the traffic. A lot of the traffic on our freeways is airport related. Currently 405 and 105 Freeways come to halt several times a day. The EIR/EIS do not have any mitigation measures for handling traffic on the freeways. What about construction traffic and cargo traffic? What mitigation measures are going to be taken - My suspicion would be NONE! Since traffic can't be mitigated without congesting our surface streets and the freeways.

**Response:**

Freeway impacts are discussed in the Congestion Management Program (CMP) analysis, which is included as section 6 of Technical Reports 3b and S-2b. Also, please see Topical Response TR-ST-4 regarding airport area traffic concerns, particularly Subtopical Response TR-ST-4.4 regarding I-405 impacts, and Topical Response TR-ST-3 regarding construction traffic.

**PC02137-3**

**Comment:**

LAX is already one of the region's single largest source of NOx emissions - the primary precursor to ozone. The EIS/EIS predicts that the increased ground and air traffic will result in increased emissions of all five EPA classified major air pollutants. This could affect the respiratory systems of some people and may cause cancer. How is the LAWA proposing to reduce pollution?

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**Response:**

The Supplement to the Draft EIS/EIR provided an enhanced discussion of air quality mitigation measures in Section 4.6.8 and in Appendix S-E Section 2.3. Please see Response to Comment AL00043-6 regarding LAX as a source of air pollution. Also, please see Topical Response TR-HRA-3 regarding human health impacts of toxic air contaminants.

**PC02137-4**

**Comment:**

Finally, I want an answer as to why the LAWA spent approximately sixty million dollars in preparing the EIR/EIS but zero dollars in notifying the surrounding communities regarding the Hearings.

**Response:**

A major component of the LAX Expansion EIS/EIR work program is public participation and outreach. LAWA has had press releases, newsletters, neighborhood info packets, public workshops, and a web site in order to communicate with neighbors and interested parties. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Also, please visit the web site, [www.laxmasterplan.org](http://www.laxmasterplan.org).

**PC02138**

**Bharadwa, Raj**

**None Provided**

**9/19/2001**

**PC02138-1**

**Comment:**

As a resident of Westchester, I am very concerned about traffic and pollution relating to the EIR/EIS.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02138-2**

**Comment:**

Traffic is horrible now - what will happen after the Expansion - we will not be able to leave Westchester - we will be prisoners in our own homes!

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

**PC02138-3**

**Comment:**

Pollution is affecting the health of the surrounding communities - what will happen when there is extra pollution because of increase in ground and air traffic.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR address air quality in Section 4.6, Air Quality, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E, and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR.

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In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-3 regarding air pollution increase, Topical Response TR-ST-4 regarding airport area traffic concerns and TR-ST-1 regarding cargo truck traffic.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated the potential risk of adverse health effects for each of the Master Plan Alternatives based on the emissions associated with each of the alternatives. The No Project/No Action Alternative assumes that no substantial changes are made to current LAX facilities, and is based on projections of growth in airport activity between 1996 and horizon year 2015. Airport congestion during this time is expected to grow worse without additional capital improvement. In all cases, build alternatives are expected to relieve current and predicted future congestion by making airport operations, particularly aircraft operations, more efficient.

After implementation of mitigation measures, the build alternatives would reduce predicted impacts to human health compared with the No Project/No Action Alternative. Implementation of any of the build alternatives is therefore anticipated to reduce future health impacts for most people living, working or going to school near the airport. However, as was indicated in the Supplement to the Draft EIS/EIR, predicted chronic non-cancer human health impacts for maximally exposed residents under Alternatives B and C are slightly higher for some areas than those predicted with the No Project/No Action Alternative. Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

#### PC02138-4

##### Comment:

Regional Solution is the answer. In case of any emergency when LAX may have to shut down - it will be wise to have another international/large airport close-by.

##### Response:

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

**PC02139**

**Smith, Lawrence**

**None Provided**

**9/8/2001**

#### PC02139-1

##### Comment:

Century Blvd.  
Synomous with airport  
What is it you've accomplished?  
What did you accomplish before?  
What is the fruit of your labor?  
What is a labor of love?  
Whats at stake?  
Century - Century City, Century 100 yrs

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What are your revenue figures based on?  
What are they coordinated with - If I loose my coordination what happens? If I'm uncoordinated what am I?  
What does ambiguity cause along with  
When a bird flys, is the bird ambiguous  
We all hope for a better future - if war breaks out who would coordinate your plan - a depression - computer - bathrooms - toilets hardware  
Century Blvd - Now that's a handful  
Hotels - Employment traffic - tourism - food  
Century freeway - whats the length of Century Blvd.? is that what determined if there could be a Century freeway or was it Imperial Highway? The news paper articles I've included are food for thought  
Are airplanes for mans conconveience or his destruction?  
And of course baseball & the - Dodger Blue.  
When you think of Century Blvd - you can imagine a whole lot

Sweet Dreams  
Good Luck  
May the winds of good fortune follow you

**Response:**

Comment noted.

**PC02139-2**

**Comment:**

To continue, more important than ever after the Attacks September 11, 2001 in New York is a concern with safty or being safe.

**Response:**

Comment noted.

**PC02139-3**

**Comment:**

To paraphrase Century Blvd. LAX 2015 plan synomonous with - whats notorious about each & what do they have in common with a can opener? I bought one that worked for a short time than failed to open cans the can opener was made to open. The can opener was bought at a Albertsons cost 2 or 3 dollars in Westchester on Lincoln Blvd., the can opener was made in China, By Bradshaw International Inc. Rancho Cucamonga, the same thing happened to a can opener purchased at the Marina Ralphs for 3 or 4 or 5 dollars worked for a short time than wouldn't open any cans - (Both can openers probably had warranties - return if not satisfied?

**Response:**

Comment noted.

**PC02140**

**Kokelaar, Pieter &  
Linda**

**None Provided**

**9/19/2001**

**PC02140-1**

**Comment:**

WE ARE FIRMLY OPPOSED TO ANY LAX EXPANSION.

**Response:**

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

**PC02140-2**

**Comment:**

WHILE WE RECOGNIZE THE NEED FOR EXPANDED GROUND FACILITIES TO ACCOMODATE THE INCREASING AMOUNT OF AIR TRAFFIC, WE BELIEVE A REGIONAL APPROACH TO THIS PROBLEM IS PREFERABLE. TRAFFIC CONGESTION, AIR POLUTION, POPULATION DENSITY, AIR AND GROUND SAFETY CONSIDERATIONS ALL DEMAND A REGIONAL SOLUTION.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality impacts in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G and Technical Reports 2, 3 and 4 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. Also lease see Topical Response TR-SAF-1 regarding aviation safety.

**PC02141**      **Ovalle, Jr., Ernest**      **None Provided**      **9/20/2001**

**PC02141-1**

**Comment:**

I THINK THE EXPANSION SUCKS! I WORKED HARD TO GET MY HOUSE AND I DON'T WANT TO LOSE IT.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. Alternative D does not include any residential acquisition.

**PC02141-2**

**Comment:**

EL TORO AND PALMDALE AIRPORTS SHOUD BE USED INSTEAD.

**Response:**

Comment noted. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

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**PC02142      Lindsay, Kent      None Provided      9/19/2001**

**PC02142-1**

**Comment:**

I am a Westchester home owner who is totally opposed to the LAX Expansion. In the wake of the World Trade Center tragedy, it is unthinkable that anyone in their right mind could still be thinking that going ahead to make LAX even more of a target for terrorism than it already is, is a good idea. The obvious problems of increased smog and congestion seem secondary now to this new and very real threat. DON'T DO IT!

**Response:**

Comment noted. Please see Response to Comment PC00051-93. Subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - would provide enhanced security and would be consistent with the policy framework of the SCAG 2001 Regional Transportation Plan, which proposes no expansion of LAX, and no relocation of residences. Instead, Alternative D would shift the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D.

**PC02143      Lund, Ph.D., P.E.,      None Provided      9/20/2001**  
**Russell**

**PC02143-1**

**Comment:**

While expansion of air transportation facilities must accompany population growth and economic development, plans for LAX expansion as described in the Draft EIS/EIR (including the LAWA preferred Alternative C) are ill-conceived and based on faulty premises. In this letter, I address fundamental inadequacies of proposals, as well as citing flaws that will directly adversely impact my family and my neighborhood.

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02143-2**

**Comment:**

LAWA'S ESSENTIAL MISTAKE The Draft EIS/EIR opens with an inaccurate premise that "urban airports [such as LAX] are, by definition, located efficiently and conveniently close to the highly concentrated populations they serve" (page ES-1, emphasis added). While it is true that LAX is located relatively close to the geographic center of the five-county region as illustrated in the figure on page ES-4, it cannot be said that surface transportation provides either efficiency or convenience in reaching LAX. According to a recent editorial in the Los Angeles Times\*, "a national study recently crowned Los Angeles the most congested city in America." Because of roadway congestion, travel to the LAX area is routinely slow (see page 4 of this letter). Continued development and growth (e.g. the Playa Vista development and proposed LAX expansion) will only add to congestion and increase travel time to LAX.

\*July 16, 2001, page B10

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in



Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Also please see Topical Response TR-ST-4 regarding airport area traffic concerns.

#### PC02143-3

**Comment:**

To be efficient and convenient, air transportation facilities must not only be located relatively close to population and business centers, but must be easily accessible. The proposed LAX expansion plan does not offer any significant surface transportation improvement apart from the immediate airport vicinity. In contrast, development of regional airports not only reduces average travel distances from the most populated areas of the five county region, these locations provide increased efficiency and convenience through better highway access.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR.

#### PC02143-4

**Comment:**

The map above was taken from page ES-4 of the Draft EIS/EIR, with existing and potential regional airports added. It presents a markedly different picture than that suggested by LAWA. The notion that LAX is more "efficiently and conveniently close" than Ontario for a trucker hauling manufactured goods from Brea or chemicals from Pico Rivera is absurd. No one at all familiar with traffic patterns on the 405 freeway can honestly contend that a business person in Newport Beach can reach LAX efficiently or conveniently during normal commute times, but if properly developed John Wayne or El Toro would be easily accessed.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

#### PC02143-5

**Comment:**

It is perhaps inappropriate to expect a parochial group such as LAWA to develop plans for correcting an air transportation growth problem that begs for a regional solution. Until recently, under the leadership of new Los Angeles Mayor Hahn, LAWA did not demonstrate any desire to foster growth at the two other airports under its control. In a July radio appearance, an Ontario city councilperson decried LAWA's failure to fulfill promises to lobby, advertise, or otherwise promote increased use of the Ontario Airport. LAWA has no real power with other regional airport facilities, and apart from very localized improvements, is impotent with regard to essential ground transportation infrastructure. LAWA's

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resources would be better used in developing Palmdale and Ontario, and in lobbying airlines and officials in Washington to encourage and require better use of these facilities.

**Response:**

Comment noted. Please refer to Response to Comment PC02143-3. Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02143-6**

**Comment:**

THE FALLACY of PROJECTED DEMAND

One of three stated objectives of the master plan is to respond to increased local and regional demand for air transportation (page ES-6). The Draft EIS/EIR speaks frequently of "projected" and "predicted" demand. This is evidently derived from SCAG RTP economic and regional aviation "projections", massaged via the RADAM.

These and similar projections have long been subject to question. Many books have been written addressing difficulties in accurately predicting economic trends. Shifting from economic forecasts to aviation demand estimates only increases uncertainty in the confidence of any projections.

Airline profits declined in 2000 relative to the preceding three years due to a decline in business travel associated with a slowing economy\*. By the third quarter of 2001, economic indicators were approaching the technical definition of an economic recession. Business traffic in 2001, as of August, had reportedly declined 15% to 20% relative to 2000\*. In August, projected passenger loads for 2001 were lower than actual 2000 loads. The predicted summer air transportation crunch never occurred. All these observations stand in marked contrast to the sharp increase in both demand and the rate of increase in demand plotted on page ES-3 of the Draft EIS/EIR.

Of course, the reliability of all projections was destroyed by the horrific terrorist attacks of September 9, 2001. No one knows what effects the attacks, and potential responses worldwide, will have on national or global economies. It does seem certain, however, that aviation demand will be decreased, at least in the short term. Major carriers (United, Delta, American, Continental, Northwest, US Airways, and America West) have all announced reductions in flight service of about 20%§.

There is no question that one of three main underpinnings of the "need" for airport expansion, namely sharply increased demand over the next 15 years, simply cannot be supported. These arguments also apply in part to the claimed need to expand in order to maintain the so-called international commercial gateway role of the City of Los Angeles.

\*LA Times, August 15, 2001, page C1.

§LA Times, September 17, 2001 page C1, and September 18, 2001 page C1.

**Response:**

The aviation demand projections used in the development of the Master Plan alternatives were developed using proven and accepted models and assumptions, and are based on long-term trends and data. Periodic upturns and downturns in aviation activity such as those cited in the comment are not unusual, and do not substantially detract from the validity of the projections and their usefulness in the planning of future improvements to major airports. Additional information regarding periodic influences on aviation activity such as the nationwide impact of the events of September 11, 2001 and the recent economic recession is provided in Section 2.3 of Appendix S-B of the Supplement to the Draft EIS/EIR.

**PC02143-7**

**Comment:**

FREEWAY ACCESS to LAX

To be useful, travelers and shippers must have convenient access to airport facilities. For most people in Southern California, this means freeway driving. The Draft EIS/EIR, the LAX Master Plan, and literature produced by LAWA try to suggest that components included in the master plan will improve off-airport traffic. Apart from potential minor improvements in the immediate airport vicinity, principally the proposed LAX Expressway, this suggestion is patently false.

According to the LAX Master Plan, during rush hours the four major freeways on the Westside already operate at or below the poorest level of service included in the rating scheme (November 7, 2000 draft, page i-2.9). A national study identified Los Angeles as the most congested city in the nation, and found that residents spend an average of 56 hours per year in traffic\*\*. Increase in LAX activity will further contribute to this already bad situation. An increase of passenger load by some 50% (as predicted by LAWA) can only worsen problems on already overloaded Westside freeways. Even if congestion on the 405 freeway were somehow ameliorated on the six-mile segment between Rosecrans and the Marina Freeway as suggested in the Draft EIS/EIR++ (page ES-24), travelers outside this small area will be confronted by increased congestion and increased travel time. After all, most travelers must use the freeway system to reach the 405 between Rosecrans and the Marina Freeway. Any local improvement in traffic flow that is associated with increase in freeway loads outside the local area will slow travel overall.

A study sponsored by LAWA found that LAX-related traffic on the 405 freeway during rush hours constitutes "only" 3% in the morning and 9.7% in late afternoon#. The Los Angeles Board of Airport Commissioners president used this finding to suggest that airport traffic does not cause 405 freeway rush hour delays, presumably because the percentages are relatively small. However, LAWA's own draft Master Plan states that the 405 freeway operates below the level of service at which "small increases in volume could cause substantial delays" (November 7, 2000 draft, page i-2.8 and i-2.9). It is clear then that if LAX expansion takes place, the concomitant "small" increase in traffic (e.g. 1.5%-4.9%, 50% increases) will be sufficient to cause "substantial delays".

For many passengers using LAX, accessibility is not presently controlled by time spent in the immediate airport vicinity, but by time spent on freeways reaching Westchester. In August 2001, on a weekday at 6 PM, a trip from Van Nuys to Westchester, entirely on the 405 freeway, took 47 minutes to travel 16 miles. In June, air passengers driving from Santa Clarita allowed more than three times the normal driving time to reach LAX. They did not encounter any accidents or incidents during this rush hour trip, but after three hours on the road missed their flight. A Sunday trip from Agoura Hills to Westchester, a distance of some 32 miles, took 1 1/2 hours (i.e. an average speed of just over 20 MPH).

Many more such anecdotal experiences could be provided. In themselves, these experiences may not provide convincing proof of the inadequacy of existing freeway access to LAX, or of the falsity of suggestions that the master plan will improve overall conditions of access to LAX. However, they clearly point out an important flaw in LAWA's reasoning regarding traffic and "convenient access" to LAX. Travelers cannot base plans for driving to LAX on average travel times. Since our freeways are already so unstable that small increases in flow or minor incidents can result in tremendous delays, travelers must always plan for the worst case. Thus it is pointless for LAWA to claim that proposed local changes might reduce average travel time. The bottlenecks outside the local area, which can tremendously increase travel time, will still exist. This again illustrates the need to develop regional airport solutions, so passengers are not faced with long freeway commutes.

\*\* Los Angeles Times, July 16, 2001 page B10, and June 17, 2001 page M6

++ It is difficult to envision, for example, how a new ramp located in the vicinity of Arbor Vitae can help reduce southbound 405 traffic over the distance from the Marina Freeway to the proposed ramp.

# The Argonaut, June 2001

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-4 regarding airport area traffic concerns, particularly Subtopical Response TR-ST-4.1. Please note that the FHWA has withdrawn its support for a half interchange at Arbor Vitae, and that the proposed half interchange is not

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part of the LAX Master Plan. FHWA policy is to only consider full proposed interchange, not partial ones. While on any given day, proposed local changes may not help reduce average travel times, these times would be reduced when averaged over the course of time.

#### PC02143-8

**Comment:**

Freeway congestion will increase with time. Playa Vista developers have indicated that Phase 1 alone will increase 405 traffic by 3% to 4%. As noted above, LAWA's own data show that small increases will have inordinately large detrimental effects on traffic flow. LAX must not expand and further contribute to this worsening situation.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns, particularly Subtopical Response TR-ST-4.1, for more information.

#### PC02143-9

**Comment:**

MISLEADING "INTERNATIONAL GATEWAY" ARGUMENT

LAWA argues that the "international gateway" role of LAX benefits the region. To the extent that this service is merely one of providing connecting flights for passengers and transfer sites for cargo, it is difficult to see the direct financial benefit apart from landing fees and a relatively small number of airport-related jobs. This limited "benefit" does not justify proposed expansion; the important role of LAX and other regional airports is and should be to serve resident passengers and local business.

LAWA goes beyond the claim that the international gateway role is of regional benefit to make specious arguments that our region risks losing "billions of dollars" to other cities like San Francisco, Denver, and Seattle\*\* if expansion does not occur. San Francisco's airport is already overloaded. The high altitude of Denver limits aircraft loads, effectively increasing airfreight costs. Seattle is remote from an industrial base such as exists in Southern California, and lacks an extensive network of interstate highway connections. These other airports have their own problems, and international air transport would have shifted long before now if they were considered advantageous.

\*\*\* Draft EIS/EIR page ES-5, LAX Master Plan Draft EIS/EIR Questions & Answers Q26

**Response:**

Comment noted.

#### PC02143-10

**Comment:**

The MYSTERY of PASSENGER vs. FLIGHTS INCREASE for ALTERNATIVE C

The LAX Master Plan Draft EIS/EIR Questions & Answers document provides a succinct summary of the Alternative C mystery, without giving a satisfactory solution. Item Q9 forecasts an increase in passenger demand of 53%. In other words, for every two passengers in 1999, LAWA predicts a demand of three passengers by 2015. Furthermore, LAWA predicts a doubling of the amount of cargo handled (Q37). Here's the mystery: LAWA claims these huge increases will be accommodated by only a 4% increase in the number of daily flights!

How will this happen? The draft documents do speak of airline shifts to larger aircraft. However, by law choice of aircraft is left to individual carriers. LAX currently has no ability to require airlines to use fewer but larger aircraft. There have been ongoing efforts in San Francisco to encourage or force airlines to schedule fewer commuter flights using larger aircraft, without notable success.

The present economy will not foster expansion of airline fleets to larger aircraft. Indeed, the world's largest manufacturer of commercial aircraft recently announced plans to cut 30,000 jobs by the end of 2002\*\*\*. This is in response to an anticipated drop of up to 26% in orders over the next year. There is no sign that struggling airlines will invest in larger aircraft as envisioned by LAWA.

\*\*\*LA Times September 19, 2001, page A1

**Response:**

The Master Plan does not assume that airport management or local or Federal governments would cap activity or in any other way constrain activity at LAX. Rather, the aviation activity profiles were tailored to match the capacity of each alternative and are based on the anticipated air service adjustments that are likely to occur over time in response to the capacity constraints. The predicted air service changes are reasonable assumptions because they are based on historical observation and aviation industry trends. The Master Plan acknowledges that these air service and activity levels are dependent on the collective decisions of the airlines and the predicted adjustments may not be fully realized. For example, if the airlines do not choose to reduce commuter service, the average aircraft size would be smaller and fewer passengers could be served with Alternative C than is predicted in the Master Plan (although operations levels would be similar). Please also see Response to Comment PC00593-1 for a discussion of the development of the aircraft and passenger activity profiles for 2015 Alternative C.

The present economy downturn does not encourage larger aircraft airline fleets in the near term. However, the economy is expected to recover and the aviation activity is expected to once again increase, based on recoveries seen after downturns in previous years. The assumption of the increase in aircraft fleet is consistent with historical trends and the increase is forecast to happen gradually over time.

Alternative D was developed in 2001 as a Master Plan alternative that would be consistent with the Southern California Association of Governments Regional Transportation Plan (SCAG RTP) and also meet new safety and security standards at LAX. Alternative D would be designed to serve approximately 78 MAP, which is similar to the activity level identified in the scenario adopted by SCAG for LAX. For a discussion of SCAG's role in the LAX Master Planning Process please see Topical Response TR-MP-2. For the activity levels and air service assumptions associated with Alternative D please Chapter 3, Section 3 of the Draft LAX Master Plan Addendum.

**PC02143-11**

**Comment:**

I estimate that LAX currently handles well over 2000 flight operations daily, nearly 100 flights per hour if spread over the entire day. According to the FAA, of all national airports, LAX has the dubious distinction of having had the highest number of serious near-collisions during the period of 1997-2000. LAWA hopes to expand capacity with only a small increase in flights. If, as seems more likely, the predicted usage increase results in a significantly increased number of flights, an already dangerous situation will worsen. LAWA should devote itself to lobbying at the federal level for legislation to allow LAWA to control and limit the number of flights at LAX to a safe and sane level. It is misguided to propose building more terminals with the same limited number of runways and with minor changes in configuration of taxiways. With more gates available, airlines may increase the number of flights, and these flights will be forced to use the already crowded and potentially dangerous runways.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 for further discussion regarding aviation safety.

**PC02143-12**

**Comment:**

I've been a resident homeowner in Westchester for 20 years. The airport is among my neighbors. I'm not forced to live here, and philosophically don't believe I have any special "right" to block airport expansion. Nonetheless, I want to close this letter by describing some of the damage I feel would result from the proposed expansion.

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**Response:**

Comment noted. Please see Responses to Comments below. Also, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02143-13**

**Comment:**

Under Alternative C, the North runway will be relocated a few hundred feet closer to my home. We live far enough north to be outside current and projected 65 dB CNEL contours. I have not studied this issue, so don't know the definition or significance of CNEL, but can affirm that on occasion airport noise is intrusive outside the contour. The time average noise level is not excessive, but there are isolated periods from day to day when noise reaches disruptive levels. For example, some evenings and nights we cannot continuously hear television without setting the volume at an uncomfortably high level. If the runway is moved closer, the noise level will increase.

**Response:**

Please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. See also Topical Response TR-LU-4 regarding outdoor noise levels and Subtopical Response TR-N-6.1 regarding existing and future high noise levels.

As stated by the commentor, under Alternative C Runway 6L/24R on the north airfield would be moved 340 feet north. Section 4.2, Land Use, of the Draft EIS/EIR, presents 65 CNEL contours under 1996 baseline conditions and projected for Alternative C 2015 on Figures 4.2-5 and 4.2-21, respectively. Figure S4.2-1 in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, shows the 65 CNEL noise contours for Year 2000 conditions. A comparison of the 65 CNEL contour under Alternative C to Year 2000 conditions is shown on Figure S8 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR. Alternative C would shift the 65 CNEL noise contour further north, resulting in some noise-sensitive uses being newly exposed to high noise levels, when compared to the 1996 baseline and Year 2000 conditions. However, as stated by the commentor, the subject property would be outside both existing and projected 65 CNEL noise contours. As defined in Section 4.1, Noise, of the Draft EIS/EIR, CNEL (Community Noise Equivalent Level) is the average sound level and considers both the loudness and duration of noise exposure. The 65 CNEL noise contour is the threshold stated in federal and State law for determining land use compatibility. In general, land uses for most types of noise-sensitive uses are considered incompatible when they are within the 65 CNEL noise contour. Noise-sensitive residential uses within the 65 CNEL contour or greater are eligible for residential sound insulation under the aircraft noise mitigation program (ANMP) as further described in Topical Response TR-LU-3.

Regarding the concern over noise levels outside the current and projected 65 dB CNEL contours, increased noise levels during isolated periods, or single event noise levels were presented in the Draft EIS/EIR as detailed in Tables A5-6, A5-7, A5-8, and A5-9 in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR provide an analysis of single event noise levels that result in nighttime awakening (as defined by the 94 dBA SEL noise contour) for Alternatives A, B, and C and an analysis of 65 CNEL noise levels and 94 dBA SEL noise levels for a new LAWA Staff preferred Alternative D. As shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, the subject property is outside of the 94 dBA SEL under 1996 baseline and Year 2000 conditions. As shown on Figures S4.2-14 of the Supplement to the Draft EIS/EIR and S9 in the Supplemental Land Use Technical Report, the subject property would not be exposed to significant single event noise levels under Alternative C. As described in Section 3.3.2 of the Supplement to the Draft EIS/EIR, under Alternative D Runway 6L/24R would maintain its same location and would be extended 1,495 feet to the west. As shown on Figure S4.2-16 of the Supplement to the Draft EIS/EIR and Figure S10 of the Supplemental Land Use Technical Report, the subject property would not be exposed to the 65 CNEL under Alternative D. The subject property would also not be exposed to significant single event noise levels under Alternative D, as also shown on Figure S4.2-18 of the Supplement to the Draft EIS/EIR and Figure S11 of the Supplemental Land Use Technical Report. As stated in Section 4.2.8 of the Supplement to the Draft EIS/EIR, under mitigation measure MM-LU-2 residential uses newly exposed to significant single event noise levels that result in

nighttime awakening, as a result of development of the LAX Master Plan, would be incorporated into the ANMP.

#### PC02143-14

**Comment:**

Proposed LAX expansion will cause the destruction of buildings where I have been doing business for many years. A neighborhood library will be torn down, schools will have to be moved or closed. Leased space of a new, hugely successful college-preparatory high school, servicing a largely Latino community, will be destroyed+++. These are not desirable changes.

+++ LA Times June 25, 2001, page B1

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed land acquisition for each of the alternatives in Chapter 3, Section 4.2, Land Use (subsection 4.2.6) and Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns. Please see Topical Responses TR-LU-1 regarding overall acquisition effects on communities and TR-LU-2 concerning impacts within the Community of Westchester. Also note, as was described in Section 4.2, Land Use (subsection 4.2.6.5) of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District. As described in Sections 4.26.4, Libraries, and 4.27, Schools, there would be no significant impacts due to acquisition on libraries or public schools under the proposed Master Plan alternatives. As was presented in Section 4.26.4, Libraries, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the Westchester Branch Library has been acquired and relocated under a separate program. As was described in Section 4.27, Schools, of the Draft EIS/EIR, acquisition of the 98th Street school within Manchester Square would also occur under a separate program and independent of the LAX Master Plan. As described in Response to Comment PC00267-3 and Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the Westchester Neighborhood School (a private school) and CPR Training School would be acquired under the Master Plan alternatives. Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed LAWA's programs for the acquisition and relocation of residences and business properties. Also, please see Topical Response TR-RBR-1 regarding residential acquisition and relocation.

#### PC02143-15

**Comment:**

The draft plan claims that impacts on businesses will be "less than significant" (Draft EIS/EIR page 4-369). How can this be assured? I recognize that existing law may require compensation and relocation assistance, but this in no way guarantees that small businesses I've dealt with for years, who lease office space, will be able or willing to relocate in Westchester. There is already a shortage of space (acknowledged in the draft plan, page 4-371), and I see no real signs of the development promised in the empty space north of the airport. Owners and landlords might be satisfied and adequately compensated, but I doubt small business owners could be.

**Response:**

To clarify, as was detailed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.9), of the Draft EIS/EIR, business relocation impacts associated with Master Plan Alternative A would be less than significant after mitigation; impacts under Alternative B would be significant and unavoidable for light industrial uses, including air freight, as well as hotel uses; and under Alternative C, impacts would be significant and unavoidable for air freight uses only. The identification of significant impacts is not based merely on compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and its implementing regulations (collectively referred to as the Uniform Act), since compliance is required for all Master Plan relocation activities. Rather, the analysis assumed that an impact would occur if the acquired uses cannot be relocated on airport-owned property in a timely manner, as indicated in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.2), of the Draft EIS/EIR. Generally, a hardship would occur when businesses that are

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dependent on proximity to LAX are displaced and would have no readily available relocation site near the airport.

Subsequent to publication of the Draft EIS/EIR, a fourth Master Plan build alternative, Alternative D - Enhanced Safety and Security Plan, was proposed and evaluated in the Supplement to the Draft EIS/EIR. Alternative D involves the acquisition of far fewer businesses than the other build alternatives and the associated impacts could be fully mitigated. Please see Response to Comment PC00013-5 regarding collateral development at LAX Northside/Westchester Southside, which is proposed as part of the Master Plan. Also refer to Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

#### **PC02143-16**

**Comment:**

The plan acknowledges "significant unavoidable impact due to insufficient relocation space for air freight uses", yet expansion in LAX cargo handling is anticipated. It makes no sense to pump more freight traffic into the LAX area, both on the ground and in the air, while at the same time eliminating facilities (including many small businesses) for dealing with it.

**Response:**

Each of the Master Plan alternatives involves the development of new and upgraded cargo space at LAX in order to accommodate projected increases in cargo processing. As was discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR, Alternatives B and C would have additional cargo building space available at the airport to accommodate some of acquired air freight uses. While there are no opportunities to relocate air freight uses onto the airport under Alternative A, considering the critical relationship between these uses and the cargo operations on the airport, it is realistic to assume that the vacant Manchester Square area, purchased under the independent Aircraft Noise Mitigation Program, would be redeveloped as an independent project that would provide relocation opportunities for airport-dependent uses, as provided in Master Plan Commitment RBR-1, Residential and Business Relocation Program (Alternatives A, B, C, and D). It should also be noted that Alternative D, which was evaluated in the Supplement to the Draft EIS/EIR, would limit cargo processing to a level similar to that associated with the No Action/No Project Alternative, and therefore, would generate fewer related impacts than the other build alternatives.

#### **PC02143-17**

**Comment:**

As population grows, and specifically as population density increases, the quality of life goes down. More and more communities are taking steps to control growth and preserve existing lifestyles.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

#### **PC02143-18**

**Comment:**

I've attended meetings and had discussion with neighbors who have lived in Westchester much longer than I. I've repeatedly heard that historically LAX has expanded into surrounding neighborhoods with promises that expansion will be capped. Those promises have not been kept.

**Response:**

Comment noted. Please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.



**PC02143-19**

**Comment:**

At some time, expansion of LAX must be stopped, and to best preserve our community that time is now. As I've described in previous sections of this letter, LAX expansion is inappropriate from a regional perspective. LAWA should also consider the detrimental effects LAX expansion will have on its neighbors.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed land use impacts in Section 4.2, Land Use, with supporting technical data and analyses provided in Technical Report 1 of the Draft EIS/EIR and Technical Report S-1 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02144**

**Evans, Thomas &  
Erna**

**None Provided**

**9/3/2001**

**PC02144-1**

**Comment:**

With regard to the voluminous expansion master plan and environmental reports which the public had a very short amount of time to inspect considering the length thereof, the following are specific areas of concern to us and questions and comments to which we would appreciate a reply:

**Response:**

Comment noted. Please see Responses to Comments below. Also, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02144-2**

**Comment:**

1. What tests and studies have been done on the current levels of jet fuel emissions and related toxins as to: a) levels; b) impact on area residents; c) impact on area properties; and what are the results of those tests/studies. Please include all data on any impact to health issues.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR each provide a discussion of toxic air pollutants and related human health risks associated with the LAX Master Plan in Section 4.24.1.

In 1998, the South Coast Air Quality Management District (SCAQMD) initiated the Multiple Air Toxics Exposure Study (MATES-II). Described as a "landmark urban toxics monitoring and evaluation study," the MATES-II study was conducted to quantify the current magnitude of population exposure to existing sources of selected toxic air contaminants within the South Coast Air Basin (Basin). One of the primary findings of the MATES-II study was that on-road mobile sources (cars and trucks) account for approximately 54 percent of the toxicity-weighted emissions associated with air toxics in the Basin. Off-road mobile sources (trains, ships, aircraft and associated ground support equipment, construction and farm equipment, etc.) account for approximately 39 percent of the toxicity-weighted emissions associated with air toxics in the Basin. (By comparison, the 2003 AQMP estimates that in 1997, the year following the environmental baseline used for the LAX Master Plan Draft EIS/EIR, all on-road vehicles in the South Coast Air Basin contributed approximately 48 percent of the basinwide VOC emissions, 84 percent of the basinwide CO emissions, 66 percent of the basinwide NOx emissions, and

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6.5 percent of the basinwide PM10 emissions, whereas all off-road vehicles in the South Coast Air Basin contributed approximately 15 percent of the basinwide VOC emissions, 14 percent of the basinwide CO emissions, 24 percent of the basinwide NOx emissions, and 6.7 percent of the basinwide PM10 emissions.) Diesel particulate matter is the substance that accounts for the majority of the human health risk attributable to air toxics emissions in the Basin.

The MATES-II study included microscale seasonal air toxics monitoring at SCAQMD's Hawthorne monitoring station. This station is located near LAX, approximately 2.4 miles from the LAX Theme Building. (Criteria pollutant monitoring data from the Hawthorne monitoring station was used in the Draft EIS/EIR to establish the environmental baseline in the vicinity of LAX; see Response to Comment PC00070-1.) The monitored data indicated that air toxics concentrations at Hawthorne tended to be similar to or slightly lower than the Basin-wide average concentrations. As a microscale monitoring station under the MATES-II study, data was only collected over a four- to six-week period during each of the four seasons. The fixed-site stations in the study included periodic sampling over an entire year.

During the summer of 1999, SCAQMD conducted a short-term air toxics monitoring program in the area around LAX. The results of that short-term study indicated that air toxics levels in the neighborhoods surrounding LAX were consistent with those found elsewhere in the Basin. However, this SCAQMD study was limited in extent and duration and did not provide data that could be used to determine either long-term impacts or LAX's contribution to toxic air pollutants. In addition to LAX, sources of toxic air pollutants within the vicinity include three major freeways, several heavily traveled major arterial routes, and numerous industrial facilities including the Chevron El Segundo refinery, the Hyperion Wastewater Treatment Plant, the LADWP Scattergood Generating Station, and the SCE El Segundo Generating Station.

#### **PC02144-3**

##### **Comment:**

2. What tests and studies have been done on the future levels (based on the proposed expansion figures) of jet fuel emissions and related toxins as to: a) levels; b) impact on area residents; c) impact on area properties; and what are the results of those tests/studies. Please include all data on any impact to health issues.

##### **Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed human health risks in Section 4.24.1. Also, please see Topical Response TR-HRA-3 regarding human health impacts of toxic air contaminants.

#### **PC02144-4**

##### **Comment:**

3. With regard to items 1 and 2, above, what studies have been done on the cost of repair/maintenance to area homes to periodically remove the heavy black soot residue from jet fuel emissions which blacken area homes. Statistics are requested for current levels and for estimated future levels based on expansion figures.

##### **Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping near LAX. There are no known additional studies done about the cost of repair/maintenance to homes due to jet exhaust fall out. Soot levels associated with future-year operational levels at LAX are not possible to compute.

#### **PC02144-5**

##### **Comment:**

4. What tests and studies have been done on the future levels (based on the proposed expansion figures) of increased noise effects on individuals living in surrounding areas. Specifically, does the decibel figure increase with the increased number of flights, based on frequency? Or does the decibel

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figure only represent the levels of individual aircraft flying overhead? If noise levels can actually be reduced due to the use of quieter aircraft, what studies/tests have been done regarding increased frequency of noise pollution on area residents; and specifically what data is available on any impact to health issues of area residents caused by the additional frequency of flight noise. Also, what data is available with respect to current noise levels as they affect the health and well-being of area residents?

**Response:**

Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR provided the results of aircraft noise modeling conducted to evaluate the noise impacts of existing operations at LAX and future operations under each of the proposed alternatives. The modeling was completed in accordance with FAA requirements and includes analysis of daily noise levels, which represents the energy average of noise events occurring over a 24-hour period with "penalties" assigned to events occurring in the evening and nighttime hours, and of single-event noise levels as may result in nighttime awakenings or disruption of school learning activities. The analysis takes into account the phasing out of noisier aircraft, referred to as Stage 2 aircraft, and accompanying replacement with quieter Stage 3 aircraft as mandated by the Airport Noise and Capacity Act (ANCA) of 1990. Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR described the general nature and extent of studies pertaining to the health effect of noise, including studies conducted at major airports. As described therein, there is consensus that noise has some health effects; however, there is no agreement as to the degree of the effects or the level at which they become significant. Also please refer to Topical Response TR-N-2 regarding differences between the single event noise levels and cumulative noise levels.

**PC02144-6**

**Comment:**

5. What impact will the additional cargo figures cause to the surrounding areas in terms of pollution and traffic from the delivery trucks for said cargo and the frequency of cargo flights.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts, including emissions from traffic, in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02144-7**

**Comment:**

6. With regard to your estimates of increased pollution caused by the proposed expansion, what effects can be expected on the health and well-being of area residents?

**Response:**

This comment is essentially the same as comment PC02138-3. Please refer to Response to Comment PC02138-3.

**PC02145**

**Lindsay, Cathy**

**None Provided**

**9/20/2001**

**PC02145-1**

**Comment:**

One of my greatest concerns about the LAX expansion is how the Arbor Vitae Expressway will affect my immediate neighborhood, which is located at Thornburn and La Cienega. In January 1972, the airport forced my family out of our neighborhood, which was where the "old" La Tijera dead-ended at Hastings Avenue. When my husband and I got married, we specifically bought in an area of Westchester far enough away from the airport that our home would not be threatened again - or so we thought. Now we're looking at plans that would put this expressway right at the end of our street!!!

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**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and residential and business relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. Supporting technical data and analyses are provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. As discussed in TR-LU-2, Alternative D does not include any residential acquisition or acquisition within the Westchester business district. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway.

**PC02145-2**

**Comment:**

To make matters worse, I spoke with a former director of the Department of Transportation, who told me most of the plans we're seeing now were drawn up 20 years ago - and quite a few of them were in the works 50 years ago. I am appalled to think the airport had this in mind before we even bought our house in 1982. Had WE known that, we never would have moved here.

**Response:**

Chapter 3 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR described the process used in developing, evaluating, refining, and selecting the five alternatives currently being considered for the LAX Master Plan. As described therein, that process began in fall 1995.

**PC02145-3**

**Comment:**

There are many second-generation Westchester residents like myself, who have borne more than their share of the burden for LAX.

With other communities and airports eager for increased business, I think we need to look toward a more regional solution.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02145-4**

**Comment:**

I also have serious concerns about the vastly-increased pollution (not to mention traffic!) we'll be living with, as a result of the increased air and ground traffic (on the Expressway, in particular). The long-term ramifications to our health may not be known for decades, and I can't imagine any of you would want to place your own families at that kind of risk.

**Response:**

This comment is essentially the same as comment PC02138-3. Please refer to Response to Comment PC02138-3.

**PC02145-5**

**Comment:**

We are not obstacles to be moved. We are people like you, with families and communities that we have very strong ties to. Please do not destroy our neighborhood AGAIN.

**Response:**

Comment noted. Please see Response to Comment PC02145-1 above.

**PC02146      Scott, Douglas      None Provided**

**PC02146-1**

**Comment:**

Please oppose the LAX expansion plan.

**Response:**

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

**PC02146-2**

**Comment:**

Traffic in the LAX area is gridlocked during all daylight hours. One always comes to a complete stop on the 405 Freeway at LAX. This is a potentially disastrous situation. Expanding the airport and further exasperating this problem is unconscionable

**Response:**

Comment noted.

**PC02146-3**

**Comment:**

The airspace around LAX is also congested and the traffic is spreading to a larger and larger area. Besides the noise and the psychological impact of low flying planes over densely populated areas, exhaust pollution rains down constantly.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, and human health and safety in 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety and Topical Response TR-AQ-1 regarding air pollutant deposition.

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**PC02146-4**

**Comment:**

In the last several years the aircraft pattern has expanded to include the entire South Bay and calls to the FAA would confirm this fact. Now there is a strict denial that the take off routes have ever changed but those of us who live in this area know what they see and hear coming out of LAX.

**Response:**

Please see Topical Response TR-N-3 regarding aircraft flight procedures.

**PC02146-5**

**Comment:**

The black exhaust dust that we find each morning on our cars and children's toys comes from these planes. The Marina Del Rey is notorious for this exhaust material and now as more planes are squeezed into LAX the affected area is expanding without any environmental or health concern.

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

**PC02146-6**

**Comment:**

Please stop LAX expansion and restrict flight patterns to the corridor where flights currently land.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-N-3 regarding aircraft flight procedures.

**PC02146-7**

**Comment:**

Regional airports are in the best interest of business and people.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02147**

**Webb, Dr. & Mrs.  
Charles**

**None Provided**

**9/19/2001**

**PC02147-1**

**Comment:**

It is obvious to Mayor Hahn that the only long range solution to the passenger and cargo problems is the development and expansion of the Palmdale and Ontario airports

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**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Also, please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02147-2**

**Comment:**

plus a viable rapid transport system to augment Palmdale and Ontario. Even Ruth Galanter says she understands and supports this.

**Response:**

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

**PC02147-3**

**Comment:**

We continue to oppose the expansion of LAX. It is not a reasonable or prudent option and it is not in the best interests of the traveling public or the air cargo industry.

**Response:**

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

**PC02148**

**Seidel, Cathy**

**None Provided**

**7/18/2001**

**PC02148-1**

**Comment:**

The traffic is already terrible here as well as the noise. This expansion would have a major impact on our quality of life here in Westchester. I am a lifetime resident and don't want to see our community ruined by this expansion.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts to quality of life and Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

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**PC02149      Englehart, Regina      None Provided      7/17/2001**

**PC02149-1**

**Comment:**

I am very concerned in regards to the airport expansion. Our community has always been a small, quaint family oriented area. The proposed LAX Expressway & Ring Road will endanger the Central Business District on Sepulveda, and will make people in the Nielson Field area lose their homes.

**Response:**

The Supplement to the Draft EIS/EIR provided additional discussion beyond that presented in the Draft EIS/EIR of potential acquisition effects on the Westchester Business District. As described in Section 4.2, Land Use (subsections 4.2.6.2 through 4.2.6.4), acquisition within the Westchester Business District would be about 16 acres or 31 percent of the District under Alternative A, about 11 acres or 21 percent under Alternative B, or approximately 13 acres or 26 percent of the District under Alternative C. Under Alternatives A, B, and C, relocation opportunities would be available for some uses nearby within Westchester Southside. Also, many of the uses being acquired are airport related and a number of the community related uses that would be acquired (a bank, an office supply store, a bar and beauty shop) would still remain available through similar businesses that are located in close proximity within the Westchester Business District.

Regarding residential acquisition, please see Topical Response TR-RBR-1, and note that Master Plan Commitment RBR-1 ensures that LAWA will implement a relocation plan for affected properties in compliance with the Uniform Relocation Act, state and local regulations, and FAA Advisory Circular 150/5100-17.

Also, as described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, note that in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any acquisition within the Westchester Business District or residential acquisition. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02149-2**

**Comment:**

The traffic & noise in this area has already increased dramatically. Additional expansion will increase these areas at a very high magnitude.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. In addition, please see Topical Response TR-LU-1 regarding overall traffic and noise impacts.

**PC02149-3**

**Comment:**

Please consider moving the cargo area to Palmdale, Ontario or El Toro. These airports can easily accommodate these demands without hurting their communities or ours!



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**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02149-4**

**Comment:**

Keep Westchester & Playa Del Rey whole!

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02150**

**King, Beverley**

**None Provided**

**7/16/2001**

**PC02150-1**

**Comment:**

I live one blk from runway south of Pershing - the planes cut over to the houses - rather than going straight out for 1 mile then turn.

**Response:**

The commentor resides approximately ¼ mile north of the extended centerline of departures from the north runway complex and is exposed to noise from overflights immediately to the south of her location, as well as to occasional overflights from aircraft that drift to the north after departure. The property is within the area eligible for sound treatment mitigation. The distance to the runway centerlines from her location will not change under any of the future alternatives. However, the improvement of on-board equipment in aircraft will provide for gradually improving conditions regarding the direct overflights by reducing the drift of aircraft from the runway centerline toward her home. For further information, please see Topical Response TR-N-3 regarding aircraft flight procedures, and particularly Subtopical Response TR-N-3.2 regarding early turns over areas north and south of LAX.

**PC02150-2**

**Comment:**

The noise after 10 pm is increasing -

**Response:**

The number of operations that are projected to occur during the night hours will indeed increase, and with that increase will come a commensurate increase in aircraft noise. Please see Response to Comment PC01879-5.

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#### **PC02150-3**

**Comment:**

the traffic off the 105 onto Sepulveda to Airport is always backed up.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02150-4**

**Comment:**

I have sound proof my home - but I do like to breath some fresh air - the circulation system, is just recycled dusty air. It bothers my sinuous.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

#### **PC02150-5**

**Comment:**

To say that an additional 30% traffic will not impact the area, is ridiculous - Do you think we are stupid?

**Response:**

Comment noted. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

#### **PC02150-6**

**Comment:**

LA payes big taxes and you just want more - but you don't give back to Playa del Rey, Westchester, and other locations, our road are in need of repairs, our parks are a mess.

**Response:**

No City of Los Angeles General Funds are used in the operation of LAX nor are any proposed to be used in implementation of the proposed Master Plan.

**PC02151      Gioffre, Patty      None Provided      7/16/2001**

**PC02151-1**

**Comment:**

I am opposed to the expansion of the LAX and any more roadway development. We should be lowering the density not increasing the density - on the roads or in the sky. Also there will be additional pollution and possibility of air collisions etc.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02151-2**

**Comment:**

There will be an increase in noise from planes cargo delivery and traffic. And a decrease in enjoyability of property owners in their homes and a decrease of property values.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-ST-1 regarding cargo truck traffic, Topical Response TR-LU-1 regarding impacts on quality of life, and Topical Response TR-ES-1 regarding residential property values.

**PC02152      Rollins, Rich      None Provided      8/8/2001**

**PC02152-1**

**Comment:**

I have been a resident of Westchester for 20+ years. The fumes, noise and traffic caused by the airport has become unbearable.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment PC00045-4 regarding fumes and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02152-2**

**Comment:**

I understand that there is a statewide effort to reduce traffic by developing rideshare and other programs. It make great sense to develop a regional airport plan to develop new airports/increase other

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airports throughout LA County. This will reduce traffic eliminating the need to drive 100 plus miles instead of using an airport closer to them

**Response:**

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

**PC02152-3**

**Comment:**

Further expansion to the east will eliminate Neilson Park the only youth sports park in the area. Especially since we are park deficient already.

**Response:**

Please see Response to Comment PC01014-3 regarding expansion of Carl E. Nielson Youth Park.

**PC02153      Dodge, Sherwood      None Provided      8/9/2001**

**PC02153-1**

**Comment:**

REMEMBER "CEDARHURST ALLEY"

**Response:**

Comment noted.

**PC02154      Tsubakiyarna,      None Provided      8/8/2001**  
**Margaret**

**PC02154-1**

**Comment:**

I am a 10 year resident & homeowner in Westchester. I am opposed to any expansion of LAX.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02154-2

**Comment:**

Surrounding airport - Palmdale, Ontario, El Toro - should bear their part of increased air traffic in So. Cal.

**Response:**

Comment noted. Please see Topical Response TR-RC-4 regarding Orange County air transportation demand for information on El Toro, John Wayne Airport, and Ontario International Airport. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses. Also please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02154-3

**Comment:**

I am concerned about the health of my family - both my children have allergies & asthma - and strongly believe that an increase in air traffic will only worsen their health.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated the potential risk of adverse health effects for each of the Master Plan Alternatives based on the emissions associated with each of the alternatives. The No Project/No Action Alternative assumes that no substantial changes are made to current LAX facilities, and is based on projections of growth in airport activity between 1996 and horizon year 2015. Airport congestion during this time is expected to grow worse without additional capital improvement. In all cases, build alternatives are expected to relieve current and predicted future congestion by making airport operations, particularly aircraft operations, more efficient.

After implementation of mitigation measures, the build alternatives would reduce predicted impacts to human health compared with the No Project/No Action Alternative. Implementation of any of the build alternatives is therefore anticipated to reduce future health impacts for most people living, working or going to school near the airport. However, as was indicated in the Supplement to the Draft EIS/EIR, predicted chronic non-cancer human health impacts for maximally exposed residents under Alternatives B and C are slightly higher for some areas than those predicted with the No Project/No Action Alternative.

#### PC02154-4

**Comment:**

Please oppose expansion of LAX.

**Response:**

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

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**PC02155      Farmas, Misha      None Provided      8/8/2001**

**PC02155-1**

**Comment:**

I strongly oppose the LAX Master Plan. The plan must be withdrawn in its entirety. The material adverse impacts on the surrounding communities can not be mitigated.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02155-2**

**Comment:**

The only acceptable alternative is to disburse air traffic regionally to Ontario & Palmdale and other airports.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02156      Sweeney, John      None Provided      8/8/2001**

**PC02156-1**

**Comment:**

I oppose expansion of LAX because Westside/South Bay is already developed to maximum capacity. Even without Playa Vista, we simply can't handle more traffic and lower quality of life.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02156-2**

**Comment:**

Palmdale and Ontario offer healthy alternatives to LAX expansion.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02157 Ibrahim, Mike None Provided**

**PC02157-1**

**Comment:**

The area of the airport is already very much congested especially at weekends and holidays. An expansion mean more congestion, heavier traffic more pollution, and thus more harm to the community. We are much against the plan of expansion.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02158 Briones, Lou None Provided 8/9/2001**

**PC02158-1**

**Comment:**

There is abundant evidence of the folly of the LAX expansion plan. The lack of a complete EIR should be reason enough to question the motives of those pushing for LAX expansion.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR provides a comprehensive analysis of Alternative D and was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

**PC02158-2**

**Comment:**

I have lived here for 21 years & have seen the growth of noise, pollution, gridlock. I don't want to move but it's hard to stay. I must use earplugs to get a good nights sleep.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, the Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

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**PC02158-3**

**Comment:**

You must pay heed to the citizens of LA & ignore the demands of the airlines!

**Response:**

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

**PC02159**

**Zywan, Robert**

**None Provided**

**8/9/2001**

**PC02159-1**

**Comment:**

WHAT PART OF NO LAX EXPANSION DO YOU NOT UNDERSTAND?

**Response:**

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

**PC02160**

**Kriwanek, Richard**

**None Provided**

**8/9/2001**

**PC02160-1**

**Comment:**

MY HOUSEHOLD IS STRONGLY OPPOSED TO THE LAX MASTER PLAN AND AN EXPANSION TO LAX IN ANY FASHION.

**Response:**

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

**PC02160-2**

**Comment:**

TRAFFIC ISSUES HAVE NOT BEEN ADDRESSED, ESPECIALLY AS PERTAINS TO THE CUMULATIVE EFFECT OF PLAYA VISTA, HUGHES CENTER, NORTHSIDE DEVELOPMENT AND MANY OTHER SMALLER, YET CUMULATIVELY DAMAGING PROJECTS.

**Response:**

Please see Response to Comment AR00003-21 regarding cumulative impacts. Also, please see Topical Response TR-ST-2 regarding Playa Vista and the Hughes Center.

**PC02160-3**

**Comment:**

SAFETY ISSUES WITH AIR TRAFFIC CONTROL ARE SPIRALING OUT OF CONTROL DUE TO UNCHECKED INCREASES IN TAKE-OFFS & LANDINGS. THE AREA SURROUNDING LAX WILL SOON BE UNSAFE WITHOUT THE EXPANSION.



**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02160-4**

**Comment:**

STOP IT NOW! BEFORE IT'S TOO LATE!

**Response:**

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

**PC02161      Hyra, Joan                      None Provided                      8/9/2001**

**PC02161-1**

**Comment:**

Our communities have suffered long enough with LAX traffic and pollution. Regional airports are the answer.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

**PC02162      Lind, Michael                      None Provided                      8/9/2001**

**PC02162-1**

**Comment:**

I BELIEVE A MORE REGIONAL PLAN WOULD WORK TO USE OTHER AIRPORTS TO BALANCE OUR CITY FLIGHT AND FWY TRAFFIC. ONLY FOOLS WOULD BOTTLENECK ALL THAT INTO ONE AREA. LET'S SPREAD IT OUT EFFECTIVELY.

**Response:**

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

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**PC02163      Glodery, R.      None Provided      7/15/2001**

**PC02163-1**

**Comment:**

I was a victim of Los Angeles Airport expansion in the 1960's and 1970's and lost my home as a result of that.

I am enclosing copies of newspaper articles of the Airport expansion plans then, and I am sure you surely must have read the article in the Los Angeles times on June 20, 2001, claiming that they need to expand again because they have a Safety problem.

They don't need to expand. The money hungry officials and greedy airlines have created that situation and to solve their problem they need to utilize the existing airports in Palmdale and Ontario and spread the wealth to those areas, thus leaving our homes, businesses and streets intact.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, and Topical Response TR-SAF-1 regarding aviation safety.

**PC02163-2**

**Comment:**

The scars of the first expansion are still visible. If this proposed expansion isn't stopped now, it will be detrimental to everyone living anywhere near LA World Airport.

It will create more air pollution, more noise, more traffic and won't solve their so called 'safety problem', because they will continue, to constantly, overload their runways with more and more incoming and outgoing flights.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; traffic impacts in Section 4.3, Surface Transportation, and safety in Section 4.24.3, Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-SAF-1 regarding aviation safety. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02163-3**

**Comment:**

More flights. More people. More money.

Lets stop the expansion now. Enough is Enough!

**Response:**

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

**PC02165      Greene, Stephanie      None Provided      7/19/2001**

**PC02165-1**

**Comment:**

I live on the Peninsula in Venice, several miles north of the airport. For the last several years, myself and my neighbors, even in the north Venice Canal area, have noticed black jet fuel debris pollution all over our environment = on our trees, plants, houses, cars, windows, lawn furniture, fences, vegetable gardens, window sills, windshields, everything that has a surface. This is a "new" pollution. This area did not have this jet fuel debris pollution prior to this period of time. This pollution appeared in conjunction with the heavily expanded LAX program last implemented.

My neighbor painted his house white and about a week later we noticed this black gunk all over the surface of the new paint. You could make a smear of it with your finger. That is when we wondered what this mess was. After several days of wondering, we concluded, and realized, that it was everywhere, and just "showed up" more noticeably with the new painted surface. We surmised it was jet fuel debris pollution.

Since that realization, we have been living with this black gunk all over the surfaces of our environment and lives. We also wonder how it "looks" inside our lungs.

I believe that if the LAX expansion "goes thru" that this JET FUEL DEBRIS POLLUTION will become much worse because of increased capacity of this small area airport.

**Response:**

Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-AQ-1 for additional information regarding deposition, soot and fuel dumping.

**PC02165-2**

**Comment:**

The LAX expansion must not take place in this over crowded, small area, confined logistics terrain.

**Response:**

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

**PC02165-3**

**Comment:**

Los Angeles officials must keep their word and expand Palmdale as originally planned 30 years ago. This will keep our area from further pollution.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

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**PC02166      Allan, James      None Provided      7/17/2001**

**PC02166-1**

**Comment:**

I am against the airport expansion.

**Response:**

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

**PC02167      Lindstrom, Dean & Margie      None Provided      9/17/2001**

**PC02167-1**

**Comment:**

After the events of the past week, it should be obvious to all that expansion of LAX at this location is a dangerous proposition and totally unwarranted. The most likely target for terrorists in Los Angeles is the airport. Expanding it at this location will make it a more desirable target. The only expansion under consideration at this time should be at Palmdale, Ontario, and Orange County. Then an attack at LAX would be less effective and, consequently, less likely.

I hope that you and those in authority for developing for this plan will take this responsible action.

**Response:**

Comment noted. Please see Response to Comments AL00051-93 PC02131-5 regarding airport security, and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02168      Younglove, Charles      None Provided      9/18/2001**

**PC02168-1**

**Comment:**

I am requesting that the Federal Aviation Administration (FAA), Los Angeles World Airports (LAWA), and Southern California Association of Governments (SCAG) terminate the expansion of LAX. I oppose the LAX expansion alternatives A, B, and C.

**Response:**

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

**PC02168-2**

**Comment:**

Also, I am requesting that the "No Action/ No Project Alternative" for LAX Master Plan not be approved. The "No Action/ No Project Alternative" is a fraud because it includes the increase of passengers from 40 million to 78 million. LAX was intended to handle 40 million passengers.

**Response:**

Comment noted. Please see Topical Response TR-GEN-3 regarding the 40 MAP activity level.

**PC02168-3**

**Comment:**

I am requesting that the "Ring Road", "Arbor Vitae Interchange", and the "Airport Boulevard Connector Road" which are development plans for the LAX expansion be terminated. The development of the "Ring Road", "Arbor Vitae Interchange", and the "Airport Boulevard Connector Road" will not solve nor adequately mitigate any of the issues that the LAX draft EIS/EIR proposes.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed surface transportation impacts in Section 4.3.1, On-Airport Surface Transportation, and in Section 4.3.2, Off-Airport Surface Transportation. Subsequent to the publication of the 2001 Draft EIS/EIR, the FHWA withdrew its support for a half interchange at Arbor Vitae. The interchange is not part of the LAX Master Plan. FHWA policy is to consider only full interchanges, not partial ones. Please also see Topical Response TR-ST-2 regarding the Arbor Vitae interchange. Note that Alternative D does not include the LAX Expressway or the Ring Road.

**PC02168-4**

**Comment:**

The development of the "Ring Road", "Arbor Vitae Interchange", and the "Airport Boulevard Connector Road" will destroy the residential communities of Westport Heights, Westchester, and Inglewood.

**Response:**

Comment noted. Land use, traffic, and community disruption impacts were addressed in Section 4.1, Land Use, Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, and Section 4.3, Surface Transportation, respectively, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting documentation provided in Appendix K and Technical Reports 1, 2, 3, S-1, and S-2. As presented in Section 4.3.2.6.2 and Appendix K of the Draft EIS/EIR, improvements associated with the ring road and LAX Expressway, including the Arbor Vitae interchange and Airport Boulevard would not destroy residential neighborhoods and send traffic onto local streets but rather would direct airport traffic away from residential streets. As further described in Section 4.4.2, Land Use and Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR, residential acquisition associated with the ring road proposed under Alternatives A, B, and C would occur along the northern edge of the airport and would not split residential neighborhoods. The acquired areas would be used for right-of-way, open space and landscaped berms, no hotels or light industrial buildings are proposed in this area. Similarly, as described in Appendix K, Supplemental Evaluation for LAX Expressway and State Route 1 Improvements of the Draft EIS/EIR, under the same alternatives, residential acquisition associated with the LAX Expressway would occur along the rights-of-way of existing freeways or major arterials at the edge of residential areas. In contrast to the other build alternatives, Alternative D, LAWA Staff's new preferred alternative, does not include proposals for the LAX Expressway, ring-road, or residential acquisition. Please see Topical Response TR-LU-1 regarding overall traffic and acquisition impacts and Topical Response TR-LU-2 regarding traffic and acquisition effects on the community of Westchester.

**PC02168-5**

**Comment:**

I am requesting that a "Regional Solution" be developed for airline passengers and airline cargo. Centralizing all the passengers and cargo from Los Angeles County, Orange County, San Bernardino County and San Diego County into LAX is ludicrous. Centralization of all the passengers and cargo into LAX is not feasible. The LAX draft EIS/EIR does not mitigate nor address the issues adequately. Now is the time that each region should develop and accept responsibility for airplane passengers and airplane cargo. There are eleven (11) airports in Southern California that should be developed as international airports to handle at least 40 million passengers and one million tons of cargo per airport.

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**Response:**

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

**PC02168-6**

**Comment:**

My requests are based upon the Los Angeles International Airport Master Plan Draft Environmental Impact Statement (EIS) / Environmental Impact Report (EIR).

The LAX draft EIS/EIR does not adequately address nor mitigate the following issues:

**Response:**

Comment noted. Please see Responses to Comments PC02168-7 through PC02168-19 below.

**PC02168-7**

**Comment:**

1. The EIR does not adequately address nor mitigate traffic congestion. Traffic congestion on the 405 Fwy., 105 Fwy., 10 Fwy. and the 101 Fwy. have not and can not be mitigated. The freeways have become parking lots due to the excess LAX passengers and the cargo. For example, the EIR states that traffic congestion on the 405 Fwy exists between 7 a.m. to 9 a.m. and 3:30 p.m. to 7 p.m. These statements are false. The traffic congestion on the 405 Fwy exists from 6:30 a.m. to 11:30 a.m. and from 2:30 p.m. to 7:30 p.m. The 405 Fwy is bumper to bumper with traffic congestion all day long due to the excess 28 million passengers and the 1.4 million tons of cargo that exceed the capacity that LAX was built to handle back in 1966.

LAX was built to handle 40 million passengers and 1 million tons of cargo per year. Currently, 68 million passengers and 2.4 million tons of cargo pass through LAX per year. All the freeways are becoming parking lots for LAX traffic.

**Response:**

The I-405, I-105, I-10, and I-101 freeways accommodate much more traffic than just airport trips. In fact, the percent of airport traffic on these freeways is generally less than 20 percent, even adjacent to the airport. This percentage quickly diminishes farther from the airport. Section 4.3.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR included a discussion of the Congestion Management Program, which is where analysis of freeways beyond the immediate study area is located. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, Topical Response TR-MP-1 regarding air cargo activity and demand, and Topical Response TR-ST-1 regarding cargo truck traffic.

**PC02168-8****Comment:**

There is no way that Los Angeles can adequately address or mitigate 98 million passengers and 4.2 million tons of cargo by 2015 via the expansion of LAX.

**Response:**

Each of the Master Plan alternatives was designed to maximize the number of passengers that could be served with minimal land acquisition. Alternatives A and B are projected to serve 98 million annual passengers (MAP) and 4.2 million tons of cargo by 2015. Alternatives A and B would be able to serve this level of activity because both alternatives would add a new runway, additional gates and terminal space, and would provide for landside roadway improvements. The expansion of the airport in these alternatives would require an additional 345 acres of land. Please see Chapter V, Section 3.3.1 of the Draft LAX Master Plan for a description of facility modifications made in the future alternatives. Alternative C is not able to serve 98 MAP and 4.2 million tons of cargo. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

**PC02168-9****Comment:**

2. The EIR does not adequately address nor mitigate health issues. The EIR does not adequately address nor mitigate the air pollution from the passenger airplanes, the cargo airplanes and the freeway traffic due to LAX.

**Response:**

Human health impacts were addressed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects and Topical Response TR-HRA-3 regarding human health impacts.

**PC02168-10****Comment:**

The EIR does not address nor mitigate the increase in cancer and respiratory ailments due to jet fuel and automobile and truck exhaust.

**Response:**

Please refer to Topical Response TR-HRA-2 regarding airport emissions and links with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-AQ-1 regarding air pollutant deposition.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to toxic air pollutants (TAPs).

The Supplement to the Draft EIS/EIR was prepared to integrate a new alternative, Alternative D, into the existing environmental review process and to incorporate supplemental information and analysis for the LAX Master Plan. Such information and analysis are based upon the availability of new or updated information since publication of the Draft EIS/EIR in January 2001. As described in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR, health risks (cancer, non-

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cancer chronic and non-cancer acute) for the majority of nearby residents would be lower for Alternative D than for 1996 baseline, Year 2000 conditions and the No Action/No Project Alternative. Alternative D provides for airfield improvements that would enable aircraft to move more efficiently, thereby reducing air pollutant emissions from aircraft operating in taxi/idle mode, and provides substantial improvements to the on-airport and off-airport surface transportation systems, thereby reducing air pollutant emissions from motor vehicles. Additionally, Alternative D, unlike the No Action/No Project Alternative, includes Master Plan commitments and mitigation measures to reduce air pollutant emissions.

#### PC02168-11

**Comment:**

Anyone that lives within 10 miles of the LAX airport has potential legal causes of action to sue for cancer and respiratory ailments.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase. Please also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

#### PC02168-12

**Comment:**

3. The EIR does not adequately address nor mitigate the noise pollution due to the passenger and cargo airplanes and the freeway traffic due to LAX. The EIR limited the study of noise levels to 65 db. The EIR is inadequate. The noise levels exceed the 65db levels in all of the surrounding communities: Westchester, Inglewood, El Segundo, Manhattan Beach, and Playa del Rey.

Today the noise level exceeds 65 db twenty four hours a day due to LAX excess passengers and cargo. Eight years ago the noise level dropped below 65 db after 8 p.m. to 6 a.m. due to LAX. LAX has failed to address noise pollution.

**Response:**

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

#### PC02168-13

**Comment:**

4. The EIR does not adequately address nor mitigate LAX safety of air space. The recently released FAA report indicates that LAX is the worst airport in the United States regarding near miss collisions. LAX has experienced 33 near miss collisions in the last four years. The limited airspace is dangerous. Common sense tells you that increasing the concentration of airplanes flying in and out of LAX will open the doors to civil actions against the FAA, LAWA and SCAG due the breach of their fiduciary duty to protect the passengers and the people who live in the vicinity of LAX. Expansion of LAX will only



increase the liability, damages and deaths due to the concentration and centralization of airplane passengers and cargo in such limited air space.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02168-14**

**Comment:**

5. The EIR did not address the issue of risk from earthquakes at LAX. If LAWA, the FAA and SCAG proceed with the expansion of LAX to centralize and concentrate the passengers and cargo from all of Los Angeles County, Orange County, San Bernardino County and San Diego County, what will happen if there is a "Northridge" size earthquake at LAX? The LAX Master Plan for Expansion puts "all our eggs in one basket" for the entire Southern California region. This is ludicrous. This is a breach of your fiduciary duty. The "Regional Solution" to airport expansion is the only solution to diversify the risk from catastrophic disasters. Southern California's entire economy would be destroyed when LAX is hit by a "Northridge" size earthquake.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed geologic hazards, including earthquake-induced hazards, in Section 4.22, Earth/Geology, with supporting technical data and analysis provided in Technical Report 12 of the Draft EIS/EIR. It should be noted that Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02168-15**

**Comment:**

6. The EIR did not address the issue of risk from hijackers at LAX. If LAWA, the FAA and SCAG proceed with the expansion of LAX to centralize and concentrate the passengers and cargo from all of Los Angeles County, Orange County, San Bernardino County and San Diego County, what will happen if there are hijackers at LAX?

On September 11, 2001 the World Trade Towers in New York were destroyed by hijackers and over 5,100 people were killed. Again, the LAX Master Plan for Expansion puts "all our eggs in one basket" for the entire Southern California region. What if hijackers fly out of LAX (loaded with jet fuel) and crash into all the oil reserve tanks that are located in Manhattan Beach and El Segundo. LAX will be destroyed and all the people in Manhattan Beach and El Segundo will be killed. This is ludicrous. This is a breach of your fiduciary duty. The "Regional Solution" to airport expansion is the only solution to diversify the risk from catastrophic disasters.

**Response:**

Please see Response to Comments PC02236-02, AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02168-16**

**Comment:**

7. The EIR did not address, incorporate nor mitigate the traffic congestion, noise, health, and safety issues that are the result of the development of the Howard Hughes project, Playa Vista project, Ballona Creek project and the Marina del Rey project(s). These four (4) developments are going to have a massive impact on the entire Westside of Los Angeles and the South Bay Areas. The LAX Master Plan for expansion and the EIS/EIR have failed to address the impact of these four developments on LAX. Again, this is ludicrous.

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**Response:**

Comment noted. Please see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Regarding Ballona Creek, it is believed that the commentor is referring to the Playa Vista project. The Playa Vista project, Howard Hughes Center, and Marina del Rey development were accounted for in the cumulative impacts analysis of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Mitigation is proposed for all significant project-specific and cumulative impacts.

**PC02168-17**

**Comment:**

8. The LAX Master Plan for expansion does not address the fact that two (2) billion dollars will be wasted to demolish Westchester and Inglewood prior to the expansion of LAX. LAWA owns LAX, Palmdale and Ontario airports. Since the land in Palmdale and Ontario was purchased a long time ago why waste billions of dollars?

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02168-18**

**Comment:**

9. Orange County (El Toro airport, etc), San Diego County and the inland empires should be held responsible to provide airport facilities for passengers and cargo that are destined for that region.

**Response:**

Comment noted. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys Airports. The decision to develop any airport is the responsibility of local government. Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02168-19**

**Comment:**

10. I do not want SCAG's Incremental Expansion of local streets as an attempt to mitigate traffic to expand LAX. The incremental expansion of these streets will destroy the following residential communities: Westport Heights, Westchester, Inglewood, Playa del Rey, Marina del Rey and Culver City.

I do not want Incremental Expansion of the following streets to mitigate traffic to expand LAX:

1. Arbor Vitae Interchange Project.
2. Widening of Sepulveda Blvd. From Centinela to Lincoln Blvd.
3. Widening the off ramp from the 105 Fwy. On to Sepulveda Blvd.
4. The completion of Westchester Parkway to the 405 Fwy.
5. Connecting Airport Blvd. (at 74th Street) with the 405 Fwy and widening Airport Blvd..
6. Widening of La Tijera Blvd. (Located at the Buggy Whip restaurant).
7. Widening of Aviation Blvd. from Arbor Vitae to Manhattan Beach Blvd.
8. HOV and High Speed Bus lanes from Sepulveda Blvd. To LAX.
9. Widening of the La Tijera freeway bridge for LAX expressway.

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**Response:**

Protecting neighborhoods is one of the four principles guiding the development of the Ground Access Plan. The Neighborhood Protection program is summarized in the Topical Response TR-ST-2. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02168-20**

**Comment:**

I hope James Hahn, Mayor of Los Angeles, will fulfill his promise to stop the expansion of LAX.

**Response:**

Please see Response to Comment PC00578-1 regarding the development of Alternative D-Enhanced Safety and Security Plan, which was developed at the direction of Mayor James Hahn.

**PC02168-21**

**Comment:**

The FAA, LAWA and SCAG has a fiduciary duty to address all these concerns. Try the regional airport approach. Stop the LAX expansion plan.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02169**

**Corets, Esq., Beth**

**None Provided**

**9/18/2001**

**PC02169-1**

**Comment:**

When I was taking my law school exams, we were only allowed to bring into the test-taking room those items which were carried in clear plastic bags, such as those made by Ziploc.

Similarly, I suggest that the FAA require those passengers desiring to carry items onto the airplane must do so in clear plastic bags. For those passengers who fail to come to the airport with their carry-on items in plastic bags - they would have the option of purchasing bags at a kiosk set up outside the check-in area. Any other item not separated into a plastic bag must be stored in passenger's luggage - which would be checked in prior to entering the gate area.

In addition to the obvious safety benefits, the plastic bag/carry-on idea would be to speed up security checks so that the aircraft could be boarded more quickly.

Additionally, plastic bags could serve as another source of revenue for the airport.

**Response:**

Comment noted.

**PC02170**

**Alexander,**

**None Provided**

**9/18/2001**

**PC02170-1**

**Comment:**

The airport plan devalues our property.

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**Response:**

Please see Topical Response TR-ES-1 regarding the effects of LAX on property values.

**PC02170-2**

**Comment:**

The people of Inglewood and the surrounding areas should not have to bear the entire burden of the majority of people who want to fly by air. It negatively affects are communities w/increased traffic and God knows what kind of air, health related problems, not to mention the constant noise assault from those planes flying over our homes. This burden should be shared through a regional plan.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic in Section 4.3, Surface Transportation, air quality in Section 4.6, Air Quality, human health in Section 4.24.1, Human Health Risk Assessment and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, and 14a of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, and S-9a of the Supplement to the Draft EIS/EIR.

**PC02171      Beck, Paul      None Provided**

The content of this comment letter is identical to comment letter PC02120; please refer to the responses to comment letter PC02120.

**PC02172      Huben, Kevin      None Provided      9/13/2001**

**PC02172-1**

**Comment:**

I have been a life long resident of the airport area. I grew up in the early 60's in Westchester and watched as the airport slowly ate up most of south Westchester. In the late 70's and early 80's I watched as LAX expanded in preparation for the 1984 Olympics.

I moved to El Segundo in 1988 and began to raise a family there in the 90's. Over time, the airports passenger volume clearly began to exceed its design capacity. That is evident by the surrounding traffic gridlock on the freeways and surface streets. We now have aircraft tasking off every few minutes nearly 24 hours a day.

I elected to stay close to LAX when I chose to move to El Segundo with the thought in mind that there would be a limit to the amount of noise and pollution I would be subjected too. I also realize that the airport brings in jobs & commerce and is good for the surrounding economy.

I feel that LAX should NOT be allowed to expand. The current passenger and freight volume is adequate to maintain a good economy. As surrounding residents we have taken more than our share of noise and pollution in the name of commerce and economy.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic in Section 4.3, Surface Transportation, noise in Section 4.1, Noise, air quality in Section 4.6, Air Quality, and economic impacts in Section 4.4.1, Employment/Socio-Economics. Supporting technical data and analyses are

provided in Appendices D and G and Technical Reports 2, 3, 4, and 5 of the Draft EIS/EIR, and Appendices S-C and S-E and Technical Reports S-2, S-3, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the role of the LAX Master Plan in the regional approach to meeting demand.

#### PC02172-2

**Comment:**

The greater Southern California area has such a substantial population that the surrounding areas such as Palmdale, Orange County, Riverside, Ontario and even Bakersfield area should not only share in the burden of supporting and airport for their area but the residents/business people should not have to somehow commute to LAX for their air travel needs.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02172-3

**Comment:**

I urge you to enact other alternatives to expanding LAX and to NOT expand LAX.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02173**

**Neusteter, Jane  
Adams**

**None Provided**

**6/22/2001**

#### PC02173-1

**Comment:**

I am opposed to any expansion of LAX. The size and the noise of the airport are already making a very negative impact on the local neighborhoods, many of which are still residential and family oriented. The impact of traffic is also huge and negative.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-LU-1 regarding potential impacts to quality of life in the areas surrounding LAX. Please note that Alternative D-Enhanced Safety and Security Plan is designed

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for an activity level comparable to that of the No Action/No Project Alternative. Additionally, the design of Alternative D includes an emphasis on enhanced safety and security at LAX.

#### **PC02173-2**

**Comment:**

There is no benefit to the airport or to this area to be moving freight in and out.

**Response:**

Comment noted. The economic benefits of the project were addressed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR with supporting technical data in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR.

#### **PC02173-3**

**Comment:**

The proposed vehicular access, enlarging and connecting surface streets, will increase noise and traffic and destroy what is left of quiet, safe neighborhoods, for residents and for school children.

**Response:**

Please see Topical Response TR-ST-6 regarding neighborhood traffic impacts. Note that Alternative D does not include the LAX Expressway or the Ring Road. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

#### **PC02173-4**

**Comment:**

The appropriate action is to follow through with the previously accepted proposal to move freight in and out of locations away from the center of this area.

**Response:**

Comment noted.

#### **PC02173-5**

**Comment:**

Besides the impact to surface streets, the 405 is always overcrowded to grid locked.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02173-6**

**Comment:**

The airport and the neighborhood need to be free of the trucks and traffic for freight.

**Response:**

Please see Topical Response TR-ST-1 regarding cargo truck traffic (in particular Section 1, Truck Traffic Plan for LAX Airport Master Plan Alternative C) for more information.



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**Response:**

Comment noted. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

**PC02174-4**

**Comment:**

We urge you to modernize LAX so that the existing airport can run as efficiently as possible. We understand it's role in the vitality of Los Angeles business in the greater marketplace. We do ask however that future changes to the airport allow for this greater efficiency without increasing total volume into the airport. This will provide protection to airplanes as airspace is limited, and will also protect the quality of life in the adjacent neighborhoods.

**Response:**

All of the build alternatives would result in the modernization of LAX. Please see Response to Comment PC00928-3 regarding the ability of LAWA to place limits on the volume of activity at an airport. Please see Response to Comment PC00656-2 and Topical Response TR-SAF-1 for a discussion on the capacity of the airspace, and Response to Comment PC00260-1 regarding physical and activity constraints. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02174-5**

**Comment:**

We also urge you to rely on a truly regional solution which should include the other existing airports as well as the future building of the Palmdale airport to support passenger and cargo flights for the entire Los Angeles population.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02174-6**

**Comment:**

For the health, safety, well being, and vitality of our communities and our children we beg you to reject any and all expansion efforts at LAX.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided



in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02175**      **Cully, Douglas &**      **None Provided**      **9/19/2001**  
**Katharyn M.**

**PC02175-1**

**Comment:**

No LAX EXPANSION! EVER! SECURITY NOW & SAFETY.

I vehemently oppose LAX expansion! To realign the north runway is a horrible idea for our area!

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The proposed relocation of the runways in the various development alternatives is to accommodate a new parallel taxiway that will enhance safety of aircraft operations at the airport by reducing runway incursions. For more information, see Topical Response TR-SAF-1 regarding safety and Topical Response TR-SEC-1 regarding security issues.

**PC02175-2**

**Comment:**

The airlines, FAA, and LAX have no concern whatsoever for Playa del Rey. Arrogant and unresponsive are two milder of the adjectives to describe them. (FAA, ATA, LAX)

**Response:**

Efforts to eliminate early turns over El Segundo and Playa del Rey are incorporated into the recommended mitigation actions for each project alternative. Please see Subtopical Response TR-N-3.2 regarding early turns over El Segundo and Playa del Rey. For more information on noise impacts on Playa del Rey, see Response to Comment PC00499-01.

**PC02175-3**

**Comment:**

The noise mitigation measures were eliminated several years ago by our "good neighbor," LAX. The "Task Force" did nothing to improve anything for our area. Our concerns were and are unanswered. We learned that the ATA runs the FAA.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise abatement components in Master Plan Commitments in Section 4.1.5. The airport does not have jurisdiction to enforce any operating procedures on aircraft in flight. This authority is vested solely in the FAA through its responsibility for the safe and efficient operation of the nation's air space. When locally preferred procedures are in place, the FAA will attempt to accommodate the procedures subject to its primary responsibilities. For additional information on enforcement please see Topical Response TR-N-7.

**PC02175-4**

**Comment:**

Writing a book wouldn't cover my complaints.

### 3. Comments and Responses

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It would be nice if we had some officials who planned intelligently for the future, i.e. developing Palmdale (AWAY from LAX).

**Response:**

Comment noted. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02176      Cully, Mark                      None Provided                      9/19/2001**

**PC02176-1**

**Comment:**

Absolutely NO LAX expansion.

**Response:**

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

**PC02176-2**

**Comment:**

Playa del Rey is pounded by aircraft noise at all hours, day and night. To expand the airport and add flights is unthinkable to those of us who suffer the noise punishment, much of it unnecessary and added since 1997.

**Response:**

Comment noted. For information regarding future noise increases, please see Topical Response TR-N-6. In addition, please see Alternative-Specific Abatement Opportunities in Section 7.2 of Appendix D, Aircraft Noise Technical Report, in particular Section 7.2.2 Alternative A and Topical Response TR-N-5 Nighttime Aircraft Operations. Aircraft noise mitigation was described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8. Aircraft noise mitigation is described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise were provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02176-3**

**Comment:**

\*To "realign" the north runway and bring it closer to Playa del Rey is idiotic.

**Response:**

Comment noted. Alternatives A and C propose the development of a runway north of the current north runway alignment. Each would make the air traffic using that runway fly closer to Playa del Rey. Alternatives B and new Alternative D would not move runways northward.

**PC02176-4**

**Comment:**

Enough damage has been done to our community. How about a little intelligent planning for the future?

Palmdale is wanted by almost everyone but the airlines.

Profit/Greed versus Security/Safety

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-SEC-1 regarding security issues.

**PC02177      McGindley, Robert      None Provided      9/21/2001**

**PC02177-1**

**Comment:**

1. I cannot believe the stupidity of the commissioners to let themselves be driven by the foolish dream of a lame-duck mayor. Obviously LAX is in worse hands than I ever believed.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02177-2**

**Comment:**

2. More planes = more flights = more likelihood of a disaster. I would not like THAT on MY conscience.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02177-3**

**Comment:**

3. Since when has greed been more important then the welfare of an entire community? Obviously YOU, the Airport Commission think so. Is that why I lost my first house, and if you have your way, lose another?

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. Alternative D does not include any residential acquisition. Please note that LAX is not run as a for-profit organization. It is a public service and the fees collected are used to pay for the maintenance and upkeep. As required by Federal law, any funds generated at the airport must be expended at the airport.

**PC02177-4**

**Comment:**

4. Do any of you commissioners or FAA officials live in Westchester with the noise and pollution produced by the airport? I think NOT! Why should you care that we have been here 30+ years and don't

### **3. Comments and Responses**

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want more noise or pollution? I defy any one, or all, of you to look me straight in the eye and justify the proposed airport expansion.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02177-5**

**Comment:**

5. With the New York Disaster of 9/11 in mind, what will happen if terrorists close LAX, and it is the ONLY airport into LA that can handle the volume of materials needed, thanks to your stupidity? Live with that one.

**Response:**

Comment noted. Alternatives A, B, and C and the No Action/No Project Alternative are able to offer increased security in the current and likely future methods prescribed by the Transportation Security Administration. Alternative D has been developed to go beyond these measures to develop two levels of security screening. "Level one" screening would be imposed at an expanded perimeter of the airport including existing and future FlyAway terminals and "level two" screening would be within the center of mass of the airport. See Appendix S-9 of the Supplement to the Draft EIS/EIR. Please also see Response to Comments PC01881-31 and PC02131-5.

**PC02177-6**

**Comment:**

6. Other areas, such as Palmdale and Ontario, want and need the benefits of a large airport. Did any of you think to look at where the projected population growth will occur? Obviously NOT.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02177-7**

**Comment:**

7. Why do you and the FAA lie when told an airplane flew over someone's house. You answer that it must be a mistake, it's not on your radar screen. Am I an IDIOT? I spent 4 years in the USAF and I damn well know when a plane is out of the pattern and flies OVER my house. Stop and think how stupid you look with answers like those.

**Response:**

Please see Topical Response TR-N-3 regarding aircraft flight procedures.

**PC02177-8**

**Comment:**

8. I will continue to live where I do because you and your grandiose plans are doomed to defeat. All you have done is waste millions of taxpayer dollars and arouse the anger of millions of people in Southern California. Was it worth it?

**Response:**

Comment noted. It should be noted that construction of the improvements proposed by the LAX Master Plan would be funded by airport-related revenues, not through taxpayer funds.

**PC02178**

**Handelman, Murray  
& Maxine**

**None Provided**

**9/19/2001**

**PC02178-1**

**Comment:**

We are totally against the Master Plan for LAX. We do not want any plan that limits expansion only to LAX.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02178-2**

**Comment:**

Noise: We have lived in Playa del Rey for forty (40) years. For the past month and a half we are hearing plane noise day and night - loud cargo planes after 12:00 midnight.

**Response:**

LAWA will be pursuing Federal approval to restrict easterly takeoffs circling back to the west on their departures to Asia by making over-ocean procedures mandatory when they are in effect between midnight and 6:30 a.m. During a recent 18-month period, 82 jets departed to the east when over-ocean procedures were in effect, an average of about one per week. As noted by the noise abatement procedures delineated in Topical Response TR-N-7, exceptions to the over-ocean procedures are available when weather of wind conditions require east traffic flow. Please see Topical Response TR-N-3 particularly Subtopical Response TR-N-3.1 regarding flight routes relative to areas of the South Bay. See Response to Comment PC00499-01 on noise impacts in Playa Del Ray. See also, Topical Response TR-N-5 regarding night time aircraft operations. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on

### **3. Comments and Responses**

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and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D and analysis of noise impacts on nighttime awakenings.

#### **PC02178-3**

**Comment:**

The planes are now flying over Playa del Rey.

**Response:**

The commentor's reside more than one mile north of the west end of the north runways. At that location, they are likely exposed to occasional overflights of turboprop aircraft that air traffic control has directed to turn to create separation from the following jet aircraft. For additional information on such activity, please see Subtopical Response TR-N-3.2 regarding early turns over areas north and south of LAX.

#### **PC02178-4**

**Comment:**

We do not want this noise impact by moving the North runway another 500 feet closer to Playa del Rey.

**Response:**

Please see Response to Comment PC02176-3 regarding the relocation of Runway 24R/6L.

#### **PC02178-5**

**Comment:**

According to Dr. Joyce Brothers, "Excessive noise has an effect on gastrointestinal function. It can cause blood pressure to rise, severe headaches, and some people become very nervous."

**Response:**

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

#### **PC02178-6**

**Comment:**

Noise is such a great disturbance in our homes - as are fumes, air pollution, and traffic congestion.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment PC00045-4 regarding fumes.

#### **PC02178-7**

**Comment:**

Ring roads, tunnels, taking of more homes, ruining neighborhoods and business areas cannot be tolerated.

**Response:**

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed land use impacts in Section 4.2, Land Use, traffic impacts in Section 4.3, Surface Transportation, and relocation impacts in Section 4.4.2, Relocation of Residences or Businesses, with supporting technical data and analyses provided in Technical Reports 1, 2, 3, 5, S-1, and S-2. It should be noted that Alternative D, added subsequent to publication of the Draft EIS/EIR, does not include the LAX Expressway or the ring road, does not require extension of the Sepulveda Boulevard tunnel, does not propose the acquisition of homes, and requires substantially less acquisition of businesses than the other build alternatives.

**PC02178-8**

**Comment:**

We must have a regional plan to handle the aviation needs over the coming years.

Improve Ontario and Palmdale airports. Develop new airports to better serve other communities. This would more fairly share the burdens and benefits of aviation across Southern California.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02178-9**

**Comment:**

Stop this expensive and misguided plan for expanding LAX. We don't need more noise, pollution, and unbearable traffic to Playa del Rey, Westchester, El Segundo, and Inglewood.

The answer is a regional plan!

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

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**PC02179      Garbanati, James      None Provided      9/21/2001**

**PC02179-1**

**Comment:**

Aside from the community inconveniencies and harm that may occur with inappropriate expansion of LAX, a very real concern is the making of LAX "the hub" of air traffic. I have heard expressed that for monetary reasons it is cost effective for airlines and cargo shipping companies to have consolidated airport operations at one airport, i.e., LAX, that is not to have redundant operations elsewhere. However, to fail to build up passenger and cargo traffic at other airports is not in the best interests of the people of Los Angeles.

In light of the events of Sept. 11th, it is unwise to consolidate LAX into a more likely terrorist target. The world trade center buildings were symbolic but also were an area of maximum casualties because of the number of people in each building. To cripple LAX would be much more devastating to Los Angeles if it is the central focus of air traffic. A more distributed air traffic plan would be safer for LA and make all airports less likely as targets. What could be more devastating to the lives and economy of LA than to attack its critical link to the outside world? Although this would be true whether LAX were expanded or not, our long term capacity would be much more crippled if a network of airports carrying large capacity is not established.

I have heard that Disneyland could be a target because of its symbolism, but much greater threat to the lives and peace of mind of Angelenos now and in the future are wrapped up in a flawed plan to expand LAX and make it even more disproportionately important to air traffic and the livelihood of LA.

Please consider the new reality we are experiencing.

**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02180      Perkins, Jeanne      None Provided      9/15/2001**

**PC02180-1**

**Comment:**

It's superfluous to list all the usual reasons for not expanding LAX - and to list the reasons for using El Toro and other airports in the nearby Los Angeles area - Palmdale, Ontario, John Wayne - after the cruel events on September 11, 2001. It does not make sense nor is it fair to expect Westchester to be whittled away at AGAIN so that "ten pounds of potatoes" can be crammed into a five pound bag. Stop and think what would happen to So. Calif. if LAX had to be shut down for any reason - including acts of terror. Cargo and passenger service needs to be spread out - in order for us to protect our cities. It is so much better to experience a quiet Sepulveda and to realize it could be better permanently - It is not FAIR to expect LAX to shoulder more and more traffic.

Orange County may not want to share the responsibility, but they should not be allowed to use LAX and they'll get the message very quickly. We're not asking for them to take on LAX - just take on some of the responsibility for the growing

- noise
- pollution in the air
- truck traffic
- passenger traffic
- greasy residue on our yards & homes

**Response:**

Comment noted. Please see Response to Comments AL00051-93 and PC02131-5. Also, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.



**PC02180-2**

**Comment:**

Thank you for the chance to express the thoughts of someone who has lived in Westchester for 31 years and loves it.

**Response:**

Please see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester.

**PC02181      Maleman, Geoff      Westchester LAX Marina del Rey    9/21/2001  
Chamber of Commerce**

**PC02181-1**

**Comment:**

The Westchester/LAX/Marina del Rey Chamber of Commerce is an organization dedicated to the promotion of business opportunity in our service area which includes Westchester, Playa del Rey, and Marina del Rey. The Chamber has extensively reviewed the proposed plans for expansion of Los Angeles International Airport.

The Chamber recognizes that LAX is a vital economic engine that allows many of our local businesses to flourish. Despite our mission, we reluctantly find that despite claims to the contrary, there will be an adverse and negative impact on our communities. After reviewing the EIR/EIS documentation, the Chamber believes that there are less invasive and more efficient ways for LAX to accomplish its goals and protect the local community at the same time. Until such time as LAX expansion plans take into consideration the impacts on our constituency, the Chamber will be unable to support the proposed alternatives.

The Chamber specifically wishes to acknowledge and commend LAWA and in particular its Director Lydia Kennard for their willingness to work with the Chamber to maintain a dialogue regarding the future of LAX modernization and expansion and their willingness to discuss potential ways to accommodate the concerns raised by the Chamber in meetings with LAWA officials - even after the Chamber took its official position in opposition to the current alternatives. We believe that this spirit of cooperation can result in an eventual design of LAX which we will find acceptable. The Chamber is not opposed to every plan - this just isn't the right plan.

Ultimately we do note one inescapable truth inherent in every one of the proposed Alternatives - they are obsolete as soon as they are built. Each of the proposals is designed to meet the needs of LAX in 2015 - and at best might be built by then. Which means that by 2016 the design capacity of the proposal will already be exceeded. We can confront the ultimate problem now or later - but the Alternatives presented in the EIR are simply delaying the inevitable.

**Response:**

Comment noted. The proposed Master Plan uses a horizon year of 2015 for anticipating and planning for the types of improvements necessary at LAX to manage the level of airport activity projected for that time frame. As indicated in the construction phasing plans presented in Chapter 3 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, many of the improvements anticipated for the 2015 activity level would be completed well before 2015 to address the growth occurring at the time. It is important to note that each of the proposed alternatives incorporates certain "constraints" in the design that are anticipated to limit future activity levels at LAX in the future and, moreover, help to shift any additional demands to other airports in the region. This approach of avoiding expansion of LAX in favor of shifting future demands to other airports in the region is consistent with the policy framework of the 2001 Regional Transportation Plan (RTP) adopted by the Southern California Association of Governments, and is best reflected in the proposed design of Alternative D, as described in Chapter 3 of the Supplement to the Draft EIS/EIR. The effectiveness of this approach would be reevaluated as part of

### 3. Comments and Responses

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any future master planning efforts for LAX, as might occur in light of periodic updates to regional aviation demand forecasts for timeframes beyond 2015.

#### PC02181-2

##### Comment:

Comments to EIR/EIS

The Chamber is filing these written comments<sup>1</sup> to the EIR pointing out the impacts of the proposals on the surrounding business and residential communities served by the Chamber.<sup>2</sup> We have concluded that the proposed Alternatives are inconsistent with the basic goals of the Chamber regarding LAX expansion:

- No destruction of the Westchester Business District
- Control traffic impact on communities represented by the Chamber
- Control noise impact on communities represented by the Chamber

As a result, our focus in submitting these comments is on those portions of the EIR which impact upon these issues. This narrow focus should in no way imply to the reader that the treatment of other issues in the EIR are not equally flawed. Our focus has not been on impact on land use - social impacts, air quality, hydrology and water quality, cultural resources, biotic communities, endangered and threatened species, wetlands, floodplains, coastal zone management, light emissions, solid waste, construction impact, hazardous materials or any number of other areas required to be included in the EIR.

<sup>1</sup> For ease of reading, throughout these comments, references made to specific pages and figures in two documents submitted by Los Angeles World Airports ("LAWA"). The LAX Master Plan, Draft, dated November 7, 2000 (released 1/18/01), will be referred to as the "MP"; references made to the EIR/EIS will refer simply to the "EIR". Page numbers (e.g. p.271) refer to the page numbering in the relevant electronic documents of the EIR and MP as distributed in Adobe Acrobat for ease of reference by the reader.

<sup>2</sup> These comments are submitted pursuant to the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"). As an interested party as defined by CEQA § 15086(a)(4), the geographic area defining the Chamber's membership is proximate to LAX and is an area which the EIR admits will be significantly impacted by the proposals.

##### Response:

Comment noted. Please see Responses to Comments below. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. As indicated in TR-LU-2, Alternative D (LAWA staff's new preferred alternative), does not include any acquisition within the Westchester Business District.

#### PC02181-3

##### Comment:

The Chamber respectfully submits that neither the EIR nor the Master Plan itself meet the requirements of CEQA and NEPA and that they should be found to be inadequate. These comments present deficiencies in these documents which fatally flaw the presented proposals. The plans submitted by LAWA should therefore be substantially revised or scrapped altogether.

##### Response:

Comment noted.

**PC02181-4****Comment:**

As required by law, LAWA must respond to these comments in writing providing the necessary information, analysis, and as applicable, additional technical reports.<sup>3</sup> Said written responses to the comments contained herein shall be directed to:<sup>4</sup>

Westchester/LAX/Marina del Rey Chamber of Commerce  
9800 S. Sepulveda Blvd., #214  
Westchester, CA 90045  
Attn: Executive Director

3 CEQA, Public Resources Code Section 21000, et. .seq

4 CEQA, Public Resources Code Section 21092.5

**Response:**

In accordance with the provisions of NEPA and CEQA, FAA and LAWA have provided written responses to all comments received on the Draft EIS/EIR and Supplement to the Draft EIS/EIR, including the comments within this comment letter. The responses contain all necessary information and analysis. These responses are provided herein as part of this Final EIS/EIR. Section 21092.5 of CEQA cited by the commentor, requires the lead agency to provide "a written proposed response to a public agency on comments made by that agency." This provision applies only to comments received from public agencies. However, the Final EIS/EIR has been made available for public review at FAA and LAWA and through distribution to public libraries throughout the area, and is available electronically at [www.laxmasterplan.org](http://www.laxmasterplan.org).

**PC02181-5****Comment:**

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- A) No Alternatives Presented for Ground Transportation
- B) No Analysis of Impact of Intended Traffic Access Through Adjoining Communities
- C) Lack of Disclosure Regarding Traffic to LAX Through Residential Communities
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- B) Flawed Alternative Selection Methodology
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- D) Confusing and Inconsistent Nomenclature

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**Response:**

Please see Responses to Comments below.

**PC02181-6**

**Comment:**

I. GROUND ACCESS ISSUES

A) No Alternatives Presented for Ground Transportation

With respect to Ground Access, the EIR is fatally flawed in that it fails to provide any alternative to the one and only one alternative presented - namely a ring road combined with a West Terminal. The key to understanding the most important failure of the EIR with respect to Ground Access is that the Ground Access proposed in all three plans; to wit, Alternatives A, B and C, is identical. No options are given, despite the fact that options were analyzed at length in the Master Plan and that alternatives must be included in the EIR.

The Master Plan did study four alternatives for Ground Access.<sup>5</sup> They were:

Option 1 - Minimal Change (Existing Roads/No West Terminal)

Option 2 - Unconstrained (Loop Road w/West Terminal - No Intermodal Transfer Center)

Option 3 - New Landside Terminal East of the Existing Central Terminal Area (Including Intermodal Transfer Center)

Option 4 - Emphasis on Westside Access (Including Intermodal Transfer Center)

Effectively, the MP Option 2 referred to in the diagram shown at right<sup>6</sup> is the one adopted by the EIR. Of these four Options, the plans presented in EIR Alternatives A, B and C most similarly match Option 2 - "Unconstrained." Even the ring road connection leading to the proposed Arbor Vitae off ramp is shown in Option 2.

Option 2 is fully described in the Master Plan as follows:

"A ring road around the airport, utilizing Westchester Parkway, Sepulveda Boulevard, an extension of the I-105 Freeway to the west, and Pershing Drive, would serve access to the airport and circulation in and around the airport. An internal roadway, linking the existing CTA and new West Terminal, would be introduced and connected to the ring road. An APM system would be provided between the CTA and new West Terminal."<sup>6</sup>

By comparison, Option 1 is effectively the No Action Alternative.

Option 4 differs from the Alternatives in the EIR in that like Option 3, it does offer an Intermodal Transfer Center whereas Option 2 does not.

Option 3 demonstrated the feasibility of an alternative plan which had in its features neither a ring road, nor a West Terminal.<sup>7</sup> Option 3 therefore also has the advantage of having the least impact on surrounding communities and has an Intermodal Transfer Center.

With respect to Ground Access to LAX, the three "Alternatives" presented in the EIR are not alternatives at all -they are all the same monolithic proposal, namely Option 2 from the Master Plan. It is important to understand that as shown above, there are other viable alternatives - fully analyzed in the Master Plan - that are not presented in the EIR. Options 3 & 4 not only meet the needs of LAX, they are actually superior to Option 2, yet, they are given no ink in the EIR itself.

<sup>5</sup> See also Regional Access Assumptions, MP, Chapter 5, Part 1, Section 2.5.2.3, V-2.153

<sup>6</sup> 2d Iteration Ground Access Options, MP, Chapter 5, Part 1, p. 177, Figure V-2.49.

<sup>7</sup> 2d Iteration Ground Access Options, MP, Chapter 5, Part 1, p.177, Figure V-2.51

**Response:**

Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. This alternative is analyzed

in the Supplement to the Draft EIS/EIR. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

#### PC02181-7

##### Comment:

B) Lack of Disclosure Regarding Traffic to LAX Through Residential Communities

The EIR Alternatives are also flawed in that the EIR document fails to disclose the real reason for the selection of the Ring Road/West Terminal "Option 2" Ground Access as the single proposed approach. However, it is clear from reading LAWA's own Master Plan document that the reason for preferring the Ring Road/West Terminal is related to an undisclosed preferred approach to LAX through the residential community of Playa del Rey.

In the absence of a desire to create a new backdoor to LAX, there would be no reason for either the Ring Road or the West Terminal. As noted above Master Plan analysis found that the needs of LAX for Ground Access are all met by the MP Option 3 roadway design which is devoid of these intrusive features.

A reference to the accompanying map shown at right for Option 2 shown graphically displays this new approach route highlighted in black.

As quoted from the Master Plan: "Option 2, the 'Unconstrained Option,' attempts to provide improved regional access via two areas: 1) the I-405 freeway, with elevated HOV lanes above Century Boulevard, providing a direct HOV linkage from the freeway into and out of the airport at the Sepulveda Boulevard entrance and 2) the Marina Freeway and Culver Boulevard, providing an additional major access route to the new West Terminal.

To facilitate major access to the west side of the airport from Culver Boulevard, a connection would be made from Culver Boulevard to Pershing Drive, via Falmouth Avenue. Westchester Parkway would be realigned to serve as a part of the proposed ring road. Along with this realignment, Lincoln Boulevard would terminate at Westchester Parkway."8

The failure to disclose this intended use of the proposed Ring Road and West Terminal fatally flaws the EIR in that the impacts on the community of this traffic are simply not even addressed let alone mitigated, and there are no alternatives presented, such as a closed loop around the airport or the Eastside approach of Option 3.9

The impact of traffic directed through Playa del Rey as shown on LAWA's own diagrams cannot be understated. One must keep in mind that the current approach to LAX by the vast majority of all traffic is via either the 105 to Sepulveda Boulevard northbound to the CTA, or via Century Boulevard to the CTA. In other words, at the present time, traffic comes to LAX through heavily commercial areas, not through residential communities. It is respectfully submitted that bringing such traffic through Playa del Rey is not an appropriate approach and would have serious and negative repercussions which are not even remotely addressed by the EIR.

Furthermore, the People Mover analysis in an Appendix to the Master Plan shows that access to midfield terminals can be achieved without need for a Ring Road or a West Terminal for vehicle traffic. This is the model currently in use at many airports including Atlanta and Hong Kong.

It should also be noted that the lack of understanding regarding the access through residential communities extends throughout LAWA. Officials of LAWA have disavowed the intent of the ring road to draw traffic through Playa del Rey, stating that to the contrary, it is their belief that there was not to be access through residential areas to the ring road. Yet the Master Plan distinctly calls for access via Pershing Blvd from both the North and the South.

In the EIR the level of detail regarding proposed on and off ramps to access the Ring Road is also inadequate to determine the final impact of the proposals. It is respectfully submitted that Ground Access options warrant their own separate Project Level EIR.

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8 Analysis of 2d Iteration Option 2, Unconstrained, Description Summary, MP, Chapter 5, Part 1, p.248, Section 2.6.4.1 (boldface emphasis added).

9 Analysis of 2d Iteration Option 2, Unconstrained, Description Summary, MP, Chapter 5, Part 1, p.251, Figure V-2.86.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns. Alternatives A, B, and C would be designed to limit west terminal access from the north on Pershing Drive. While access would be provided from Playa del Rey to and from the east on the Ring Road, direct access to and from the west terminal would not be allowed. This is designed to restrict airport cut-through traffic in Playa del Rey. This should help the airport traffic issues in that community.

The design features that the commenter refers to are not included in the proposed alternatives. Chapter 3, Alternatives, of the Draft EIS/EIR discussed the alternatives. The Draft EIS/EIR and Supplement to the Draft EIS/EIR are program-level environmental documents intended to analyze the impacts of a master plan. It is acknowledged that further documentation may be required to address certain environmental issues in a more specific manner, as necessary and appropriate. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

**PC02181-8**

**Comment:**

C) Lack of Intermodal Transportation Center

The EIR specifically addresses needs relating to both automobile and mass transit access. Although the Master Plan Ground Access Options 3 & 4 both identified and located an Intermodal Transportation Center (shown as a star in MP Option 3 diagram on next page) as a key component to improve ground access, the concept has apparently been dropped in favor of the Option 2 Ring Road/West Terminal plan without mention of the alternative in the EIR. No rationale is given for dropping the Intermodal Transportation Center. As the EIR notes:

"LAX is one of the few major airports in the U.S. that does not have a direct link between its regional roadway system and the airport terminal. The I-105 freeway ends at Sepulveda Boulevard on which vehicles transition to the airport roadways. A large proportion of airport traffic travels on Aviation, Century, Lincoln, and Sepulveda boulevards and other local streets, contributing to congestion, noise, and air pollution in neighboring communities.

The benefits of direct freeway access to LAX would include a segregated flow of traffic from the region to the passenger and cargo terminals. This would reduce the impact of traffic on the airport's local communities by keeping cars bound for the airport out of business districts, which depend on unimpeded access, and out of residential neighborhoods. Direct rapid transit access is one of the best ways to ensure that employment opportunities associated with the airport are available to all of the region's residents. While transit systems can attract a modest amount of airport passenger traffic, other cities have found that the greatest benefits of rapid transit result from increased accessibility by employees and fewer employee vehicle trips to and from the airport area. A transit link would reduce the need for remote employee parking lots and corresponding shuttle bus traffic. The overall need for roadway improvements would be proportionally reduced".<sup>10</sup>

10. EIR p.2-10.

**Response:**

Please see Topical Response TR-ST-5 regarding the rail and transit opportunities and Topical Response TR-ST-2 regarding surface transportation analysis methodology and results.

#### PC02181-9

**Comment:**

D) Traffic Analysis Understates Real Impact of LAX Expansion

EIR Figure 4.3.2-4 defies all logic until the underlying data manipulation is understood.

If one is to believe the Figure, traffic will be reduced (where shown as blue roadways) on the 405 Freeway even though there will be tens of millions more passengers coming and going from LAX on an annual basis. But unlike noise, which must be measured on a 24 hour weighted basis (CNEL), the traffic analysis focuses on a single snapshot in time -namely, "PM Peak Hour."

Careful review of the underlying assumptions reveals that the EIR counts on a reduction in "Phantom Workers" to accomplish the seemingly impossible reduction in traffic with an increase in automobile trips. The EIR claims that since the current plan for the "Northside" business park will be scaled back to comprise the new "Southside" business park if the Alternatives are adopted, that they can take credit for the workers that would have been getting in their cars at PM Peak Hour in their comparison. But of course, none of those buildings now exist, nor will they exist at any time in the foreseeable future, so they are deducting from their traffic forecasts at rush hour, workers that do not exist. Yet, the deduction of Phantom Workers does not reflect the true impact of 89-98 MAP on the roadways surrounding LAX and therefore the impacts are dramatically understated and inaccurate. Furthermore, if measured on a 24 hour basis, the traffic analysis would not be skewed so dramatically by the deduction of the Phantom Workers that would arrive and depart in great number only during peak traffic hours. This particular traffic study is flawed by its failure to analyze traffic impact over the complete day rather than at the one moment in time that most minimizes impact. We would encourage LAWA to undertake a more complete and accurate traffic study.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and results, particularly Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs.

#### PC02181-10

**Comment:**

Finally, the traffic analysis fails to consider the substantial impact that the proposed Ring Road will have on existing North/South commuter traffic. As is, LAX presents a major obstacle to such traffic flow, and the proposals will effectively remove Pershing Drive and Lincoln Boulevard as commuter routes, forcing all of that traffic onto Vista del Mar to the West and Sepulveda to the East - both of which are already heavily traveled. The EIR is devoid of analysis of the impact on this commuter traffic.

**Response:**

Under Alternatives A, B, and C, the intersection of Pershing Drive and Westchester Parkway would be revised (Alternative D does not include a Ring Road.) Most of the turning movements would still be allowed, but a few movements would be eliminated. It would still be possible to turn right or left from southbound Pershing Drive onto Westchester Parkway and/or Sandpiper Street. It would also be possible to turn right or left from Westchester Parkway or Sandpiper Street onto northbound Pershing Drive.

The turning movements that would be eliminated would be the north/south through trips on Pershing Drive, the eastbound right turn from Sandpiper Street to southbound Pershing Drive, the northbound left turn from northbound Pershing Drive to westbound Sandpiper Street, and all U-turns. These movements would be eliminated in order to avoid large increases in trips on Pershing Drive and other arterial streets in Playa Del Rey and El Segundo, as well as to improve operations of the access road system to the West Terminal. Elimination of these movements would mean that the following connections would not be possible to/from Pershing Drive in Playa Del Rey:

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Access to/from the LAX West Terminal (access to streets connected to the East Terminal would be allowed from Pershing Drive, but connections to/from the West Terminal from Playa Del Rey would need to be made via another street such as Lincoln Boulevard to the Ring Road); and through trips along Pershing to/from Imperial Highway.

The modified connection would allow full access between the Westchester and Playa Del Rey communities via Westchester Parkway and Pershing Drive. Access between Playa Del Rey and El Segundo would be impacted. Vehicles wishing to travel along Pershing Drive from Imperial Highway into Playa Del Rey would be required to use either Vista Del Mar or Sepulveda Boulevard between Imperial Highway and Westchester Parkway.

At the intersection of Pershing Drive and Imperial Highway, all turning movements would be allowed except the eastbound left turn from Imperial Highway to Pershing Drive, the southbound right turn from southbound Pershing Drive to Imperial Highway, and all U-turns. It should be noted that Pershing Drive is not a through street today, and does not continue into El Segundo south of Imperial Highway. Vehicles wishing to access Pershing Drive to/from El Segundo today must use other streets in El Segundo such as Vista Del Mar, Main Street, and Sepulveda Boulevard. In the LAX Master Plan alternatives, there are two alternative paths available for accessing Pershing Drive from Imperial Highway. One alternative is to use Vista Del Mar, which is only about 1,700 feet away. The other alternative path, which uses Sepulveda Boulevard, Lincoln Boulevard, and Westchester Parkway to travel between El Segundo and Playa Del Rey, includes many intersection and roadway improvements that would improve the attractiveness of this alternative and mitigate this impact.

#### PC02181-11

##### Comment:

#### II. RUNWAY CONFIGURATION ISSUES

##### A) No Mention of Impact of Relocation of Northernmost Runway on Westchester Business District

The primary reason for the dislocation of businesses in the South Westchester Business District is the intrusion of the underpass on Sepulveda where it passes below grade underneath the proposed Ring Road. A number of factors contribute to the problem, but most importantly is the proposal for the relocation of the Northernmost runway further to the North to allow for a taxiway between the North runways. Moving Runway 24R North by 350 feet moves the commencement point for the transition to the underpass ramp that much further North as well. Additionally, FAA mandated setback requirements for building heights impact the Westchester business community. The difference in impact resulting from the relocation of the runway and the attendant dislocation of Westchester businesses from either cause is not quantified or identified in the EIR.

##### Response:

The areas proposed for acquisition in Westchester under Alternatives A, B, and C are intended for portions of a ring road, an open space landscape buffer, and berms. Under Alternative C, runway 24 R would be relocated 350 feet to the north. While Alternative A, which adds a runway to the north airfield, does involve greater acquisition within the Westchester Business District than Alternatives B and C (by three and five acres respectively), all of these alternatives include acquisition within the District. Acquisition impacts are fully detailed and described in Section 4.4.2, Relocation of Residents or Businesses, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

The Supplement to the Draft EIS/EIR provides additional discussion beyond that presented in the Draft EIS/EIR of potential acquisition effects on the Westchester Business District. As described in Section 4.2, Land Use (subsections 4.2.6.2 through 4.2.6.4), acquisition within the Westchester Business District would be about 16 acres or 31 percent of the District under Alternative A, about 11 acres or 21 percent under Alternative B, or approximately 13 acres or 26 percent of the District under Alternative C. Under Alternatives A through C, relocation opportunities would be available for some uses nearby within Westchester Southside. Also, many of the uses being acquired are airport related and a number of the community related uses that would be acquired (a bank, an office supply store, a bar and beauty shop) would still remain available through similar businesses that are located in close proximity within the Westchester Business District.



Also, as described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, note that in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any acquisition within the Westchester Business District. Refer to Topical Response TR-LU-2 for further discussion of effects on the community of Westchester.

Regarding impacts on the Westchester business community resulting from FAA mandated setback requirements for building heights, as described in Section 4.24.3 and shown on Figure 4.24.3-4 of the Draft EIS/EIR, under 1996 baseline conditions, a portion of the Westchester Business District is currently located within a Runway Protection Zone (RPZ) which governs building heights and imposes other land use restrictions. As shown on Figure 4.24.3-20 of the Draft EIS/EIR, under Alternative C, portions of the Westchester Business District would remain within an RPZ. However, as shown on Figure 4.24.3-17, only under Alternative B was acquisition proposed in conjunction with expanding the RPZ beyond its existing boundaries in the Westchester Business District. Under Alternative B, approximately 11 acres of acquisition within the Westchester Business District would be associated with the RPZ and the development of the ring road. Although a portion of the Westchester Business District would be located within the RPZ under Alternative D, similar to 1996 baseline conditions (see Figure S4.24.3-7 of the Supplement to the Draft EIS/EIR and Figure 4.24.3-4 of the Draft EIS/EIR, respectively), no acquisition in the Westchester Business District is proposed, because no ring road would be developed.

#### PC02181-12

**Comment:**

B) Air Noise Envelope Relies on Changes in Aircraft That Cannot Be Guaranteed

The assumption that Stage 3 aircraft noise regulations will be fully implemented by 2015 is not justified. When passed by Congress, these regulations were to have been fully implemented no later than year 2000. Yet, at the present time, such rules are only partially in place with a substantial number of aircraft operating out of LAX exempt from the regulations. In order for the noise contours that LAX shows in the EIR will be reflective of the impact on the communities adjacent to the airport to be constrained to the parameters claimed, a complete implementation of Stage 3 aircraft is required, yet it is mere speculation to believe that these measures can be reliably counted upon to reduce the noise footprint of the substantially expanded number of daily flight operations envisioned by the three Alternative presented in the EIR.

**Response:**

Please see Topical Response TR-N-7 regarding noise abatement measures/enforcement, particularly Subtopical Response TR-N-7.6 regarding ANCA Phase-out of Stage 2 aircraft, Topical Response TR-N-1 regarding the noise modeling approach, particularly Subtopical Response TR-N-1.5 regarding the accuracy of forecast fleet mix, and Topical Response TR-N-6 regarding noise increase, particularly Subtopical Response TR-N-6.2 regarding relationship between traffic levels and noise levels.

#### PC02181-13

**Comment:**

In fact, the EIR shows that Alternatives A&C actually reduce the total noise exposure from flight operations, but reading the details more carefully, it is clearly stated that "The reduction in noise exposure is the result of a federally mandated phase out of older, noisier Stage 2 jets."<sup>11</sup> Critically, the EIR is flawed for failing to provide the data on the number of impacted people exposed to noise levels of 65 CNEL or greater if the critical assumption of full implementation of Stage 3 guidelines is not met.

11 EIR p.4-11.

**Response:**

The commentor accurately describes a portion of the data provided in the Draft EIS/EIR. Please see Topical Response TR-N-7 regarding noise abatement measures/enforcement particularly Subtopical Response TR-N-7.6 regarding ANCA Phase-out of Stage 2 aircraft.

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#### PC02181-14

**Comment:**

Even with the reliance on aircraft regulations which may not take place, Alternative B nonetheless increases total noise exposure and should be rejected as the most intrusive of the three expansion Alternatives.

**Response:**

Comment noted. The commentor is correct in identifying that Alternative B would have the greatest noise impact.

#### PC02181-15

**Comment:**

C) Redundant 12000 Foot Runway (24L) is Unnecessary

While the Master Plan justifies the necessity of a 12000 foot runway to provide a safe landing for the largest aircraft in inclement weather, Alternatives A, B and C all provide for the extension of an existing runway on the North side of the airfield to the 12000 foot length while failing to compare or provide any alternatives that do not include said runway extension. Furthermore, the EIR and MP fail to note that such a runway is not in any event justified because the airfield already has a 12000 foot runway located on the South side of the airfield. The EIR fails to specifically address the reasons for including this aspect of the designs submitted which substantially extend the impacts of LAX operations to the North and East including but not limited to the tunneling of Sepulveda Boulevard and its attendant impact on the Westchester business community.

**Response:**

Comment noted. The runway that would be lengthened in the north airfield to 12,000 feet in Master Plan build alternatives A, B, and C would accommodate departure operations and provide operation flexibility and enhance airfield efficiency. The alternative in the Master Plan which does not extend Runway 6R/24L is the No Action/No Project Alternative. The Master Plan Chapter V, Sections 3.3.1.1, 3.3.1.2, 3.3.1.3, and 3.3.1.4 and the Draft EIS/EIR Chapter 3, Sections 3.2.4, 3.2.5, 3.2.6, and 3.2.7 provide in detail the descriptions of the No Action/No Project Alternative and build alternatives and address the reasons for the runway extension. Please also see Response to Comment AL00022-188 for a more detailed discussion on the necessity of extending Runway 6R/24L.

#### PC02181-16

**Comment:**

D) No Action Proposal Fails to Look at Mitigation Measures Applied Without Runway Changes

The Alternatives proposed all provide for a common set of measures designed to reduce the impact of aircraft noise. Since none of the proposed mitigation measures requires or is linked to the proposed expansion plans, there is no apparent reason why they should not have been applied to the No Action Alternative in comparing apples to apples.

Specific mitigation measures referred to that are not dependent on expansion include the following:12

"- Installation of fixed ground power and/or air conditioning service at each aircraft parking position at the terminals. The consolidation of maintenance run-up activity at locations between the runways and the construction of ground maintenance run-up enclosures would reduce noise levels so that they do not affect the noise contours off the airport. Stationary power sources at the parking positions would eliminate the need for portable generators at each aircraft location and the noise associated with their use.

12 EIR, p.4-43

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise abatement components in Master Plan Commitments in Section 4.1.5. The No Action/No Project Alternative assumes that no new improvements will be implemented during the planning period with the exception of currently planned and programmed projects at the airport and related regional transportation infrastructure. Other than what is already contemplated by the Part 150 program, if there is no action there will be no mitigation. The airlines are expected to change the air service provided at the airport as a result of the capacity limitations imposed by the continuation of the environmental baseline four system runway and airspace configuration and by environmental baseline terminal facility and aircraft gate limitations. The fleet of aircraft is expected to include a larger share of wide-body aircraft up to the capacity of the present terminals. The commentator is correct in identifying that certain mitigation measures are not dependent on expansion. Installation of fixed ground power and/or air conditioning service at each aircraft parking position at the terminals has already been done at LAX as part of its air quality mitigation program. Airport restrictions are in place that prohibit ground run-up operations during the period between 11 p.m. and 6 a.m. without express approval by the Executive Director of the airport or a designee. The Airport Operations staff is authorized to shut any run-ups down that are found during these hours. Each future development alternative includes the provision of Ground Run-up Enclosures - facilities that substantially reduce the levels of run-up noise heard in the community. The relocation and consolidation of run-up facilities on the airport would require a redesign of the current facility locations, as is proposed by the various development alternatives. Noise levels outside dwellings can only be mitigated by removal or quieting of the noise source - both are impractical at LAX.

**PC02181-17****Comment:**

- Develop instrument departure procedures that guide all westerly departures to the coastline before initiating turns. The use of advanced Flight Management System (FMS) and/or Global Positioning System (GPS) navigation procedures to better direct departing aircraft along straight-out courses from the runways until reaching the coast would reduce the breadth of the contour pattern north and south of the airport, west of the runway mid-points, by reducing the degree of dispersion along the departure path between takeoff and 3,000 feet altitude. After the runways are relocated in the long-term, these procedures would be redeveloped for the new runway end points.

**Response:**

The commentator's suggestions were incorporated into the recommended mitigation actions for each future alternative. All future alternatives identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR show aircraft crossing the coastline before initiating turns.

**PC02181-18****Comment:**

- Construction of high-speed exits from arrival runways. This measure is incorporated into the Master Plan configuration to enhance the efficiency of traffic flow, but would also reduce the time an aircraft remains on the runway and require less application of reverse thrust to slow the aircraft. As the aircraft exits the runway toward the interior of the airfield, it would move away from the adjacent residential areas north and south of the complex, thus reducing the noise levels from the arrivals."

**Response:**

The commentator is correct in his analysis of the noise-related effects of high speed taxiways. High speed taxiways have been incorporated into the plans for each build alternative.

**PC02181-19****Comment:**

E) EIR Fails to Adequately Consider Impact of Design on Runway Incursions

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Since the date of the issuance of the draft EIR, there has been substantial attention given to the issue of runway incursions both by the press and the FAA. Some of the latest thought on this issue is that the danger presented by runway incursions can be greatly reduced by the routing of aircraft around the ends of the runways rather than crossing active runways while taxiing. This safety issue is not only inadequately addressed by the EIR which is outdated on this topic, it must by necessity cause a complete reconsideration of the proposed runway design and the installation of a taxiway in between runways which is designed to facilitate planes crossing the inner runway to the outer runway both prior to takeoff and following landings. It would be highly imprudent to leave this issue inadequately updated with the latest data and thinking while simultaneously advocating a major runway redesign which appears to run contrary to current thinking on this safety issue.

**Response:**

One of the guiding principles in the LAX Master Plan proposal is to enhance the margin of safety for the LAX airfield. The commentor is correct in that Airport layout and design play a contributory role in runway incursions. This is especially true where there is minimal runway spacing between parallel runways or multiple exits from runways in areas of complex ground operations. The proposed center taxiway between the closely spaced parallel runways would provide a safe area allowing pilots to orientate themselves before their next action by slowing down or stopping without unsafely interfering with other aircraft operations; thereby, reducing the potential for runway incursions. For further discussion of safety enhancements through proposed airfield projects in the Master Plan Alternatives, please see Response to Comment PC00563-4 and Chapter V, Section 3.3 of the Draft LAX Master Plan.

Los Angeles World Airports (LAWA) has been very proactive in establishing additional marking and lighting to preclude runway incursions. The airport has installed multiple sets of "wig-wag" lights at every runway/taxiway intersection. They have also set a new schedule for the painting of hold bars at runway/taxiway intersections to ensure paint is not obliterated by normal operations. Since the issuance of the Draft EIS/EIR the FAA has commissioned the Airport Movement Area Safety System (AMASS) at Los Angeles International Airport. It was commissioned in September 2001.

There also is an on-going study of perimeter taxi routes being conducted by NASA and other airports to assess the operational and safety benefits by minimizing runway crossings.

#### PC02181-20

**Comment:**

III. TERMINAL CONFIGURATION ISSUES

A) Evaluation Matrix Flawed

The terminal evaluation process that resulted in the choices proposed in the EIR is itself flawed in two respects: 1) By design, there was no input from impacted persons or businesses in the surrounding communities; and, 2) The criteria used was weighted to minimize adverse impacts as a part of the decision making process. As a result, thoroughly studied and viable alternatives which meet the needs of LAX and were less intrusive were left out of the EIR entirely. The text accompanying the Terminal Evaluation Matrix states:

"2.2.6 2ND ITERATION INITIAL TERMINAL EVALUATION PROCESS

To reduce the number of conceptual terminal options for further refinement and development, a simple evaluation system was developed for use in the 2nd iteration concept development. This system consists of a matrix containing the evaluation criteria presented in Figure V-2.23 in which conceptual options are ranked using a grade of plus, minus, or zero. Input to this initial evaluation process was received from members of the LAX Master Plan Team, LAWA, airlines, and various other terminal users and tenants. This preliminary evaluation process resulted in four of the terminal options being retained for further refinement and evaluation."<sup>13</sup>

Notable to this process was the lack of input from any of the persons or businesses that will bear the brunt of the impact from the chosen designs. Only "members of the LAX Master Plan Team, LAWA,

airlines, and various other terminal users and tenants"were asked when it came time to evaluate the options.

The most amazing part of this flawed process is that of the +/-25 points that were accorded to each terminal proposal, only 1 single point was accorded to "Potential Impacts" -weighted the same as such categories as "Intuitive Way Finding" and "Architectural/Landscape Design Potential". While we strongly object to the dramatic minimization of impact as a criteria important to the selection process, and understand how it is that proposals that do make sense did not make it through the process, there is no explanation whatever as to why any one of these terminal proposals should have received a plus, zero or minus on any of the criteria set forth. It appears to be wholly arbitrary.

13 MP, Section 5, Part 2.2.6 (p.107) Terminal Evaluation Process (boldface added for emphasis)

**Response:**

The evaluation process of the four terminal options was conducted solely based on the actual configuration of the terminals and associated parallel concourses. Alternatives A, B, and C all have a terminal processor located on the west side of the airport. Certain configurations of the processor yield benefits in meeting requirements such as (but not limited to) curbside demand, parking facilities and level of service for roads.

The evaluation team consisted of those parties that have a direct interest in the operation and configuration of the airport. The team members acted with the understanding that impacts arising from alternatives presented would be identified, input from interested parties would be solicited and incorporated, mitigation of identified impacts would be prepared, and an alternative selected with full knowledge of all benefits, costs, impacts, and mitigation.

The commentor's suggestion that the evaluation is flawed because criteria such as potential impacts were not heavily weighted is noted. However, potential impact as depicted in Figure V-2.23 in Chapter V, Section 2.2.6 of the Draft LAX Master Plan refers to impacts associated with implementation and phasing with existing on-airport facilities such as cargo and maintenance hangars. It does not refer to the general overall impact of the West Terminal project. Because all alternatives impact the region, one purpose of the Draft EIS/EIR is to evaluate the severity of those impacts and identify mitigation that may reduce or eliminate those impacts.

**PC02181-21**

**Comment:**

B) No Variation of Terminals in EIR Alternatives

As is the case with the Ground Access plans presented in the three Alternatives in the EIR, there is likewise no variation or options given with respect to terminal configuration. What we do know is that the EIR states that in order to meet the projected needs of flight operations at LAX in 2015, the airport needs to have a gate capacity of 276 Narrow Body Equivalent Gates (NBEG).<sup>14</sup> Yet, neither LAWA's preferred Alternative C nor Alternatives A&B will meet that stated objective.

Once again, what is ignored is that there are alternatives not presented to the public in the EIR with equal or greater capacities than the proposed Alternatives which appeared in the Master Plan. A refinement of the design concepts contained in Options 6, 7,8 or 17 - not one of which provides for a ring road or a West Terminal - could meet or exceed the design capacities of the proposed Alternatives.<sup>15</sup>

Case in point is that by completing the third midfield terminal in Option 6 (shown on next page), enough gates would be added to meet the stated NBEG target.

Compliance with law relating to the EIR mandates that less intrusive alternatives be reviewed -yet, as is often the case with the EIR, although less intrusive alternatives in fact exist, the EIR fails to disclose that there are alternatives that have dramatically reduced impact on surrounding business and residential communities.

<sup>14</sup> EIR p.2.9

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15 MP, Appendix C, Figures V-C.6, V-C.7, V-C.8, V-C.17, pgs.7-9, 19.

**Response:**

A series of preliminary terminal development options were developed and included in the Draft Master Plan Appendix V-C. These options varied in nature; some met the unconstrained demand and others that did not. An evaluation process was conducted to determine which conceptual options should be brought forward in the process. The results served as the basis for Alternatives A, B, and C. For a description of the process please see Response to Comment PC02181-20.

Ultimately, Alternatives A, B, C, and D do not meet the unconstrained gate requirement of 276 NBEG gates. The alternatives proposed are an attempt to meet the overall needs of the stakeholders to varying degrees by providing an alternative that had balanced capacities of functions. All of the alternatives could be modified to provide additional gates, however other critical elements of the airport would need to be reduced and/or eliminated (i.e., cargo airline maintenance etc.).

**PC02181-22**

**Comment:**

C) Deleted Terminals

Past history has unfortunately shown that LAX promises of capacity limits have not been kept - such limits have been greatly surpassed. In fact, the design capacity of LAX pursuant to the 1978 Master Plan and EIR which were adopted and built by 1984 was for a maximum size of 40 MAP. That capacity was reached in 1986 - only two year after build out. As of 2000, with an approved EIR for 40 MAP still in effect, LAX operated at in excess of 67 MAP! Consequently, we believe it is wholly inappropriate for the EIR to be reviewed and potentially approved based on a limited evaluation of environmental impacts related to the proposed design capacity of the Alternatives presented, but rather, such impacts must be reviewed in light of the certainty that the design capacity of the airport will be immediately exceeded.

Exacerbating this problem is the fact that the three Alternatives presented in the EIR materially vary in their design capacity predominantly due to the number and configuration of terminal buildings placed between the existing CTA and the proposed West Terminal. Alternatives A&B fill the space between the CTA and West Terminal while in Alternative C, the designers simply used an eraser to delete two such terminal structures - but there are little or no barriers to LAX later building these structures and filling in the gaps without necessity of a massive new EIR process. In fact, the infrastructure provided by the West Terminal is in reality there to support this possible future expansion. Interestingly, not even one of the final terminal design concepts in the Master Plan failed to fully utilize the entire space between the CTA and West Terminal-therefore it is logical to conclude that the EIR is flawed in failing to disclose that Alternative C will ultimately result in a design capacity similar to its brethren Alternatives A&B both of which have identical design capacities of 98 MAP compared to Alternative C's design capacity of 89 MAP.

**Response:**

Please see Topical Response TR-GEN-3 regarding the projected versus actual capacity at LAX. The design constraint that determines the 89 MAP served by Alternative C as compared to the 98 MAP served by Alternatives A and B is the four-runway airfield configuration (compared to the five-runway system of Alternatives A and B), and is not based on the design of the West Terminal. It should be noted that Alternative D, added subsequent to publication of the Draft EIS/EIR, uses a terminal gate frontage constraint to result in reduced future (2015) activity levels that are comparable to those of the No Action/No Project Alternative.

**PC02181-23**

**Comment:**

IV. OVERALL COMMENTS

A) No Environmental Baseline for Comparison Provided

It is impossible to see the true impact of the proposals because the EIR is devoid of a true environmental baseline for comparison. The 1996 baseline data (and traffic data as old as 1994) fails to satisfy the requirements of CEQA that the baseline for comparison be as of the time that the EIR is submitted, not some five years earlier. Likewise, the "No Action/No Project" proposal fails to provide a baseline as it only provides conjecture as to future conditions - not present conditions as required by CEQA. Similarly, comparisons to impacts in 2005 and 2015 fail to meet the requirement of providing baselines for comparison to existing conditions.

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

**PC02181-24**

**Comment:**

B) Flawed Alternative Selection Methodology

2d Iteration Concept Development resulting in the three Alternatives presented in the EIR clearly show that primary focus was placed on airside operations. As a result, relatively minimal consideration was given to Ground Access and Terminal Configuration in making the final choices for the EIR. Yet these choices critically impact the local communities and business district. A review of Figure 3.2 shows this clearly16:

16 EIR, Chapter 3 - Alternatives, p.9

**Response:**

While the 2nd iteration concept development did account for potential terminal and landside configurations, the commentor is correct that the emphasis at that stage of development was on the airside. This is because runway configurations are much less flexible than terminal and landside options, and can require significantly more land area. They consequently tend to have a much broader range of environmental impacts than do different terminal and landside options. Most terminal and landside options can be adapted to fit into various runway configurations, but the reverse is not true. Therefore, it was important that the runway configurations primarily drive the early stages of concept development.

**PC02181-25**

**Comment:**

C) Understatement of Impact on Businesses/Vague Mitigation Measures

LAWA figures state that 238 businesses will be impacted by expansion plans, yet there are 340 businesses located in the three office buildings located at Westchester Parkway and Sepulveda Boulevard alone.

**Response:**

Please see Response to Comment PC01881-156 regarding the number of businesses identified for acquisition and recent updates to the land acquisition data.

**PC02181-26**

**Comment:**

While LAWA refers to an "aggressive relocation strategy to retain businesses" it also indicates that while all of these business properties will be acquired by 2005, only 40% of their proposed Southside business park will be completed by that time. Even when completed, LAWA readily admits that many businesses will not be relocated, but rather that businesses impacted will be "invited" on the basis of priority given to businesses with the greatest employment and tax basis for the city. Such a plan is not disclosed in the EIR in any detail to see what is meant by these public comments 17, nor is it appropriate to simply focus on giving relocation assistance to big business which meets the "invitation"

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criteria set forth while small businesses-those least likely to be able to absorb the economic impact of forced dislocation are not given adequate relocation assistance. Until the plans for handling the impact on dislocated businesses are spelled out in detail and can therefore be adequately scrutinized for the timing and breadth of the mitigation offered, the EIR is deficient in an area critical to the Chamber.

By comparison, LAX in fact did a detailed plan including face to face surveys in the community to get an accurate understanding of impacts before drafting and implementing its plan for the Belford/Manchester land acquisitions. Ultimately, the problem is this: How do you have public hearings w/o specific plans to comment upon?

17 In fact, details of the entire Southside Business Park concept have yet to be presented either to this commenting organization, or to the community and is not contained in any Appendix or Exhibit to the Master Plan or EIR. As such, the EIR fails to provide the information regarding this major aspect of the claimed mitigation of impacts on the Westchester Business District.

**Response:**

The Master Plan includes a Preliminary Property Acquisition and Relocation Plan, originally provided in Appendix P to Chapter V of the Master Plan (January 2001), and updated in Chapters 2.7 and 2.8 of the Master Plan Addendum (June 2003). The Plan includes parcel-level detail for the properties proposed for acquisition under the Master Plan alternatives, an assessment of relocation effects, and a recommended approach to relocation. As discussed therein, a final relocation plan would be developed as soon as possible and would detail relocation needs, specific procedures, and special considerations. As described in the Proposed Relocation Plan, fair market value will be offered property owners for the acquisition of their property. The appraised fair market value of a property will disregard any decrease or increase in the fair market value of the property caused by the project. In addition, owners and tenants displaced due to the acquisition of their home will be provided a replacement housing payment which can be used to purchase or lease a comparable replacement dwelling in a neighborhood distant from an airport and not subject to airport noise. Thus, the payments offered to homeowner and tenant occupants allow relocation to a comparable home in an area unaffected by airport impacts. A variety of relocation payments may also be provided to eligible displaced persons to compensate for moving expenses, mortgage interest rate differentials or rent differentials, down payment assistance, and assorted incidental costs. The procedures for residential acquisition and relocation would be identical to those detailed within LAWA's Final Relocation Plan - Voluntary Residential Acquisition/Relocation Program for the Areas Manchester Square and Airport/Belford (Existing Relocation Plan), dated June 2000. In compliance with the Uniform Act, state and local regulations, and FAA Advisory Circular 150/5100-17, LAWA has also proposed Master Plan Commitment RBR-1, Residential and Business Relocation Program (Alternatives A, B, C, and D). This commitment has been revised since publication of the Draft EIS/EIR to clarify the timing of the commitment, conform to statutory language, and address a recent LAWA housing program related to relocation issues (the Move On Housing Program). The text of this commitment is provided in its entirety in Section 4.4.2, Relocation of Residences or Businesses, of the Supplement to the Draft EIS/EIR. The proposed relocation program builds upon the existing program currently in place as part of the Voluntary Residential Acquisition/Relocation Program for the Belford and Manchester Square areas. Please see Response to Comment PC0013-5 for further discussion of business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan.

**PC02181-27**

**Comment:**

Furthermore, mitigation measures proposed by the MP/EIR are not tied to any specific timetable which would necessitate their implementation concurrent with the impacts created by expansion. Specific examples impacting the Chamber include the failure to provide timetables for development of the Southside Business Park, a complete absence of information regarding the "phasing" of traffic mitigation proposals<sup>18</sup>, and plans for "future" development of the people mover system to be extended to the areas East of the existing terminals down Century Boulevard, and/or to service the pedestrian street of 98th.<sup>19</sup>

18 As an example, while North/South flow on Aviation Blvd. Is eliminated as it passes through the Century Blvd. Hotel corridor, there are no mitigation measures for this impact specified at all.



19 Extension of the people mover is critical to the hotel members of the Chamber as it mitigates traffic congestion and reduces the need for identified hotel van congestion both on Century Boulevard and on the LAX terminal loop.

**Response:**

In accordance with Section 21081.6 of the California Environmental Quality Act (CEQA) and Section 1505.2(c) of the National Environmental Policy Act (NEPA), mitigation monitoring and reporting requirements will be included as part of project approvals. The mitigation monitoring and reporting plan will specify the timing of, and monitoring responsibility for, implementation of the adopted mitigation measures. It is not known at this time, given that the Master Plan project is still at a program level of planning, what the timing will be for development of any individual business park project that might occur in conjunction with the Master Plan. With regards to the timing of transportation system improvements, Tables 4.3.2-27 and 4.3.2-28 of the Draft EIS/EIR identify the improvements required by 2005 and by 2015, respectively, for Alternative C, which was the preferred alternative at the time. Tables S4.3.2-11 and S4.3.2-12 in the Supplement to the Draft EIS/EIR identify the improvements required by 2008 and by 2015, respectively, for Alternative D, which is the now the LAWA staff-preferred alternative. Additional information regarding the phasing of traffic improvements for Alternative D is presented in Table S4.3.2-13 of the Supplement to the Draft EIS/EIR. Alternative D includes the proposed development of an Automated People Mover system that would extend along Century Boulevard between the existing Central Terminal Area (CTA) and the proposed Ground Transportation Center, and another link of the system would extend along 98th Street to connect the CTA with the proposed consolidated rental car facility and the proposed Intermodal Transportation Center. Based on the construction summary schedule presented in Figure S3-15 of the Supplement to the Draft EIS/EIR, the APM system would be completed by 2009. The timing of other improvements proposed as part of Alternative D is shown in that figure as well. Also refer to Response to Comment PC0013-5 regarding the collateral development at LAX Northside/Westchester Southside and the proposed Preliminary Property Acquisition and Relocation Plan.

**PC02181-28**

**Comment:**

D) Confusing and Inconsistent Nomenclature

During our attempts to study the 12000+ pages of materials provided by LAWA in the Master Plan and EIR/EIS, we found that the two documents were not in sync with each other. As an example, while there is a very strong resemblance between proposals 1, 2 and 3 in the Master Plan with Alternatives A, B and C in the EIR, the inconsistencies in nomenclature and detail make it nearly impossible for the average reader to be able to comprehend and compare the features contained in the two documents. In any revised EIR, LAWA should make certain that the references made in the two documents remain consistent to allow for easier cross-comparisons.

**Response:**

Comment noted.

**PC02181-29**

**Comment:**

FINAL COMMENTS

From the perspective of common sense, we again remind the reader that the proposals only meets the needs of the airport in 2015 - and when completed they will be immediately outgrown. Like it or not this would only be a band aid - real long term planning solutions are needed. It is an ultimate reality that no matter what form LAX expansion takes, it alone can not solve the air transportation needs of the Southern California area. The ultimate question for any plan must be: Then what?

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**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, Alternative D, Enhanced Safety and Security Plan, was added to the range of alternatives being considered for the LAX Master Plan. Alternative D has been designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient and efficient. Alternative D is consistent with the policy framework of the SCAG 2001 RTP and the draft 2004 RTP update, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. The SCAG RTP provides a long-term transportation plan for Southern California.

**PC02181-30**

**Comment:**

From the perspective of legally relevant criticism of an EIR/EIS, the overriding flaw repeated throughout the document is the failure to either disclose known impacts on the community or to provide the legally required alternatives which yield a lesser impact to the preferred alternative. In the present case, there is no alternative for development presented that would mitigate the impacts of development more than preferred Alternative C. These are fatal flaws which should cause the EIR/EIS to be rejected outright.

**Response:**

The Draft EIS/EIR disclosed known impacts to the community, including impacts associated with noise, traffic, air quality, acquisition, health risk, public services, and other topics. Please also see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. Please also see Response to Comment PC01094-4.

**PC02182**

**Dalton, Stanley M. & Sharron D. None Provided**

**9/20/2001**

**PC02182-1**

**Comment:**

RUTH GALLANTER PLANNED A MEETING FOR THE PALMDALE COMMUNITY (9-19) TO DISCUSS THE AN AIRPORT FOR PALMDALE ILO EXPANDING LAX. THIS MEETING WAS CANCELED ON 9-19. THE FOLLOWING ARE COMMENTS I WANTED TO MAKE AT THIS MEETING.

I AM OPPOSED TO BRINGING COMMERCIAL FLIGHTS TO PALMDALE. I HAVE NO OPINION ON EXPANDING LAX AND DON'T UNDERSTAND WHY IT IS EVEN BEING CONSIDERED OR HOW THIS MASTER PLAN WILL IMPROVE CONDITIONS THERE.

Perhaps I don't have an open mind. But, what I do have is experience and a distinct point of view on implementation of the subject Master Plan.

Firstly, expansion is something we chose to do to ourselves. I have never heard anyone say, we won't - we can't - rip up the city to bring more noise, more stink and more pollution. Stop escalating the destruction of whatever quality of life people near LAX might have. Stop thinking you can off-load the problem to outlying areas!

REGARDING RUTH GALLANTER'S "KEY ISSUES" DOCUMENT:

I live in Palmdale. The detractants you describe in your "Key Issues" would be no less for us if you bring all that mess to the desert.

I left Burbank to get away from the carbon soot, the black dirt all over the sidewalks, on the buildings and in our lungs. I left Burbank to get away from all the noise and sound pollution. I left Burbank to get away from all the traffic and congestion that, is in part, the airport.

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Where, or where, did you come to think we want any part of an airport up in Palmdale? You may have talked to city people, novice - tax revenue greedy - people, who don't speak for their constituencies. When it comes to going to the mat, people up here will be fierce. We have already had over-development crammed down our throats, suffered with low income housing and an influx of gangs, etc. This airport scheme is just too much and we will resist you putting us over the edge, so to speak.

The City Councils and politicians are telling us only the good parts to this story: they are not telling the whole story. When you have more manure than you can put in your trash barrel you have two choices:

- 1) you can get rid of a horse or two; or
  - 2) you can throw it over into your neighbors yard.
- You have obviously chosen option 2, AND to make it worse, you plan to get another horse!!

Here are my issues that I would have brought up had our meeting occurred:

#### - IMPACT TO MILITARY AIRCRAFT MODIFICATION & MANUFACTURE

When the military aircraft take-off, they do so at a higher alpha (nose up) than commercial. They minimize their impact on all of us by getting to altitude, making turns that pull various g's, and they make us think of that phrase we all use...."the sound of freedom." A sound that now has even more of a special meaning.

Plant 42 needs flexible schedules for their modification programs. Will they really get that flexibility in the long run, or will it erode away until each Mfg / Mod enterprise move their businesses (and take those jobs with them) out of state where they all have their own fields?

The sound of freedom that we hear, will not last long and I believe that you are attempting to remove those occasional sounds, and substitute the "sounds of money" and a continuous sound it will be.

#### - GEOGRAPHICAL IMPACT

LAX is oriented so that take-offs go out over the ocean. This minimizes the roar of heavy, low takeoffs associated with commercial flights. We don't have an ocean to absorb those sounds. We have West Side - where our most expensive homes are located. You will kill West Side. Flight paths are with the prevailing winds. Full load / full power take-offs going out will go over the entire West Side of Palmdale, Quartz Hill and portions of Lancaster. Not the military stuff with high alpha TOs, quick turns and burn. This will be like Burbank, low, slow and straight out past QH and on into Holiday Valley. What about the East side? Oh, they will have the joy of experiencing the sounds of Thrust Reversers. A deafening roar that will drown out the sounds of those pennies dropping into our coffers. East Side will remember the names of everyone who works to facilitate this plan, just as West Side will remember.

The peace and quiet that I enjoy, a big yard, lots of birds, an occasional aircraft (which we love as we are an aerospace family) will all be gone. "For Sale" signs will go up like kites in the wind. Lancaster is not far enough away to be immune from this, either. The quick, military style take-offs will be replaced with the slow, gradually turns East...directly over the heart of Lancaster.

This spiraling degradation of our neighborhoods starts out slowly, grows and grows until everyone moves out. A trip to Burbank would illuminate how the option of sending LAX's expansion up to Palmdale would affect us: a trip to Burbank would show how we will be spending the rest of our lives if this continues and comes to fruition.

#### - AIR POLLUTION

Many people relocated to the high desert to mitigate their respiratory problems and try to greatly improve their quality of life. These people still work in the San Fernando Valley and farther south, but are able to survive because they sleep in cleaner air and enjoy the benefits on the week-ends. These people will move where??? Where can they go to still maintain jobs and balance their breathing problems??

Those of us who don't have respiratory problems will be at risk of developing them as an airport will start to grow and expand. The few pieces of silver that will go into the city's coffer each day will be exceeded by bigger money spent improving our health, with no possibility for solution!!

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So, on your visit to Burbank, notice how the black specs collect in corners of office doorways that are not swept and before the rains wash some of it away. Burbank has a dark look to many of the sidewalks and unwashed parts of its buildings.

Yes, I really know what an airport town is like. Dust rags in your house will be black .....not white. The microscopic carbon soot gets all over your furniture, your linens, your tables, and even your face. It is everywhere. You will breathe it in, and if you have a breathing problems, you will notice that you are suddenly worse. You will try new remedies, but there will be no stopping your continuous ingestion of a major contributor.

#### - REVENUE SOURCES

Airports generate jobs .....Maintenance, passenger services, etc. It's a no-brainer that this business makes money and makes jobs, just like any other business does. So, drive to LAX and Burbank and tell me what you like about what you see and hear. Is this the business you want? It does not stay within its walls like other businesses. It spreads out all over our communities and brings nasty things with it.

Do we need businesses up here for people to make a decent living? Yes, yes, yes. Dairies, Chicken Ranches, Hog Farms, Airports, etc..... are not the way. They all make money and bring in the beloved tax revenue ..... but I tell you this, we'd all rather pay a few bucks more in taxes than live with these things, 'cause it ain't living.

#### - CONVENIENCE vs INCONVENIENCE

Lastly, do I fly a lot..... you bet I do. I flew a lot with business and I still fly a lot now. I get up early, I drive to either Ontario or LAX, I use the fly-away in Van Nuys or Wally Park. I travel as much or more than most. Do I mind getting up early for my drive to the Airport? Do I mind that drive, but then come home to a quiet community where the air is clean, where the dust is "white," where we have an acceptable level of traffic and where I can sleep late the mornings if I choose to ? What do you think? I would GLADLY drive a few extra HOURS a year - no DAYS - rather than have every waking moment spent cursing the airport, the noise and all the things that go with it.

Do I feel sorry for those living near LAX? Every day. Imagine their mixed emotions (sorrow and delight) when they had no noise for several hours during our crisis 9-11 / 12.

#### - CONCLUSION

Don't throw away the quiet we have, the peace, all the birds (there are not many birds in Burbank), the rural atmosphere and lack of four way lights at every intersection. Once you commit to this path, there will be no way out. There will be no way to say, "Oops, I didn't know it would be this bad !!"

What you will do FOR the city will long be forgotten as we deal with what you have done TO the city.

#### Response:

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02183**

**Englen, Alan**

**None Provided**

**9/17/2001**

**PC02183-1**

#### Comment:

(1) The last major LAX expansion destroyed Westchester & all but eliminated the "community." It has taken decades to rebuild the community atmosphere we have. The projected expansion will once again destroy our community of Westchester.

#### Response:

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02183-2****Comment:**

(2) I am very concerned with the noise pollution for the residents and our schools.

**Response:**

Comment noted. Noise impacts, including impacts on schools, were addressed in Section 4.1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02183-3****Comment:**

(3) I am concerned that the effects of more jet engine pollution will be very harmful to the residents & school children.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. The human health risk assessment specifically evaluated possible health risks for residents (adults and children) and children attending grade schools at locations where air quality impacts are predicted to be highest. As was discussed in the health risk assessments, air quality is actually expected to improve somewhat at these locations. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

**PC02183-4****Comment:**

Where is the information relating to the impact of these fumes etc. on people?

**Response:**

The content of this comment is essentially the same as comment PC00599-5; please refer to Response to Comment PC00599-5. Also, please see TR-AQ-3 regarding air pollution increase, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-HRA-4 regarding human health mitigation strategies.

**PC02183-5****Comment:**

(4) Traffic congestion around the airport is already heavy & eliminating Lincoln is not good.

**Response:**

Comment noted. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

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**PC02183-6**

**Comment:**

(5) Expand other airports in Orange County etc. Stop the expansion in LA only. No LAX expansion!

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02184**

**Faris, Gracie  
(Bobbie) Elnora**

**None Provided**

**9/21/2001**

**PC02184-1**

**Comment:**

I am against the option to extend commercial flights (to off-load LAX) to our city of Palmdale. We already have an Air Base with military planes actively flying and to have a commercial airport as an extension to LAX would be far too much. I prefer the military planes and I support our national defenses. I do not support commercial operations.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02185**

**Biffar, Woodrow**

**None Provided**

**9/21/2001**

**PC02185-1**

**Comment:**

In the call for expansion of LAX. I am firmly opposed to it!

**Response:**

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

**PC02185-2**

**Comment:**

There are several regional airports that should take care of the growing business, why funnel all the passenger and cargo into LAX. Auto and truck traffic are bad enough now and destroying more of Westchester community and business is insane!

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that

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of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR.

#### PC02185-3

##### Comment:

Cargo should be distributed to outside airports, relieving traffic and pollution which is enough now and would eliminate air traffic.

##### Response:

Comment noted. Please see Response to Comment PC00599-54 for more information about cargo activity. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality impacts in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G and Technical Reports 2, 3 and 4 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02185-4

##### Comment:

I live on Airport Blvd and could not live with it being made an expressway so I am opposed to the expressway and Arbor Vitae interchange. No more traffic noise & pollution please! Upgrade present airport.

##### Response:

Comment noted. The proposed Arbor Vitae interchange is not a part of the LAX Master Plan and has had the federal funding withdrawn. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR.

PC02186

**Anderson, David &  
& Carol Butler**

**None Provided**

**9/21/2001**

#### PC02186-1

##### Comment:

As residents of Westchester, my husband, David and I are very much against the LAX expansion program. Our neighborhood will be compromised, our community hurt and destroyed. Noise, pollution, more cars. All in the name of more revenue for Los Angeles.

##### Response:

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts

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in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02186-2

**Comment:**

Why not spread the wealth to Palmdale or other areas with lots of space? Particularly after last week's horrendous attacks, I would hope that some consideration for PEOPLE would fall into play now.

**Response:**

Comment noted. Please see Response to Comments AL00051-93 and PC02131-5. Also, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02186-3

**Comment:**

And please do not give us the rhetoric about safety as being the reason for expansion. PLEASE give us a little bit of credit. Westchester is such a nice little community, a family community, still intact within the larger urban area. Thank you for your time in listening to the PEOPLE.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-SAF-1 regarding aviation safety. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02187**

**Haythorn, J. Denny**

**None Provided**

**9/21/2001**

#### PC02187-1

**Comment:**

I am concerned that the decision to move the northern most runway is based primarily on the belief that the public will be traveling in larger and larger planes such as those proposed by Airbus. The effect of these planes will be, if they can be filled, to greatly increase passenger traffic without increasing the number of planes in the air. The ground approaches to LAX are already overburdened and any attempts to remedy the traffic will be defeated by the geography.

If the LAWA is indeed doing all this work in the anticipation of these planes, I think they would do well to consider the history of the airline industry. Although the 747 is available, airlines are still flying aircraft of much smaller capacity. When Boeing decided not to compete in that market, they must have determined that, in fact, there was a strong likelihood that there would be no market.

**Response:**

The intent of the proposal to relocate Runway 6L/24R (the northern most runway) 350 feet north in Alternative C is to enhance safe aircraft operations by providing a taxiway between the parallel runways. The purpose of this safety enhancement is to reduce the potential for runway incursions. The proposed center taxiway would be designed to accommodate New Large Aircraft (NLA) based on the forecast which anticipates NLA operations in the future. Please also see Response to Comment PC00015-1 for a more detailed discussion on the necessities to provide a center taxiway. The ground



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access system would be appropriately designed to accommodate the additional traffic with acceptable levels of service, as discussed in Sections 4.3.1 (On-Airport Surface Transportation) and 4.3.2 (Off-Airport Surface Transportation) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Alternatives A, B, and C would generally accommodate airport traffic with better levels of service than exists today while Alternative D would be similar to the No Action/No Project Alternative. Airbus is moving forward with its plans for the New Large Aircraft (NLA), in close collaboration with the airlines. Airport facilities are designed to accommodate the largest aircraft expected to use the airport. In fact, airlines use different sizes of aircraft to meet the demand in the most financially viable manner. Typically, large aircraft such as Boeing 747 (or the NLA in the future) are used for international routes, in particular, trans-pacific routes. Smaller aircraft are used domestically and on international routes where passenger demand does not dictate the use of aircraft the size of the Boeing 747.

#### PC02187-2

##### Comment:

With the downturn in the economy and the demand for increased security now is the perfect time to take the opportunity to design an airport to accommodate your anticipated growth and the need to control access. A remote airport at Palmdale, with rail connections to the existing population centers, would allow this to become a reality and Los Angeles could become a world leader in airport design.

##### Response:

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale, and Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand.

**PC02188**

**Rudick, Roger**

**None Provided**

**9/21/2001**

#### PC02188-1

##### Comment:

Just one comment on the question of airport expansion:

GET THE GREEN LINE INTO THE AIRPORT ALREADY! Regardless of the expansion decision.

It's ridiculous that the train stops less than two miles from the terminals. There's no need to tunnel under runways. Just get the darned thing to go along its original intended Aviation alignment and right to the terminals. There's no need to use a people mover when the Green Line--which basically is a people mover--can circle around the terminals directly. Why have people transfer from a people mover to a people mover? That's the least expensive, simplest way to go and offers the most direct route from downtown. Even if the airport is not expanded, the Green Line must be finished.

##### Response:

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02189**

**Hossan, Carole**

**None Provided**

**9/21/2001**

#### PC02189-1

##### Comment:

I BELIEVE THE LAX MASTER PLAN DOES NOT ADEQUATELY ADDRESS THE QUALITY OF LIFE OF WESTCHESTER RESIDENTS.

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**Response:**

Please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02189-2**

**Comment:**

I OBJECT TO THE LOSS OF THE MONTESSORI SCHOOL THAT HAS BEEN IN WESTCHESTER MANY YEARS. THAT SCHOOL IS A TREASURE...ITS LOSS CANNOT BE MITIGATED.

**Response:**

The Montessori school referenced by the commentor (Escuela de Montessori) would not be acquired under any of the Master Plan alternatives as described in Response to Comment PC00267-4.

**PC02189-3**

**Comment:**

I OBJECT TO THE PROPOSED "ROAD IMPROVEMENTS" INCLUDING:

A) THE LAX EXPRESSWAY: WILL DEVASTATE WHAT'S LEFT OF WESTCHESTER'S DOWNTOWN BUSINESS DISTRICT WHILE REMOVING CARS FROM A 3 MILE STRETCH OF FREEWAY THAT NORMALLY IS NOT CONGESTED

B) THE RING ROAD: WILL ALSO DEVASTATE THE WESTCHESTER BUSINESS DISTRICT; ITS ONLY PURPOSE IS TO FEED THE PROPOSED GIANT TERMINAL ON THE WEST END OF LAX.

C) THE "MYSTERY" INTERCHANGE AT SEPULVEDA AND LA TIJERA. ANOTHER DISASTER FOR DOWNTOWN WESTCHESTER.

D) THE ASSUMPTION THAT THE ARBOR VITAE INTERCHANGE WILL BE IN THE PLAN; AT PRESENT THIS IS A CONTESTED ITEM.

**Response:**

The alternatives were planned to satisfy the future airport demand while also mitigating any impacts on the surrounding street system, including in Westchester. The analysis revealed that the plan would help to separate regional airport traffic from local traffic, which is a goal of a well-planned roadway/freeway system. The analysis did not indicate that the plan would devastate the Westchester business district. Please see Response to Comment AL00008-8 for more information on the status of the Arbor Vitae/I-405 ramps and Topical Response TR-LU-2 regarding effects on Westchester.

**PC02189-4**

**Comment:**

E) HAVING A GIANT (OR ANY) TERMINAL(S) AT THE WEST END MAKE IT VERY DIFFICULT TO RECONFIGURE TAXIWAYS THAT CROSS AT MID-POINT TO THE WEST END, TO ADDRESS THE ISSUE OF NEAR MISSES ON THE GROUND.

**Response:**

Alternatives A, B, and C each develop a new West Terminal and provide additional north/south taxiways connecting the proposed reconfigured North and South Airfields. These improvements have the potential to reduce congestion on taxiways leading to aircraft gates. By reducing taxiway congestion, the potential for aircraft accidents and incidents is also reduced.

In the Supplement to the Draft EIS/EIR, Alternative D does not include a West Terminal. However, Alternative D does add two north/south taxiways to the taxiway system. These additional taxiways have the potential to reduce taxiway congestion similar to Alternatives A, B, and C.

**PC02189-5**

**Comment:**

THE EXPANSION PLAN SHOULD BE SCRAPPED!

**Response:**

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

**PC02189-6**

**Comment:**

P.S. RECENT TRAGIC EVENTS DEMONSTRATE WITHOUT ANY DOUBT THAT SOUTHERN CA NEEDS MORE THAN ONE MAJOR AIRPORT

**Response:**

Comment noted. Please see Response to Comments AL00051-93 and PC02131-5. Also, please see Topical Response TR-RC-1 regarding the LAX Master Plan Role in the regional approach to meeting demand. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02190**

**Collins, Mr. & Mrs.  
Donald**

**None Provided**

**9/21/2001**

**PC02190-1**

**Comment:**

We have been residents of the Inglewood community 32 years and live in the flight path near Century Blvd. Our comments on the Draft LAX Master Plan and Environmental Impact Report should be of great value.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02190-2**

**Comment:**

The noise level has become increasingly higher and more frequent, making it difficult, as we have retired and are senior citizens in our community. We anticipated a more serene community as the population became more mature, but the flight noise level increased.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding high noise levels at 10404 8th Place and along Century Boulevard (east of Crenshaw Boulevard), to qualify for soundproofing, properties must be exposed to 65 CNEL or greater noise levels. As shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, overall areas exposed to high noise levels under 1996 baseline and Year 2000 conditions do extend into the City of Inglewood at the commentor's property and along portions of Century Boulevard. Therefore these areas are eligible for sound insulation under the Aircraft Noise Mitigation Program (ANMP) as described in Topical Response TR-LU-3. As also indicated on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 of the Supplement to the Draft EIS/EIR, the extent of land area within the 65 CNEL contour under 1996

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baseline and Year 2000 conditions have decreased over time compared to the 1992 fourth quarter 65 CNEL contour. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), the subject property and portions of Century Boulevard are located within the 94 dBA SEL contour under 1996 baseline and Year 2000 conditions, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. However, as also shown on Figure S4.2-3 the overall area exposed to high noise levels along Century Boulevard have decreased over time since 1992. See also Topical Responses TR-LU-4 regarding outdoor noise levels, and Subtopical Response TR-N-6.1 regarding existing high noise levels.

#### PC02190-3

##### Comment:

A fair consideration should be given to long-time residents who are committed to remain in the community and would like to enjoy the total environment of the property which we worked so hard for. (Open the windows, sit on the patio, etc.)

##### Response:

Please see Topical Response TR-LU-4 regarding outdoor noise levels and Topical Response TR-LU-1 regarding impacts on quality of life.

#### PC02190-4

##### Comment:

You can only appreciate my comments to the fullest extent if you lived in my community. We have expressed concerns often, but to no avail.

##### Response:

Comment noted.

**PC02191**

**Sheehan, Jeanine**

**None Provided**

**9/21/2001**

#### PC02191-1

##### Comment:

After reviewing the Draft Master Plan for LAX (EIS/EIR) expansion & related data, I have concluded that I only support a Regional Airport plan in which other airports such as Ontario, Palmdale, Orange Cty., etc. would help absorb increased future flights, instead of a huge expansion at LAX alone.

##### Response:

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02191-2

**Comment:**

One population is growing faster near proposed regional airports than near LAX, according to U.S. Census data and So. California Assoc. of government data, so it would be much more sensible to have airports in these areas absorb a lot of the expansion proposed for L.A.X.

**Response:**

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

#### PC02191-3

**Comment:**

Also, since the attacks on the World Trade Ctr. and the Pentagon, it may be much easier to have stronger airport security if Airport growth is regional. A smaller number of people in various airports would certainly be easier to keep safe and to control.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative - Alternative D - Enhanced Safety and Security Plan - was added to the range of alternatives currently being considered for the LAX Master Plan. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project. Alternative D's approach of not expanding the capacity of the LAX is consistent with the SCAG Regional Transportation Plan policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-SEC-1 regarding security issues.

#### PC02191-4

**Comment:**

Lastly, as a Westchester resident since 1997, I have environmental concerns about the bad effect upon the air and the environment that a huge increase in flights and size at LAX would engender. My husband and I moved from Mid-Los Angeles to Westchester in 1997 to get away from noise, traffic, and especially pollution since I am somewhat asthmatic and my husband is very allergic as well. So, I oppose a large LAX expansion and support regional expansion instead.

Please do what you can to keep LAX from a large expansion and promote a plan of regional expansion instead.

Thank you for your consideration.

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**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in 4.24, Human Health and Safety, noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02192**

**Knight, Kathy**

**Spirit of the Sage Council**

**9/22/2001**

**PC02192-1**

**Comment:**

Spirit of the Sage Council is writing this letter to support the acquisition of the West Bluff of the Ballona wetland ecosystem as mitigation for any loss of habitat for the endangered Riverside Fairy Shrimp recently found at LAX. We have been informed by US Fish & Wildlife that this mitigation is acceptable to them. This mitigation would be superior to only using Madrona Marsh, since that habitat has already been saved and is further away from LAX. The West Bluff of the Ballona Wetlands is about 1 mile north of LAX. It is the only natural bluff left of this last large coastal wetland ecosystem, and is in danger of being destroyed by Catellus Development Corporation's proposed 114 home luxury home development.

The West Bluff has what is probably the very last vernal pool left in the City of Los Angeles. It is shown on the historical maps, and in recent photographs. Therefore, relocating the fairy shrimp there would be compatible, and would serve as an opportunity for local students to learn how to restore such an ecosystem

In making this statement of support, Spirit of the Sage Council is not taking a position of supporting the expansion of LAX. We support the acquisition of the West Bluff as mitigation for the Riverside Fairy Shrimp only if the current LAX habitat were going to be destroyed or not properly maintained, for any reason.

**Response:**

Please see Topical Response TR-ET-2 regarding potential sites for vernal pool restoration or creation. The West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the cysts due to the significantly high cost associated with acquiring the properties for purposes of relocating the embedded cysts.

**PC02192-2**

**Comment:**

We hope you consider this request very seriously. Thank you,

**Response:**

Please see Response to Comment PC02192-1 above.

**PC02192-3**

**Comment:**

PLEASE SUBMIT OUR PAGE 2 WITH HISTORIC MAP OF VERNAL POOLS IN LA AREA WITH THESE EIS/EIR COMMENTS

THANK YOU

**Response:**

The historic map of vernal pools on page 2 of the comment letter is included in comment letter PC01949.

**PC02193      Frankel, Rex                      Ballona Ecosystem Education      9/22/2001**  
**Project (BEEP)**

**PC02193-1**

**Comment:**

The Ballona Ecosystem Education Project is a grassroots citizens group that is dedicated to educating the public as to the critical importance of saving the Ballona wetland ecosystem. One of our major projects has been to work to raise public awareness of the importance of saving the West Bluff of the wetlands.

**Response:**

Comment noted.

**PC02193-2**

**Comment:**

We are very concerned about the loss of a rare vernal pool there if a proposed 114 home development by Catellus would be built. This vernal pool area would be an excellent site to recover and restore habitat for the endangered Riverside Fairy Shrimp (see attached second page showing this rare animal).

It was such good news that those incredible animals were recently found at LAX (it was thought to be lost from Los Angeles County)! Since the West Bluff is so close to LAX - only about a mile away - it would make sense to use this newly-found population in a West Bluff restoration.

Also, if for any reason there would be any loss of habitat of the Fairy Shrimp at LAX, we support the acquisition by LAX of the West Bluff for mitigation.

**Response:**

Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. The West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the cysts due to the significant high costs associated with acquiring the property for the purpose of relocating the embedded cysts. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS. The Draft Biological Opinion issued by the USFWS is included as Appendix F-E of this Final EIS/EIR.

**PC02194      McPherson, Patricia      Grassroots Coalition                      9/22/2001**

**PC02194-1**

**Comment:**

This letter is to inform you that Grassroots Coalition is in favor of the acquisition by LAX of the West Bluff of the Ballona Wetlands as mitigation for any loss of habitat at LAX for the endangered Riverside Fairy Shrimp.

We have been involved for many years in the struggle to save the Ballona Wetlands ecosystem, the last large coastal wetland system left in the County of Los Angeles. Through our work, we are aware of the value of saving the very rare vernal pool habitat on the West Bluff.

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**Response:**

Please see Topical Response TR-ET-2 for the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. The West Bluff of the Ballona wetland ecosystem is no longer considered a potential conservation site for cysts of the Riverside fairy shrimp due to the significantly high cost associated with acquiring the property for purposes of relocating the embedded cysts. As a result of Section 7 consultation among LAWA, FAA, and USFWS, the soils containing cysts of the Riverside fairy shrimp will be relocated to property owned by the FAA and designated a habitat preserve at the former Marine Corps Air Station at El Toro, or a comparable site approved by the USFWS. The Draft Biological Opinion issued by the USFWS is included as Appendix F-E of this Final EIS/EIR.

**PC02194-2**

**Comment:**

Please enter our letter into the official comments for the LAX Master Plan EIR/EIS.

**Response:**

This letter has been entered as an official comment letter on the LAX Master Plan Draft EIS/EIR as comment letter PC02194. Responses to individual comments included in this comment letter are provided above.

**PC02195**

**Marsh, Kenneth**

**None Provided**

**9/22/2001**

**PC02195-1**

**Comment:**

Re Noise:

Could airlines be penalized for excessive noise or flying low in unauthorized paths? Most European airports have systems to monitor noise and assess penalties. Do the airlines have any incentive to reduce noise on take off? Can an effective system be developed?

**Response:**

The vast majority of aircraft using LAX fly the flight paths and altitudes given to their pilots by air traffic controllers. If an aircraft is directed to fly in a particular area or at a particular altitude by air traffic control, then the aircraft is not in violation of Federal Aviation Regulations and no penalties apply. If for some unjustified reason, a pilot willfully disregards the directions of air traffic control and flies into unauthorized airspace, then the FAA may suspend the pilot's license. All airlines flying into LAX meet minimum noise standards set by the FAA. The implementation of noise level limits, while possible, would require the completion of a FAR Part 161-Notice and Approval of Airport Noise and Access Restrictions evaluation, and more importantly, its approval by the FAA. The FAA has not yet approved an access restriction under Part 161 in the twelve years since its promulgation. At LAX an automated noise and operations monitoring system is in use that provides daily records of flight operations by virtually all aircraft using the facility. The FAA's Automated Radar Terminal System (ARTS) records are accessed by software owned and operated by the Department of Airports' Noise Management Bureau to obtain location and other descriptive information related to each arrival and departure. This information is processed to assign each aircraft to one of several predefined flight track corridors and the resultant information is loaded into a relational database. The database includes aircraft type as designated by radar, runway and flight track assignments, user identification and flight number, type of operation (approach or take off), and its time of occurrence. Records of flights are extracted from this database with proprietary software developed for and owned by the Noise Management Bureau to produce a compiled report of operations for any period desired. The Noise Management Bureau will continue to use this system in meeting its responsibility to regularly monitor and report on noise conditions in the airport environs. Sub-Section 2.1.5 , Environmental Baseline Fleet and Aircraft Operations which is located in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR describes this process in greater detail. Also see Topical Response TR-N-7 regarding noise abatement measures/enforcement particularly Subtopical Response TR-N-7.1 and Subtopical Response.



**PC02196 Marsh, Beth None Provided 9/22/2001**

**PC02196-1**

**Comment:**

RE POLLUTION:

DO THE AIRLINES HAVE ANY REQUIREMENTS &/OR INCENTIVES TO REDUCE AIR POLLUTION?

IF YES, WHAT ARE THEY & HOW ARE THEY ENFORCED?

IF NO, WHY NOT?

**Response:**

Please see Response to Comment PC01881-101 regarding incentives.

**PC02197 Marsh, Beth None Provided 9/22/2001**

**PC02197-1**

**Comment:**

RE SURFACE STREET TRAFFIC:

IS IT POSSIBLE TO HAVE A GREATER POLICE PRESENCE ON THE SURFACE STREETS LEADING IN & OUT OF THE AIRPORT (SEPULVEDA, MANCHESTER, LA TIJERA) TO MITIGATE SPEEDING?

**Response:**

Comment noted. Please see Section 4.26.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding law enforcement.

**PC02198 Walker, Daniel Friends of the Green Line**

**PC02198-1**

**Comment:**

Overall, we have a mixed review about the LAX Master Plan. We feel strongly that LAX must be improved ASAP in three important ways:

Improved:  
ground transportation access  
safety  
security.

We reviewed primarily the LAX Master plan ground transportation because that is our expertise. Collectively, we have many years experience reviewing transportation alternatives for Southern California. Some sections of the LAX Master Plan need significant re-work, other parts are still quite vague (i.e. schedule, funding sources), but other sections show good vision for the future, like the Green Line Light Rail extension and LAX People Mover.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic in Section 4.3, Surface Transportation, safety in Section 4.24.3, Safety. Supporting technical data and analyses are provided in Appendix G and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-2, S-4, S-9a, and S-9b of the Supplement to the Draft

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EIS/EIR. In addition, please see Topical Response TR-ST-5 regarding the rail/transit plan, Topical Response TR-SAF-1 regarding aviation safety, Topical Response TR-SEC-1 regarding security, and Response to Comment AL00008-6 regarding funding.

#### **PC02198-2**

**Comment:**

For LAX, transportation improvements must precede, not follow, LAX growth. In the last few years, LAX and surrounding areas have continued to grow rapidly but the transportation infrastructure has fallen significantly behind. During the next couple years, we hope to work with LAX staff and with other concerned local citizens to make sure any changes to LAX, benefit local residents and the Southern California region, as a whole.

**Response:**

The LAX Master Plan includes numerous transportation-related improvements, including extension of the Green Line to the West Terminal under Alternatives A, B, and C, and to the Intermodal Transportation Center under Alternative D. These improvements would be implemented as part of the Master Plan.

#### **PC02198-3**

**Comment:**

We have a lot of sympathy for and agreement with those opposed to any changes associated with LAX. We agree that no single part of Southern California should have to shoulder all of the negative environmental impacts. However, air travel is important to the whole Southern California region. Mobility, via well designed airports, roads, freeways, and mass transit, is very important for our local economy and our local environment. Because Southern California population is growing rapidly, regional airport capacity must also increase, both for passengers and cargo. A healthy Southern California economy will help bring in money to make many other important things possible (hire police, buy more park land, build better schools, build other transportation projects, etc.). Most people in LA area recognize that the status quo today is not acceptable and that traffic congestion and pollution are likely to get worse if nothing is done.

Uncontrolled LAX expansion without proper transportation mitigation could be make traffic and pollution much worse, both locally and overall. Traffic and pollution would be minimized if travelers had the option to use their closest airport. Expansion of remote airports in Palmdale, Ontario, Burbank, Long Beach, John Wayne, March AFB, El Toro, etc. is generally a good idea but each airport is likely to have its own significant local environmental issues, legal constraints, and local NIMBY opposition. We'll reserve judgment on these other airport plans until their draft environmental impact reports are released.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange

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County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

#### PC02198-4

**Comment:**

However, while these airports may be great for the small but growing local populations in Palmdale/Lancaster, Ontario, etc., we are concerned how millions of others will be able to commute to these airports from much further away without massive improvements in transportation infrastructure. Although it may be a great future idea, we don't believe that MagLev trains (linking only local airports) will be a practical solution to airport /traffic in Southern California for now. It is not fair to force Ontario or Palmdale residents to drive two or more hours to LAX. Likewise, commuting to distant, remote airports by millions of frequent travelers from West LA and the South Bay is neither environmentally friendly nor economically viable.

**Response:**

Please see Topical Response TR-ST-5 regarding high-speed rail planning and connections to LAX.

#### PC02198-5

**Comment:**

Criteria for Evaluation

We took a global look at what would be best for Southern California residents, as a whole, when reviewing LAX area transportation ideas. We did not just focus on impact to local LAX residents. We looked for mobility solutions which would minimize overall congestion delays (not just travelers to LAX) and ideas to minimize overall pollution.

**Response:**

Comment noted.

#### PC02198-6

**Comment:**

Congestion and Transportation

We believe that current traffic problems in and around LAX should be significantly improved first before any large scale expansion is permitted. We recognize that the airport brings in good jobs and is vital to our local economy. Unfortunately, the area around LAX has become very congested due to past LAX expansion and numerous other projects in the area. Therefore, we recommend that LAX and local leaders aggressively pursue transportation funding to improve roads, freeways, and especially mass transit around LAX ASAP. We disagree strongly with some extremists would like to prevent any transportation improvements for this area. Cars and buses which are stuck in traffic pollute more than free flowing vehicles. LAX Master transportation improvements in the area are needed immediately to handle current traffic overload for past projects in the corridor, not to mention many other future developments, like Playa Vista, which are certain to increase traffic volume in the future, even if LAX does not expand.

**Response:**

Comment noted. Please refer to Topical Response TR-ST-5 regarding the rail/transit plan.

#### PC02198-7

**Comment:**

"Regional" Airport Plan

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We agree that LAX and other officials should take a regional approach to airport expansion. We need to expand airport service in Orange County and convert El Toro Marine Base from a military to commercial airport. Orange County residents will be able to use a much closer airport, which will reduce congestion on the 405 freeway and reduce overall air pollution in LA and Orange counties.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

**PC02198-8**

**Comment:**

Also, airports in Burbank, Ontario, Palmdale, and others should be expanded to meet growing demand from those who live closer to these airports. Today, many people support the vague concept of expanded service somewhere else. However, after many more years of new environmental analysis and new million dollar Master Plans for these other airports, could similar local concerns arise from neighbors of these other airports? An environmental justice issue could be made that the rich from the westside and South Bay are pushing airport related environmental impacts to poorer areas in the east.

**Response:**

Comment noted. Please see Response to Comment PC02198-3. Also, please see Topical Response TR-EJ-3 regarding environmental justice and regional context.

**PC02198-9**

**Comment:**

It is not fair to force Inland Empire and Palmdale area residents to drive many hours both ways in bumper to bumper traffic to LAX. Likewise, it is not reasonable to expect many Westside or South Bay travelers to drive two or more hours to distant desert airports. For now, most Inland Empire and Palmdale area leaders support expanded airports which will spur local business. However, we are concerned that local, state, and federal officials may not really provide the millions of dollars which will be required to expand these other airports and pay billions more to improve the roads, freeways, and mass transit so millions more travelers could access the remote airports in a reasonable time.

**Response:**

Please see Response to Comment PC02198-3.

**PC02198-10**

**Comment:**

Mass transit access to these airports is very minimal today from most Southern California communities. Maglev train access is a great idea for the distant future but no funding is likely to be provided for this unproven technology for many years. How will the masses get to the Maglev stations? We do not believe the regional airport plan should be based on uncertain Maglev funding.

**Response:**

Comment noted. Development of the LAX Master Plan is not dependent on Maglev Funding. Also, please see Response to Comment PC01276-3.

**PC02198-11**

**Comment:**

LAX Area Transportation Problems Today

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Today, many of the roads around LAX are very congested for many hours every day. Significant freeway, road and mass transit are needed today to handle just current traffic volumes. Even if LAX is not expanded significantly, transportation around the LAX area must be improved ASAP.

Lincoln Blvd. (state route 1) is very congested most week days going both north and south at rush hour. Current state route 1 improvements, some already completed and others still in work now by Caltrans, will not be enough to handle the expected increases traffic from other projects in the LAX area.

The 405 freeway past LAX is one the busiest and most congested freeways in the world. The 405 widening to allow extension of the HOV lanes between the 105 and the 101 (currently under construction) will help traffic some but not enough to handle the traffic volumes predicted for the years ahead. Nothing in the recently approved SCAG 25 year Long Range Transportation Plan adequately addressed improving this vital north / south corridor, which is already over capacity.

The 105 freeway is generally backed up every work day morning at the Sepulveda North / LAX off-ramp. Numerous accidents have occurred on the 105 westbound and 405 to 105 connectors approaching this off-ramp. This Sepulveda north off-ramp is poorly designed and for safety reasons it should be widened to three lanes ASAP, separate from the LAX Master Plan. Has LAWA also considered widening the Sepulveda tunnel (under the south runways) in order to eliminate the traffic light and severe congestion at the end 105 Sepulveda North off-ramp?

**Response:**

Comment noted. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. LAWA has researched the widening of the Sepulveda tunnel (under the south runways) in order to reduce traffic congestion. Their conclusions were that widening the tunnel is not feasible and that the width of the tunnel is not the bottleneck, rather the primary causes of traffic congestion are the intersections at either end of the tunnel. These intersections are proposed to be improved under Alternatives A, B, or C.

**PC02198-12**

**Comment:**

Cargo

LAX Master Plan proposes to modernize, expand passenger service somewhat, and expand cargo capacity significantly. We believe that LAWA should study environment impact of handling some increased cargo at LAX (to help growing local area companies) and increased cargo handling at other regional airports. Former military airbases in the Inland Empire could be ideally suited to handle cargo headed further east. Providing more cargo handling capacity at regional airports may reduce the overall travel distance to the ultimate destination and thereby reduce road congestion and air pollution, also.

**Response:**

Please see Response to Comment PC02198-3. Also, please see Response to Comment PC00599-54 for more information about cargo activity.

**PC02198-13**

**Comment:**

Small Jet / Commuter Aircraft Diverted from LAX

From the Master Plan, it appears that LAX may shrink the available space and capacity for handling small aircraft significantly (to focus on primarily on larger commercial aircraft). This would likely push many smaller commuter jets to other regional airports. We are not sure about the safety and environmental impact of this proposed shift to handling mostly large jets at LAX and more small jets at other smaller near by airports. What will be the environmental impact on Santa Monica, Hawthorne and other regional airports and their surrounding communities? Does shifting most smaller aircraft from LAX to other regional airports increase overall congestion and pollution? LAWA should study the overall

### **3. Comments and Responses**

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environmental impact on LAX area as well as near other airports, if small commuter aircraft capacity at LAX is changed significantly.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

**PC02198-14**

**Comment:**

LAX Noise Mitigation

Many local residents in Westchester, El Segundo, Inglewood, and other near by cities are concerned about the recommended plan to move the north runway further north and other proposed runway realignments. What noise mitigation attenuation would be provided by an additional row of landscaped hills and /or trees north and south of the airport?

**Response:**

Comment noted. For information regarding future noise increases, please see Topical Response TR-N-6. In addition, please see Alternative-Specific Abatement Opportunities in Section 7.2 of Appendix D, Aircraft Noise Technical Report in particular Section 7.2.2 Alternative A; Topical Response TR-N-4 regarding noise mitigation and in particular Subtopical Response TR-N-4.3 for a discussion of additional mitigation measures. Aircraft noise mitigation is described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provides mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02198-15**

**Comment:**

Airport Taxiway Congestion and Safety

LAX has had an increasing rate of near miss plane crashes on its taxiways. LAX modernization should include everything possible to improve safety of passengers above LAX and on the runways and taxiways. LAX should also try to reduce ground and airborne delays which cause delayed airplanes to emit more air pollution. Technology improvements, adequate airport controller staffing, runway, and gate improvements should be considered.

**Response:**

Airport layout and design play a contributory role in runway incursions where there is minimal runway spacing between parallel runways or multiple exits from runways in areas of complex ground operations. The Master Plan build alternatives propose airfield improvements to bring the airfield to current Federal Aviation Administration's (FAA) design standards to increase operational efficiency and enhance safety. Improvements include runway extensions, construction of a center taxiway between closely spaced parallel runways, and an upgrade of existing facilities and proposed construction of new facilities to provide sufficient taxiway clearances for all aircraft types. For a more detailed discussion on the airfield and safety improvements made under each of the Master Plan alternatives please see the Draft LAX Master Plan Chapter V, Section 3.3.1. Alternative D, the Enhanced Safety and Security Plan, has been added since publication of the Draft EIS/EIR in light of the events of September 11, 2001, and is specifically designed to protect airport users and crucial airport infrastructure, and to incorporate federal security recommendations as they are developed to the greatest extent possible. Please see Chapter 2 of the Draft LAX Master Plan Addendum regarding the airfield and safety improvements associated with Alternative D. Please also see Responses to Comments AL00025-66 and AL00040-152 for more discussion on airfield improvements to increase operational efficiency and enhance safety.

In September of 2001, the FAA commissioned the Airport Movement Area Safety System (AMASS) at Los Angeles International Airport. AMASS increases the safety of aircraft and vehicles operating on the

surface of the airport. Please also see Topical Response TR-SAF-1 for a further discussion of the LAX runway incursion rate, airspace analysis, the air traffic controllers and the adequacy of their equipment, and the improvements proposed to increase safety.

#### PC02198-16

##### Comment:

Green Line Extension to LAX is long overdue

Independent of the LAX expansion, we recommend that the Green Line be extended to LAX ASAP. In addition, there should be a north / south mass transit link to relieve some traffic from PCH, Sepulveda, and the 405 Freeway. The Green Line should be extended north from LAX to connect with the MTA approved Expo Light Rail line in West LA area. To provide better regional access to LAX, LAWA should also study the benefits of extending the Green Line further east (to at least the Norwalk Transportation Center) and south, as well.

Overall, the lack of detail about the proposed Green Line extension in the Master Plan was disappointing. The route between the existing Green Line Aviation station and LAX was just a dotted line on a big LAX Master Plan drawing. We look forward to working with LAX staff, MTA, and other interested parties on the details of this important project ASAP, if even LAX expansion is shelved or significantly reduced.

##### LAX Light Rail Green Line Route Alternatives

We recommend that LAWA study several options for the Green Line extension from existing Green Line Aviation station:

1. Master Plan proposed route to the new proposed Western terminal with additional station(s) at Sepulveda/Imperial Highway and/or Main Street/Imperial Highway intersections in El Segundo
2. north to Century Blvd. Station along Aviation Blvd. with a direct connection to the new proposed LAX People Mover running east/west along Century Blvd..The LAX People Mover could then also serve the big hotels and other businesses along Century.
3. north along Aviation Blvd. to Lot C area transportation hub (with link to buses, LAX People Mover)
4. Light Rail connection to the proposed Crenshaw Blvd. Corridor, along the Harbor Subdivision ROW, then north along Crenshaw to the recently approved Expo ROW Light Rail to downtown LA.

##### Green Line Extension South and East

MTA Board last year voted to study a possible short Green Line Light Rail south extension from the current Marine Ave terminus in Redondo Beach. We recommend that LAWA and MTA study extending this line further south beyond the South Bay Galleria to Torrance at least, above the MTA owned Harbor Subdivision railroad track right of way. LAWA should also study providing remote Green Line airport check-in and adequate safe parking in the South Bay and / or Harbor Gateway area. LAWA should consider using trains with adequate room for luggage. The Green Line Aviation Blvd. Station should be modified to allow some trains to run north directly to LAX from Redondo Beach, without requiring a transfer at Aviation station. Similarly, some trains from Norwalk should run directly to LAX without requiring a transfer. Reasonable priced, convenient, safe remote parking could significantly reduce LAX bound traffic on the 105, PCH and the 405 from the South Bay and Harbor areas. LAWA should also encourage many of its approximately 56,000 LAX related employees to use Green Line to work at LAX. Already about 100,000 people use the existing Aviation station Green Line shuttle to/from LAX every month, of which about 10,000 carrying bags. Direct convenient Light Rail access into LAX would certainly increase employee and passenger ridership significantly. The Green Line should also be extended about 2 miles east from the current Norwalk station to link directly with Metrolink at the Norwalk Transportation Center. With an LAX connection, parking at the current MTA Norwalk Green Line station will exceed capacity. The Green Line east extension, over Interstate 5 freeway, should be coupled with the Interstate 5 corridor improvement project, which is beginning environmental analysis of options soon.

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An LAX Green Line station would provide a non-polluting, non-freeway option to travelers and airport employees who live close to more than 50 LA county MTA rail stations and more than 50 other Metrolink passenger train stations located throughout 5 Southern California counties.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan, particularly Subtopical Response TR-ST-5.4 regarding the Metro Green Line extension to the west terminal complex for more information.

**PC02198-17**

**Comment:**

Improve Freeway Access to LAX reduce traffic on Local Streets

The proposed ring road, LAX Expressway & 105 Extension make sense if a new western terminal is built. The ring road and 105 extension would take some traffic off PCH, Sepulveda, Airport, and other local streets. This will benefit local residents with less local street traffic, noise, and air pollution. However, this may not be nearly enough to handle the proposed LAX expansion.

North / South Access to LAX

Since about 37% of passengers access LAX from the north, the proposed LAX Expressway north only to Howard Hughes Center or Marina Freeway would be inadequate. This will only push current 405 freeway traffic congestion north. The 405 from the Marina Freeway to the Santa Monica Freeway and to the 101 is very congested today. Any LAX Expansion should include significant mitigation of the increased traffic along the 405. We suggest that LAX seriously study extending the LAX Expressway to at least the 10 Freeway and include mass transit from LAX north down the center of (or on top of) the 405.

We believe that LAWA should study extending the Green line north from LAX along one of these possible corridors:

- a. Lincoln (possible stations in Westchester, Playa Vista, Marina Del Rey, Venice)
- b. Sepulveda Blvd. (possible stations at Century, Manchester, Howard Hughes Center, Fox Hills, Venice)
- c. above 405 freeway (down the center of the future LAX Expressway)
- d. Crenshaw Blvd. Corridor (MTA is currently studying this corridor)

Any Light Rail extensions should be grade separated to the maximum extent feasible for improved speed, safety, and minimal impact on local street traffic. The Green Line north extension should link to the recently MTA approved Exposition Light Rail line in West LA or Santa Monica.

Harbor Subdivision MTA owned Right of Way (ROW) from downtown LA to LAX to the Harbor

We believe that this MTA owned Harbor Subdivision railroad ROW should be used for a direct rail link between LAX and downtown LA Union Station. Providing a fast LAX / Union Station link is important because Union station directly links to many bus routes, red-line subway, Pasadena / East LA Light Rail, Amtrak, and Metrolink. This Harbor Subdivision ROW also continues south from LAX to Torrance and to the Harbor area. After the Alameda corridor project is finished in a couple years, only limited local freight service would be needed on this track. We recommend that LAX seriously study various rail options to LAX using this ROW as either Light Rail or Commuter Rail (Metrolink). A commuter rail link would be cheaper and faster to start because it could use the existing freight track, as is. Local freight service could continue at night on the same track. Unfortunately, this ROW is mostly single track. LAWA should study possible locations for additional double tracking to allow more frequent passenger rail service to LAX. An alternate Light Rail on this ROW would be quieter and pollute less than Metrolink passenger service, but it would require significant track modifications. LAWA should study possible locations for other possible intermediate stations on this ROW and links to other intersecting mass transit lines (Green Line, Blue Line, and/or Harbor Busway).



**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan, particularly Subtopical Response TR-ST-5.2 regarding light/conventional rail connections. In addition, please note that Alternative D does not include the LAX Expressway or the ring road.

**PC02198-18**

**Comment:**

LAX People Mover

The proposed LAX People Mover, with zero emissions, is a good concept, which is working well in many other large airports. It should reduce traffic congestion and pollution by replacing most of the numerous buses circulating around LAX today. However, the People Mover should provide convenient access to all of the current (and any possible future) terminals. Only People Mover Option 3 from the Master Plan would serve the entire existing central terminal area. We do not favor Option 1 or 2 because they only connect the proposed future west terminal to the Bradley International Terminal. Perhaps the People Mover could also connect LAX to the hotels and businesses on West Century Blvd.? The LAX Green Line station should be located conveniently close to the LAX People Mover to encourage travelers to use both. Access to the end of the People Mover should be quick and convenient for taxis, buses, and "kiss and drop" cars directly to and from the freeway to minimize traffic on local LAX area streets.

**Response:**

During the course of concept alternative formulation, consideration was given to the prospect of extending the automated people mover (APM) alignment further to serve the hotels and remote parking facilities located east of the CTA. However, the relatively small number of airport users that would be served by this extension was judged to be insufficient to justify the cost of such an APM system extension. Supplemental information on the transit technologies accessing the airport and their associated alignments is provided in Topical Response TR-ST-5. The APM system will run alongside the hotels in Alternative D, connecting the Ground Transportation Center and Intermodal Transportation Center to the CTA. In Alternatives A, B, and C, an extension of the APM from the CTA to the hotels along Century Boulevard is cost-prohibitive.

**PC02198-19**

**Comment:**

Remote Flyaway Lots with direct convenient access to LAX

We support the LAX proposed expansion of the Van Nuys Flyaway (park and ride) to other parts of the county. This will reduce LAX area congestion and pollution if these new flyaway locations are safe and convenient for both car and local bus access.

**Response:**

Please see Response to Comment AL00050-6 regarding Flyaway service.

**PC02198-20**

**Comment:**

LAX Bike Access for employees

LAX should provide safe bike access for LAX employees from the north and south, perhaps from Pershing Drive if western terminal is built. Today, bike access to LAX from the south (via Sepulveda tunnel) is prohibited.

**Response:**

Bicycle access to/from the west terminals would be provided, via bike lanes along Westchester Parkway, Imperial Highway, and Pershing Drive.

### 3. Comments and Responses

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#### PC02198-21

**Comment:**

Vista Del Mar Park

Today, the western part of LAX, is unused, between Imperial Highway, Vista Del Mar and Pershing Drive, where hundreds of homes once stood. This prime real estate should be developed as a park, with hiking trails, bike path, etc. for local residents and travelers to enjoy the beautiful Pacific ocean view.

**Response:**

The area between Imperial Highway, Vista Del Mar and Pershing Drive is the Los Angeles/El Segundo Dunes. The Los Angeles/El Segundo Dunes contain three state-designated sensitive habitats, as well as the 203-acre Habitat Restoration Area preserve for the federally endangered El Segundo blue butterfly. Due to the need for security at the airport and surrounding areas and due to the installation of navigational aids, public access is not recommended to the dunes area. It is not recommended that the Los Angeles/El Segundo Dunes becomes a park. In addition, the Conservation Element to the City of Los Angeles General Plan mentions the El Segundo Blue Butterfly and the City's role in preserving this species and the Los Angeles/El Segundo Dunes. This element specifically states the dunes are restricted from public access. The Los Angeles/El Segundo Dunes is a fragile environment easily susceptible to trampling if given access by the public.

#### PC02198-22

**Comment:**

Airport improvements, ring road, LAX Expressway, Green Line extension should be built without any significant impact to the local animals, especially in the existing El Segundo Butterfly Reserve.

**Response:**

With the implementation of mitigation measures, impacts to sensitive and listed fauna would be reduced to below the level of significance. Impacts to sensitive and listed fauna were addressed in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

#### PC02198-23

**Comment:**

Rail Access to Ontario international Airport

Expansion of passenger service at Ontario airport will benefit both passengers from the inland Empire and congestion around LAX. However, access to Ontario airport is already difficult today because the nearby 60 and 10 Freeways are often very congested. Over time, traffic on these freeways is likely to worsen as population in this area grows rapidly. Significant road and mass transit improvements would be required to handle several million more annual passengers.

Currently, Metrolink service to nearby East Ontario train station is infrequent (only 6 morning and 6 afternoon trains at rush hour). A cheap short term fix would be increase the number of Metrolink trains running on this Riverside route. The current Ontario Metrolink station is not located close enough to the airport terminal to be practical for most travelers or airport employees. However, if Ontario Airport is expanded significantly, we suggest a direct rail link into the Ontario airport terminal to serve both passengers and airport employees. There are three existing rail corridors running east/west relatively close to Ontario airport. Two of these rail corridors currently carry Metrolink passenger trains today (Riverside line and San Bernardino line). In less than 2 years, the downtown LA to Pasadena Light Rail line will open. With sufficient state and / or federal funding, phase 2 extension from Pasadena to Claremont will be built a few years later on MTA owned existing railroad track right of way. We suggest

LAWA work with other agencies to seriously study a phase 3 extension into an expanded Ontario airport. We also suggest that Metrolink run more frequent service to the Burbank Airport train station.

**Response:**

Comment noted.

**PC02198-24**

**Comment:**

Conclusion

We found some good ideas and some significant problems with the LAX master plan. LAX needs to improve safety, security, and ground transportation significantly as soon as possible. In order to improve our quality of life in Southern California, we hope to work closely with LAWA staff, local elected leaders, and other concerned parties in the future to improve our local airports, ground transportation, and the environment in Southern California.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, public safety in Section 4.26, Public Services, and traffic in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Technical Reports 2, 3, 14a, 14c, and 16 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SEC-1 regarding safety and security and TR-LU-1 regarding quality of life

**PC02199**

**Rousseve, Sylvia**

**None Provided**

**9/20/2001**

**PC02199-1**

**Comment:**

A Master Plan for LAX?? . . . Create a regional system which places some of the stress and pressure of air travel across this county. What is the point of having Palmdale, Ontario, John Wayne, and the potential of El Toro unless we make use of them?

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

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#### **PC02199-2**

**Comment:**

When I hear our neighbors to the south declaring that they need a park, I suggest that we, who have borne the weight of the increase of air travel for years, would also like a park. Yet, as things stand, we can at least be grateful if the expansion stops in its tracks.

**Response:**

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

#### **PC02199-3**

**Comment:**

I do not live in Inglewood or Hawthorne, or El Segundo, but I understand how much they endure with the planes overhead and fuel being dropped over their small parks, schools, and homes.

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot, and fuel dumping.

#### **PC02199-4**

**Comment:**

I have lived in Westchester for close to fifty years and have watched the encroachment of traffic and commerce - with Playa Vista now also causing havoc in so many ways - and I lament the deterioration of a wonderful community.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02199-5**

**Comment:**

We no longer go casually to Santa Monica, to Manhattan Beach, or even to the Marina because of the horrific traffic. Sepulveda, Lincoln, Jefferson, Manchester, to say little of the parking lot known as the 405. Finally, I shudder to think of the chaos that would occur in the event of some monumental event - even a major earthquake - How could firetrucks, paramedics, and people simply trying to evacuate begin to navigate what is even now so difficult?

**Response:**

Comment noted.

#### **PC02199-6**

**Comment:**

We speak of the need for housing and yet this notion of expansion could ultimately lead to the tearing down of existing neighborhoods to the east, west, and south. Some twenty years ago, I watched friends searching for new homes when theirs were lost to a northern expansion.

This geographical area cannot endure any further development of LAX.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed residential and business relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. In addition, please see Topical Response TR-RBR-1 regarding residential acquisition and relocation.

**PC02199-7**

**Comment:**

The burden, especially of cargo aircraft, can easily be rerouted to Ontario which would also take some of the trucking traffic off the freeways going to the industrial area east of LA. Create the jobs for those who live in the eastern and northern sectors of this county. They have genuine need for well-paying jobs close to home. One obvious benefit would be fewer workers leaving the valley and the Santa Clarita and moving south on the freeways.

**Response:**

Please see Topical Response TR-RC-5 regarding the role of airline economics in shifting operations to regional airports.

**PC02199-8**

**Comment:**

We want, we need a regional answer to this situation.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02199-9**

**Comment:**

Those of us who have signed here agree with the cover letter:

**Response:**

Comment noted. Please see Responses to Comments above.

**PC02200**

**Weinberg, Sheila**

**None Provided**

**9/22/2001**

**PC02200-1**

**Comment:**

Now, more than ever, it is important to develop other airports in the region to handle growth. LAX has been on the alert as a possible terrorist target. We can't continue to have all our airport traffic "eggs in one basket."

We must develop other airports.

No more growth at LAX.

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**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC02131-5. Also, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02201      Baca, Mary Jean      None Provided**

**PC02201-1**

**Comment:**

Comments: I am a resident of the Westchester area of Los Angeles. I am opposed to the approval of the Draft Master Plan and the Environmental Impact Report/Environmental Impact Statement for the following reasons:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02201-2**

**Comment:**

1. Both of these proposals will severely and negatively impact my community. There is already an abundance of traffic, pollution and noise created by the airport and all of its attendant business activities as it is currently configured.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02201-3**

**Comment:**

I travel Hillcrest road to and from work every day. This is one block from Arbor Vitae and the area targeted for destruction of the homes and businesses in order to install the ring road and make room for cargo operations. A new cargo warehouse has recently been opened on that street. There is a traffic jam created nearly every day from the trucks attempting to get in and out of this facility. This is one new cargo operation. What is going to happen when the whole neighborhood is demolished and there is nothing but airport related businesses? Any further increase in the size of runways and a "ring road" will simply make matters much worse.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding cargo truck traffic, please see Topical Response TR-ST-1. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please note that Alternative D does not include the LAX Expressway or Ring Road. Please see Topical Response TR-MP-1 regarding air cargo activity and demand.

**PC02201-4**

**Comment:**

2. We have lived with the jets rattling our houses and spewing fuel onto our cars for years. We have borne our fair share of the transportation burden for Los Angeles as well as Orange County and it is time for others to bear their share. There is more than enough "benefit" to go around. We are not responsible for the increase in passengers and flights. The additional people are coming from all over the Southern California region. I'm sure they would not choose to drive two hours to LAX for a flight if they had sufficient airport facilities nearer to their homes. The cities of Palmdale and Ontario want increased airport operations to accommodate their residents. Even this proposed expansion will not be enough to keep up with growth. By the time this project is built we will be right where we are now - needing more room for an ever-expanding airport. Why not stop it now and build elsewhere while there's available land at a lesser cost?

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand for information on El Toro, John Wayne Airport, and Ontario International Airport. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality impacts in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendices D and G and Technical Reports 2, 3 and 4 of the Draft EIS/EIR and Appendices S-C and S-E and Technical Reports S-2 and S-4 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

**PC02201-5**

**Comment:**

3. All major U.S. cities have more than one airport. New York, Washington, D.C., and Dallas are examples. Many foreign cities have their airports outside the city limits. Hong Kong and Seoul, Korea are examples. It is safer and allows for future expansion should the need arise.

**Response:**

Please see Topical Response SAF-1 regarding aviation safety.

**PC02202**

**Pfeifer, Nancy**

**Dennis Zane: Urban Dimensions**

**9/21/2001**

**PC02202-1**

**Comment:**

It was a pleasure speaking with you on August 24, 2001. As we discussed, this letter provides additional information regarding the two bound transcripts of public comments on the LAX Master Plan Draft Environmental Impact Statement/Environmental Impact Report that our firm delivered to your offices on July 17, 2001, via Federal Express.

### **3. Comments and Responses**

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The first bound transcript contains a cover page on Rocket Reporting Network letterhead. The cover page reads:

L.A.X. Master Plan and Environmental Impact Report Community Meeting  
Public Response to the E.I.R.  
Monday, May 14, 2001  
File No. K01058  
Reported by Leslie R. Katzman  
C.S.R. No. 9712, R.P.R

The public comments contained in this bound transcript were given at a public meeting sponsored by the City of El Segundo and the El Segundo Residents Association on May 14, 2001. Each person whose comments are contained in the transcript gave his or her oral testimony directly to the court reporter. The court reporter recorded each individual's comments in shorthand and later transcribed the shorthand to the typed form contained in the transcript. The transcript is a true, correct and complete transcript of each person's comments as indicated by the certification signed by the court reporter, Leslie R. Katzman. The certification is contained in the bound transcript.

The second bound transcript contains a cover page on Rocket Reporting Network letterhead. The cover page reads:

L.A.X. Master Plan and Environmental Impact Report Community Meeting  
Public Response to the E.I.R.  
Thursday, May 31, 2001  
File No. K01062  
Reported by Leslie R. Katzman  
C.S.R. No. 9712, R.P.R.

The public comments contained in this bound transcript were given at a public meeting sponsored by the South Bay Cities Council of Governments on May 31, 2001. Each person whose comments are contained in the transcript gave his or her oral testimony directly to the court reporter. The court reporter recorded each individual's comments in shorthand and later transcribed the shorthand to the typed form contained in the transcript. The transcript is a true, correct and complete transcript of each person's comments as indicated by the certification signed by the court reporter, Leslie Katzman. The certification is contained in the bound transcript.

Dennis Zane: Urban Dimensions assisted in coordinating both of the community meetings at which this testimony was given and forwarded the completed, certified transcripts to your offices.

Although you assured me on the telephone that the comments contained in each of these bound volumes have been duly recorded in the LAX Master Plan Draft EIS/EIR comments being collected by your office, I have taken the liberty of enclosing a certified copy of each transcript to ensure that they become part of the record.

**Response:**

Comment noted. The responses to comments contained in the referenced bound transcript are provided in the responses to testimony comments PC01838 through PC01858.

**PC02203      Waters, Maxine      U.S. House of Representatives      9/19/2001**

**PC02203-1**

**Comment:**

Introduction/Executive Summary

This document is the official comment of the Office of Congresswoman Maxine Waters on the proposed Los Angeles International Airport Master Plan and the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The Congresswoman appreciates the opportunity



### 3. Comments and Responses

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provided by Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) to comment on these documents on behalf of her District.

Congresswoman Maxine Waters represents California District 35, which is located just east of and adjacent to the Los Angeles International Airport (LAX). Areas located within the District include the City of Inglewood, the City of Hawthorne, the City of Gardena and the southern portion of the City of Los Angeles. An area that is adjacent to the above mentioned cities on the west and bordered by Alameda and Central Avenues on the east.

The intent of this document is to put into public record the Congresswoman's and the 35th District's opposition to the proposed expansion plan laid out in the LAX Master Plan and draft EIS/EIR documents. Our detailed objections to the proposed expansion plan are summarized herein under four main categories that affect the communities and citizens of CA 35th District, as well as the rest of the LA Basin. These categories include air pollution, noise, human health and traffic. The first section of this document discusses these four impact categories in terms of their effects on the human population of the communities surrounding LAX - in other words, the environmental justice impacts of LAX and the proposed expansion plan. The draft EIS/EIR itself is evaluated in terms of the four topics mentioned above.

While almost \$60 million went into preparing the draft EIS/EIR, the document is deeply flawed and contains numerous omissions, ambiguous or misleading information and a number of faulty assumptions (LAWA and the FAA only suggested alternatives that are worse than its preferred options although less burdensome alternatives exist). Specifically, our objections to the plan proposed by the draft EIS/EIR and the LAX Master Plan hinge on the following:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02203-2**

**Comment:**

- Environmental Justice: The draft EIS/EIR clearly states that the environmental, noise and health burdens of the airport's operations and expansion are, and will be, borne by low income and minority populations, yet it offers no commitments to recognize and address this imbalance. The draft EIS/EIR's proposed mitigation strategy for this issue is the creation of The Environmental Justice Task Force, which "will work with affected communities and LAWA to explore appropriate formulation of specific Master Plan Commitments related to Environmental Justice." We cannot endorse any plan proposed by LAWA and the FAA without first having an opportunity to evaluate and comment on this plan's approach to address the imbalance of burdens and benefits.

**Response:**

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. Many of these measures apply to minority and low-income communities, as well as other potentially effected communities. While a number of these mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection

### **3. Comments and Responses**

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with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

Please also see Topical Response TR-EJ-1 regarding air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### **PC02203-3**

##### **Comment:**

- Air Quality: The current operations at LAX already constitute the largest single source of air pollution in the nation's worst air quality region. Any proposed expansion will further decrease the air quality in the surrounding communities and the LA Basin. The air quality for over 500,000 citizens living and working in the communities of South LA, Hawthorne, Inglewood, Gardena, and other South Bay cities (as well as the rest of the LA region) will worsen still as emissions from the airport increase, as projected by the draft EIS/EIR. The draft EIS/EIR concludes that the only way to improve air quality for the surrounding communities is to reduce airport activities, specifically flight operations at LAX.

##### **Response:**

Please see Response to Comment AL00043-6 regarding LAX as a source of air pollution. Also, please see Topical Response TR-AQ-3 regarding air pollution increase.

#### **PC02203-4**

##### **Comment:**

- Noise: An increase in airport operations will significantly increase the noise levels in communities surrounding the airport, thereby reducing the quality of life of the people living there. The City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City. The current operations at LAX already subject over 95,000 people living and working in the neighborhoods surrounding the airport to a 65 dB community noise equivalent level (CNEL) or above - the noise equivalent of being next to an operating vacuum cleaner for 24 hours a day. Furthermore, the 65 CNEL represents only an average.

##### **Response:**

An increase in aircraft operations does not necessarily correlate to a higher CNEL as described in Topical Response TR-N-6, in particular Subtopical Response TR-N-6.2. LAX is currently addressing noise impacts through its Aircraft Noise Mitigation Program with additional abatement and mitigation measures being addressed in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR. The commentor identifies that over 95,000 people are currently impacted by noise exceeding 65 dB CNEL (compared to a vacuum cleaner) on a daily basis, whereas, Section 3.3.2, Existing Incompatible Land Uses, shows that those numbers are closer to 72,000 as identified in Table 11 of ANMP, 1992 Fourth Quarter CNEL Noise Contours Incompatible Residential and Noise Sensitive Properties by Jurisdiction. Single Event Noise and CNEL Differences are addressed in Topical Response TR-N-2. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information regarding noise-related mitigation. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02203-5**

**Comment:**

Scientific studies conducted on the effects of high noise levels on communities have shown that noise from departing and arriving aircraft is a constant source of distress, interfering with normal speech, interrupting sleep, and can disrupt a wide range of activities. These studies also show a relationship between noise and the health of community residents.

**Response:**

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

**PC02203-6**

**Comment:**

- Human Health: LAX is one of the largest single sources of air pollution in this region today. Implementation of any of the draft EIS/EIR's proposed build alternatives will result in increased emissions of toxic air pollutants (TAP) as well as emissions of criteria pollutants - components of urban air pollution and precursors of smog. Criteria pollutants exacerbate respiratory and cardiovascular conditions in young and old members of the community. More importantly, the long-term and cumulative health risks posed by the current emissions of TAPs to the citizens living and working in the communities surrounding the airport are currently unknown. This fact alone makes none of the proposed expansion plans supportable.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase. Please also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities. Please see Response to Comment AF00001-51 regarding basin-wide cumulative impacts of TAPs and criteria pollutants, Response to Comment AL00033-127 regarding cumulative impacts and Response to Comment AL00051-14 regarding long-term and cumulative risks associated with TAPs.

**PC02203-7**

**Comment:**

- Traffic: LAX already constitutes one of the largest single destinations for vehicular traffic in the Los Angeles region. The draft EIS/EIR concludes that construction activities from any of the proposed build alternatives will result in increased traffic congestion, potentially affecting the local communities during the next fifteen years and beyond. It further states that these traffic impacts to the citizens living and working in the communities surrounding the airport will be "significant and unavoidable." In fact, a back-of-the-envelope calculation shows that the increase in cargo volume alone will require over 6 semi trucks per hour, or one every 10 minutes, to support this increase.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport

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roadways, Topical Response TR-ST-3 regarding construction traffic, Topical Response TR-ST-1 regarding cargo truck traffic, and Topical Response TR-MP-1 regarding air cargo activity and demand.

#### PC02203-8

##### Comment:

- Understated Effects: In general, the draft EIS/EIR tends to understate the impacts of the expansion and misleads the public. Even the name of the preferred option - "No Additional Runway" - is misleading. This title implies that runway construction will be minimal if at all existent. Further exploration and understanding of the plan, however, reveals that construction will occur on all four existing runways, essentially giving the airport four entirely new runways. Additionally, in public presentations, LAWA representatives continue this line of "education" with posters and handouts on which LAWA claims the expansion will result in reduced air pollution and have minimal community impacts. None of these handouts or posters discusses the "significant and unavoidable" impacts contained in the draft EIS/EIR. Between the inaccessibility of the draft EIS/EIR and the misleading public "educational" materials, the average citizen is led to believe that the expansion of the airport will have far less impact on themselves and the surrounding communities than it will in reality.

##### Response:

Comment noted. Given that Alternative A is titled "Alternative A - Added Runway North" and Alternative B is titled "Alternative B - Added Runway South," the use of the title "Alternative C - No Additional Runway" is considered to be appropriate for, and consistent with, the overall nomenclature formulated for the three subject build alternatives. It should be noted that Alternative D, described in the Supplement to the Draft EIS/EIR, would not include the addition of a new runway.

Also, please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

#### PC02203-9

##### Comment:

- Regional Transport Strategy: The draft EIS/EIR and the proposed Master Plan do not reflect long-term regional transportation strategy for the greater Los Angeles Region. The proposed expansion only focuses on operations at LAX, and does not adequately assess the viability of a region-wide system. Southern California has eleven airports that could make up a tightly integrated transportation network, which would share the burdens and benefits of air transportation across communities, economic, and ethnic populations. This region-wide approach has the potential of setting the standard and providing an example for a premier regional transportation strategy for the nation.

##### Response:

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

#### PC02203-10

**Comment:**

- General Concerns: The draft EIS/EIR lacks sufficient health studies, relies too heavily on models for analysis, discounts important health impacts, and sometimes provides analyses of important impacts based on faulty assumptions. LAVA and the FAA need to complete a more thorough investigation and analysis of the effects of noise, air pollution and traffic on the communities surrounding the airport, and LA region.

**Response:**

The comment is essentially the same as Comment AL00051-16; please see Response to Comment AL00051-16.

#### PC02203-11

**Comment:**

LAWA also needs to make more of an effort to elicit input from citizens in the surrounding communities.

**Response:**

A major component of the LAX Expansion EIS/EIR work program is public participation and outreach. LAVA has had press releases, newsletters, neighborhood info packets, 18 public workshops and hearings, and a web site in order to communicate with neighbors and interested parties. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Also, please visit the web site, [www.laxmasterplan.org](http://www.laxmasterplan.org).

#### PC02203-12

**Comment:**

- Outreach Concerns: The draft EIS/EIR itself is a prohibitive document. It is over 12,000 pages long, available to the general public only at limited locations or via the Internet and costs approximately \$3,300 to purchase a hard copy. The document is written by experts and contains many complex technical details. Due to its limited availability, the technical details and the costs associated with purchasing a copy of the draft EIS/EIR, it is very difficult for the average citizen, and even small community organizations and institutions to gain an adequate understanding of the impacts of the proposed expansion of LAX.

**Response:**

The content of this comment is identical to comment AL00051-17; please see Response to Comment AL00051-17. Additionally, please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR for public review.

#### PC02203-13

**Comment:**

- Lack of Community Support: In an effort to include community concerns regarding the proposed expansion of LAX, we conducted a brief constituent survey. The results of this survey indicate that the residents of the 35th District are convinced that increased operations at the airport will negatively impact their lives and community. A clear majority (over 90%) already feel that current airport operations disrupt their daily lives, including sleep patterns and outside activities. Approximately one-quarter of the respondents already suffer from asthma and another 19% have "other respiratory" conditions. Further increase in air pollution will exacerbate these problems and even increase the number of cases. (See Appendix A for further results.)

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**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-LU-4 regarding outdoor noise levels, and Topical Response TR-AQ-3 regarding air pollution increase. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the effects of single event noise at night in Section 4.1, Noise, with supporting technical data and analyses provided in Appendix D of the Draft EIS/EIR and Appendix S-C1 of the Supplement to the Draft EIS/EIR. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02203-14**

**Comment:**

Most important, we vehemently oppose the expansion plan because of the human and community dimensions of the impacts. Impacts from the expansions are much more than just the numerical increase, either in the 65 CNEL noise levels or the 1300 % increase in particulate matter pollution. For example, the proposed expansion plan forces students of nine schools in the adjacent communities to learn in an environment in which airport noise permeates both classroom and outdoor activities. It asks almost half of the community, the very old and very young who are more susceptible to air pollution, to breathe more polluted air. These are not acceptable impositions on our communities.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, human health and safety in Section 4.24, Human Health and Safety, and schools in Section 4.27, Schools. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to school disruption in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects and Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02203-15**

**Comment:**

The expansion plan's proposed mitigation strategies are further impositions. For sensitive use areas such as schools and parks, the proposed mitigation strategies involve their relocation from noise affected areas. Relocating these natural community centers will mean that an entire community of low income and minority people will need to travel much farther to interact with others in their community, or to learn about their children's academic progress, if at all. This, along with the interruption of street conversations by airport noise, prohibits the development of normal community relations and interactions.

**Response:**

No schools or parks are proposed for relocation as a result of the LAX Master Plan. As stated in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, one public school is proposed for relocation independent of the LAX Master Plan under LAWA's existing acquisition program for the Manchester Square and Belford areas. Concerning effects on street conversation due to airport noise, please see Topical Response TR-LU-4.

#### PC02203-16

**Comment:**

The proposed mitigation plans for air pollution either dilute the pollutants over a wider geographic area, thereby lessening their concentration (but perhaps not their cumulative effects), or do not reduce pollution at all. These are also not acceptable impositions on our communities.

**Response:**

Please see Response to Comment PC01196-12 regarding air quality impacts and further mitigation measures.

#### PC02203-17

**Comment:**

Finally, in addition to the unmitigated "significant and unavoidable" impacts to the 35th District, our opposition to the proposed plans comes from the fact that LAWA has not fully dealt with the current noise and pollution problems in our communities. Noise mitigation and abatement programs proposed and initiated by LAWA have not yet been completed and are progressing slowly. Prior to proposing more noise and pollution mitigation strategies, we ask that LAWA complete what it has started.

**Response:**

The 1996 environmental baseline accounts for the incremental increases in activity at LAX that have occurred up to that point, including airport-related traffic, noise, air pollutant emissions, and other environmental factors that affect the surrounding community. The impacts analysis within the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the environmental effects projected to occur with ongoing increases in activity projected to occur by 2015. The mitigation measures presented in the subject documents provide for both on-airport and off-airport improvements to reduce LAX's impacts to the local community; improvements that would not otherwise occur outside of the Master Plan and EIS/EIR processes. It should be noted that mitigation measures adopted as part of project approval are subject to the monitoring and reporting requirements of CEQA. Similarly, mitigation measures set forth as part of the Record of Decision (ROD) are monitored. Please see Topical Response TR-LU-3 for a description of the existing Aircraft Noise Mitigation Program (ANMP), including how eligibility is determined, how soundproofing is prioritized, current noise monitoring, and how approval of the LAX Master Plan would revise the ANMP.

#### PC02203-18

**Comment:**

Environmental Justice Impacts

Any proposed expansion of LAX will place greater environmental and health burdens on over 500,000 citizens living and working in the communities of South LA, Hawthorne, Inglewood, and Gardena (California's 35th Congressional District), the majority of which can be classified as either low income or minority populations, or both.

**Response:**

Please see Response to Comment AL00017-190.

#### PC02203-19

**Comment:**

In addition, due to its limited availability, the technical details, and the costs associated with purchasing a copy of the draft EIS/EIR, it is very difficult for the average citizen, and even small community organizations to fully gain an understanding of the impacts of the proposed expansion of LAX.

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**Response:**

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR for public review.

**PC02203-20**

**Comment:**

The draft EIS/EIR clearly states that the environmental, noise and health burdens of the airport's operations and expansion are, and will be, borne by low income and minority populations, yet it offers no commitments to recognize and address this imbalance.

**Response:**

Please see Response to Comment PC02203-2 and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

**PC02203-21**

**Comment:**

The draft EIS/EIR's proposed mitigation strategy for this issue is the creation of The Environmental Justice Task Force, which "will work with affected communities and LAWA to explore appropriate formulation of specific Master Plan Commitments related to Environmental Justice."<sup>1</sup> We cannot endorse any plan proposed by LAWA and the FAA without first having an opportunity to evaluate and comment on this plan's approach to address environmental justice issues.

1 "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration, pp. 5-6.

**Response:**

Please see Response to Comment PC02203-2 and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

**PC02203-22**

**Comment:**

The Congresswoman's office has made numerous attempts to determine the composition of this task force and its meeting locations and times, in an effort to understand and assist in the formulation of LAWA's proposed mitigation strategies, and to communicate them to the affected communities. At the time of this writing we have been unable to determine what efforts the task force has made in regard to an environmental justice plan, or its progress.

**Response:**

Please see Response to Comments PC01897-4.

**PC02203-23**

**Comment:**

We cannot support any expansion of LAX operations, based on the lack of details provided by the draft EIS/EIR concerning how LAWA and the FAA plan to recognize and address the unfair burdens currently placed on the affected communities.



**Response:**

Please see Response to Comment PC02203-2 and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

**PC02203-24**

**Comment:**

Furthermore, the draft EIS/EIR does not detail ways to offset the additional burdens placed on these communities from the proposed expansion plans, which is contrary to the requirements of California Environmental Quality Act (CEQA).

**Response:**

Please see Response to Comment PC02203-2 regarding environmental justice-related mitigation measures and benefits. Also please see Topical Response TR-EJ-1 regarding air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

**PC02203-25**

**Comment:**

Finally, the discussion in the draft EIS/EIR regarding environmental justice issues contains a number of flaws and omissions. Specifically, the draft EIS/EIR is missing the following important components:

- Affected Business Demographics: The draft EIS/EIR's land use plan calls for the relocation of a number of businesses and residences in the affected zones. The report does a thorough analysis of the demographics of the citizens living in the areas surrounding the airport. However, it needs to provide demographics of the businesses that would need to be relocated, as they will also be affected. The draft EIS/EIR indicates that minority-owned businesses may have special challenges in relocating, thus, the business demographics are important in the analysis to allow for the creation of an action plan to relocate these businesses. The lack of business demographics highlights an area where LAWA failed to perform the needed analysis and instead chose to rely on a wait and see approach.

**Response:**

Public information on the demographics of business ownership and employment is limited. As a result, and based on issues related to privacy rights and the difficulty of completing a survey within the study area, this information was not included in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. However, the potential for relocation effects on minority businesses is identified on pages 4-428, 4-430 and 4-432 of the Draft EIS/EIR and on pages 4-336, 4-337 and 4-339 of the Supplement to the Draft EIS/EIR. As stated in Section 4.4.3, Environmental Justice of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, relocation would be undertaken in compliance with the Uniform Relocation Act and pursuant to a LAWA Relocation Plan that would include special provisions to assist minority owned businesses. Although relocation impacts are less than significant in light of regulatory compliance and relocation plan provisions, to the extent that there could be disproportionate effects on minority businesses, they would be addressed through LAWA's Relocation Plan and the Environmental Justice Program described in subsection 4.4.3.7 of this Final EIS/EIR, including Mitigation Measure MM-RBR-2 and the job related provisions for disadvantaged business enterprises described under the environmental justice benefit "Job Outreach Center." As demonstrated above, the lack of greater specificity on business demographics has not compromised the environmental justice analyses or the adequacy of LAWA's Environmental Justice Program, Mitigation Measures or Master Plan Commitments that address and offset potential disproportionate effects.

### **3. Comments and Responses**

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#### **PC02203-26**

**Comment:**

- Origin and Destination Study: Also lacking in the draft EIS/EIR is an analysis of the use of the airport by the surrounding communities. The document does not provide an analysis of whether those bearing the largest burden of the airport by living in its shadow are benefiting from airport services.

**Response:**

Although benefits may be taken into account in making findings regarding a project's potential for disproportionately high and adverse environmental and health effects pursuant to U.S. Department of Transportation Order 5610.2, there is no legal requirement under NEPA or CEQA for economic benefits, or for benefits to be proportionate to environmental burdens. The primary focus of the EIS/EIR under NEPA and CEQA is to disclose and mitigate physical impacts on the environment. As described in 2., Purpose and Need for the Proposed Action, the project focuses on improvements to transportation infrastructure that serve the general public. A survey of demand for transportation services by community is beyond the scope of this EIS/EIR. Regarding benefits and mitigation measures that address effects on minority and low-income communities, please see Section 4.4.4, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR and Topical Response TR-EJ-2.

#### **PC02203-27**

**Comment:**

- Environmental Justice Mitigation Plans: The draft EIS/EIR fails to detail plans for mitigation of the proposed expansion's noise, air quality, traffic, and health impacts in terms of environmental justice. The only mitigation plans proposed by the draft EIS/EIR involve either noise abatement through soundproofing, or relocation. Neither of these is adequate mitigation in terms of environmental justice (to be discussed more fully below).

**Response:**

Please see Response to Comment PC02203-2 regarding environmental justice-related mitigation measures and benefits. Also please see Topical Response TR-EJ-1 regarding air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### **PC02203-28**

**Comment:**

Finally, the draft EIS/EIR details the jobs that will be created due to the expansion of the airport. Also detailed are the programs that LAWA has created to help low income and minority populations obtain the training they need to be able to compete for these jobs (independent of any expansion plans). These details stand out in sharp contrast to the lack of commitments and plans for mitigating the environmental problems created by the expansion. We would like to go on record and state that jobs are not mitigation for environmental or health impacts.

**Response:**

Please see Response to Comment PC02203-2 regarding environmental justice related mitigation and benefits. Also note that LAWA, as required by CEQA, has proposed and will be obligated to implement all feasible mitigation measures to address the significant impacts of the project. These mitigation measures apply to all areas and communities subject to the significant impacts of the project. The Environmental Justice Program, which does include job related provisions, goes beyond these mitigation measures to identify additional means of avoiding, reducing or offsetting disproportionate impacts on minority and/or low-income communities. Also please see Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

**PC02203-29****Comment:****Regional Airport System and Economic Benefits**

The draft EIS/EIR continually refers to the economic benefit that will be obtained by the entire region with the proposed expansion of the airport. However, it does not put forth a plan for the entire region to share the burden of this gained economic benefit. This collective health and environmental burden heavily impacts only those communities that surround the airport. Thus, the few are supporting the whole.

These few also happen to be primarily made up of minority and low-income populations, according to the 1990 Census (the most recent population estimates available and the same statistics used by the Master Plan and draft EIS/EIR). Congressional District 35 is predominately a minority community, where 43.1% of the residents are of Hispanic origin, and 42.7% of the residents are African American. In addition, of the 570,882 residents residing in this area, 181,412 are under the age of 18. Based on the maps supplied by LAWA in the draft EIS/EIR, all of the census tracts that fall into Congressional District 35 are considered minority populations, and a majority of these tracts are considered low income.

**Response:**

LAX is a public use airport. Rates and charges are imposed to cover the cost of maintaining and upgrading the facility for public use. LAX is a public entity not a "for profit" entity. It is an agency of the City and any "economic gain" in the form of increased revenue must be utilized for airport purposes. Although benefits may be taken into account in making findings regarding a projects potential for disproportionately high and adverse environmental and health effects pursuant to U.S. Department of Transportation Order 5610.2, there is no legal requirement under NEPA or CEQA for economic benefits, or for benefits to be proportionate to environmental burdens. The primary focus of the EIS/EIR under NEPA and CEQA is to disclose and mitigate physical impacts on the environment. Accepting that the project would result in disproportionately high and adverse effects on minority and low-income communities, a benefits program has been developed with public input. Please see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, and Topical Response TR-EJ-2.

Section 4.4.3.3 of the Supplement to the Draft EIS/EIR provides revised minority and low-income tracts based on the 2000 Census, which was not available at the time of the Draft EIS/EIR distribution. Based on the new information, an increase in minority, low-income, and minority and low-income populations was identified. For additional information, please see TR-EJ-3 regarding environmental justice and regional context.

**PC02203-30****Comment:**

LAWA states that it takes a minimum of eight years, on average, to plan, approve and construct new aviation facilities. For this reason, the draft EIS/EIR claims, the region will lose the economic benefit of LAX while waiting for other airports to be built. However, the timeline for completion of the proposed LAX Master Plan is fifteen years. Thus it will take the other regional airports approximately the same, if not less, time to build up to capacity as it would take LAX to expand.

**Response:**

Comment noted. Alternative D, added subsequent to the publication of the Draft EIS/EIR proposes a much less intensive development program for LAX than Alternatives A, B, and C. Additionally, Alternative D is consistent with the policy framework of the SCAG RTP, which anticipates and promotes the expansion of regional airports other than LAX, particularly at regional airports located in areas where substantial future growth is projected to occur.

### 3. Comments and Responses

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#### PC02203-31

##### Comment:

Finally, from the onset of Master Plan, LAWA dismisses the idea of supporting a regional airport system. The draft EIS/EIR claims that failure to expand LAX would cost the Los Angeles Region both dollars and jobs. However, with LAX assuming the responsibility for all of the air transportation growth in the region, it is denying the right of other portions of the region to grow and benefit from air services. While LAX will continue to be a major hub in a regional system, the other eleven commercial airports should be allowed to grow and expand in a manner consistent with regional population growth. Not only is LAWA asking its surrounding communities to carry the additional burdens of noise, health problems and air pollution, but it is also asking other communities to relinquish their rights to economic benefits.

##### Response:

All LAX Master Plan alternatives were selected in accordance with the requirements identified in the California Environmental Quality Act (CEQA) regulations, and the National Environmental Policy Act (NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a detailed discussion of the alternative selection process. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits, and Topical Response TR-EJ-3 regarding environmental justice and regional context. Also please see Topical Response TR-RC-1, regarding the LAX Master Plan role in the regional approach to meeting demand.

See pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Alternative D was added to the Supplement to the Draft EIS/EIR as a build alternative designed to serve a level of future (2015) activity comparable to the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX, and instead, shifting the accommodation of future aviation demand to other airports in the region.

#### PC02203-32

##### Comment:

###### Air Quality Impacts on the Health of Surrounding Communities

As discussed in the Air Quality Impacts section of this comment document, the proposed expansion of LAX will further decrease the air quality in the surrounding communities. The draft EIS/EIR concludes that the only way to improve air quality in the area is to reduce airport activities, specifically operations at LAX. LAX is already considered an environmental monster in the region, to increase activities would only worsen the problem and its effects on local residents.

The draft EIS/EIR lists six "significant and unavoidable" impacts the expansion will have on air quality in the surrounding communities. These include:

1. Air pollutant emissions from on-airport operational emissions sources would increase.
2. Changes in airport operational activity would affect ambient air quality pollutant concentrations.
3. Regional traffic emissions would increase.
4. Construction activities would cause air pollutant emissions.
5. Construction activities would temporarily cause increased ambient air pollutant concentrations.
6. People living, working, recreating, or attending schools in the communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants (TAP).

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The people living in communities near LAX will experience the following air quality impacts:

- Increased emissions of all five "criteria pollutants" (the five EPA-classified main air pollutant components) for all expansion scenarios proposed by the draft EIS/EIR. Diesel-engine construction equipment will also be a significant source of NO<sub>x</sub>, and particulate matter, or PM. (NO<sub>x</sub>, or oxides of nitrogen, is a significant contributor to smog generation. PM is a carcinogen listed under CA's Proposition 65).<sup>2</sup>

- NO<sub>x</sub> and SO<sub>2</sub> emission levels for Alternative C, the proposed alternative, will reach "significant impact," according to the draft EIS/EIR. NO<sub>x</sub> is a main component of smog, and SO<sub>2</sub> is a potent air pollutant. Both of these compounds will affect respiratory systems of children and the elderly.

- Due to increased traffic, total NO<sub>x</sub> emission from the airport will increase by 1,592 tons (31%) per year in 2015, or 4.4 tons (8,223 lbs.) per day. Total SO<sub>2</sub> emissions will increase by 100 tons (55%) per year in 2015, or 548 pounds per day.

- Construction will add 4,152 tons of NO<sub>x</sub> (80% of current levels), 582 tons of SO<sub>2</sub> (318% of current levels), and 2,071 tons of particulates (1,302% or 13 times current levels) to emissions from airport activities in 2004.

It is not acceptable for the surrounding communities that these "significant and unavoidable" impacts go unmitigated. The minority and low-income populations living near the airport may be more severely impacted by increased air pollution. These populations, especially the young and the elderly, may be more susceptible to asthma and other chronic respiratory illnesses than the average population.<sup>3</sup> These illnesses are often exacerbated by air pollution.

<sup>2</sup> Note: The five identified major air pollutant species from aircraft operations are: volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), soot or particulate matter (PM), carbon monoxide (CO), and sulfur oxides (SO<sub>x</sub>). These five species of air pollutants are also present in automobile and truck exhaust gases and are the main components of urban air pollution. Along with these five pollutants are other compounds from aircraft operations whose effects are just beginning to be investigated, and are far from fully understood.

<sup>3</sup> "Asthma: A Concern for Minority Populations," National Institute of Allergy and Infectious Diseases, January, 1997.

**Response:**

Please see Response to Comments AL00017-190, AL00017-194, PC02203-33, and AL00051-88.

**PC02203-33**

**Comment:**

In addition, low-income and minority populations are generally less informed of the health risks associated with air pollution and tend to have less access to adequate healthcare. LAWA and the FAA do not address these health impacts, nor do they have a plan for informing and educating the surrounding communities. We do not believe that it is fair to have 500,000 people bear the burden of the 89 million annual passengers passing through the airport.

**Response:**

Please see Response to Comments AL00017-190, AL00017-194, and PC02203-33. Please note that Alternative D, Enhanced Safety and Security Plan, would constrain LAX operations at about 75 million annual passenger.

**PC02203-34**

**Comment:**

Studies have shown that African-American children, who comprise approximately 1/6 of the total population of the 35th Congressional District, have a higher incidence of asthma than other

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populations.<sup>4</sup> Residing and attending school in proximity to LAX (a place known to release pollutants that exacerbate and/or cause asthma) increases these children's risk of asthma.

<sup>4</sup> Ibid.

**Response:**

Please see Response to Comments AL00017-190, AL00051-88, and PC02203-33.

**PC02203-35**

**Comment:**

LAWA, in dismissing the regional approach to air transportation, is unfairly placing a large burden on these children to absorb the health risks associated with living near the airport.

**Response:**

Please see Response to Comment PC02203-31, regarding alternatives and a regional approach to meeting demand, Topical Response TR-EJ -1 regarding potential air quality and health risk impacts on low-income and minority communities, Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits, TR-EJ-3 regarding environmental justice and regional context, and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02203-36**

**Comment:**

The draft EIS/EIR cites a lack of studies regarding the true health effects of the toxic air pollutants released by the airport as their reason for lack of analysis. Yet, LAWA and the FAA have not proposed a remedy or action plan for participating in such an analysis, nor do they offer any sort of mitigation or educational plan to help these communities understand what they can do to avoid the impact of these pervasive air-borne pollutants. (See additional discussion in the Human Health section of this document.)

**Response:**

Please see Response to Comments AL00017-190, AL00017-194, and PC02203-33.

**PC02203-37**

**Comment:**

The air quality assessment in the draft EIS/EIR is also lacking several important components (as listed in sections to follow). These missing components will also directly affect the local communities, and need to be addressed by LAWA and the FAA as part of the environmental justice action plan in the next submission of the draft EIS/EIR. (The missing components that will have bearing on the health and well being of the local communities are covered in subsequent sections of this document). This missing data and lack of comprehensive analysis indicates that the assumptions made in the draft EIS/EIR may be faulty and incomplete. The analytic basis for the community impacts by the draft EIS/EIR is also insufficient, since critical demographic and other relevant health data are missing. Without the above components, the true impact of the expansion on air quality cannot be identified, especially relating to the health and well being of the local communities.

**Response:**

Please see Response to Comments AL00017-190, AL00017-194, and PC02203-33. Particularly, the analyses contained in Section 4.4.3, Environmental Justice, and Appendix F of the Draft EIS/EIR and Section 4.4.3, Environmental Justice, and Appendix S-D of the Supplement to the Draft EIS/EIR provide comprehensive information pursuant to NEPA and CEQA requirements, consistent with Executive Order 12898 and DOT Order 5610.2. Finally, please see Response to Comment PC02221-24 regarding demographic data.

**PC02203-38****Comment:**

Furthermore, the increases in aircraft operations under all proposed scenarios by the draft EIS/EIR will result in additional air pollution, and will offset any of the anticipated benefits of lower-emitting aircraft and other mitigation measures. Thus, the affected communities will not share in the full benefits of lower emission levels.

**Response:**

Please see Response to Comments AL00017-190, AL00017-194, and PC02203-33.

**PC02203-39****Comment:**

The assumptions underlying the air quality analysis also ignore the possibility that airport improvements may result in more passengers and more flight operations sooner than anticipated. This will also result in increased emissions.

**Response:**

Please see Response to Comment AL00017-190.

**PC02203-40****Comment:**

In public forums such as the environmental workshops and the public hearings, LAWA has informed the public that air pollution will, in fact, be lessened by the expansion because of the shift of the runways and docking bays to the west. Not only is this information wrong, but it also fails to explain that cargo activities will be expanded to the east and therefore bring the impact of increased diesel exhaust emissions to the areas closest to the local communities. In those opportunities where LAWA and the FAA could be educating and informing the public of how to protect themselves, they are choosing to misinform them.

**Response:**

Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR analyzes potential air impacts of the Master Plan build alternatives as compared to the environmental baseline and the No Action/No Project Alternative. This section also proposes an Environmental Action Plan that could reduce many of the potential impacts. Section 4.24.1, Human Health Risk Assessment (CEQA), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR assesses potential impacts of the projects on human health. Without mitigation, estimated incremental health risks for each build alternative would be less than the CEQA thresholds of significance; under Alternative A, these risks would actually be lower than the environmental baseline. Also see Topical Response TR-AQ-2 regarding toxic air pollutants, TR-AQ-3 regarding air pollution increase, and TR-EJ-1 regarding potential air quality and health risk impacts to minority and low-income communities.

**PC02203-41****Comment:**

Noise Impacts on the Surrounding Communities

As discussed in the Noise Impacts section of this document, the proposed expansion of LAX will further increase the noise levels in communities surrounding the airport, thereby reducing the quality of life of residents. The City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the city. Current operations already subject over 95,000 people living and working in the neighborhoods surrounding the airport to a 65 dB community noise equivalent level (CNEL) or above.

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**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life. Noise impacts were addressed in Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix D of the Draft EIS/EIR and Appendix S-C of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program and Topical Response TR-LU-4 regarding outdoor noise levels.

**PC02203-42**

**Comment:**

Scientific studies have shown that noise from departing and arriving aircraft is a constant source of distress, interfering with normal speech, interrupting sleep, and can disrupt a wide range of activities. These studies show there is also a relationship between noise and the health of community residents. High noise levels have been linked to hypertension and cardiovascular disorders.<sup>5</sup>

5 Bronzaft, Arline, L.; Ahern, Kathleen Dee; McGinn, Regina; O'Connor, Joyce; Savino, Bartholomew, "Aircraft Noise, A Potential Health Hazard," Environment and Behavior, Vol. 30, No. 1, January 1998.

**Response:**

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

**PC02203-43**

**Comment:**

The analysis of the draft EIS/EIR shows that low-income and minority populations are most affected by the noise of over-flights, as they are the ones living within the noise contours. The only mitigation strategies offered by LAWA to combat the increases in noise are noise abatement programs and soundproofing. While soundproofing can be effective when people remain inside their homes, businesses or schools with closed windows, it has no effect on life outdoors. Thus citizens are forced to limit their outdoor activities and much of the community life that occurs on porches and in the street is limited. It is unfair to ask these citizens to stifle their cultural and community activities due to higher noise levels. Many also complain that current soundproofing measures do not eliminate the noise problem.

**Response:**

Please see Topical Response TR-LU-3 regarding soundproofing and Topical Response TR-LU-4 regarding outdoor noise levels.

**PC02203-44**

**Comment:**

The draft EIS/EIR also suggests property acquisition as a second noise abatement program. This program assumes equivalent housing is available, but does not take into account an equivalent community, or does it take into account the loss in property values. The fact that suitable housing is available does not mean that the residents will relocate to a community that meets their cultural needs.

**Response:**

LAWA's priority under its Aircraft Noise Mitigation Program (ANMP) has been and will continue to be mitigation of incompatible uses through sound insulation. The reference to a second noise abatement program that involves acquisition is unclear. In the event this refers to the existing voluntary program



established for the Manchester Square and Belford areas, this program was instituted based on a high level of interest in acquisition on the part of residents and property owners within these communities. See Topical Response TR-ES-1 regarding impacts to residential property values. Regarding the availability of suitable housing that will meet the cultural needs of those to be relocated, LAWA would make every effort to address such needs through the Relocation Program described in Master Plan commitment RBR-1.

Also note, LAWA Staff's new preferred alternative, Alternative D, does not propose residential acquisition.

#### **PC02203-45**

**Comment:**

Also, the conversion of residential areas into light industrial or less sound sensitive uses changes the character of the neighborhood for those remaining residents. The residents and city officials of the affected area have already stated opposition to such conversion programs.

**Response:**

As discussed on page 4-456, in Section 4.5, Induced-Socio-Economic Impacts, of the Draft EIS/EIR, residential areas within the City of Inglewood to which the commentor refers are designated in the City's plans for conversion to other uses consistent with City policy as established by City officials. Additionally, please note that, as stated in Mitigation Measure MM-RBR-2, on page 4-312, in Section 4.4.2, Relocation of Residences or Businesses, of the Supplement to the Draft EIS/EIR, "...LAWA shall coordinate with the City of Inglewood and the County of Los Angeles to identify residential land uses that are subject to high levels of aircraft noise where land acquisition and conversion to compatible land uses is contemplated under applicable plans (emphasis added) or is otherwise deemed appropriate." As indicated above, there was no proposal for land use conversion programs in the Draft EIS/EIR or Supplement to the Draft EIS/EIR that would conflict with the plans and policies of surrounding jurisdictions.

#### **PC02203-46**

**Comment:**

LAWA has not completed current noise abatement programs designed to deal with the noise problems of today. It is unacceptable for LAWA to propose new programs when the current ones are not complete. This will only lead to a slowing of the completion of any new program. The current noise abatement programs are not applicable when the buildings are made of substandard construction. Thus there is a segment of the population that will continue to live with unacceptable noise levels, which will only increase with the expansion.

**Response:**

As stated in Mitigation Measure MM-LU-1 in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, LAWA would first satisfy its commitments under the current Program before mitigating properties newly exposed to high noise levels due to changes imposed by the LAX Master Plan. The measure also includes actions for accelerating the rate of land use mitigation to eliminate noise impact areas in the most timely and efficient manner possible. Furthermore, as indicated in the sections, LAWA has made substantial progress in implementing its Aircraft Noise Mitigation Program (ANMP) since publication of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and is already implementing components of MM-LU-1 that are aimed at accelerating the program, including initiating steps to conduct an F.A.R. Part 161 Access Restriction Study and lifting aviation easement requirements associated with sound insulation of residential properties within the City of Inglewood. Whether or not the proposed Master Plan is approved, LAWA will continue to work with affected jurisdictions in pursuing all feasible means to expedite mitigation of aircraft noise impacts within the ANMP boundaries.

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#### PC02203-47

**Comment:**

The draft EIS/EIR lists seven "significant and unavoidable" noise impacts on the surrounding communities, listed below. Again, LAWA and the FAA do not adequately address these impacts.

1. Total population/dwellings exposed to aircraft noise above 65 CNEL would increase under the three proposed build alternatives, yet decrease under the No Action/No Project alternative.
2. Sensitive uses exposed to aircraft noise above 65 CNEL would increase under the three proposed build alternatives, and yet decrease under the No Action/No Project alternative.
3. Population/dwellings in the 65 CNEL contour would be exposed to increases of 1.5 CNEL.
4. Population would be newly exposed to 65 CNEL.
5. Construction of the proposed expansion plans will expose noise sensitive locations to excessive increases in noise levels.
6. Residential and other noise sensitive uses may be exposed to high noise levels or experience significant increases in existing high noise levels.
7. High construction noise levels would affect residential and noise sensitive uses within 600 feet of construction sites.

**Response:**

The mitigation measures presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix D and Technical Report 1 of the Draft EIS/EIR, and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR, represent an effort by LAWA to implement all feasible mitigation measures to address the significant impacts of the project. Even with these measures, it is acknowledged that certain noise related impacts would remain significant and unavoidable with implementation of the project. Please note, however, that Alternative D, LAWA Staff's new preferred alternative, would have fewer impacts than the other build alternatives and would limit future (2015) activity at LAX to levels that would be similar to what would occur with existing facilities if the Master Plan were not approved.

#### PC02203-48

**Comment:**

The people living in communities near LAX will experience the following noise impacts:

- Alternative C will expose an additional 7,150 people to the 65 CNEL noise level. 5,090 people will experience additional, significant noise impact (1.5 CNEL or more) over the 65 CNEL range. The affected population will be comprised entirely of Congresswoman Water's constituents.
- Total population exposure, sensitive uses exposure (school & churches), and population/dwelling exposure to aircraft noise in 2015 under the "NAR" scenario will be "significant and unavoidable." (950 single-family housing, 1,470 multi-family housing, 9 schools, 3 churches, 3 hospitals, 5 parks, and 1 library in the local communities will be affected).
- The draft EIS/EIR estimates that during construction, the noise impact will exceed the 5 dBA Leq (a "significant increase" according to CEQA) over ambient levels near residential and school areas.

The above impacts affect the people living, working and recreating in the communities around the airport and in particular those living within the noise contours. The demographics of the affected population include predominately low-income and minority residents, a significant number of children and several sensitive uses including schools and libraries.

**Response:**

Please see Topical Response TR-EJ-2 for a discussion of environmental justice related mitigation and benefits and Topical Response TR-EJ-3 for a discussion of aircraft noise effects on minority and low-income populations under Alternative D.

**PC02203-49****Comment:**

Furthermore, scientific studies have linked excessive noise to various health impacts, such as noise-induced stress, hypertension and cardiovascular disorders.

**Response:**

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

**PC02203-50****Comment:**

Studies have also linked chronic noise exposure (particularly from aircraft) to poor reading skills in children.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

**PC02203-51****Comment:**

The children of Congressional District 35 are already challenged by poverty, language barriers, lack of healthcare and possibly inadequately funded schools. We do not support exposing them to additional disadvantages including excessive and constant noise.<sup>6</sup>

<sup>6</sup> Ibid.

**Response:**

Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix D and Technical Report 1 of the Draft EIS/EIR, and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. Please also see Section 4.4.3 of the Supplement to the Draft EIS/EIR for a discussion of Mitigation Measure MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and the Ability of Children to Learn, and Mitigation Measure MM-LU-4, Provide Additional Sound Insulation for Schools Shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise.

**PC02203-52****Comment:**

As with the air quality impact assessment, the noise assessment is lacking several important components, as detailed in the Noise Impacts section of this document. Without this information, the true effects of increased noise to the 35th Congressional District due to the expansion cannot be determined.

**Response:**

For a full discussion and evaluation of increased noise, including new and refined mitigation measures, please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix D and Technical Report 1 of the Draft EIS/EIR, and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

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#### PC02203-53

**Comment:**

Traffic Impacts on Surrounding Communities

As discussed in the Traffic Impacts section of this comment, the proposed expansion of LAX might impact on the traffic flow through the communities adjacent to the airport. The draft EIS/EIR concludes that construction activities will also result in increased traffic congestion during the fifteen years of construction. This places an unfair burden on the low-income and minority populations, who live, work and recreate in the area.

**Response:**

As indicated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, traffic impacts, including those associated with construction, while significant, would not have a disproportionate effect on low-income and minority communities which are largely located to the east of the I-405. Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provides all feasible mitigation measures available to address traffic congestion associated with implementation of the LAX Master Plan. In addition, please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-4 regarding airport area traffic concerns.

#### PC02203-54

**Comment:**

The draft EIS/EIR lists the following six "significant and unavoidable" traffic impacts on the surrounding communities, even after the application of proposed mitigation strategies.

1. Construction-related traffic, lane closures, and detours would temporarily impede access to community services and other amenities from some portions of the adjacent communities.
2. Demand on inbound, upper level ramps in CTA would increase.
3. Construction traffic would disrupt normal roadway operations.
4. Change in vehicle demand through various intersections.
5. Construction traffic would disrupt normal roadway operations.
6. Disruption of adjacent communities due to temporary changes in circulation patterns.

Locally, the people in communities near LAX will experience the following traffic impacts:

- Construction will result in significant traffic delays and problems, however "temporary" they may be. Construction traffic will add up to 25 truck trips per hour to CTA peak-hour traffic in 2004.

Alternative C, the preferred alternative will increase traffic volumes on the northbound-to-westbound ramp from Sepulveda Blvd to the CTA, resulting in significant on-airport traffic impact.

- The traffic volume under the Alternative C, even with all "mitigation" measures in place, will still leave six intersections with CEQA "significant" impact. Two of these CEQA "significant" impact intersections are located within the 35th District (the intersections are: La Cienega at Arbor Vitae, La Cienega at Century). The remaining four intersections (Lincoln Blvd at Jefferson Blvd, Lincoln Blvd at the Marina Expressway, Lincoln Blvd at Teale Street, Sepulveda Blvd at La Tijera Blvd) are in communities adjacent to 35th District, which may impact traffic in that area.

Again, these impacts on the communities adjacent to LAX must be adequately address by LAWA and the FAA in the draft EIS/EIR, as the citizens living in these communities will be the ones directly affected by the above impacts, not the whole of the population of the LA Basin.

**Response:**

Comment noted. Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR provides all feasible mitigation measures available to address traffic congestion associated with implementation of the LAX Master Plan. In addition, please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-4 regarding airport area traffic concerns.

#### PC02203-55

**Comment:**

**Air Quality Impacts**

Any proposed LAX expansion will further decrease the air quality in the surrounding communities. The air quality for over 500,000 citizens living and working in the communities of South LA, Hawthorne, Inglewood, and Gardena (California's 35th Congressional District), and other South Bay cities will substantially worsen as emissions from LAX increase, as projected by the draft EIS/EIR. In fact, the draft EIS/EIR concludes that the only way to improve air quality for the surrounding communities, is to reduce airport activities, specifically flight operations at LAX.<sup>7</sup>

According to the South Coast Air Quality management District (SCAQMD), the LA Basin exceeded one or more federal air-quality standards on nearly one third of the days of the year in 1995, and has continued to do so on a regular basis. These violations of the air quality standards have earned the Basin a "non attainment" designation from the US Environmental Protection Agency for ozone ("extreme" designation), carbon monoxide (serious designation), and particulate matter ("serious" designation) in 1998. These "non-attainment" designations are reserved for areas in the nation that fail to reduce air pollution levels to prescribed federal standards.<sup>8</sup>

Based on the details provided by the draft EIS/EIR, a number of air quality impacts will be "significant and unavoidable." This fact alone makes none of the proposed expansion plans supportable. Furthermore, as pointed out below, the air quality analysis in the draft EIS/EIR contains a number of inconsistencies, flaws, and omissions that have rendered it less than useful as a planning document.

Specifically, the draft EIS/EIR analysis of air quality impact is missing the following important components:

7 LAX Technical Appendix G. "Air Quality Impact Analysis," from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration.

8 SCAMD 2001. "Current Air Quality and Trends." South Coast Air Quality Management District, May 2001.

**Response:**

Please see Response to Comment PC00070-1 regarding existing air quality. Also, please see Topical Response TR-AQ-3 regarding air pollution increase. Furthermore, please see Responses to Comments PC02203-60, PC02203-62, PC02203-69, PC02203-81, PC02203-83, and PC02203-92 below.

#### PC02203-56

**Comment:**

- Conformity with the State Implementation Plan: The draft EIS/EIR does not address how the increase in air pollution from LAX operations affects the State Implementation Plan (SIP), and what steps will be taken to help the State meet the goals and objectives of the SIP.

**Response:**

Please see Responses to Comments AF00001-4 and PC02203-92 regarding LAX emissions and conformity with the SIP.

#### PC02203-57

**Comment:**

- Inventory of Toxic Air Pollutants: The draft EIS/EIR does not contain a comprehensive baseline inventory of Toxic Air Pollutants (TAP), an assessment of their long-term health risks, or an analysis of their potential or cumulative effects on the communities surrounding LAX.

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**Response:**

Please refer to Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. TAPs of potential concern were selected based upon a comprehensive review of TAPs potentially emitted by airport activities. For additional information regarding TAP emissions associated with LAX operations please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, Section 3.3, Emissions Estimates for TAPs, of Technical Report 14a and Attachment F of that Technical Report, which is the Air Quality Modeling Protocol for Toxic Air Pollutants, LAX Master Plan EIS/EIR (Attachment F).

Please refer to Response to Comment AL00051-64 regarding the assessment of long term health risks from toxic air pollutants (TAP) associated with LAX operations and Response to Comment AL00051-24 regarding cumulative impacts associated with LAX operations on communities surrounding LAX. For additional information regarding human health impacts, please see Topical Response TR-HRA-3. In addition, please refer to Response to Comment AL00051-24 for a discussion of epidemiological studies conducted at other airports.

**PC02203-58**

**Comment:**

- Inventories of Particulate Matter Emissions From Aircraft: The draft EIS/EIR does not provide a comprehensive inventory of emissions of particulate matter (PM) less than 10 micrometer in size (PM10), and particulate matter less than 2.5 micrometer in size (PM2.5) from aircraft.

**Response:**

Please see Responses to Comments AL00025-54, AL00033-329, and PC00417-7 regarding PM10 and PM2.5 aircraft engine emission factors and emission inventory results.

**PC02203-59**

**Comment:**

- Construction Impacts on Local Air Quality: The draft EIS/EIR's contains few details regarding the increase in emissions and air pollution due to airport automobile traffic and aircraft traffic delays as a result of the proposed construction projects.

**Response:**

Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed all sources of potential emissions including on-airport traffic, aircraft traffic delays, and construction equipment, with supporting technical data and analyses are provided in Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02203-60**

**Comment:**

The draft EIS/EIR analysis does not adequately address the fact that air emissions from LAX contain air pollutants other than the five "criteria pollutants" that affect urban air quality, as identified by the US EPA. Very little is known about these other pollutants' cumulative and long-term impacts, or the way they interact with one another, and how chronic exposure to these multiple airborne chemicals may harm human health.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed human health risks from toxic air contaminants in Section 4.24.1. Also, please see Topical Response TR-HRA-3 regarding human health impacts from toxic air contaminants.

#### PC02203-61

**Comment:**

Furthermore, the draft EIS/EIR's proposed mitigation strategies for air pollution do not address the fact that the minority and low-income populations living and working in communities surrounding LAX may be more severely affected by any increase in criteria pollutant emissions as well as other air pollutants. Members of these communities, including the constituents of the 35th Congressional District, especially the young and the elderly, will be more severely affected because they may be more susceptible to asthma and other chronic respiratory illnesses.<sup>9</sup>

9 "Asthma: A Concern for Minority Populations," National Institute of Allergy and Infectious Diseases, January, 1997.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02203-62

**Comment:**

"Significant and Unavoidable" Impacts

We oppose the expansion plans proposed by the draft EIS/EIR due to the following "significant and unavoidable" impacts, as detailed in the draft EIS/EIR.

1. Air pollutant emissions from on-airport operational emissions sources would increase.

- The draft EIS/EIR concludes that increased traffic and activity levels will result in increased emissions of all five "criteria pollutants" (the five EPA-classified main air pollutant components) in all expansion scenarios - a "significant and unavoidable" impact.

The five identified major air pollutant species from aircraft operations are volatile organic compounds (VOCs), nitrogen oxides (NOx), soot or particulate matter (PM), carbon monoxide (CO), and sulfur dioxide (SOx). The two most significant of these five air pollutants (both in volume and effects emitted by operations at LAX, are VOC and NOx. These two pollutants are particularly problematic for three reasons:

1. These chemicals are extremely harmful pollutants by themselves;
2. They belong in a class of chemicals known as "ozone precursors" or, more specifically, "ground-level ozone precursors," because they contribute to the formation of hazardous tropospheric ozone (O<sub>3</sub>) a significant urban air pollutant and the primary component of smog; and,
3. According to the US EPA, the presence of these pollutants in urban air is expected to increase in the near future despite the current control regime."<sup>10</sup>

-2. Changes in airport operational activity would affect ambient air quality pollutant concentrations.

- The maximum carbon monoxide (CO) concentrations for future scenarios from on-airport sources alone are predicted to increase by as much as 400% compared to the Environmental Baseline data.

- Nitrogen dioxide (NOx) concentrations are forecast to increase by as much as 1,000%.

Given the fact that the LA Basin exceeded one or more federal air-quality standards on nearly one third of the days of the year in 1995, and has continued to do so on a regular basis, this is a serious issue. In addition, with the projected increases in total emissions due to increases in both aircraft and automobile

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traffic, the ambient air quality pollutant concentration for other pollutants for the LA Basin in general, and the neighborhoods in CA District 35th in particular, will correspondingly increase. This will result in the worsening of future air quality in the District and the region.

3. Regional traffic emissions would increase.

- Due to increased traffic, total NOx emissions from the airport will increase by 1,592 tons (31%) per year in 2015, or 4.4 tons (8,223 lbs.) per day.

- Total SO2 emissions will increase by 100 tons (55%) per year in 2015, or 548 pounds per day.

See 1 and 2, above.

4. Construction activities would cause air pollutant emissions.

- Construction of the proposed plan will add 4,152 tons of NOx, annually (80% over current levels)

- Construction of the proposed plan will add 582 tons of SO2 annually (318% over current levels)

- Construction of the proposed plan will add 2,071 tons of particulates annually (1,302% or over 13 times current levels) to emissions from airport activities in 2004.

- Diesel-engine construction equipment will also be a significant source of NOx and particulate matter, or PM.

See 1, 2, and 3, above.

5. Construction activities would temporarily cause increased ambient air pollutant concentrations.

See 2, 3, and 4, above.

Increased ambient air pollution concentration will lead to adverse health effects on the residents of the local communities.

6. People living, working, recreating or attending schools in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants (TAP).

Emissions of other compounds from aircraft operations will increase along with the five criteria pollutants. These include toxic and carcinogenic air pollutants (TAPs) whose cumulative effects on the general populace are far from fully understood. LAWA and the FAA have not thoroughly investigated or quantified these risks, nor have they proposed mitigation strategies.

10 Nitrogen Oxides: Impacts on Public Health and the Environment. US Environmental Protection Agency, Washington, DC August 1997

#### Response:

Please see Topical Response TR-AQ-3 regarding air pollution increase. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health risks of toxic air contaminants in Section 4.24.1. Also, please see Topical Response TR-HRA-3 regarding human health risks of toxic air contaminants. The Draft EIS/EIR presented analyses demonstrating that predicted ambient concentrations of CO due to unmitigated as well as mitigated on-airport operational sources will be less than significant for all build alternatives in the future. The Draft EIS/EIR presented analyses demonstrating that predicted ambient concentrations of NO2 even due to mitigated on-airport operational sources will be significant for all build alternatives in the future. However, the Supplement to the Draft EIS/EIR presented a revised analysis demonstrating that predicted ambient concentrations of NO2 due to on-airport operational sources will, in fact, be less than significant for all build alternatives in the future.



#### PC02203-63

**Comment:**

Other Air Quality Impacts

In addition to the "significant and unavoidable" impacts discussed above, the proposed expansion plans of the draft EIS/EIR will also result in the following air quality impacts to the people living or working in the communities around the airport. These impacts are no less significant, and in some cases, pose higher risk levels to the communities than the five criteria pollutants, and will require further analysis by LAWA and the FAA.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

#### PC02203-64

**Comment:**

Diesel Exhaust Pollution: In addition to the health effects of criteria pollutant emissions from aircraft and ground vehicles, the proposed volume of cargo at LAX will expose the surrounding communities to the exhausts of diesel trucks and other vehicles that move mail, cargo, and people to and from the airport. Emissions from these vehicles not only contribute to smog and visibility problems, but many of the components of diesel exhaust are extremely toxic, affecting the health of nearly everyone exposed to them.<sup>11</sup>

<sup>11</sup> Exhausted by Diesels, How America's Dependence on Diesel Engines Threatens Our Health. Natural Resources Defense Council, New York, NY. May 1998.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR address air quality in Section 4.6, Air Quality, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E, and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR.

Please also see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-3 regarding air pollution increase, Topical Response TR-ST-4 regarding airport area traffic concerns and TR-ST-1 regarding cargo truck traffic.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated the potential risk of adverse health effects for each of the Master Plan Alternatives based on the emissions associated with each of the alternatives. Diesel emissions were included in the human health risk assessment, as discussed in Section 4-24 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The No Project/No Action Alternative assumes that no substantial changes are made to current LAX facilities, and is based on projections of growth in airport activity between 1996 and horizon year 2015. Airport congestion during this time is expected to grow worse without additional capital improvement. In all cases, build

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alternatives are expected to relieve current and predicted future congestion by making airport operations, particularly aircraft operations, more efficient.

After implementation of mitigation measures, the build alternatives would reduce predicted impacts to human health compared with the No Project/No Action Alternative. Implementation of any of the build alternatives is therefore anticipated to reduce future health impacts for most people living, working or going to school near the airport. However, as was indicated in the Supplement to the Draft EIS/EIR, predicted chronic non-cancer human health impacts for maximally exposed residents under Alternatives B and C are slightly higher for some areas than those predicted with the No Project/No Action Alternative. Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

#### PC02203-65

**Comment:**

Diesel exhaust is also the major source of sooty particles from vehicles. Compared to gasoline engines, diesels put out about 100 times more soot under the same load conditions - exhaust from heavy-duty diesel engines can contain up to 200 times more small particles (PM<sub>2.5</sub>) than gasoline engine exhaust. In California, diesel exhaust accounts for 26 % of total PM from all combustion and 66 % of the total PM<sub>10</sub> from traffic.<sup>12</sup>

12 Ibid.

**Response:**

Comment noted. Please see Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-AQ-2 regarding air toxic pollutants.

#### PC02203-66

**Comment:**

Particulate Matter Pollution:

Studies have connected particulate pollution at concentrations below current health standards to increased hospital and emergency room admissions, reduction in lung functions, and premature deaths. These studies have also shown a correlation between short-term exposure to air pollution and increases in respiratory illnesses.<sup>13</sup>

13 Ibid.

**Response:**

Please refer to Topical Responses TR-HRA-2 and TR-HRA-3 regarding airport emissions and link with adverse health effects and human health impacts.

#### PC02203-67

**Comment:**

We are extremely concerned with the emissions of fine particles less than 10 microns in size; specifically, those measuring 2.5 microns or less that are especially associated with the operation of diesel fueled vehicles. These particles (PM<sub>2.5</sub>) are too small to be filtered, are not easily purged by the human respiratory system, and can lodge deep in the recesses of human lungs, causing long-term respiratory problems.

**Response:**

Particulates less than 10 microns in size associated with the operation of diesel-fueled vehicles were evaluated in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to

the Draft EIS/EIR. Diesel exhaust, in the form of particulate matter (PM), was evaluated as a TAP of concern in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR, using the approach presented by SCAQMD in the MATES-II study. Toxicological research indicates that the component of diesel exhaust responsible for most toxicological effects is PM. Diesel PM typically consists of a solid core, composed mostly of elemental carbon, with a coating of various organic and inorganic compounds. More than 75 percent of diesel exhaust particulates have diameters smaller than 1 micrometer with typical particles sized between 0.1 and 0.25 micrometers. Diesel was therefore evaluated based on the assumption that exposure was to all fine particles less than 10 microns in size. Because this range includes the PM<sub>2.5</sub> fraction, Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR did address cancer risks for very small particles. Please see Section 3.6, Evaluation of Diesel Exhaust as a TAP of Concern, in Technical Report 14a of the Draft EIS/EIR for a discussion of diesel exhaust.

Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR found that most potential risk and hazard to human health could be attributed to releases of only a few chemicals, including diesel particulates (less than 10 microns in size), 1,3-butadiene, benzene, and acrolein.

Other health hazards associated with PM are addressed separately in the air quality analysis. The evaluation of potential impacts of five criteria pollutants, including PM<sub>10</sub>, was presented in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR. Included in this Section is a discussion of PM<sub>10</sub> and PM<sub>2.5</sub>.

#### PC02203-68

##### Comment:

How Air Quality Changes Affect Local Population

The draft EIS/EIR projects that there will be significant increases in airport emissions of air pollutants, as well as increases in their ambient concentration, but it does not detail how these pollutants may affect the people living and working in the surrounding communities of LAX, or their environment. Below are examples of some of these effects, whose impacts and mitigation measures will need to be adequately addressed by the FAA and LAWA.

- Minority and low-income populations may be more severely affected by any increase in pollutant emissions and ambient concentration of criteria pollutants, particularly O<sub>3</sub>, because they may be more susceptible to asthma and other chronic respiratory illnesses. They are also less informed of the risks and have less access to adequate healthcare to help them manage these respiratory problems.<sup>14</sup>

- NO<sub>x</sub>, and SO<sub>2</sub> emission levels for the draft EIS/EIR's "No New Runway" scenario will reach "significant impact." Furthermore, their mitigated ambient concentrations will exceed California Ambient Air Quality Standards. Both of these compounds will affect respiratory systems of children and the elderly. People with asthma are especially sensitive to NO<sub>x</sub>, and exposure to NO<sub>2</sub> can impair respiratory defense mechanisms and increase susceptibility to infection; chronic exposure may cause structural changes in the lungs. In addition, all asthmatics are sensitive to the effects of sulfur dioxide.<sup>15</sup>

- Particulate emissions will increase for all of the proposed expansion plans according to the draft EIS/EIR. Long-term exposure to particulate matter pollution can negatively affect human health; studies have shown that fine particulate matter is the most acutely pernicious and dangerous of the many hazardous air pollutants. The elderly, people with existing respiratory or cardiovascular diseases and children are susceptible to the effects of fine particulate matter. The American Cancer Society (ACS) found that people living in cities with the dirtiest air (high criteria pollutant concentrations) had as much as a 17 % greater mortality rate than people living in the least polluted cities. The study's findings suggested serious, chronic health risks connected with particle pollution at concentrations well below current health standards. Even modest exposures to air pollution, especially particulate pollution, have the potential to reduce the lives of constituents of the 35th Congressional District by several years.<sup>16</sup>

<sup>14</sup> Ibid.

<sup>15</sup> Regulatory Support Document. Control of Air Pollution from Aircraft and Aircraft Engines. US Environmental Protection Agency, Washington, DC February 1997.

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16 Breath-Taking. Premature Mortality due to Particulate Air Pollution in 239 American Cities. Natural Resources Defense Council, New York, NY. May 1996.

**Response:**

In recognition of the environmental effects that the LAX Master Plan would have on surrounding communities, LAWA has developed a comprehensive set of Master Plan Commitments and Mitigation Measures to address potential impacts to the maximum extent feasible, as set forth in Chapter 5, Environmental Action Plan, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. LAWA accepts that even with these commitments and mitigation measures, there would still be impacts that remain significant, as described in Chapter 6, Other NEPA/CEQA Topics (section 6.2), of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

Nonetheless, taken as whole, operation of the airport with implementation of the LAX Master Plan is not expected to significantly change or degrade the quality of life in surrounding communities. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Air pollutant emissions from airport operations (specifically from aircraft, ground support equipment, and traffic traveling to or from the airport) are among several sources that impact the air quality of neighborhoods surrounding LAX. Emissions associated with airport operations were estimated for five criteria pollutants: sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), fine particulate matter (PM<sub>10</sub>), nitrogen dioxide (NO<sub>2</sub>), and ozone (O<sub>3</sub>). Criteria pollutant concentrations that exceed National Ambient Air Quality Standards (NAAQS) may indicate a potential health hazard. NAAQS define clean air and are established by the Federal Government under the Clean Air Act (CAA) to protect the public's health, including the health of sensitive populations such as asthmatics, children, and the elderly. NAAQS define the maximum amount of a pollutant that can be present in outdoor air without harm to even the most sensitive individuals. Such impacts are governed under the CAA. California has a State Implementation Plan (SIP) that provides an attainment strategy to reduce criteria pollutant concentrations to acceptable levels. Federal actions are required to conform to applicable SIP under Section 176 of the CAA. Master Plan impacts associated with criteria pollutants are addressed through mitigation strategies that are intended to meet attainment within the air quality management district, as defined in the SIP.

In the air quality impact analysis, ambient concentrations from airport operations, when combined with background (non-airport) concentrations indicated that the NAAQS would not be exceeded in areas immediately surrounding LAX, and California Ambient Air Quality Standards (CAAQS) would be met for all criteria pollutants except for PM<sub>10</sub>, which currently exceeds the CAAQS. In July 1997, USEPA promulgated a new 24-hour and annual PM-2.5 NAAQS. While these standards were the subject of judicial challenges, they are currently in force and in the process of being implemented by the USEPA. State agencies have either adopted the National AAQS or have set more stringent standards, as California has. The air quality analysis reflects applicable federal, state, and regional requirements in effect as of February 2003. The Natural Resources Council study referenced by the commentor reflects the concern of public agencies, such as CARB, in setting air quality standards protective of the most sensitive individuals.

As further noted in Section 4.6.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a number of mitigation measures are proposed that will reduce significant adverse air quality impacts of the LAX Master Plan build alternatives.

Toxic air pollutants (TAPs) are evaluated through the risk assessment process and regulated through California's air toxics program. Potential health risks to populations in the vicinity of LAX from TAPs associated with Master Plan alternatives were documented in Section 4.24.1, Human Health Risk Assessment, and Technical Report 14a, Human Health Risk Assessment, of the Draft EIS/EIR. Section 4.24.1 of the Supplement to the Draft EIS/EIR provides an evaluation of human health risks and adverse effects for Alternative D. Supplemental analyses address several issues including: baseline year, possible acute impacts from acrolein emissions, cumulative impacts of airport emissions on human health for effects other than cancer, and impacts of revised mitigation measures on conclusions reached in the Draft EIS/EIR.

The term "health risk assessment" is sometimes misinterpreted. A health risk assessment does not indicate whether a specific, observed health problem or symptom was caused by chemical exposure. Epidemiological studies are used to evaluate whether past chemical exposures may be responsible for actual health problems observed in real populations. Health risk assessments are used to estimate

potential health impacts resulting from current or future chemical exposures in a population. In order to avoid underestimating chemical exposure, the health risk assessment prepared for the Draft EIS/EIR estimated risks for the maximally exposed individual (MEI), a hypothetical individual that lives, works, or goes to school at a location with the highest predicted concentrations of TAP in air, and who has other characteristics, such as inhalation rate and years of exposure, that result in maximum intake of TAP. In addition, toxicity criteria used in all health risk assessments are developed to be protective of groups that may be exceptionally sensitive to a chemical, such as children and the elderly. The result is a conservative estimate of potential health impacts associated with Master Plan build alternatives. Health risk assessment is the appropriate tool to evaluate whether estimated future emissions associated with Master Plan alternatives may potentially result in human health impacts.

Please see Topical Response TR-AQ-3 regarding air pollution increase, Topical Responses TR-EJ-1 and TR-EJ-2 regarding potential air quality and health risk impacts on low-income and minority communities and environmental justice-related mitigation and benefits, and Topical Responses TR-HRA-2, TR-HRA-3 and TR-HRA-4 regarding airport emissions and link with adverse health effects, human health impacts, and human health mitigation strategies, respectively.

#### **PC02203-69**

**Comment:**

- The air pollutants that harm humans also adversely affect the local environment: The LA Basin's visibility and haze problems can be traced to airborne particles in the atmosphere, which include carbon compounds, NO<sub>x</sub>, SO<sub>x</sub>, and soil dust. Increases in LAX operations will directly contribute to the Basin's visibility problems, which can lead to flight delays and other economically detrimental consequences for the LA region.

**Response:**

The commentor is correct that fine airborne aerosols, both primary particulate matter and secondary particles formed in the atmosphere from the emissions of precursor compounds such as elementary carbon, oxides of nitrogen, and oxides of sulfur emitted from sources such as mobile and stationary combustion equipment, can contribute to the extinction of light in the atmosphere which results in a degradation of visual range. Such a situation can be manifested on a localized basis as a reduction in visibility or on a much larger spatial scale as regional haze. Regulatory programs are in place to control emissions of visibility-reducing particles. As stated in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, LAWA will continue to comply with all air quality requirements which apply to activities over which it has control.

#### **PC02203-70**

**Comment:**

- Air pollutants also harm trees and other plant life by reducing their respiration capacity and increasing their susceptibility to diseases and insect attacks.

**Response:**

Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR discussed potential indirect impacts to sensitive biotic communities and sensitive floral species from air emissions. Additionally, please see Response to Comment AL00033-178 for further discussion of potential air quality impacts to floral and faunal species.

#### **PC02203-71**

**Comment:**

All of these factors will act to reduce property values in the 35th District and reduce the quality of life for all of its citizens.

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**Response:**

Please see Topical Response TR-ES-1 regarding impacts to residential property values and Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02203-72**

**Comment:**

Further, the draft EIS/EIR does not detail how LAWA proposes to inform and educate the surrounding population of the increased health risks, or what steps can be taken to reduce their daily exposure.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR provide a full disclosure of health risks and hazards associated with airport emissions in Section 4.24.1, Human Health Risk Assessment. These documents were circulated for public review and comment and provided an opportunity for the public to become aware of these risks and hazards. LAWA held nine public hearings and several Environmental Justice workshops between June 2001 and November 2001 during the public review period for the Draft EIS/EIR and additional twelve public hearings/workshops and three Environmental Justice workshops during July through October 2003 during the public review period for the Supplement to the Draft EIS/EIR. These hearings and workshops provided additional opportunity to educate the public regarding the health risks associated with the LAX Master Plan. The public hearings included a workshop component in an open house style with separate stations for key environmental disciplines. One station provided graphic materials illustrating the health risks and hazards associated with the LAX Master Plan. Experts were available to answer questions from the public regarding issues relating to human health. The format of the Environmental Justice workshops was similar to the public hearing workshops. LAWA is committed to working in cooperation with affected communities and appropriate regulatory agencies to support and participate in long-term studies that would contribute to an understanding of environmental impacts associated with airport operations.

**PC02203-73**

**Comment:**

Faulty Assumptions

After examining the draft EIS/EIR, we believe that the conclusions regarding the air quality impacts on the local communities and the region in general, may not be entirely accurate or reliable, and may be understated or flawed. Below are a number of factors that we have identified that may have contributed to the faulty conclusions:

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02203-74**

**Comment:**

- The draft EIS/EIR's air quality impact assessments and conclusions use emission estimates that are based only on models and simulations. In addition, the draft EIS/EIR only offers one scenario for each proposed expansion plan, rather than a range in which future emission inventories may fall (or high and low emission totals for each of the planning horizon year). Although models provide an adequate picture of what the air emission inventories may be in 2005, 2010, or even 2015, to base the planned expansions' impact assessments on just one set of results limits the analyses, especially for a 15-year planning horizon.

**Response:**

Please see Response to Comment AL00040-111 regarding assumptions used in the air quality analyses.

#### PC02203-75

**Comment:**

- As discussed in the above point, the emission inventories for each of the planning horizon years uses only one possible composition of the future aircraft fleet. We believe the assumptions for the fleet projection to be overly optimistic. It projects a high rate of adoption of larger aircraft classes by airlines and cargo carriers alike. We believe additional analysis using lower adoption rates by airlines and cargo carriers is needed.

- The draft EIS/EIR's aircraft emission inventories are missing estimates of emissions from foreign-owned and operated aircraft. Sufficient information is available to tell us that emissions from this category may be another significant contributor to the overall airport emissions. Given the importance of LAX as an international hub, foreign flights are expected to account for at least 7% of traffic, if not more.<sup>17</sup> It is also likely that activities by foreign-owned aircraft will increase in the near future, like other air transport activities. If so, their contribution to the air emissions at LAX will also increase.

- The draft EIS/EIR emissions inventory was compiled using emission factors for existing aircraft engines and is missing particulate emission factors for a large number of new engines. While the US EPA has recommended the adoption of ICAO emission standards, these standards only cover NOx, VOC and smoke emissions. Thus, the draft EIS/EIR's assessment of future particulate emissions and impacts is missing an important component.

<sup>17</sup> Flying Off Course. Environmental Impacts of America's Airports. Natural Resources Defense Council, New York, NY. October 1996.

**Response:**

The air quality analysis uses a future aircraft fleet mix developed by the LAWA and professional airport planners. Foreign aircraft are included in the fleet mix for the air quality analyses. Airbus, Ilyushin, Saab, BAE, and Fokker are all examples of foreign aircraft manufacturers. The aircraft's owner (i.e., Southwest, Aeroflot, JAL) is generally irrelevant to any of the environmental analyses since the manufacture and sale of long-range aircraft is a global market. Although many aircraft engines have not been tested for particulate emissions, the air quality analyses attempted to estimate particulate emissions from all aircraft engines in the Draft EIS/EIR using the best available data.

#### PC02203-76

**Comment:**

- The draft EIS/EIR uses environmental baselines from differing years, which can provide inconsistent results. For example, the draft EIS/EIR uses an "environmental baseline" for 1996, an "adjusted environmental baseline" for current conditions, and "No Action/No Project" for future impacts.

**Response:**

Please see Response to Comment AL00017-207 regarding the environmental baseline for air quality analysis and Topical Response TR-GEN-1 for the general description of environmental baseline.

It should be noted that No Action/No Project Alternative is not the same as the 1996 environmental baseline. All alternatives, including the No Action/No Project Alternative, are compared against the environmental baseline for purposes of determining significance under CEQA, as discussed in Section 4.6.3, Affected Environment/Environmental Baseline, and Section 4.6.4, Thresholds of Significance, of the Supplement to the Draft EIS/EIR. The No Action/No Project Alternative and Alternatives A, B, C, and D, are all compared against the environmental baseline separately for purposes of the significance determination.

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#### PC02203-77

**Comment:**

- The draft EIS/EIR analysis of future air quality impacts and possible mitigation measures is not realistic. Specifically, the draft EIS/EIR indicates that airport NOx emissions were determined to have "significant impacts" before and after mitigation measures. Thus, the proposed mitigation measures do not appear to be successful in reducing emissions of this criteria pollutant.

**Response:**

Please see Response to Comment PC00109-15 regarding airport-related NOx emissions.

#### PC02203-78

**Comment:**

- The draft EIS/EIR uses hourly wind data from LAX to model air quality at off-airport roadway intersections. In order to produce more realistic results, the wind data must be collected at the modeled intersections. Otherwise, predicted pollutant concentrations may be skewed.

**Response:**

It is impractical to conduct continuous meteorological data collection at all source locations in a dispersion analysis, regardless of source type (for example stationary sources, mobile sources, etc). Because of this, dispersion modeling guidelines instead make use of representative meteorological data either from an on-site monitoring station when available, or the closest available approved weather station. For all dispersion analyses, the peak concentration for each required averaging period is reported to provide a worst-case value when comparing to the relevant thresholds. Please see Response to Comment AL00022-127 for additional information regarding meteorological data used in the CO hotspot analysis.

#### PC02203-79

**Comment:**

- The draft EIS/EIR makes the assumption that NOx emissions from construction equipment will be controlled through the use of low-NOx equipment. We believe that this is an overly optimistic mitigation strategy, since new equipment adoption tends to be slow. Furthermore, the draft EIS/EIR makes the assumption that a low-NOx counterpart exists for every piece of construction equipment extant, which might not be the case.

**Response:**

Please see Response to Comment AL00016-45 and Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR for revised assumptions regarding construction equipment emissions and mitigation measures.

#### PC02203-80

**Comment:**

Lack of Evidence/Evidence to the Contrary

The draft EIS/EIR asserts that the proposed plans for expansion, especially Alternative C, represents the least impact of all expansion plans. Our analysis of the proposed details, however, shows the following:

**Response:**

Comment noted.



#### PC02203-81

**Comment:**

- Because of the substantial growth in projected operations, the draft EIS/EIR shows no significant improvements in air quality attributable to LAX under any of the proposed plans. Increases in projected aircraft operations will result in additional air pollution and will offset any of the anticipated benefits of lower-emitting aircraft and other mitigating measures.

- Despite reductions in emissions from individual aircraft types, emissions of nitrogen oxides (NOx), volatile organic compounds (VOC) and carbon monoxide (CO) will not decrease. Because of the increase in aircraft operations, the affected communities will not share in the full benefits of lower emission levels.

**Response:**

The Supplement to the Draft EIS/EIR presented an enhanced discussion of air quality mitigation measures in Section 4.6.8 and in Appendix S-E Section 2.3. Under Alternative D, the LAWA staff's preferred alternative, the level of anticipated aircraft operations at LAX will be essentially the same as under the No Action/No Project Alternative. Please see Response to Comment PC00801-2 regarding the air quality benefits associated with Alternative D.

#### PC02203-82

**Comment:**

- The draft EIS/EIR's conclusion that the preferred alternative will have the least negative air quality impacts results from certain questionable assumptions. The preferred alternative, which results in improvements in traffic flows and a reduced number of delays, compared to the "no action" scenario, inevitably has fewer emission impacts.

- The use of this "no action" comparison is also extremely misleading. The comparison occurs between a worst case scenario and a model of the future. No where is there a comparison between current conditions and the future impacts.

**Response:**

For purposes of determining significance under CEQA, all emissions, including those estimated for the No Action/No Project Alternative, were compared against the environmental baseline. Concentrations were compared against the California and National AAQS. The Draft EIS/EIR addressed thresholds of significance for both state and federal standards in Section 4.6.4 of Section 4.6, Air Quality, and the Supplement to the Draft EIS/EIR provides an updated discussion in Section 4.6.4 of Section 4.6, Air Quality. Please see Response to Comment AL00017-207 regarding comparison to the environmental baseline.

Please note that for purposes of determining an adverse affect under NEPA, a comparison of the No Action/No Project against the LAWA-Staff Preferred Alternative, Alternative D, for future scenarios is necessary. Please see Section 4.6.2.6, Methods of Determining Significance, of the Supplement to the Draft EIS/EIR regarding the determination of significant air quality impacts.

Please see Sections 4.6.6 and 4.6.9 of the Supplement to the Draft EIS/EIR for results and a discussion of the comparison of the No Action/No Project Alternative and Alternatives A, B, C, and D against the 1996 environmental baseline and the comparison of Alternative D against the No Action/No Project Alternative .

#### PC02203-83

**Comment:**

- The assumptions underlying the air quality analysis ignore the possibility that airport improvements may result in more passengers or more flight operations sooner. If the airport increases its airside

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efficiency and reduces delays, it is plausible that airlines will choose to increase flights to LAX as opposed to using other regional airports, resulting in increased emissions.

**Response:**

LAWA does not have the authority to restrict the level and timing of aircraft operations at LAX, so it is plausible that more flight operations could occur sooner than anticipated in the Master Plan. However, under Alternative D, the LAWA staff preferred alternative, the airport capacity is physically constrained, so the level of operations anticipated in the horizon year 2015 and the associated air quality impacts could possibly occur sooner but would not likely become worse.

**PC02203-84**

**Comment:**

Draft EIS/EIR Omissions  
We also noted the following omissions in our reading of the draft EIS/EIR.

**Response:**

Please see Responses to Comments PC02203-85 through PC02203-89 below.

**PC02203-85**

**Comment:**

- Conformity with the State Implementation Plan: The draft EIS/EIR does not address how the increase in air pollution from LAX operations affects the State Implementation Plan (SIP), and what steps will be taken to help the State meet the goals and objectives of the SIP.

**Response:**

Please see Responses to Comments AF00001-4 and PC02203-92 regarding LAX emissions and conformity with the SIP.

**PC02203-86**

**Comment:**

- Inventory of Toxic Air Pollutants: The draft EIS/EIR does not contain a comprehensive inventory of Toxic Air Pollutants (TAP), an assessment of their long-term health risks or an analysis of their potential effects on the communities surrounding LAX.

**Response:**

The content of this comment is essentially the same as comment PC02203-57; please refer to Response to Comment PC02203-57.

**PC02203-87**

**Comment:**

- Inventories of Particulate Matter Emissions From Aircraft: The draft EIS/EIR does not provide a comprehensive inventory of emissions of particulate matter (PM) less than 10 micrometer in size (PM10) and particulate matter less than 2.5 micrometer in size (PM2.5) from aircraft.

**Response:**

Please see Response to Comment PC02203-58 regarding PM10 and PM2.5 aircraft engine emission factors and emission inventory results.

**PC02203-88****Comment:**

- Construction Impacts on Local Air Quality: The draft EIS/EIR's contains few details regarding the local increase in emissions and air pollution due to airport and aircraft traffic delays as a result of construction projects proposed.

**Response:**

Please see Response to Comment PC02203-59 regarding construction-related air quality impacts.

**PC02203-89****Comment:**

- Missing Data: The analytic basis for the community impacts is insufficient, since critical demographic and other relevant health data are missing. Moreover, the draft EIS/EIR does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the project's impacts.

**Response:**

Please refer to Response to Comment AL00017-35 regarding health risk impacts for communities surrounding LAX. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting aviation demand, Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-3 regarding environmental justice and regional context.

**PC02203-90****Comment:**

Points From Other Studies/Papers

We reviewed a number of documents and studies related to air quality issues in the course of analyzing the impacts detailed by the draft EIS/EIR. The issues listed below are the issues that we feel LAWA and the FAA need to take into consideration in order to fully capture the impacts associated with the proposed expansion as outlined in the draft EIS/EIR. The CEQA or NEPA process may not require some of the issues presented below. Nevertheless, they should be taken into account because of their potential to affect the communities around the airport.

**Response:**

Comment noted. Please see Responses to Comments PC02203-91 through PC02203-96 below.

**PC02203-91****Comment:**

- In discussing the impact of toxic air pollutants associated with current airport operations, the draft EIS/EIR notes that LAWA is initiating an "independent" study of air quality in the area around LAX for the purpose of examining impacts. Given that the results are necessary to establish the baseline setting, the draft EIS/EIR needs to include consideration of toxic air pollutants associated with current airport operations.

**Response:**

Please see Topical Response TR-AQ-2 regarding the Air Toxics Study, also known as the Source Apportionment Study.

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#### **PC02203-92**

**Comment:**

- As aircraft and airport operations increase, there will be a corresponding increase in air pollution. Stationary or other sources in the area that would otherwise be compliant with Federal and State laws will be forced by air quality regulators to spend additional resources to offset emissions from LAX.

**Response:**

LAWA is working with SCAQMD to integrate the Master Plan developments into the 2003 AQMP. Likewise, LAWA is working with SCAG to integrate the Master Plan developments into the 2004 RTP. These efforts should allow for continued economic growth and for the timely attainment of the ambient air quality standards in southern California. Also, please see Topical Response TR-AQ-3 regarding air pollution.

#### **PC02203-93**

**Comment:**

- Current ICAO (International Civil Aviation Organization) standards that have been recommended for FAA adoption by the US EPA for aircraft emission standards were not developed based on air quality impacts. Thus, the local population will not be as protected as if the standards were set based on health criteria.

**Response:**

ICAO states "Aircraft are required to meet the engine certification standards adopted by the Council of ICAO. These are contained in "Annex 16 - Environmental Protection, Volume II - Aircraft Engine Emissions" to the Convention on International Civil Aviation. These were originally designed to respond to concerns regarding air quality in the vicinity of airports." The California and National Ambient Air Quality Standards have been developed to protect the public health and property. Attainment to these standards is shown through ambient air monitoring and/or air dispersion modeling.

#### **PC02203-94**

**Comment:**

- The net effect of emissions from airport operations can be difficult to fully assess. The cumulative health impacts of air pollutants on humans have rarely been studied. As LAX is one of the world's busiest airports, and is already the largest single source of air pollution in Southern California, it is imperative that its impacts on the hundreds of thousands of people who are immediately exposed to its contaminants be fully investigated and understood.

**Response:**

This comment is essentially the same as PC02203-6, please see Response to Comment PC02203-6.

#### **PC02203-95**

**Comment:**

- It is imperative that permanent monitoring stations be set up near schools and other institutions to monitor and warn of excessive local ambient concentrations of air pollutants. (Note: schools located nearby include: Felton Elementary, Lennox Middle, Buford Elementary, Moffet Elementary, Whelan, and Jefferson)

**Response:**

Please see Response to Comment PC01947-9 regarding air monitoring.

**PC02203-96****Comment:**

- Any emissions reduction measures affecting aircraft and airport operations will face other hurdles, among them groups representing airports and airlines. In fact, a number of these groups have successfully resisted a recent initiative by the EPA to bring affected parties into a discussion regarding how to reduce emissions from airline operations. Therefore, we believe that the mitigation measures proposed in this document cannot be realistically implemented, and other mitigation measures should be proposed.

**Response:**

Please see Response to Comment PC00608-2 regarding aircraft emission standards.

**PC02203-97****Comment:**

Noise Impacts

The proposed plans would result in an increase in airport and aircraft activities, as well as an increase in traffic on the streets and highways around the airport. An increase in airport operations will significantly increase the noise levels in communities surrounding the airport, thereby reducing the quality of life of the people living in these communities, including the communities of the 35th Congressional District. In fact, the City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-6 regarding noise increase, in particular Subtopical Response TR-N-6.2 regarding the relationship between traffic and noise and Subtopical Response TR-N-6.1 regarding current and future noise levels. See also Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02203-98****Comment:**

The current operations at LAX already subject over 95,000 people living and working in the neighborhoods surrounding the airport to a 65 dB community noise equivalent level (CNEL) or above. As described by the draft EIS/EIR, at 65 CNEL, constituents of the 35th Congressional District are experiencing the noise equivalent of an operating vacuum cleaner for 24 hours a day. The 65 CNEL represents only an average and does not include loud noise instances belonging in the "single event" category.

**Response:**

Please see Response to Comment PC02203-4.

**PC02203-99****Comment:**

Scientific studies conducted on the effects of high noise levels on communities have shown that noise from departing and arriving aircraft is a constant source of distress, interfering with normal speech, interrupting sleep, and can disrupt a wide range of activities. These studies also show there is a relationship between noise and the health of community residents. High noise levels have been linked to hypertension and cardiovascular disorders.

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**Response:**

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

**PC02203-100**

**Comment:**

Specifically, the draft EIS/EIR analysis of noise impacts is missing the following important components:

- Fleet Analysis: The information used by the draft EIS/EIR to generate noise contours does not take foreign aircraft and cargo operations into account. Foreign and cargo operations might utilize older, noisier aircraft than is accounted for in the fleet analysis.

**Response:**

All types of aircraft types both foreign and domestic were included in the noise modeling. Please see Topical Response TR-N-7 regarding noise abatement measures/enforcement, in particular Subtopical Response TR-N-7.6 regarding the ANCA phase-out of Stage 2 aircraft.

**PC02203-101**

**Comment:**

- Single Event Noise Impact Information: The information provided by the draft EIS/EIR regarding noise impacts on the surrounding communities does not provide information regarding impacts of single noise events (SNL). SNL information, in conjunction with the CNEL metric, is a more comprehensive indicator of the level of disruption the noise impacts have on the exposed communities.

**Response:**

The commentor is mistaken. Lmax levels for single events are included in Appendix D, Table A5-5 of the Draft EIS/EIR. Additionally, the Supplement to the Draft EIS/EIR provides an extensive section on single event impacts on awakenings and on speech disruption in school environments. Also, please see Topical Response TR-N-2 regarding single event noise and CNEL differences.

**PC02203-102**

**Comment:**

- Monitoring: The projected noise impacts provided by the draft EIS/EIR are based almost entirely on simulations. Very little information is provided regarding the comparison of the current baseline to actual noise measurements in the affected communities. In addition, the draft EIS/EIR offers no provisions for on-going or proposed monitoring programs to ensure the noise levels remain within predicted boundaries.

**Response:**

Comment noted. The State of California regulations on aircraft noise provide the requirement that LAWA monitor noise levels in the airport environs and mitigate to measured noise levels. Appendix D of the Draft EIS/EIR provides a comparison of the measured noise levels for the environmental baseline year with the modeled noise levels for the same period. Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.1 and Subtopical Response TR-N-1.2, for more discussion on this topic.

#### PC02203-103

**Comment:**

- Reverse Thrust Braking: The draft EIS/EIR's noise analysis does not take into account jet noise generated by aircraft using reverse thrust for braking upon landing. The noise contours provided in the analysis were generated using only aircraft flight track data.

**Response:**

Reverse thrust is, in fact, incorporated into the Integrated Noise Model. Reverse Thrust Restrictions are further discussed in Section 7.1.3.6 of Draft EIS/EIR Appendix D.

#### PC02203-104

**Comment:**

- Identification of Other Areas Affected by Noise Levels: The noise information provided by the draft EIS/EIR does not identify areas or provide contour maps of areas that are affected by a CNEL of 60 dB or more.

**Response:**

The 65+ CNEL contours utilized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR are consistent with federal and state guidelines for noise compatibility planning. Also, please see Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.2 and Subtopical Response TR-N-2.4.

#### PC02203-105

**Comment:**

- Quantification of Construction Impacts: The draft EIS/EIR does not quantify the effects of construction and increased traffic noise on the affected communities.

The analysis of the draft EIS/EIR downplays the fact that noise from construction activities will exist in the surrounding communities for the next 15 years, the estimated construction duration.

**Response:**

Comment noted. Figure 4.1.6 in the Draft EIS/EIR shows the location and extent of noise sensitive uses that may be significantly impacted by construction noise under Alternatives A, B, or C. Figure S4.1-5 of the Supplement to the Draft EIS/EIR provides similar information for Alternative D. This information, along with the accompanying text in the subject documents, is sufficient to delineate and compare construction noise impacts between the subject alternatives. Unlike the quantification of aircraft noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, which identify the total number of homes, people, and sensitive receptors that may be significantly impacted on a long-term basis due to airport operations, quantification of the total number of homes, people, and sensitive receptors impacted due to construction noise would be misleading because only portions of the total impact area would be impacted at any given time depending on the particular construction activity underway nearby. The surrounding communities would not be exposed to significant construction noise levels throughout the entire Master Plan construction period, but rather would be limited to the impacts of activities occurring nearby from individual construction projects during the time those individual projects are underway.

#### PC02203-106

**Comment:**

In addition, the draft EIS/EIR discounts scientific evidence on the health effects of noise on communities, especially on children.

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**Response:**

Comment noted. Please see Responses to Comments AL00017-52 and AL00038-11 regarding the health effects of aircraft noise and the impact of high noise levels on children, respectively.

**PC02203-107**

**Comment:**

Furthermore, the draft EIS/EIR's proposed mitigation strategies for noise pollution do not address the fact that minority and low-income populations living and working in communities surrounding LAX may be unfairly affected by increases in noise levels and intensity.

**Response:**

The Environmental Justice Program outlined in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR recognizes the potential disproportionate effects that the Master Plan would have on minority and low-income populations due to aircraft noise and goes beyond basic mitigation proposals to address the unique needs of these communities. With input gathered through environmental justice workshops and an extensive public outreach effort, the Environmental Justice Program presented in the Final EIS/EIR represents a full and good faith effort to identify all possible means for avoiding, reducing, or off-setting the impacts of the Master Plan in a manner that addresses the needs and preferences of affected minority and/or low-income communities in accordance with NEPA and CEQA requirements. Regarding fairness, with the orientation of the runways at LAX, it is inevitable that increases in aircraft activity and associated noise will have a greater burden on communities to the east of LAX than those to the north and south. It should be noted however, that LAWA Staff's new preferred alternative, Alternative D, has the least impacts of the Master Plan build alternatives and would limit activity at LAX to future (2015) levels that would be similar to what would occur with existing facilities if the Master Plan were not approved. Please see Topical Response TR-EJ-2 for a discussion of environmental justice related mitigation and benefits and Topical Response TR-EJ-3 for a discussion of aircraft noise effects on minority and low-income populations under Alternative D.

**PC02203-108**

**Comment:**

"Significant and Unavoidable" Noise Impacts

We oppose the expansion plans proposed by the draft EIS/EIR due to the following "significant and unavoidable" impacts on the communities surrounding LAX, as detailed in the draft EIS/EIR.

1. Total population/dwellings exposed to aircraft noise above 65 CNEL would increase under the three proposed build alternatives, yet decrease under the No Action/No Project Alternative.

- The draft EIS/EIR concludes that under the preferred build alternative, alternative C, 6,000 more members of the communities surrounding LAX will be exposed to 65 CNEL in 2015, as compared to the "No Action" alternative.

Members of the nearby communities are already exposed to excessive noise levels under the current operational structure. All of the proposed expansion plans will result in an increase in the number of residents exposed to high noise levels, further reducing their quality of life.

**Response:**

The commentor correctly states the general conclusions for noise impacts presented in the Executive Summary and Overview of Section 4.1, Noise, in the Draft EIS/EIR. However, the population of approximately 6,000 residents would be newly exposed to the 65 CNEL compared to the No Action/No Project Alternative. As stated in Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, although all of the Master Plan alternatives would result in population newly exposed to the 65 CNEL noise contour, due to a shift in the noise contours Alternative D would result in an overall decrease of 1,350 residents exposed to the 65 CNEL contour compared to the No Action/No Project Alternative. Also note that the conclusions of significant and unavoidable impacts presented in Section 4.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR are more general in nature and are further defined in Section 4.2.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.



Please see Topical Response TR-LU-1 regarding impacts on quality of life.

#### PC02203-109

**Comment:**

2. Sensitive uses exposed to aircraft noise above 65 CNEL would increase under the three proposed build alternatives, and decrease under the No Action/No Project Alternative.

- The draft EIS/EIR concludes that under the preferred build alternative, more sensitive use areas such as schools, churches, and other institutions surrounding LAX will be exposed to 65 CNEL in 2015, as compared to the "No Action" alternative.

Scientific studies have concluded that high noise levels on communities are a constant source of distress, interfering with normal speech, and disrupting learning abilities in children.<sup>18</sup>

<sup>18</sup> See, for example, Bullinger, Monika; Hygge, Staffan; Evans, Gary; Mies, Markus; and Mackensen, Sylvia. "The Psychological Cost of Aircraft Noise for Children." Lecture given at the "Environment and Psyche" symposium in Aachen, Germany, November 1998.

**Response:**

Please see Responses to Comments AL00017-52 and AL00038-11 regarding the health effects of aircraft noise and the impact of high noise levels on children, respectively. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

#### PC02203-110

**Comment:**

3. Population/dwellings in the 65 CNEL contour would be exposed to increases of 1.5 CNEL.

- The draft EIS/EIR concludes that there are noise-sensitive parcels previously exposed to 65 CNEL or higher noise levels that will be exposed to increases in noise levels of 1.5 CNEL or greater under the proposed expansion plans.

Residences, schools, and parks currently exposed to excessive aircraft noise levels will be exposed to even higher levels of noise under the proposed expansion plans. According to FAA guidelines, an increase in 1.5 CNEL constitutes a "significant" noise level increase.

**Response:**

The commentor correctly states the general conclusions and overall methodology and thresholds presented in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR. Technical Report 1, Land Use Technical Report, provides a listing of all noise-sensitive uses newly exposed to the 65 CNEL or that would experience a 1.5 CNEL increase within the 65 CNEL under Alternatives A, B, and C. Although parks that would be exposed to these noise increases are listed, this noise increase would only be considered significant for select outdoor recreational uses (e.g., amphitheater), as described in Section 4.2.2 of the Draft EIS/EIR. In addition, and as described in Topical Response TR-LU-3, many schools that would experience a significant noise increase have already received funds for sound insulation and are subject to an avigation easement. In addition, residential uses that would experience a significant noise increase may already be eligible for sound insulation under the ANMP.

#### PC02203-111

**Comment:**

4. Population would be newly exposed to 65 CNEL.

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- The draft EIS/EIR concludes that under the preferred build alternative, more members of the communities surrounding LAX (7,150) will be newly exposed to 65 CNEL, as compared to the "environmental baseline."

None of the mitigation strategies proposed by the draft EIS/EIR will result in reduced noise impacts to the communities, including the proposed "least impact" expansion scenario.

**Response:**

As presented in Table S4.1-30 of the Supplement to the Draft EIS/EIR, under LAWA Staff's new preferred Alternative D approximately 5,100 residents would be newly exposed to 65 CNEL or greater noise levels and 11,120 residents would be removed from 65 CNEL or greater noise levels compared to 1996 baseline conditions. However, several mitigation measures are provided in Section 4.1, Noise (subsection 4.1.8), and Section 4.2, Land Use (subsection 4.2.8), of the Final EIS/EIR, as derived from the Supplement to the Draft EIS/EIR, that would result in reduced noise impacts to the community by modifying airport operations, expanding the ANMP, providing additional sound insulation to schools without avigation easements, and updating the noise monitoring program. See Topical Response TR-LU-5 for additional discussion of noise mitigation.

#### PC02203-112

**Comment:**

5. Construction of the proposed expansion plans will expose noise sensitive locations to excessive increases in noise levels.

- The draft EIS/EIR concludes that construction noise would exceed ambient levels by 5 dB Leq or more at noise sensitive locations. This is a "significant increase" according to CEQA.

See 5, above

**Response:**

Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

Based upon the noise impact criteria of an exceedance of 5 dBA Leq or more above ambient levels, temporary but significant noise impacts from construction activities are predicted at noise-sensitive locations near construction sites. These noise exceedances would occur intermittently during Master Plan construction. Mitigation measures for construction noise (which were addressed in Section 4.1.8.3 of the Supplement to the Draft EIS/EIR) would reduce noise levels to the extent practicable, although generally not to a level below significance.

Please see Response to Comment SPC00275-44 for additional information regarding construction noise impacts and measures to mitigate such impacts.

#### PC02203-113

**Comment:**

6. Residential and other noise sensitive uses may be exposed to high noise levels or experience significant increases in existing high noise levels.

See 4 and 5, above

**Response:**

Please see Responses to Comments PC02203-111 and PC02203-12 above.

#### PC02203-114

**Comment:**

7. High construction noise levels would affect residential and noise sensitive uses within 600 feet of construction sites.

See 4 and 5, above

**Response:**

Please see Responses to Comments PC02203-111 and PC02203-12 above.

#### PC02203-115

**Comment:**

Other Noise Impacts

In addition to the "significant and unavoidable" impacts discussed above, our reading of the draft EIS/EIR also exposed the following impacts:

- The significant community impacts of noise from current LAX operations has not fully been addressed by the draft EIS/EIR. The environmental burden borne by the communities surrounding LAX is already enormous, and the methods to mitigate the noise burden are insufficient.

**Response:**

Please see Topical Responses TR-N-4 and TR-LU-5 regarding noise mitigation and Topical Responses TR-EJ-1 and TR-EJ-2 regarding environmental justice.

#### PC02203-116

**Comment:**

- Alternative C, the "No Additional Runway" alternative, will expose an additional 7,150 people to the 65 CNEL noise level. 5,090 people will experience additional, significant noise impact (1.5 CNEL or more) over the 65 CNEL range. The affected population will be comprised of Congresswoman Water's constituents.

**Response:**

The comment states the conclusions for impacts under Alternative C that were presented in Section 4.1, Noise (subsection 4.1.6.1.4), and 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR. Note that under LAWA Staff's new preferred alternative, Alternative D, the population newly exposed to 65 CNEL noise levels or an increase of 1.5 CNEL within the 65 CNEL would be reduced compared to Alternative C, as indicated on Table S4.1-30 and Table S4.1-31 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-5 for a discussion of mitigation measures presented in the Draft EIS/EIR to reduce noise impacts. Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a discussion of noise levels under 1996 baseline and Year 2000 conditions and projected noise impacts that would occur under the Master Plan alternatives.

#### PC02203-117

**Comment:**

- The draft EIS/EIR's proposed noise mitigation plan, involving land acquisition in the impacted areas, would leave space open for conversion to light industrial and warehousing businesses. City officials in CA 35th Congressional District have already stated opposition to such conversion.

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**Response:**

No land acquisition to mitigate noise impacts is proposed under the LAX Master Plan and sound insulation is the preferred method by LAWA to achieve land use compatibility. As described in Section 4.2, Land Use, of the Draft EIS/EIR, the Voluntary Residential Acquisition/Relocation Program for the Manchester Square and Belford area is a separate program from the LAX Master Plan and was established based on interest from homeowners and residents who requested that LAWA purchase their property in lieu of soundproofing. The purpose of the acquisition areas presented in Appendix P of the Master Plan and Chapter 2.7 of the Draft Master Plan Addendum is to accommodate airport operations and related improvements proposed under the build alternatives, not to mitigate noise impacts.

**PC02203-118**

**Comment:**

- The "keystone" of the noise mitigation measures proposed is an extension of the current LAWA sound insulation and property acquisition program. This program will either force the members of the local communities to remain indoors with their windows and doors closed, or force the population to move, resulting in a loss of constituents to the 35th District.

**Response:**

Please see Topical Response TR-LU-3 for a description of the ANMP and revisions to the ANMP under the LAX Master Plan. Subtopical Response TR-LU-3.13, provides a summary of impacts to noise-sensitive uses identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Although some residential uses would be newly exposed under the Master Plan alternatives, other residential uses would be removed from exposure to high noise levels. Based on information provided in Technical Report 1, Land Use Technical Report, pages 98 and 99, of the Draft EIS/EIR, approximately 71,556 residents are currently located within the ANMP boundaries. While the majority of the ANMP boundary is within the 35th Congressional District, the 35th Congressional District includes areas outside the ANMP boundary. Based on current conditions, areas exposed to high noise levels are still heavily populated (the population has not moved). In addition, residential soundproofing would be provided as mitigation for those dwelling units within the ANMP contour, thereby reducing interior noise levels to meet California Airport Noise standards. As stated in Subtopical Response TR-LU-3.14, the ANMP would be revised to include noise-sensitive uses newly exposed to high noise levels. Furthermore, as indicated in Section 4.2, Land Use (subsection 4.2.9.1), of the Supplement to the Draft EIS/EIR, even after incorporation of mitigation noise impacts would remain significant where aircraft noise levels of 75 CNEL or greater affect residential properties with exterior habitable areas. Please see Subtopical Responses TR-N-4.3 and TR-LU-5.5 regarding noise mitigation.

**PC02203-119**

**Comment:**

- According to the draft EIS/EIR, current noise reduction plans are slowed due to the fact that LAWA is pursuing acquisition plans instead of sound insulation. The currently exposed population is still awaiting their mitigation measures, yet LAWA is proposing the same mitigation strategies to reduce future impacts.

**Response:**

Please see Subtopical Response TR-LU-3.10, regarding progress in implementing the ANMP. As presented in Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, Mitigation Measure MM-LU-1 would accelerate the fulfillment of existing commitments to owners wishing to participate within the current ANMP boundaries prior to proceeding with newly eligible properties.

#### PC02203-120

**Comment:**

- According to the draft EIS/EIR, current noise reduction plans are hampered by substandard and non-code compliant housing stock in the most heavily impacted areas. Because sound insulation measures cannot be completed on substandard housing, the exposed population in these buildings has not, and will not receive any relief from airport noise. Instead, they will be exposed to increases in noise levels if airport operations escalate.

**Response:**

As stated in Section 4.2, Land Use (subsection 4.2.8), Mitigation Measure MM-LU-1 recommends the reduction or elimination, to the extent feasible, of structural and building code compliance constraints to mitigation of substandard housing. Nonetheless, as concluded in Section 4.2, Land Use (subsection 4.2.9.1), of the Supplement to the Draft EIS/EIR, noise impacts on substandard housing units that are not feasible to insulate due to structural constraints or other factors associated with bringing properties into compliance with building codes would be significant after mitigation. Although LAVA may choose to eliminate constraints based on building codes, Federal participation will not be available in those instances. Areas that would experience an increase of 1.5 dB within the 65 CNEL or greater contours were presented in Section 4.2, Land Use (subsection 4.2.6,) of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Also, please see Subtopical Response TR-LU-3.9 regarding progress toward implementing the ANMP.

#### PC02203-121

**Comment:**

- Due to zoning regulations, no sound insulation is undertaken for residential properties intended to be converted to non-residential use. This also excludes a segment of the population affected by the noise, and will expose them to even higher noise levels if airport operations increase.

**Response:**

As described in the Section 4.2, Land Use (subsection 4.2.9.1), of the Supplement to the Draft EIS/EIR, noise impacts on incompatible uses ineligible for insulation due to inconsistent zoning or land use designations (i.e., residential uses on land designated for industrial use) would be significant after mitigation. As stated in Subtopical Response TR-LU-3.10, under the 2001 ANMP LAVA will now authorize the mitigation of incompatible residential properties regardless of general plan or zoning designation. However, it is not a priority or policy of jurisdictions implementing the ANMP to provide sound insulation to these properties, since future uses of these properties would change in order to be consistent with their respective planning and zoning designations. Areas that would be newly exposed to the 65 CNEL or experience an increase of 1.5 CNEL within the 65 CNEL or greater contours were presented in Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### PC02203-122

**Comment:**

- The proposed property acquisition plan outlined in the draft EIS/EIR as a noise mitigation strategy does not include a majority of the population affected by the noise contours for various reasons, including the reasons discussed above.

**Response:**

No land acquisition to mitigate noise impacts is proposed under the LAX Master Plan. Sound insulation is the preferred method by LAVA to achieve land use compatibility. As described in Topical Response TR-LU-3, the mitigation boundary is based on the 1992 fourth quarter 65 CNEL noise contour, which encompasses the majority of the population affected by the noise contours. Under the LAX Master Plan, the Aircraft Noise Mitigation Program (ANMP) would be revised to include noise-sensitive uses newly exposed to high noise levels that are outside the current ANMP boundaries, would accelerate

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current commitments to owners wishing to participate in the existing ANMP, and would reduce or eliminate current constraints to providing sound insulation to affected properties.

#### PC02203-123

**Comment:**

How Increased Noise Levels and Intensity Affect Local Population

The draft EIS/EIR projects that there will be significant increases in noise levels reaching communities surrounding the airport. It also projects increases in the noise intensity affecting these areas. However, it discounts how these increases may affect the people living and working in the communities surrounding LAX, or their environment. Children are particularly susceptible to the effects of high noise levels in their home and learning environments. Below are examples of some of these effects, whose impacts and mitigation measures will need to be adequately addressed by the FAA and LAWA.

**Response:**

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

#### PC02203-124

**Comment:**

- The proposed expansion plans, outlined in the draft EIS/EIR, will subject residential and other noise sensitive uses to significant increases in noise levels. Scientific studies conducted on the effects of high noise levels on communities have shown that there is a relationship between noise and the health of community residents. High noise levels have been linked to hypertension and cardiovascular disorders.<sup>19</sup>

<sup>19</sup> See, for example, Bronzaf, 1998; or Cohen et al., 1981.

**Response:**

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

#### PC02203-125

**Comment:**

- Scientific studies have shown that noise from departing and arriving aircraft is a constant source of distress to the affected communities, interfering with normal speech, interrupting sleep, and disrupting a wide range of activities, and affecting an individuals' sense of well-being. A major effect of chronic exposure to elevated noise levels among adults living near airports is feelings of helplessness: most people who are annoyed by airport noise report feeling unable or helpless to alter the situation.<sup>20</sup>

<sup>20</sup> Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," Sound and Vibration, December 1976.

**Response:**

Please see Response to Comment AL00017-52 regarding the health effects of aircraft noise. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

#### PC02203-126

**Comment:**

- Minority and low-income populations tend to be more severely affected by any increase in noise levels or noise intensity, because they are less informed of the risks, and have less access to adequate healthcare to help them manage these problems.<sup>21</sup>

21 Bronzaft, Arline, L.; Ahern, Kathleen Dee; McGinn, Regina; O'Connor, Joyce; Savino, Bartholomew, "Aircraft Noise, A Potential Health Hazard," Environment and Behavior, Vol. 30, No. 1, January 1998.

**Response:**

Comment noted. As discussed in Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR, numerous studies have been completed regarding the health effects of noise. While there is consensus that noise has some health effects, there is no agreement as to the degree of the effects or the level at which they become significant. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR provides additional information and analysis regarding certain aspects of airport-related noise impacts such as sleep disturbance and school disruption, including such impacts occurring within minority and low-income communities located in the vicinity of LAX. Both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR acknowledge that implementation of any of the build alternatives would have a disproportionate and adverse effect on minority and/or low-income communities with regard to the population newly exposed to high noise levels.

#### PC02203-127

**Comment:**

- The proposed increase in operations outlined in the draft EIS/EIR will subject noise sensitive areas such as schools to excessive noise levels. Studies have documented that children chronically exposed to aircraft noise have poorer reading skills when compared to children living in quiet neighborhoods. In addition, studies have suggested that children in high noise areas may develop poor persistence on challenging tasks.<sup>22</sup>

22 Cohen, Sheldon; Evans, Gary W.; Krantz, David S.; Stokols, Daniel, "Physiological, Motivational, and Cognitive Effects of Aircraft Noise on Children", American Psychologist, Vol. 35, No. 3, March 1980.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. In addition, please see Topical Response TR-LU-4 regarding outdoor noise levels.

#### PC02203-128

**Comment:**

- The draft EIS/EIR's expansion plans include proposals for increasing LAX's cargo handling capacity from the current 1.9 million annual tons to 4.2 million annual tons, which will result in more round-the-clock cargo flights and other operations, potentially increasing night-time noise levels in communities around the airport. Studies have found that intermittent and impulsive noises, such as aircraft noise, are more disturbing to sleep than continuous noise sources. Furthermore, the quality of sleep and sleep disturbance are directly related to aircraft noise exposure in these studies. The cargo facilities will be located on the eastern end of the airport, the location closest to the communities most impacted by noise from over flights.<sup>23</sup>

23 Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," Sound and Vibration, December 1976.

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**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02203-129**

**Comment:**

- The draft EIS/EIR states that the proposed expansion plans will expose noise sensitive locations to excessive increases in noise levels. Affected noise-sensitive locations include schools, parks, churches, recreation venues and other places for community gathering. This will severely affect citizens of District 35 communities, especially those with less mobility, as they will have no escape from airport-related noise, either in their homes, or at any other near-by locations. Citizens of District 35 communities will have to leave their communities to escape the high level of noise. This also hinders residents' use of their porches and backyards - many of these are places where "on the street conversations" bind the community together.

**Response:**

Technical Report 1, Land Use Technical Report, provides a listing of all noise-sensitive uses newly exposed to the 65 CNEL or that would experience a 1.5 CNEL increase within the 65 CNEL under Alternatives A, B, and C compared to 1996 baseline conditions. Technical Report S-1, Supplemental Land Use Technical Report, provides a similar listing for Alternative D, as well a comparison of all the Master Plan alternatives to Year 2000 conditions. Based on the analysis provided in Sections 4.2.6 and 4.8.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, no parks would be significantly impacted by aircraft noise under Alternatives A, B, C, and D. However, it is acknowledged in Section 4.2.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, that an increase in outdoor noise levels between the 65 and 75 CNEL could affect outdoor speech and the quality of certain outdoor activities. As shown in Figures S4.2-2 and S4.2-3, a portion of District 35 communities are exposed to high noise levels under 1996 baseline and Year 2000 conditions. Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels and how areas exposed to high noise levels would, in the majority of Master Plan alternative comparisons, be reduced under the Master Plan alternatives. See also Topical Response TR-LU-5 for a description of noise impacts and mitigation measures that would be implemented to reduce these impacts under the LAX Master Plan.

**PC02203-130**

**Comment:**

- The draft EIS/EIR analysis concludes that construction of the proposed plans, once underway, would result in noise generation that exceed ambient levels by 5 dBA Leq or more at noise sensitive locations. This is a "significant increase" according to CEQA. But more importantly, this source of noise represents an undue burden on the affected citizens of the South Bay cities and CA 35th Congressional District. This noise burden affects these communities in three ways:

1. The effects of noise on the communities may be intensified for those who live, work, recreate, or attend school within the noise contours because they are constantly exposed to noise.
2. These exposed members of the communities are bearing the brunt of the noise burden of the proposed expansion plans, in addition to the aircraft noise they area already exposed to; and
3. The noise disturbance will remain with these communities for the next 15 years - the duration of the estimated construction period.

**Response:**

As described in Sections 4.1.6, Noise, and 4.2.6, Land Use, of the Draft EIS/EIR, construction noise impacts would occur within 600 feet of construction sites under all alternatives, based on an increase of 5 dBA above the lowest ambient noise levels. Even though construction noise impacts would be intermittent and temporary, these impacts were identified as significant and unavoidable. These areas



are shown on Figure 4.1-6 of the Draft EIS/EIR. To the south of the airport in the City of El Segundo (within the South Bay but outside the 35th Congressional District) these areas include approximately 510 dwelling units, one school, and one park. To the north in the City of Los Angeles (within the 35th Congressional District in the Community of Westchester) these areas include 1,600 dwelling units, two churches, and seven schools. As stated in Section 4.20 of the Draft EIS/EIR, construction is anticipated to last approximately 13 years. Although the timeframe for construction is projected to be 13 years, noise-sensitive uses would not be continually exposed to construction noise, because construction activity would vary in location (avoiding construction staging near noise-sensitive uses) and duration (avoiding sensitive times of the day) as specified under mitigation measures MM-N-8 and MM-N-11 in the Supplement to the Draft EIS/EIR. Regarding combined effects of aircraft noise and construction, as concluded in Section 4.1.7 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, these are not expected to be significant because construction noise does not occur in areas where aircraft noise increases, and existing aircraft noise would serve to mask much of the construction noise. Also please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

#### **PC02203-131**

##### **Comment:**

###### **Faulty Assumptions**

In examining the draft EIS/EIR we believe that the conclusions regarding the noise impacts on the local communities and the region in general may not be entirely accurate or reliable, and understated or flawed. Below are a number of factors that we have identified that may affect the draft EIS/EIR's noise impact assessments:

- The draft EIS/EIR only had one scenario for each proposed expansion plan, rather than a range in which future noise levels may fall (or high and low noise contours for each of the planning horizon years). Although models provide an adequate picture of what the noise levels and intensities may be in 2005, 2010, or even 2015, to base the planned expansions' impact assessments on just one set of results, limits the analyses, especially for a 15-year planning horizon.

##### **Response:**

Comment noted. The numbers of operations and fleet mix associated with each condition vary by year and alternative. In each case, the number of operations and their distribution throughout the average annual day were based on forecast schedules prepared for the Design Day condition of the Master Plan. Specific INM aircraft types selected to model the noise of each aircraft were based on current fleet configurations and aircraft acquisition trends among user carriers. Where the forecasts provided no guidance to the selection of specific INM aircraft types, the nationally dominant type(s) expected in the year of operation for each user group was selected. Additionally, please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.5 regarding the accuracy of the forecast fleet mix.

#### **PC02203-132**

##### **Comment:**

- As discussed in the above point, the noise impact analyses of the draft EIS/EIR, for each of the planning horizon years, uses only one possible composition of the future aircraft fleet using LAX. We believe the assumptions for the fleet projection to be overly optimistic. It projects a high rate of adoption of larger aircraft classes by airlines and cargo carriers alike. We believe additional analysis is needed using lower adoption rates by airlines and cargo carriers.<sup>24</sup>

<sup>24</sup> Please refer to "Appendix B - Aviation," Draft 2001 RTP Update Technical Appendix. South Coast Association of Governments. 2001.

##### **Response:**

Please see Response to Comment PC02203-131 regarding fleet projection.

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#### PC02203-133

**Comment:**

- The draft EIS/EIR's use of 1996 and earlier noise contour estimates as base year for noise impact analysis is not appropriate, as it does not represent existing conditions (completion of transition to quieter Stage III aircraft was completed in 1999). Its use might minimize the relative noise impacts from the "preferred alternative."

**Response:**

Comment noted. Please see Response to Comment PC02203-102 regarding the noise modeling approach. Also, please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3, and Topical Response TR-GEN-1 for more information on using 1996 as baseline. Section 4.1, Noise, and Appendices S-1 and S-C1 of the Supplement to the Draft EIS/EIR provide information and analysis of Year 2000 conditions compared to the Draft EIS/EIR baseline and proposed Master Plan Alternatives.

#### PC02203-134

**Comment:**

- The draft EIS/EIR's noise analysis does not take into account jet noise generated by aircraft using reverse thrust for braking upon landing. The noise contours provided in the analysis were generated using only aircraft flight track data, which isolates the noise pattern from full-throttle engine operations to the west and north.

**Response:**

Comment noted. Reverse thrust, in fact, is incorporated into the Integrated Noise Model. Reverse Thrust Restrictions are further discussed in Section 7.1.3.6 of Draft EIS/EIR Appendix D.

#### PC02203-135

**Comment:**

- The draft EIS/EIR aircraft fleet mix used in the analysis lacks the noise contribution from foreign-owned and operated aircraft. Sufficient information is available to tell us that this category may be another significant contributor to the overall airport noise levels. Given the importance of LAX as an international hub, foreign flights are expected to account for at least 7% of traffic, if not more. It is also likely that activities by foreign-owned aircraft will increase in the near future, like other air transport activities. If so, their contribution to the noise impacts at LAX will also increase.

**Response:**

All aircraft, both foreign and domestic are accounted for by the Integrated Noise Model (INM). In fact, the growth of international traffic arriving from Asia is the principle component of the increased noise levels along the approach to the north runway complex forecast for each future condition. Forecasted international operations are included in the INM and are also included by hour in Chapter 4 of the LAX Master Plan in Table IV-A.2. and for Alternative D in Appendix F, Table F-9 (3 of 3) Hourly Forecast Design Day - Total Operations by User 2015 Alternative D of the Draft LAX Master Plan Addendum.

#### PC02203-136

**Comment:**

Lack of Evidence/Evidence to the Contrary  
The draft EIS/EIR asserts that the proposed plans for expansion, especially Plan C, represents the least impact of all expansion plans. However, our analysis of the proposed details shows the following additional impacts/issues:

**Response:**

Comment noted. Alternative D, which was developed subsequent to the release of the Draft EIS/EIR and is addressed in the Supplement to the Draft EIS/EIR, would have least noise impact as discussed in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR.

**PC02203-137**

**Comment:**

- Because of the substantial growth in projected operations, the draft EIS/EIR shows no significant improvements in noise reduction under any of the proposed expansion plans. Increases in aircraft operations projected in the draft EIS/EIR will result in additional aircraft operations and noise generation, offsetting any of the anticipated benefits of quieter Stage III aircraft and other mitigating measures.

**Response:**

The commentor is mistaken that all alternatives would result in offsetting the benefits from the phase out of Stage 2 aircraft. The redistribution and spread of the contours associated with Alternatives A and B is the result of relocated runways as well as additional forecast traffic levels anticipated for the year 2015. In contrast, Alternatives C and D incorporate minor adjustments in the runway locations and anticipate many fewer operations than the other two development alternatives. Alternatives C and D consequently have fewer total impacts than the other cases. Please see Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Appendix D, Aircraft Noise Technical Report, and Appendix S-C1 of the Supplement to the Draft EIS/EIR for projected aircraft operations. For additional information on the relationship between numbers of aircraft and the noise pattern, please see Topical Response TR-N-6 regarding noise increases, in particular Subtopical Response TR-N-6.2 regarding the relationship between traffic levels and noise levels.

**PC02203-138**

**Comment:**

- The draft EIS/EIR does not provide any provisions for in-situ noise monitoring in the affected communities. According to the US EPA, in-situ noise monitoring results at Boston's Logan airport suggested that computer modeling tends to underestimate actual noise levels, at least in some neighborhoods. The draft EIS/EIR does not take this into account in its analysis, and thus does not adequately represent the likely actual noise impacts on the surrounding communities, or the effectiveness of its proposed mitigation measures.

**Response:**

The commentor draws comparisons between the Boston Logan noise monitoring and the contents of the LAX Draft EIS/EIR. Appendix D, Aircraft Noise Technical Report, Section 2.2, Comparison of Environmental Baseline Noise To Quarterly Noise Report, and Appendix S-C1, Supplemental Aircraft Noise Technical Report Section 2.1.7 Relationship of 2000 Contours to 4th Quarter 2000 Report Contours of the Supplement to the Draft EIS/EIR explains the differences in the modeling vs. monitoring process. Additionally, please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.2 and Subtopical Response TR-N-1.3.

**PC02203-139**

**Comment:**

- The noise increases to neighborhoods that fall outside of the draft EIS/EIR simulated 65-dB CNEL contour remain inadequately acknowledged and addressed, especially those areas within the 60 dB CNEL contour.

**Response:**

For informational purposes, Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR identified noise-sensitive uses that would experience an increase of 3 CNEL between the 60 and 65 CNEL, and a 5 CNEL increase below the 60 CNEL. See also Subtopical Response TR-N-2.3 regarding

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the use of the 65 CNEL contour to evaluate noise impacts and Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

#### **PC02203-140**

**Comment:**

- The draft EIS/EIR does not address the very high noise levels, especially from the new "large" aircraft in the projected future fleet. Very high noise levels occur each time aircraft fly over neighborhoods and when engines are used for braking. These high intensity noise occurrences are underrepresented in CNEL estimation methodology.

**Response:**

The Integrated Noise Model 6.0C which is the FAA approved computer model used to predict noise impacts from aircraft operations does not contain noise data for the New Large Aircraft (NLA) Airbus 380 since the aircraft has not yet been developed. However, all alternatives and mitigation measures in the Draft EIS/EIR and Supplement to the Draft EIS/EIR with supporting appendices include NLA operations through the use of a "substitute" aircraft the Boeing 747-400. The CNEL methodology incorporates all of the "high" noise levels produced by every type of aircraft forecast for future operation at LAX under each of the alternatives. The differences between single event noise levels and the cumulative CNEL metric. These differences are explained in Topical Response TR-N-2, and in particular Subtopical Response TR-N-2.1. In addition, please see Topical Response TR-N-6 regarding noise increase, in particular TR-N-6.3 regarding the relationship between aircraft size and noise levels. Noise from reverse thrust used during braking is incorporated into the noise modeling process to ensure that the noise increase is reflected in the noise contours.

#### **PC02203-141**

**Comment:**

- The draft EIS/EIR does not fully address cumulative noise impacts to account for all airport-related noise sources, not just modeled aircraft noise, as is required under NEPA.

**Response:**

Comment noted. Cumulative impacts were addressed in subsection 4.1.7, Cumulative Impacts, located in Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### **PC02203-142**

**Comment:**

- The affected communities have raised serious concerns regarding the reliance on computer models instead of in-situ measurements to determine noise levels associated with LAX operations. LAWA and the FAA have yet to address this issue or respond to the communities' concerns.

**Response:**

Comment noted. The difference between noise measurement and modeled noise levels is frequently a concern to commentor's. Noise is modeled by computer to enable the comparison of different cases. The relative differences between cases is representative of the difference in anticipated impact of the alternatives. Noise measurements are used to define mitigation areas and cannot be used to forecast noise levels for any condition other than that which was measured. For further information on this topic, please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.2.

**PC02203-143****Comment:**

- The draft EIS/EIR does not identify geographic areas where the new noise levels will exceed current levels by 1.5 CNEL or more. An increase of 1.5 CNEL or more is considered a significant increase, according to FAA guidelines.

**Response:**

Please see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for more information on and comparisons of noise and noise-related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives including new Alternative D.

**PC02203-144****Comment:**

- The draft EIS/EIR does not adequately quantify the effects of construction and increased traffic noise on the local communities.

**Response:**

The Roadway noise analysis followed the procedures in Title 23 of the United States Code of Federal Regulations Part 772, "Procedures for Abatement of Highway Traffic Noise and Construction Noise," and FHWA Highway Traffic Noise Analysis and Abatement Policy and Guidance. Please see Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for the roadway noise methodology.

**PC02203-145****Comment:**

- The draft EIS/EIR proposed noise mitigation strategies consist mostly of measures involving land acquisition and insulation - all passive measures. These measures will only be effective if the noise impact estimates provided by the draft EIS/EIR are correct. If future noise levels and intensity exceed predicted levels, these proposed mitigation measures will not be able to address these higher levels, especially if airport improvements result in increased airport operations above the levels forecasted by the draft EIS/EIR.

**Response:**

Comment noted. Under California state law LAX will still be required to mitigate noise sensitive uses that fall within the 65 dB CNEL areas based on Quarterly Noise monitoring and not quarterly forecast, regardless of the noise levels projected by the Draft EIS/EIR or Supplement to the Draft EIS/EIR. Please see Topical Response TR-N-1 regarding the noise modeling approach and Topical Response TR-N-4 regarding noise mitigation.

**PC02203-146****Comment:**

Other Airport Noise Issues/Impacts  
The draft EIS/EIR should also take the following noise issues/impacts into account:

**Response:**

Please see Responses to Comments PC02203-147 through PC02203-149 below.

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#### PC02203-147

**Comment:**

Effects of Aircraft Noise on Children: As discussed above, chronic exposure to noise negatively impacts children's learning abilities. Unfortunately, their ability to learn is not the only thing affected. Noise research confirms that children exposed to persistently high noise levels suffer from modest elevations of resting blood pressure, along with attention deficiencies, and decreased reading ability. We believe that the FAA and LAWA need to fund additional studies to further understand these detrimental effects of noise on the future generations of affected citizens, as well as identify other mitigation methods, including the relocation of schools from aircraft flight paths.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Mitigation Measures MM-LU-3, Conduct Study of the Relationship Between Aircraft Noise Levels and Ability of Children to Learn, and MM-LU-4, Provide Additional Sound Insulation for Schools shown by MM-LU-3 to be Significantly Impacted by Aircraft Noise, in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR are proposed to reduce the effects of single event aircraft noise on the disruption of classroom learning environments. In addition, please see Response to Comment AL00017-52 regarding the health effects of aircraft noise.

#### PC02203-148

**Comment:**

Normally Acceptable Noise Levels: Despite research and public testimony that a CNEL threshold of 65 dBA is not sufficient to protect the public's health and well being, the FAA has established this level as being "normally acceptable" for residential land uses. Research confirms, however, that public annoyance is often generated at average sound levels well below 65 dBA. For example, studies of the Burbank and Orange County airports, showed the percentage of the population who described themselves as highly annoyed by airport noise ranged from 70% (near the Burbank Airport) to 40% (near the Orange County Airport). These complaints were from areas with an average day/night noise level of 60 dBA or less. Yet, because the FAA has set a CNEL of 65 dBA as the threshold for compatibility with residential uses, these exposed populations are ignored because noise levels in their communities fall below a CNEL of 65 dBA. We recommend that the FAA and LAWA base future noise impacts mitigation strategies around a 60 dB CNEL threshold.

**Response:**

Comment noted. FAA is unaware of research that the CNEL 65 threshold of significance is inadequate. A review of the available literature including FAA guidance confirms that there will always be a percentage of persons exposed to aircraft noise that are highly annoyed no matter what the level. According to EPA, three percent of the population would be highly annoyed at 55 CNEL while seven percent would be highly annoyed at 60 CNEL. Please see Subtopical Response TR-N-2.2 regarding why the expansion of the ANMP under the LAX Master Plan would not be extended to include the 60 CNEL threshold. As stated in Topical Response TR-N-2, the Supplement to the Draft EIS/EIR included an analysis of single event noise levels that result in nighttime awakenings. As stated in Section 4.2, Land Use (subsection 4.2.8), of the Supplement to the Draft EIS/EIR, the ANMP would be revised to include areas newly exposed to these noise levels (defined by the 94 dBA SEL noise contour).

#### PC02203-149

**Comment:**

Limit the Expansion of LAX to Control Noise and Reduce Its Impacts on the Surrounding Communities: LAX is already a tremendous source of noise in the surrounding communities. Despite the increased use of Stage III aircraft, the noise impacts of LAX on the surrounding communities have continued

unabated. For example, a review of LAX's quarterly noise report shows that in the fourth quarter of 1998, the 65 dBA CNEL noise contour encompassed over 10,000 acres - or an area covering more than 15 square miles. This area includes over 95,000 people living in over 34,000 residences. These residents bear the excessive noise burden that will only increase with expansion. LAWA and the FAA should have the reduction of noise impacts on this population as one of its primary goals for improving service at LAX.

**Response:**

Numerous noise abatement measures have been put in place to reduce aircraft noise increases around LAX and will remain in place with the various alternatives. Noise impacts and abatement and mitigation actions were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. Additionally, for more information on noise mitigation actions and noise increase, please see Topical Response TR-N-4 and Topical Response TR-N-6.

**PC02203-150**

**Comment:**

Human Health Impacts

Any proposed expansion has the potential to impact the health of over 500,000 citizens living and working in the communities of South LA, Hawthorne, Inglewood, and Gardena (California's 35th Congressional District), and other South Bay cities.

Flight operations at LAX are currently a major source of air pollution and toxic air pollutants (TAP) in the Los Angeles region. Furthermore, the draft EIS/EIR concludes that implementation of any of the proposed build alternatives will result in increased emissions of toxic air pollutants (TAP), due to increased operations. Most importantly, the risks posed by the current emissions of TAPs to the citizens living and working in the communities surrounding the airport are currently unknown. This fact alone makes none of the proposed expansion plans supportable. As pointed out below, the human health and safety analysis, in the draft EIS/EIR, especially of airborne pollutants, contains a number of inconsistencies, flaws and omissions that may understate the risk estimates presented.

**Response:**

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please also refer to Response to Comment AL00017-35 regarding health risk impacts for communities surrounding LAX.

Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR provided estimates of possible cancer risk or non-cancer hazard as incremental impacts relative to 1996 baseline and Year 2000 conditions. This approach allowed direct comparison of the relative impacts of the build alternatives and the No Action/No Project Alternative. The human health risk assessment followed California Environmental Protection Agency and U.S. Environmental Protection Agency guidance, adapted to the airport environment. Methods used in the human health risk assessment are more likely to overestimate than underestimate possible health risks. For example, risks are calculated for individuals that are likely to be exposed at locations where toxic air pollutant emissions are predicted to be highest. Individuals are assumed to be exposed for almost all days of the year and for many years (up to 70) to maximize estimates of possible exposure. Toxicity information used in the human health risk assessment incorporated conservative assumptions designed to protect the more sensitive receptors, such as children, the elderly, and individuals with respiratory conditions. Resulting incremental risk estimates represent upper-bound predictions of exposure and health risk.

**PC02203-151**

**Comment:**

Specifically, the draft EIS/EIR analysis of human health and safety is missing the following important components:

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- Inventory of Toxic Air Pollutants: The draft EIS/EIR does not contain a comprehensive baseline inventory of Toxic Air Pollutants (TAP) from current operations, an assessment of their health risks, or an analysis of their long-term effects on the communities surrounding LAX.

- Inventories of Particulate Matter Emissions From Aircraft: The draft EIS/EIR does not provide a comprehensive inventory of emissions of particulate matter (PM) less than 10 micrometer in size (PM10), and particulate matter less than 2.5 micrometer in size (PM2.5) from aircraft. Particulate emissions have the potential to affect air quality as well as long-term human health.

- Specific Mitigation Strategies: the draft EIS/EIR does not contain specific mitigation measures relating to the reduction of TAP emissions from the airport. The draft EIS/EIR further assumes that mitigation measures to reduce criteria pollutant emissions would result in the reduction of human health impacts from TAPs.<sup>25</sup> The reduction of one type of air pollutant may not necessarily reduce the emission of others.

The draft EIS/EIR analysis acknowledges that very little is known about the cumulative and long-term effects of toxic air pollutants on humans or how chronic exposure to these multiple airborne chemicals may harm human health. Instead of examining and addressing the impacts, LAWA simply leaves its analysis incomplete. In addition, the draft EIS/EIR does not adequately address the fact that emissions of toxic air pollutants will increase during the construction phase due to increased congestion in traffic and aircraft flow.

The draft EIS/EIR's proposed mitigation strategies for air pollution do not fully address the fact that the minority and low-income populations living and working in communities surrounding LAX may be more severely affected by any increase in emissions of air pollutants. Members of these communities, including the constituents of the 35th Congressional District, especially the young and the elderly, will be more severely affected because a higher than average percentage of the population already suffers from asthma and other chronic respiratory illnesses.<sup>26</sup>

#### Proposed Expansion's Impacts on Human Health

The draft EIS/EIR's evaluation of the human health impacts by the expansion plans concluded that the overall cancer risks to inhabitants working and living in communities around the airport would not be "significant." Yet, the draft EIS/EIR also concluded that there would be "significant and unavoidable" impacts to the overall air quality of the surrounding communities due to increased emissions of criteria pollutants.

Considering that the following air quality impacts have been identified as "significant and unavoidable" due to increases in overall airport emissions of criteria pollutants, it is unlikely that emissions of TAPs would be reduced, or that the cancer risks to members of the communities surrounding LAX would not be significant.

- The draft EIS/EIR concludes that increased traffic and activity levels will result in increased emissions of all five "criteria pollutants" (the five EPA-classified main air pollutant components) in all expansion scenarios - a "significant and unavoidable" impact.

- Increased airport operational activity would affect ambient air quality pollutant concentrations. The maximum carbon monoxide (CO) concentrations for future scenarios from on-airport sources alone are predicted to increase by as much as 400% compared to the Environmental Baseline data. Nitrogen dioxide (NO<sub>x</sub>) concentrations are forecasted to increase by as much as 1,000%.<sup>27</sup>

- Total NO<sub>x</sub> emissions from airport operations is forecasted to increase by 1,592 tons (31%) and total SO<sub>2</sub> emissions by 100 tons (55%) per year in 2015.<sup>28</sup>

- Construction activities would result in additional air pollutant emissions, up to 4,152 tons of NO<sub>x</sub> (80% over current levels), 582 tons of SO<sub>2</sub> (318% over current levels), 2,071 tons of particulates (over 13 times current levels) in 2004.<sup>29</sup>

- Construction activities, projected to take place over the next 15 years, would "temporarily" cause increased ambient air pollutant concentrations.

The draft EIS/EIR analysis of the air quality impacts acknowledges that people living, working, recreating or attending school in communities near the airport may experience increased incremental



cancer risks from exposure to toxic air pollutants. However, it does not thoroughly investigate or quantify the long-term impacts of these risks, nor does it adequately communicate these risks to the people who are exposed to them. In addition, the analytic basis for the community impacts is insufficient, since critical demographic and other relevant health data are missing.

Finally, in discussing the impact of toxic air pollutants associated with current airport operations, the draft EIS/EIR notes that LAWA is initiating an "independent" study of air quality in the area around LAX for the purpose of examining impacts. Given that results are necessary to establish the baseline setting, the draft EIS/EIR should include consideration of toxic air pollutants associated with current airport operations. A full analysis of the proposed expansion's human health impacts is impossible without the results of this study. Thus, we believe that no approval of an expansion plan for LAX can go forward without the communities' full awareness of the health risks associated with living near the airport.

#### Faulty Assumptions

We believe that the conclusions regarding the air quality impacts on the local communities and the region in general, may not be entirely accurate or reliable, and may be understated or flawed. Below are some factors that we have identified that may have contributed to these results (in addition to factors that we have identified elsewhere in this report):

- The draft EIS/EIR's conclusion that the preferred alternative (Alternative C) will have the least negative human health impacts is the result of very questionable assumptions. The preferred alternative, which results in improvements in traffic flows and fewer delays, compared to the "no action" scenario, inevitably has fewer TAP emissions, which lowers health impacts.

- The assumptions underlying the air quality analysis ignore the possibility that airport improvements may result in more passengers or more flight operations sooner. If the airport increases its airside efficiency and reduces delays, it is plausible that airlines will choose to increase flights to LAX as opposed to using other regional airports, resulting in increased emissions.

25 LAX Technical Appendix 14 - "Human Health & Safety Technical Report" from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration. 2001.

26 "Asthma: A Concern for Minority Populations," National Institute of Allergy and Infectious Diseases, January, 1997.

27 "Draft Environmental Impact Statement/Environmental Impact Report." US DOT, Federal Aviation Administration, 2001.

28 Ibid.

29 Ibid.

#### Response:

The following discussion provides responses based on the point-by-point nature of the comment.

Please see Topical Response TR-HRA-1 for a discussion of environmental baseline conditions. In addition, please see Section 4.24.1, Human Health Risk Assessment (CEQA), of the Supplement to the Draft EIS/EIR for a detailed evaluation of baseline emissions and associated health risks associated with environmental baseline conditions. Detailed baseline emissions inventories and associated health risks were defined in detail in Section 4.24 and associated appendices of the Draft EIS/EIR.

As discussed in Section 4.6.2, General Approach and Methodology, of the Draft EIS/EIR, the ambient air quality standards for fine particulate matter with an equivalent aerodynamic diameter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>) were under judicial review during preparation of the Draft EIS/EIR. The recommended method to account for PM<sub>2.5</sub> at the time the Draft EIS/EIR was prepared was to use PM<sub>10</sub> as a surrogate for PM<sub>2.5</sub>. Section 4.6.2.3, Air Dispersion Modeling, of the Draft EIS/EIR provides a discussion of the methods used to model PM<sub>10</sub> concentrations. The Federal Aviation Administration's Emissions and Dispersion Modeling System - Version 3.2 was used as the primary model in developing airport emissions inventories. The EDMS 3.2 model was used to determine PM<sub>10</sub> concentrations from on-airport sources other than aircraft engines. The Industrial Source Complex - Short-term (ISCST3) was used to estimate PM<sub>10</sub> concentrations from aircraft engines.

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Please see Topical Response TR-HRA-4 for a discussion of mitigation measures for TAP emissions. In addition, please see Section 4.24.1 of the Supplement to the Draft EIS/EIR for a detailed discussion of TAP mitigation measures.

Regarding cumulative and long-term effects of toxic air pollutants on humans, methods are still being developed to evaluate cumulative risks for chemicals sharing a common mechanism of toxicity. For example, EPA released a preliminary assessment of the cumulative risks of organophosphorus pesticides in December 2001. The preliminary assessment focused on methods to describe the risk. A revised document was subsequently released in June 2002; the revised risk assessment presents a range of risk estimates that reflect the variability inherent in an assessment of such scope (EPA, 2002).

The California Air Resources Board (ARB) released a Neighborhood Assessment Program Work Plan in June 2000. This document recognized that, "from an air quality perspective, evaluating environmental justice issues and identifying differences in impacts among communities will require determining cumulative exposures, which is a technically difficult task." As stated in the work plan, no clear guidance exists as to how to assess air pollution impacts at the neighborhood-scale. One of the objectives of ARB's work plan is to develop guidelines, including technical protocols and methodologies, for conducting neighborhood impact assessments. These guidelines are scheduled to be presented to the Board for consideration by the end of 2003.

In addition, ARB released its "Policies and Actions for Environmental Justice" in December 2001. This document highlights the need to develop technical tools for performing assessments of cumulative emissions, exposure, and health risk on a neighborhood scale. The California EPA Advisory Committee on Environmental Justice met in June 2002 to discuss elements of its Environmental Justice Strategy. One of the elements discussed was the need for research and data collection on cumulative impact assessments.

Given the recognized difficulties with evaluation of cumulative risk, both within groups of chemicals that have common mechanisms of toxicity and within populations with differential health status and health care availability, the approach provided in the Draft EIS/EIR is appropriate. "LAWA will work in cooperation with the affected communities and appropriate regulatory agencies to support and participate in long-term studies that would contribute to an understanding of these types of environmental impacts." In addition, the toxicity criteria used in the Draft EIS/EIR incorporate conservative assumptions designed to protect sensitive individuals. Moreover, potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a community basis were discussed in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR and Technical Report S-9a of the Supplement to the Draft EIS/EIR. Figures presenting the geographical extent of incremental cancer risks and hazards associated with LAX operations for communities in the study area were also presented in the Supplement to the Draft EIS/EIR and Technical Report S-9a of the Supplement to the Draft EIS/EIR.

Please see Response to Comment AL00033-346 regarding evaluation of impacts associated with construction activities.

Please note that the criteria pollutants are not identified as carcinogens; no cancer slope factors have been developed for these compounds. Please see Topical Response TR-AQ-3 for a discussion of estimated increases in air pollution.

Results of emissions modeling indicated that the preferred alternative in the Draft EIS/EIR would have fewer TAP emissions, in part as a result of improvements in traffic flows and fewer delays. Growth of operations and activities at the airport would be limited in the future by the capacity of the facilities to handle additional operations. Please refer to Section 4.24.1 of the Supplement to the Draft EIS/EIR for an evaluation of health risks measured against Year 2000 conditions and a discussion of health risks associated with Alternative D.

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

#### PC02203-152

**Comment:**

Surface Traffic Impacts

Any proposed expansion will significantly alter the traffic flow through the communities of South LA, Hawthorne, Inglewood, and Gardena (California's 35th Congressional District), as well as other surrounding communities.

LAX already constitutes one of the largest single destinations for vehicular traffic in the Los Angeles Basin. The draft EIS/EIR concludes that construction activities from any of the proposed build alternatives will result in increased traffic congestion, potentially affecting the local communities during the next fifteen years and beyond. It further states that these traffic impacts will be "significant and unavoidable."

Finally, as pointed out below, the traffic analysis contains a number of inconsistencies, flaws and omissions that have lessened its usefulness.

Specifically, the draft EIS/EIR analysis of surface traffic impacts to the South Bay communities is missing the following components:

- Community Impacts: The draft EIS/EIR does not contain an analysis of the effects of 15 years of road construction and continual changing traffic patterns on the communities surrounding LAX, especially the economic effects on minority business communities.

**Response:**

The analysis focused on the peak period of the peak quarter of the peak year of construction traffic, because that would account for the maximum impacts due to construction. All other periods throughout the construction project would have fewer impacts than the period analyzed. Therefore, it was not necessary to analyze the construction traffic during other periods of construction. Also, the Supplement to the Draft EIS/EIR and Topical Response TR-ST-3 provide additional detail on construction-related traffic impacts of all alternatives.

#### PC02203-153

**Comment:**

- Cargo Traffic Impacts: The draft EIS/EIR does not address the effects of increased cargo shipments to the on- and off-airport traffic. As LAWA and the FAA propose a 220 % increase in cargo tonnage, they should adequately address the effects of increased cargo traffic through the airport, as well as the surrounding communities.<sup>30</sup> (A back-of-the-envelope calculation shows, at a minimum, an increase of 6.5 semi trucks per hour to handle this increase - or one every 10 minutes every day in addition to the current traffic).

<sup>30</sup> The draft EIS/EIR indicates an increase in "heavy," or 747-class aircraft operation from 351 in 1996 to 587 in 2005, a 67% increase.

**Response:**

This comment is voicing concern with the possible increase in truck traffic associated with the higher cargo levels assumed in the LAX Airport Master Plan alternatives and with neighborhood impacts of additional truck trips. The alternatives would not have a 220 percent increase in cargo trips over either the 1996 condition or the No Action/No Project Alternative, which is the alternative of comparison for determining impacts. As shown on Table 4.3.2-4 of the Draft EIS/EIR, there were 4,025 cargo/ancillary trips during the a.m. peak hour (the hour with the highest number of trucks) in 1996 and there are expected to be 6,620 trips during that hour in the 2015 No Action/No Project Alternative. There would be 7,419 cargo-related trips in the project alternatives, an increase of 85 percent over existing conditions and only 12 percent over the No Action/No Project Alternative. This increase has been fully analyzed and mitigated, where necessary. Please see Topical Response TR-ST-1 regarding cargo truck traffic, in particular Subtopical Response T-ST-1.4 for more information. On airport property, cargo trucks are restricted to designated cargo areas, which are physically designed for the trucks' adequate

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circulation. Therefore, cargo trucks have no meaningful impact on-airport. Immediately adjacent to these cargo areas are the off-airport streets, which are analyzed in the off-airport analysis.

#### PC02203-154

**Comment:**

- Regional Mitigation Strategies: The draft EIS/EIR proposes to mitigate on-airport traffic congestion by distributing it over a wider area. Yet, the volume of traffic to and from LAX is projected to increase due to increased operations. This increased volume of traffic will continue to use the same access routes to LAX, namely the I-405 and the I-105 freeways, as well as local access routes.<sup>31</sup> The draft EIS/EIR currently does not address the effects of increased regional traffic.

<sup>31</sup> LAX Technical Report - Chapter IV "Facility Requirements" from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration. 2001.

**Response:**

Regional traffic is addressed in the discussion of the Congestion Management Program (CMP), found in Technical Reports 3b, Off-Airport Ground Access Impacts and Mitigation Measures, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report. Also, see Topical Response TR-ST-2 regarding surface transportation methodology.

#### PC02203-155

**Comment:**

- Incomplete Mitigation Strategies: The draft EIS/EIR's proposed strategies to mitigate traffic congestion are incomplete, as there remain "significant and unavoidable" impacts at intersections in the communities surrounding LAX, including intersections within the 35th Congressional District.

**Response:**

There would be nine impacted intersections in Alternative C, six in Alternatives A and B, and three in Alternative D, that would remain significant and unavoidable after mitigation. This is discussed in Section 4.3.2.10 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### PC02203-156

**Comment:**

- Effects of increased Traffic on Communities Adjacent to LAX: the draft EIS/EIR's mitigation measures for the relief of impacts of construction on off-airport surface traffic do not take into account the effects on communities outside of the immediate construction areas. The draft EIS/EIR does not detail how airport and construction traffic will be separately routed without disrupting the near and immediate communities to LAX.

**Response:**

The recommendations for mitigating construction impacts to the surrounding roadway system are summarized in Section 4.3.2.7 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and described in greater detail in Technical Reports 3b and S-2b, Section 7. These recommendations include the establishment of a Ground Transportation Construction Coordination Office that would be designed to deal with off-airport ground access issues and problems on a day-to-day basis throughout the construction program.

#### PC02203-157

**Comment:**

Proposed Expansion's Impacts on Surface Traffic  
The draft EIS/EIR lists the following six surface traffic impacts as "significant and unavoidable":

1. Construction-related traffic, lane closures and detours would temporarily impede access to community services and other amenities for some portions of adjacent communities.
2. Inbound, upper level ramp traffic in the central terminal area (CTA) would increase.
3. Construction traffic would disrupt normal roadway operations.
4. Change in vehicle demand through various intersections.
5. Construction traffic would disrupt normal roadway operations.
6. Disruption of adjacent communities due to temporary changes in circulation patterns (on airport) during construction.

Moreover, the draft EIS/EIR does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the project's impacts. In order for the affected communities to obtain a full picture of the expansion proposed at LAX, it is essential to have this comparison.

**Response:**

The Draft EIS/EIR acknowledges that implementation of the LAX Master Plan would have a disproportionate effect on minority and low-income communities in proximity to LAX. These effects are addressed throughout Section 4.4.3, Environmental Justice, of this Final EIS/EIR.

Demographics characteristics for Los Angeles County along with those for the environmental justice study area are described in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, and are updated based on the 2000 U.S. Census in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR.

The project is proposed to serve the air travel needs of the region as a whole, including local communities. Although benefits may be taken into account in making findings regarding a project's potential for disproportionately high and adverse environmental and health effects pursuant to U.S. Department of Transportation Order 5610.2, there is no legal requirement under NEPA or CEQA for benefits to be proportionate to environmental burdens. The primary focus of the EIS/EIR under NEPA and CEQA is to disclose and mitigate physical impacts on the environment. Regarding mitigation measures and benefits, see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR.

In addition, please see Topical Response TR-ST-3 regarding construction traffic and Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02203-158**

**Comment:**

**Faulty Assumptions**

In examining the draft EIS/EIR, we believe that the conclusions regarding the surface traffic impacts on the local communities and the region in general, may not be entirely accurate or reliable, and may be understated or flawed. Below are some factors that we have identified that may contribute to these results (in addition to factors that we have identified elsewhere in this report):

- The assumptions used in estimating the numbers of peak design-day and trip purposes for the central terminal area and on-airport traffic were based on 1993 and 1994 data and baselines from different years. We believe that the draft EIS/EIR should consider using newer demographics, more recently collected data, and a consistent baseline in determining its estimates and projections.<sup>32</sup>

- The assumptions used in estimating traffic growth by the draft EIS/EIR used a mixture of 1994 data and forecasts from the 2010 Air Quality Management Plan (AQMP). The model results can seriously underestimate the amount of future traffic, as the 1994 data may not reflect current conditions, and the 2010 AQMP assumed that the City and the LA region would meet trip reduction targets.<sup>33</sup>

<sup>32</sup> LAX Technical Appendix 14 - "Human Health & Safety Technical Report" from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration. 2001.

<sup>33</sup> Ibid.

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**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs.

**PC02203-159**

**Comment:**

Conclusion

The citizens of California's 35th Congressional District and the Office of Congresswoman Maxine Waters appreciate the opportunity provided by LAWA and the FAA to comment on the January 2001 draft EIS/EIR for LAX and the proposed Master Plan. After careful review of the draft EIS/EIR and the Master Plan, we strongly oppose the expansion plans as outlined by these documents.

Our opposition is based on the fact that the proposed expansion plans will place significant and unmitigated health, noise and traffic impacts on over 500,000 citizens living and working in the communities of South LA, Hawthorne, Inglewood, and Gardena (California's 35th Congressional District). These impacts will be in addition to the existing noise, health and air pollution burdens that this population is already subjected to daily.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, traffic impacts in Section 4.3, Surface Transportation, noise in Section 4.1, Noise, and 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-4 regarding noise mitigation, Topical Response TR-N-6 regarding noise increase, Topical Response TR-HRA-4 regarding health mitigation strategies, and Topical Response TR-ST-4 regarding airport traffic concerns. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02203-160**

**Comment:**

In addition to the unmitigated "significant and unavoidable" impacts to the residents of the 35th District, we are opposed to the expansion plans because the draft EIS/EIR is a deeply flawed document. The document's analyses of impacts are incomplete and it fails to consider or document other health and expansion impacts on the surrounding population.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by that of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

#### PC02203-161

**Comment:**

Furthermore, the draft EIS/EIR clearly states that the environmental, noise and health burdens of the airport's operations and expansion are, and will be, borne by low income and minority populations, yet it offers no commitments to recognize and address this imbalance. We cannot endorse any plan proposed by LAWA and the FAA without first having an opportunity to evaluate and comment on this plan's approach to environmental justice issues.

**Response:**

Please see Response to Comment PC02203-2 and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02203-162

**Comment:**

In fact, we believe that the proposed expansion plans will significantly lower the quality of life in surrounding communities due to worsening air quality, noise, traffic, and health conditions, without any appreciable economic improvements.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendix D, Appendix G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-3 regarding human health impacts. The Supplement to the Draft EIS/EIR identifies economic benefits to neighboring minority and low-income communities in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix S-D.

#### PC02203-163

**Comment:**

Furthermore, LAWA has not done a credible job of informing the affected population of the potential expansion impacts,

**Response:**

LAWA is committed to disclosure of identified impacts. The EIS/EIR process has been laid out to provide public information through a variety of sources including media, newsletters, workshops, and a web site, [www.laxmasterplan.org](http://www.laxmasterplan.org). Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

#### PC02203-164

**Comment:**

nor has it carefully considered or mitigated impacts of its current operations on the surrounding population.

**Response:**

Please see Response to Comment PC02203-17.

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#### PC02203-165

**Comment:**

Finally, we believe that LAWA and the FAA should carefully consider regional alternatives to the need for expansion. While they have evaluated future aviation and transport needs of the LA region, they have dismissed less costly and less time-consuming alternatives as not feasible. We strongly urge LAWA and the FAA to reevaluate the conclusions drawn by the draft EIS/EIR, taking into account other factors and available analyses - including Southern California Association of Governments' (SCAG) report on regional growth and air travel projections. We also urge LAWA and the FAA to take seriously the concerns expressed by citizens in all of the LA Region.

**Response:**

Comment noted. Please see Response to Comment PC02203-9.

#### PC02203-166

**Comment:**

In summary, we submit that the documents provided by LAWA and the FAA are currently insufficient. At a minimum, they must be revised to address the omissions identified in this document as well as respond to other concerns voiced by the communities in the LA Region.

We request that LAWA and the FAA conduct additional studies and provide more comprehensive analyses of impacts, as discussed in the five main impact sections of this document, including:

- A study of toxic air pollutants and their long-term, cumulative impacts on the exposed population.
- An epidemiology study of the population exposed to airport pollutants.
- A study of airport noise impacts on the surrounding communities, including the effects of noise at 60 CNEL and below.
- A comprehensive noise monitoring effort to verify the accuracy of the methodology used in estimating airport noise levels and intensities.
- Economic (cost-benefit), and origin and destination analyses

**Response:**

Comment noted. Issues pertaining to toxic air pollutants were addressed in Section 4.6, Air Quality, and 4.24.1, Human Health Risk, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The human health risk analysis evaluates cancer risk and non-cancer health hazards using proven means and methods that are accepted by the US Environmental Protection Agency, the California Department of Toxic Substance Control, and the South Coast Air Quality Management District. There is not a sufficient body of scientific evidence and established protocol for completing, for the purpose of the LAX Master Plan EIS/EIR, an epidemiological study of the population exposed to airport pollutants, and it is beyond the scope of the project to conduct such a study.

Issues pertaining to noise impacts were addressed in Section 4.1, Noise, 4.2, Land Use, and 4.24.2, Health Effects of Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. An analysis of noise impacts at levels of 60 dBA CNEL and below is not provided because, based on the significance threshold of 65 dBA CNEL described in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, such noise levels would be less than significant. The aircraft noise analysis completed for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR is consistent with the approach required by the FAA. Recognition of existing noise monitoring at LAX has been incorporated where appropriate. Please see Topical Response TR-N-1 regarding the approach to modeling aircraft noise.



An economic analysis of the proposed project, as appropriate for an EIS/EIR, is provided in Section 4.4, Social Impacts, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Additionally, Chapter III of the Draft Master Plan provides an extensive amount of information regarding passenger origin and destination characteristics, as pertinent to the LAX Master Plan and related EIS/EIR.

#### **PC02203-167**

**Comment:**

In terms of proposed mitigation strategies, LAWA and the FAA need to provide the communities with more defined and realistic mitigation strategies that actually reduce LAX's current and future operational impacts, including:

**Response:**

Please see Response to Comment AR00003-63 and Responses to Comments PC02203-168 through PC02203-172.

#### **PC02203-168**

**Comment:**

- A strategy for LAX to comply with the State Implementation Plan

**Response:**

Please see Responses to Comments AF00001-4 and PC02203-92 regarding LAX emissions and conformity with the SIP.

#### **PC02203-169**

**Comment:**

- Noise reduction or noise limitation plans for the affected neighborhoods that minimize the loss or relocation of community or culturally significant places such as schools, parks, churches, or community centers.

**Response:**

As presented in Section 4.2.8 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Mitigation Measure MM-LU-1 would provide sound insulation for noise-sensitive uses (including churches) newly exposed to 65 CNEL or greater noise levels and outside the current Aircraft Noise Mitigation Program boundary. Schools without aviation easements that are determined to be newly exposed to significant aircraft noise levels are eligible for mitigation. Mitigation measure MM-LU-1 provides mitigation for schools determined to be significantly impacted by aircraft noise, excluding schools with aviation easements. Mitigation may take the form of sound insulation or relocation. Further mitigation is provided under mitigation measures MM-LU-3 and MM-LU-4 in the form of study of aircraft noise levels that result in classroom disruption and sound insulation for schools determined by the study or interim noise measurements to be significantly impacted. However, it is acknowledged that outdoor noise levels would remain significant after mitigation for school playground areas newly exposed to the 75 CNEL and to significant single event noise levels where classroom activity takes place outdoors. As described in Topical Response TR-LU-4, although some parks would be exposed to significant noise levels, this would not substantially interfere with the normal use of the park and therefore, the park would not be considered significantly impacted. As described in Topical Response TR-LU-5 community centers are not defined as noise-sensitive uses that would require sound insulation. However, as stated in Section 4.2.9.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a significant noise impact would occur to outdoor community areas newly exposed to the 75 CNEL. No relocation is proposed to mitigate noise impacts. See Section 4.9.1.6 and 4.9.1.8 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for a discussion of impacts on cultural resources and recommended mitigation measures.

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#### PC02203-170

**Comment:**

- An air quality improvement plan to minimize the effects of toxic and criteria air pollutant on the surrounding communities, including education and outreach efforts to the affected population.

**Response:**

Please see Topical Response TR-HRA-4 regarding human health mitigation strategies. Please refer to Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR for an analysis of the level of significance associated with the four build alternatives after mitigation measures are implemented.

Mitigation measures currently proposed differ from those under consideration during the preparation of the Draft EIS/EIR. Recommended mitigation measures were identified in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR to reduce impacts from airport operations and construction as well as from regional vehicular traffic under Alternatives A, B, C, and D. These recommended mitigation measures would also reduce impacts to human health associated with exposure to toxic air pollutants (TAPs). The Supplement to the Draft EIS/EIR was prepared to integrate a new alternative, Alternative D, into the existing environmental review process and to incorporate supplemental information and analysis for the LAX Master Plan. Such information and analysis are based upon the availability of new or updated information since publication of the Draft EIS/EIR in January 2001. As described in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR, health risks (cancer, non-cancer chronic and non-cancer acute) for the majority of nearby residents would be lower for Alternative D than for 1996 baseline, Year 2000 conditions and the No Action/No Project Alternative. Alternative D provides for airfield improvements that would enable aircraft to move more efficiently, thereby reducing air pollutant emissions from aircraft operating in taxi/idle mode, and provides substantial improvements to the on-airport and off-airport surface transportation systems, thereby reducing air pollutant emissions from motor vehicles. Additionally, Alternative D, unlike the No Action/No Project Alternative, includes Master Plan commitments and mitigation measures to reduce air pollutant emissions.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR provided a full disclosure of health risks and hazards associated with airport emissions in Section 4.24.1, Human Health Risk Assessment. These documents were circulated for public review and comment and provided an opportunity for the public to become aware of these risks and hazards. LAWA held nine public hearings and several Environmental Justice workshops between June 2001 and November 2001 during the public review period for the Draft EIS/EIR and an additional twelve public hearings/workshops and three Environmental Justice workshops from July through October 2003 during the public review period for the Supplement to the Draft EIS/EIR. These hearings and workshops provided additional opportunities to educate the public regarding the health risks associated with the LAX Master Plan. The public hearings included a workshop component in an open house style with separate stations for key environmental disciplines. One station provided graphic materials illustrating the health risks and hazards associated with the LAX Master Plan. Experts were available to answer questions from the public regarding issues relating to human health. The format of the Environmental Justice workshops was similar to the public hearing workshops. LAWA is committed to working in cooperation with affected communities and appropriate regulatory agencies to support and participate in long-term studies that would contribute to an understanding of environmental impacts associated with airport operations.

#### PC02203-171

**Comment:**

- Active mitigation strategies that monitor impacts to the affected communities and respond whenever impact levels exceed acceptable limits.

**Response:**

Please see Response to Comment AR00003-63.

#### PC02203-172

**Comment:**

- A concrete, step-by-step plan to address environmental justice issues, including commitments to recognize and address the imbalance of the environmental, noise and health burdens of the airport's operations and expansion currently borne by low income and minority populations.

**Response:**

Please see Response to Comment PC02203-2 and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02203-173

**Comment:**

As responsible members of the Los Angeles community, LAWA and the FAA need to carefully consider a more regional strategy for transportation. The Southern California area has eleven airports that could make up a tightly integrated transportation network, which would share the burdens and benefits of air transportation across community, economic, and ethnic populations. This region has the potential of setting the standard and providing an example for a premier regional transportation strategy.

**Response:**

Comment noted. Please see Response to Comment PC02203-9.

#### PC02203-174

**Comment:**

Lastly, we request that LAWA and FAA provide the currently affected communities with a comprehensive schedule for meeting outstanding commitments. We cannot endorse any proposed expansion and "mitigation" plans until the current mitigation commitments to the communities by LAWA and the FAA are met.

**Response:**

Please see Response to Comment PC02203-17.

#### PC02203-175

**Comment:**

Appendix A - CA District 35 Constituent Survey Results

Introduction

In an effort to include comments from the constituents of the 35th Congressional District, we conducted a brief survey regarding attitudes and awareness of the proposed LAX expansion plan. The Office of Congresswoman Waters distributed this survey at various public venues within the District. Over 1,500 surveys were distributed, and a total of 280 people responded. The majority of respondents already knew about the expansion plans, with the most common methods of learning about the plans being the local newspaper, and less than half of the respondents also found out about the expansion plan by attending meetings produced by LAWA. However, it is important to note that the small number of total respondents may mean that a large segment of citizens are not yet aware of the proposed plans.

**Response:**

Comment noted. Please see Response to Comment PFD00001-1 which addresses the various issues related to LAX included in the survey questionnaire prepared by Congresswoman Maxine Waters.

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#### PC02203-176

**Comment:**

Expansion Plan Impacts

The majority of the survey respondents (ranging from 84 to 88%) felt the expansion of LAX would negatively impact their lives. This included their health, children, quality of life, traffic and community overall.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life. Please see Topical Response TR-HRA-3 regarding human health impacts. In addition, surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

#### PC02203-177

**Comment:**

When asked to rate the frequency of hearing airplane noise on an average day, respondents gave an average of 8.5 on a ten-point scale with 10 being "very frequently." An overwhelming 96% felt that airplane noise would increase with the proposed expansion.

**Response:**

Comment noted.

#### PC02203-178

**Comment:**

A majority of the citizens who responded want to know more about the proposed expansion's impacts on their community. This indicates that even among the citizens who are aware of the proposed plans, a large number is not aware of the potential impacts of the proposed expansion, or how to obtain more information.

**Response:**

The FAA and LAWA are committed to public information, participation, and outreach. LAWA has had press releases, newsletters, neighborhood info packets, public workshops, and a web site in order to communicate with neighbors and interested parties. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Also, please visit the web site, [www.laxmasterplan.org](http://www.laxmasterplan.org).

#### PC02203-179

**Comment:**

Community Concerns Regarding Current LAX Operations

A clear majority felt that airplane noise disrupted their daily activities. Sleep disruption appears to be one of the biggest issues with 90% indicating they felt the number of times they are awakened by airplanes will increase with the expansion.

**Response:**

Comment noted. Please see Topical Response TR-N-6 regarding noise increases due to the proposed Master Plan. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all

four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

#### PC02203-180

**Comment:**

Airplane noise also clearly affects the community's outdoor activities; 68% indicated that airplane noise inhibits them from enjoying outside activities and 84% felt the expansion of the airport would negatively impact their future enjoyment of outside activities.

**Response:**

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels, and Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels that would result from development of the build alternatives and mitigation measures that would reduce exposure of noise-sensitive uses to high noise levels.

#### PC02203-181

**Comment:**

Traffic is another concern of communities near the airport. A majority of respondents, 79%, already notice airport traffic (i.e. large trucks, airport shuttles, etc) in their neighborhoods. Even more, 91%, feel this traffic will increase with the proposed expansion.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

#### PC02203-182

**Comment:**

As stated in this public comment, human health is a major concern for the 35th Congressional District. One quarter of the respondents reported already suffering from asthma with another 19% indicated they are suffering from other respiratory problems. Given the link between respiratory problems and air pollution, we are greatly concerned for the health of our communities.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

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#### PC02203-183

**Comment:**

Expansion Plans Not Supported by Community

It is clear that the constituents of the 35th Congressional District do not support the expansion of LAX. If the constituents do not support it, then we cannot support it. The citizen's concerns closely mirror the issues that the scientific data supports regarding problems that will arise from the expansion of the airport.

**Response:**

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

**PC02204      Acherman, Robert      None Provided      9/23/2001**

#### PC02204-1

**Comment:**

I am writing in opposition to the Draft Master Plan (DMP) and Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIR/DEIS) prepared by the Federal Aviation Administration (FAA) and the Los Angeles Department of Airports (DOA). Not only is the whole concept of expansion or modernization of Los Angeles International Airport (LAX) fundamentally flawed, but also the DMP & DEIR/DEIS as presented in how it was prepared and the information contained therein.

**Response:**

Comment noted.

#### PC02204-2

**Comment:**

GENERAL COMMENT

The thought of expanding or modernizing the nation's most congested airport on the smallest acreage for any major airport in the United States is simply mind-boggling. For the same \$8 to \$15 billion proposed to be spent to expand or modernize LAX to accommodate up to 89 Million Annual Passengers (MAP), the City of Los Angeles could easily spend far less money to develop a modern air terminal on city owned land at Palmdale with capacity for 100 MAP. Why spend \$400 per person at LAX to get an additional 11 MAP when \$40 per person for 100 MAP can be spent at Palmdale? Palmdale is one of those few communities that actually want an airport.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02204-3

**Comment:**

More than 100 cities and counties have passed resolutions opposing LAX expansion. Let's bring airport development to those communities that want it and will use it instead of overburdening those communities around LAX that are already heavily impacted by the world's third busiest airport.

**Response:**

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

**PC02204-4**

**Comment:**

PALMDALE PROMISE

During the last major expansion of LAX that ended in 1975, LAX officials had promised Westchester residents that future expansion would occur in Palmdale. The DOA is going back on that promise by proposing to enlarge LAX yet again. Jack Driscoll, who was the DOA Executive Director when the whole Master Plan process was started, responded to my question about what would happen in 2016 if the LAX Master Plan was implemented, "Then we'll go to Palmdale." What are we waiting for? The regional approach of developing Palmdale instead of expanding or modernizing LAX is the best long-term solution for meeting Southern California's growing needs for airport capacity.

**Response:**

Palmdale's remote location and limited local passenger market have made it difficult for airlines to maintain air service at the airport despite past subsidies by LAWA. Palmdale's only air service in the past consisted of commuter operations into LAX. About 19,000 passengers used the airport in 1997. In early 1998, the sole airline providing service at Palmdale ceased operations. Currently, Palmdale has no scheduled air service. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02204-5**

**Comment:**

NO ACTION/NO PROJECT ALTERNATIVE INCORRECT

The preparation of the DEIR/DEIS is supposed to consider a "No Action/No Project" alternative. The meaning of the "No Action/No Project" alternative is exactly that- no new construction or modification to the existing facility. The proposed LAX 2015 Master Plan DEIR/DEIS includes projects that the Department of Airports is already considering outside of the scope of the Draft Master Plan. This is a serious flaw because it does not provide for a baseline to measure all of the project alternatives. The other project information in the No Action/No Project Alternative is useful in that it helps those of us in opposing LAX expansion to have an idea in what over projects that the DOA is likely to pursue.

There is also a bias throughout the report that if an Alternative is implemented that it will cause a better effect than without the proposed mitigation. For example, use of low pollution vehicles is seen as a mitigation measure. The DOA could implement the use of these vehicles tomorrow if so inclined.

**Response:**

Please see Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions. The No Action/No Project Alternative does not serve as the baseline against which significant impacts are determined under CEQA. Rather, as described in Topical Response TR-GEN-1, the baseline for significance determinations is 1996 conditions. Please see Topical Response TR-GEN-3 regarding the ability to implement mitigation measures for the build alternatives and not the No Action/No Project Alternative and Response to Comment AL00022-44 regarding assumptions pertaining to laws and

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regulations that will reduce impacts associated with all of the alternatives. As indicated in that response, the Draft EIS/EIR recognizes the continuing progress made by LAWA and the airlines to convert GSE to alternative fuels and assumes future ongoing conversion of GSE to alternative fuels under all the alternatives.

#### PC02204-6

**Comment:**

PROJECT ALTERNATIVES ARE ALL BAD CHOICES

The Alternative A and Alternative B projects are simply "strawmen" for Alternative C. Both Alternatives A and B would add a fifth runway for commuter aircraft. The assumption made by airport planners is that this new runway would help alleviate some of the airspace by placing slower, propeller-driven aircraft into their own departure and arrival route. What is not considered is that many commuter airlines, which operate under contract to the major carriers, are switching to regional jets. These small commercial jets carry twice the passenger load of the propeller-driven commuter planes but operate at better economics. There is also the perception among the flying public that jet-powered aircraft are safer to fly in than propeller-powered aircraft. While LAX has few regional jets in operation presently, the rest of the United States is seeing growth in the use of regional jets on a large scale. Commuter airlines such as American Eagle, ComAir and Mesa Airlines are rapidly changing their fleets from props to jets.

**Response:**

The commentor is correct observing the industry trend in recent years towards regional jets. Regional jets are serving markets historically served by turboprop aircraft. However, regional jets are not projected to replace all turboprop aircraft and the new runways proposed in Alternatives A and B could accommodate arrival operations of many narrow body aircraft, in addition to turboprops and regional jets. Please see Response to Comment PC00225-5 for a discussion about regional jet operations and runway use assumptions.

#### PC02204-7

**Comment:**

Alternative C is recommended by DOA staff perhaps because they think it is more palatable to sell to the public as there will be no additional runways and perhaps less worry by airport neighbors in El Segundo or Playa del Rey of aircraft making early turns over their communities, a common problem despite LAX departure rules prohibiting any turns before the shoreline. The new north runway in Alternative C would place that runway closer (350' to the north and 2000' feet east) to the communities of Westchester and Inglewood. The south in-board runway would also be moved further east. This will mean that planes already flying low over the homes and schools in Lennox, an unincorporated community with many poor Latino and Pacific Islander immigrants, will have planes flying even lower overhead. The effect of re-locating these runways would be to increase the aircraft noise and pollution exposure to more residents than present.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, environmental justice impacts in Section 4.4.3, Environmental Justice, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, Appendix F, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-D, Appendix S-E, and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-3 regarding aircraft flight procedures, Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities. It should be noted that Alternative D, the new LAWA staff-preferred alternative, has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.



#### PC02204-8

**Comment:**

There is also no guarantee in the Draft Master Plan that areas presently not eligible for soundproofing newly affected by aircraft noise would become eligible. As the current program guidelines provide, a home cannot be soundproofed unless it is up to building code. It is doubtful that many residents in areas such as Lennox can afford to make the necessary home improvements to be eligible for soundproofing. What is worse is that if an eligible homeowner does not participate in the soundproofing program and the program is ended, then his home is deemed "state land use compatible" even though there may be no soundproofing treatment on the home.

**Response:**

Please see Subtopical Response TR-LU-3.4 regarding who is eligible for soundproofing under the ANMP, and Subtopical Response TR-LU-3.14 for a description of how the ANMP would be revised to include noise-sensitive uses newly exposed to high noise levels or high single event noise levels under Mitigation Measures MM-LU-1 and MM-LU-2, respectively. MM-LU-1 also recommends the reduction or elimination, to the extent feasible, of structural and building code compliance constraints to mitigation of sub-standard housing. Nonetheless, as concluded in Section 4.2, Land Use (subsection 4.2.9.1), of the Supplement to the Draft EIS/EIR, impacts on substandard housing units not feasible to insulate due to structural and/or building code constraints would remain significant after mitigation. It should be noted that money for home improvements to meet current code requirements may be available to qualifying individuals in Lennox through the Community Development Block Grant Program. The comment regarding State land use compatibility is referring to an aviation easement, which is described under Subtopical Response TR-LU-3.13.

#### PC02204-9

**Comment:**

The aviation easement, tied to the deed of the property, also poses a difficulty in that homeowners must give up part of their right to sue the DOA for noise. In a case of the fox watching the hen house, the DOA is responsible for monitoring and reporting LAX noise levels to the California Department of Transportation (CalTrans) on a quarterly basis. Residents who have accepted the soundproofing and the aviation easement can sue if LAX exceeds 3 out of 4 consecutive quarters of 65 dB CNEL reports to CalTrans. Independent monitoring must be put into place to assure that the noise reports are accurate.

**Response:**

The Draft EIS/EIR, Land Use Technical Report, discusses the terms of the 1998 Noise Variance, including LAWA requirements to submit quarterly reports to Caltrans and the County of Los Angeles, and requirements that affected property owners execute aviation easements in exchange for residential sound insulation. Under the terms specified in the Agreement for Home Insulation and Easement between LAWA and the affected property owner, the homeowner may not seek further compensation from LAWA for noise-related damages due to airport operations unless three out of four consecutive quarterly maps submitted by LAWA to Caltrans and the County of Los Angeles indicate that noise levels imposed on the owner's property exceed the fourth quarter 1992 noise levels (as presented in the Aircraft Noise Mitigation Program). As shown in Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, noise levels for both 1996 baseline and Year 2000 conditions are entirely within the 1992 fourth quarter 65 CNEL noise contours. Regarding independent monitoring of quarterly noise reports, the County of Los Angeles reviews and audits the noise monitoring data to ensure that the data were produced in accordance with an approved monitoring plan and are otherwise prepared pursuant to reporting requirements within the California Noise Standards (Title 21). These reports also are submitted to Caltrans to demonstrate good faith efforts to achieve compliance with Title 21. These quarterly reports are also provided to affected jurisdictions and are available for public review at LAWA Soundproofing Bureau's Community Office and City and County public libraries in the vicinity of LAX. Through these processes, independent review and monitoring is achieved. Please see Subtopical Response TR-LU-3.13, for a description of current requirements for aviation easements by LAWA and Section 4.2, Land Use and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR for a discussion of the 2001 Noise Variance.

### 3. Comments and Responses

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#### PC02204-10

**Comment:**

NOISE

An on-going issue with noise is that the 65 dB CNEL measurement is a daily average of aircraft noise and does not consider single events which can go higher than 70 dB, even in areas such as the Osage tract in Westchester that not inside the 1992 65 dB contour. The FAA and Congress need to redefine aircraft noise measurements to a single-event basis.

**Response:**

Comment noted. DNL is based on the use of single events over a year averaged logarithmically which gives an accurate indication of cumulative noise exposure over a specific time. Please see Appendix D of the Draft EIS/EIR, Table A5-5, in which single event Lmax levels are identified throughout the airport environs. Many single events are shown to be in excess of 70 dB level. Also, please see subsection 4.1.6 and Appendix S-C1 of the Supplement to the Draft EIS/EIR for an analysis of single event noise. The commentor is correct in identifying that it would take an act of Congress to change or modify the methodology used to define significant federal noise impact levels. For additional discussion of single event noise and CNEL differences, please see Topical Response TR-N-2.

#### PC02204-11

**Comment:**

ON-AIRPORT SURFACE TRANSPORTATION

No amount of traffic modeling can decrease the numbers of cars, vans, trucks and buses going into and out of LAX. Only since the horrific September 11th terrorist attacks on the World Trade Center in New York City and the Pentagon near Washington, DC has air traffic dropped dramatically and due to security precautions all passengers arriving and departing LAX are being bused in and out of the Central Terminal Area (CTA). The Draft Master Plan acknowledges that there are bottlenecks at Terminals 1 and 7. Adding terminals to the west end of the airfield will not only increase traffic, but also confusion about where airlines are located on the airport property. For passengers arriving at Terminals 7 & 8, the Lot C bus has been historically full by the time it reaches this terminal. Staggered scheduling of buses on the arrivals level could solve this problem at Terminal 7.

**Response:**

The west terminal would cause traffic levels in the Central Terminal Area to decrease compared to today's levels. These effects are summarized in the Draft EIS/EIR, Section 4.3.1, On-Airport Surface Transportation. See also Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### PC02204-12

**Comment:**

OFF-AIRPORT SURFACE TRANSPORTATION

The proposed ring-road with direct freeway connections will make off-airport surface traffic worse, not better. The two major freeways going by the airport, the 105 and 405, are almost always congested due to airport traffic. Even with a ring-road, the direct freeway connections will not lessen the backups at freeway off-ramps such as Sepulveda-North from the 105 freeway. There are many times that I have to exit on Nash Street or go all the way around the backside of the airport since it is not always possible to exit on the Sepulveda off-ramp. When the 105 opened in 1994, there was at least an accident a day at the Nash Street exit because drivers were confused about the airport exit. Even after four restripings, one still sees broken glass and plastic on the road from accidents at these two exits.

The ring-road also cuts off two north-south bypass roads for drivers going from one side of the airport to another. With the inclusion of Pershing Drive as a part of the ring-road, non-airport traffic will be injected in the surrounding communities of Westchester/Playa del Rey and El Segundo. Drivers coming south will take Sepulveda to Manchester to get onto Vista del Mar. Vista del Mar will allow the driver to go south and then into El Segundo via Grand Avenue to rejoin Sepulveda. This same scenario could be repeated on the east end of the airport through the cities of Inglewood and Hawthorne.

**Response:**

The purpose of the Ring Road would be to remove airport traffic from local streets, as shown in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR. Adequate north/south arterial roads would continue to serve local traffic. Please see Topical Response TR-ST-4 regarding impacts to neighborhoods and I-405, and Topical Response TR-ST-2 regarding airport trip generation and distribution. Please note that Alternative D does not include the LAX Expressway or the Ring Road.

**PC02204-13**

**Comment:**

The off-airport transportation plan also assumes that the Green Line can be extended into the airport. The DOA has no control over the Green Line operations. Presently, the Green Line railcars are not equipped to handle passenger baggage and would have to be retrofitted. The problem with the Green Line extension is that LAX cannot pay for it out of airport funds. With a court order to purchase more buses the Metropolitan Transportation Authority (MTA) is not in the financial position to pay for the Green Line improvements that LAX planners envision.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02204-14**

**Comment:**

EMPLOYMENT/SOCIO-ECONOMICS

Whether or not LAX is expanded, more aviation-related jobs will be created. Many of these jobs will be minimum wage or at the City of Los Angeles' mandated, "Living Wage." It is doubtful that many people find minimum wage to be a good wage for a long period of time. This partly explains why there is such a high turnover in the airport security positions.

**Response:**

For clarification, although incremental job growth would occur under Alternatives A, B, and C through 2005 and 2015 as well as under the No Action/No Project Alternative and LAWA staff's new preferred alternative, Alternative D, through 2005, a net decline in airport-related jobs would occur under the No Action/No Project Alternative and Alternative D by 2015. As was discussed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the decline in total jobs over the planning period shows that productivity increases (i.e., producing more economic output per worker) overwhelm net additional jobs associated with the limited growth in annual passengers and cargo tons under these two alternatives.

As for the types of new jobs and associated wages that will be generated with Master Plan implementation, each of the alternatives would be directly associated with a wide range of long-term employment opportunities within 17 different manufacturing sectors related to air cargo (none of which are minimum wage) and a variety of airline industry, government, and tourism-related sectors related to air passengers (only some of which may involve minimum wage jobs). Additionally, it should be noted that airport security operations came under federal control following the events of September 11, 2001, resulting in changes to training requirements, working conditions, wages, and consequently turnover rates. Please also see Responses to Comments PC01030-4 and PC02664-11.

### 3. Comments and Responses

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#### PC02204-15

**Comment:**

RELOCATION OF RESIDENTS & BUSINESSES

All proposed Alternatives involve the taking of homes and businesses by LAX. The effect of the expansion is to hurt local affordable housing and jobs.

**Response:**

Please see Response to Comment PC00035-2 regarding residential acquisition; and Response to Comment PC00013-5 regarding business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan. Note that residential acquisition is not proposed as part of Alternative D, which was evaluated in the Supplement to the Draft EIS/EIR. Refer to Topical Response TR-RBR-1 regarding affordable housing and Response to Comment PC01679-20 regarding the increased employment and economic output expected to result from Master Plan implementation.

#### PC02204-16

**Comment:**

ENVIRONMENTAL JUSTICE

Any effort to expand or modernize LAX will disproportionately affect minority and low-income areas. The City of Inglewood and the unincorporated area of Lennox, both under the approach paths to LAX, have very high minority populations of Blacks and Latinos. Lennox is a low-income neighborhood with many Spanish-speaking immigrants. Both of these communities are already heavily impacted by aircraft noise and pollution. Moving people and taking away their homes only destroys communities and reduces the housing stock.

**Response:**

Comment noted. Environmental Justice impacts are evaluated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The proposed LAX Master Plan does not include acquisition of homes within Inglewood or Lennox. Additionally, LAWA's priority for mitigating high noise levels under the Aircraft Noise Mitigation Program (ANMP) has been, and will remain, through residential soundproofing. Any mitigation associated with the LAX Master Plan that would involve acquisition of residential uses would only be undertaken if such an approach was established as a priority by the local jurisdiction in compliance with applicable land use plans.

#### PC02204-17

**Comment:**

AIR QUALITY

The proposal to require construction equipment to be low- NOx by 2005 may be unrealistic. Construction is not slated to begin after approval from the Board of Airport Commissioners, the City Planning Commission, the City Council and the Mayor. If the approvals are obtained, it is not likely that any construction equipment may meet the air pollution standards or that construction will be slated in such a way that by the time all of the "heavy work" is done, there is no need to comply.

**Response:**

The Master Plan Commitment proposed in Section 4.6, Air Quality (subsection 4.6.5), of the Draft EIS/EIR, AQ-1, Use of Low-NOx Construction Equipment, has been removed and replaced by an expansion of the air quality mitigation measures applicable to construction equipment. Based on additional consideration of this previously proposed Master Plan Commitment, it was determined that a focus on using construction equipment meeting a low-NOx emission limit results in increases in other criteria pollutants, namely VOC and CO. Additional mitigation measures are being proposed in the

Supplement to the Draft EIS/EIR that would serve to lower emissions of all pollutants from construction equipment, both mobile and stationary. Furthermore, unmitigated emissions from construction vehicles calculated for the No Action/No Project Alternative and Alternatives A, B, C, and D are now based on the vehicle profiles by year contained in the CARB OFFROAD model. See Section 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR for a detailed discussion of recommended mitigation measures.

#### PC02204-18

**Comment:**

The proposed consolidation of non-rental car shuttles may not be realistic. For service and competitive reasons, some hotels and private parking lots may not want to share in this kind of service. There are some hotel properties that are not near the airport that would have a problem with any kind of pooling arrangement for shuttle service.

**Response:**

The preliminary list of mitigation measures included in the Draft EIS/EIR was modified in the Supplement to the Draft EIS/EIR published in July 2003. Please see Section 4.6, Air Quality, and Appendix S-E of the Supplement to the Draft EIS/EIR regarding air quality mitigation measures.

#### PC02204-19

**Comment:**

WATER QUALITY

The proposed removal of the Imperial drainage area without a suitable replacement is unacceptable. As environmental considerations become very significant in large projects, the Draft Master Plan should consider a better drainage system to ensure clean run-off. The close proximity of the City of Los Angeles Hyperion Treatment plant presents a good opportunity for partnership between the DOA and the Department of Water and Power (DWP) to ensure clean water runoff into Santa Monica Bay.

**Response:**

Alternatives A, B, and C, as described in the Supplement to the Draft EIS/EIR, involve the elimination of the Imperial retention basin that currently releases water to the Imperial Drain outfall into the Dominguez Channel. In the case that either Alternative A, B, or C is implemented, additional structures would be built to replace the function of the Imperial retention basin in compliance with SUSMP requirements. Consideration would be given to solutions that involve use of the Hyperion Treatment plant as well as cooperation with the Department of Water and Power. Alternative D does not involve the removal of the Imperial retention basin. Under all build alternatives, LAWA will develop a comprehensive, airport-wide drainage plan, as stated in Master Plan Commitment HWQ-1, to address current and projected future drainage and flooding problems. In areas where a potential for flooding is identified, LAWA will either reduce peak flow rates to over-capacity drainage facilities or increase the drainage capacities of the facilities.

#### PC02204-20

**Comment:**

HISTORIC/ARCHITECTURAL AND ARCHAEOLOGICAL/CULTURAL RESOURCES

No amount of mitigation can save the Centinela Adobe and Randy's Donuts from any LAX expansion effort. The Centinela Adobe, birthplace of Inglewood, would lose what little backyard it has to the proposed Arbor Vitae interchange and Randy's would be gone forever. These are two landmarks that many would not see disappear. Inglewood again is affected terribly by this section of the Draft Master Plan

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe and Randy's Donuts.

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#### PC02204-21

**Comment:**

BIOTIC COMMUNITIES & ENDANGERED AND THREATENED SPECIES

Not only will humans be affected by the proposed expansion, but many plants and animals. Although the Draft Master Plan notes the movement of navigational aids for the different alternatives, there is no discussion of how the pollution from the increased amount of vehicles along Pershing Drive and Vista del Mar will affect the plants, El Segundo Blue Butterfly and the Riverside Fairy Shrimp, two endangered species.

**Response:**

The Draft EIS/EIR addressed potential impacts to plants and animals in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna. The Draft EIS/EIR addressed impacts to air quality and described the Environmental Action Plan set forth to reduce potential air pollution emissions in Section 4.6, Air Quality. Potential impacts to flora and fauna from air quality was addressed in Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR. For additional information on potential impacts to vehicle traffic, including the proposed ring road, please see subsection 4.3.2 of Section 4.3, Surface Transportation, of the Draft EIS/EIR.

#### PC02204-22

**Comment:**

CONSTRUCTION

The Draft Master Plan construction schedule is flawed in that it removes the heavy maintenance facilities from the airport and does not potential replace them until later in the construction process. LAX is one of the few aircraft heavy maintenance facilities in Southern California.

**Response:**

The Master Plan Alternatives do relocate the existing aircraft maintenance facilities as a part of the program, however it would be constructed in a sequence which would provide an adequate amount of airline maintenance facilities at all times during the process.

Portions of the heavy aircraft maintenance facilities would be relocated if LAX Master Plan Alternative D were implemented. However, construction of new facilities would occur prior to demolition of existing facilities. Please see Figure S3-2 in Chapter 3 of the Supplement to the Draft EIS/EIR for a description of a conceptual summary schedule of construction of various components of the proposed master plan.

#### PC02204-23

**Comment:**

HUMAN HEALTH RISK ASSESSMENT

The idea presented that moving more airport operations to the west side of the airport will reduce pollution is ridiculous. More people will be affected by airport noise and pollution because aircraft will be moved closer to Westchester, Playa del Rey, El Segundo, Lennox, Hawthorne and Inglewood. With more planes, the pollution will still be blown eastward to Inglewood and Lennox.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, Section 4.2, Land Use and in Section 4.24.2, Health Effects of Noise, air quality in Section 4.6, Air Quality, and

human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR discusses potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a community basis. Technical Report S-9a of the Supplement to the Draft EIS/EIR discusses potential impacts on a community basis in greater detail.

In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-LU-5 regarding land use and noise mitigation.

#### **PC02204-24**

**Comment:**

SAFETY

The Draft Master Plan seeks to extend the spacing between the runways. This increased spacing will not dramatically increase the efficiency or safety of airport operations. LAX's runway configuration and use of in-board runways for takeoffs and out-board runways for landings do not allow for optimal use. The idea of stacking aircraft on high speed turn-offs or on a new taxiway between runways does not make the circulation of aircraft to and from the terminals more efficient. This is particularly true when air traffic control (ATC) routinely has aircraft depart or arrive from runways on the opposite side of the airport from where the airline's terminal is located.

**Response:**

The purpose of providing a center taxiway between the closely spaced parallel runways is to enhance safe aircraft operations by reducing the potential for runway incursions. At the same time, the proposed center taxiway would be designed to accommodate the largest aircraft projected to be in operation at LAX and to meet all Federal Aviation Administration design standards. Please see Response to Comment PC00015-1 for a more detailed discussion on the necessities of a center taxiway. The runway layout is dictated by wind direction and speed. The existing runways at LAX are orientated east and west, which provides all wind coverage and exceeds Federal Aviation Administration (FAA) standards. The direction (east or west) of the operating flow at the airport is also dictated by wind direction and speed. The predominate flow at LAX is west (please see Chapter II, Section 2.3.1 of the Master Plan). The use of inboard runways for departures and outboard runways for arrivals is based on the FAA's operating procedures and optimized runway use. Generally, the runway throughput is higher for departures than arrivals due to the nature of operations at LAX. The use of the inboard runway for departures is to eliminate the dependency from arrival operations on the adjacent parallel runway and maximize departure runway throughput. If departures departed from the outboard runway the departure operations would have to be coordinated with arrival operations on the inboard runway for runway crossing. Thus, the departure runway throughput would be reduced to the same level as the arrival runway throughput.

#### **PC02204-25**

**Comment:**

In addition, the Master Plan has assumed that a New Large Plane (NLP) will be developed. There will be a very small market for these jets, perhaps no more than 200. Airbus Industrie has announced the 550 seat A380. Airbus realizes that there are only a few city pairs that can sustain an aircraft this large and the aircraft must be able to conform to existing airport layouts. The airlines paid the price two times with the advent of the jet age. The Boeing 707 and DC-8 required runway extensions. The Boeing 747, which can take-off in the half of the runway length of a 707, required large terminal expansions. Airlines don't want to pay the price again on facility improvements for an airplane with a limited market. This is why Airbus has tried to keep the nose to tail and wingtip to wingtip dimensions of the A380 very near to the 747-400.

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**Response:**

Comment noted.

**PC02204-26**

**Comment:**

Another key safety consideration is the location of the fuel tank farm. Thankfully, the idea to move the fuel tank farm to the Hyperion Treatment Plant was quickly abandoned. However, with the proposed construction of the West Terminal and midfield terminals, the fuel tank farm will be more open and vulnerable to wayward aircraft and potential terrorist attacks. The current placement of the fuel tank farm in between the maintenance hangars assures some camouflage.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety. As indicated in Section 4.24.3, Safety, of the Supplement to the Draft EIS/EIR, LAWA has met all federal airport security requirements and will incorporate any future airport security requirements set forth by the federal government. Such existing and future safety requirements are intended to prevent future acts of terrorism at LAX facilities.

**PC02204-27**

**Comment:**

Another safety matter is an alternative airport to handle high-jackings and terrorist attacks. These are two more reasons why a new airport in Palmdale must be built. If LAX is closed due to an accident or high-jacking, flights can be re-routed to Palmdale. Passengers will then be at the very least in the Los Angeles area and will be able to get onto their next destination on the ground by using the Metrolink train or private transportation.

**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02204-28**

**Comment:**

CONCLUSION

The LAX 2015 Master Plan is inherently fatally flawed.

**Response:**

Comment noted.

**PC02204-29**

**Comment:**

DOA planners should go back to the drawing board and come back with a more realistic regional solution that makes the best use of the 17,000 acres in Palmdale that the City of Los Angeles purchased more than 30 years ago. No one is putting his head into the sand that more air passengers and cargo are coming to Los Angeles. The question is how and where to accommodate these passengers and cargo. We must consider the longer term view to make the best use of our financial and real estate assets. Many of the concepts addressed in the Draft Master Plan would be well suited to be deployed in Palmdale. For example, a ring-road around the Palmdale airport property could serve as a buffer to prevent development from getting too close to the airport, a common problem with airport development all over the world.



**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02204-30**

**Comment:**

The longer we wait, the more expensive and the more difficult it becomes to build up regional airports such as Palmdale into modern air terminals with high speed rail and freeway connections.

**Response:**

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

**PC02205      Tallarico, Lorraine      Avis Rent A Car System Inc.      9/24/2001**

**PC02205-1**

**Comment:**

COMMENT ON LAX DRAFT MASTER PLAN

The following constitutes Avis Rent A Car System, Inc.'s (Avis) official comment on the Draft LAX Master Plan (Master Plan). The focus of these comments is the On-Airport Ground Transportation Section 2.6. Specifically, that portion of the Master Plan which pertains to rental car facilities. This paper will address the location, design, business terms, transportation and timetable for the development of a Consolidated Rental Car Facility at the Los Angeles International Airport which is included in the Staff Recommended Alternative C.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02205-2**

**Comment:**

LOCATION

Avis' primary concern is the proposed location of a Consolidated Rental Car Facility (CRCF). Alternative C-2015 Figure V-1.10 depicts a CRCF located in the unacceptably remote southwest corner of the airport. This location is problematic for a number of reasons, not the least of which is the seemingly close proximity to the runway which could impact the height of the structure and, therefore, the overall capacity.

**Response:**

The southwest corner, while remote for today's airport, would be at the front door of a future airport. Its location would be ideal, at the end of the I-105 extension to accommodate easy returns, and near the new West Terminal, for easy rentals. While the facility would be in close proximity to Runway 7R and 7L, the facility would be designed to provide sufficient capacity for all ready/returns and QTA functions.

**PC02205-3**

**Comment:**

Moreover, it is unclear whether the people mover will connect the CRCF to the airport terminals from this location. If not, common busing to the terminals would be necessary on a permanent basis. This does not support long term traffic reduction and air quality goals.

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**Response:**

The people mover would connect the consolidated rental car facility to the airport terminals. As stated in Technical Report 3a, On-Airport Ground Transportation Technical Report, Section 3.4.6 describing the Rental Car Facilities for Alternative C, "One consolidated RAC facility is to be provided in the southwest corner of the airport, serving both the eastern terminals (CTA) and the western terminals. This facility will be served by the APM link, both secure and non-secure routes, to the western and eastern terminals." Supplemental information on the transit technologies accessing the airport and their associated alignments is provided in Topical Response TR-ST-5.

**PC02205-4**

**Comment:**

Most importantly, the remote location will result in substandard customer service levels arising from a trip duration which far exceeds the maximum ten minute industry standard. During peak traffic hours, it is not unreasonable to expect one-way bus trips in excess of twenty minutes from the CRCF via Hwy 105 by a bus system. The location is so remote that even a people mover system with multiple stops would also likely exceed the ten-minute trip limit

**Response:**

The CRCF was located to provide the best combination of 1) regional highway access, and 2) proximity to the primary passenger terminal, which would be on the west side of the airport. Since about 60 percent of the passengers would use the west terminal, the CRCF would be ideally located to more than half of the passengers. A suitable site could not be found that would provide close proximity to both terminal complexes and easy access to the regional highway system.

**PC02205-5**

**Comment:**

The Master Plan is virtually silent regarding its proposed placement of the CRCF and the evaluation of alternative sites. This deficiency must be addressed before the Master Plan is finalized and adopted.

**Response:**

Comment noted. Please see Response to Comment PC02205-2. Also, while other sites were reviewed, the chosen site was deemed to be the very best location from a safety, traffic circulation, and customer convenience standpoint for the future airport with a West Terminal.

**PC02205-6**

**Comment:**

DESIGN

In addition to location, there are a number of design features which must be considered in the planning and development of the CRCF. The discussion in Section 2.6, On-Airport Ground Transportation does not include any of the following critical factors:

- The CRCF must be adequate in size to better serve the LAX market. In Section 6.2.2.5, reference is made to six current on-airport operators. The projections are based upon the existing area used by current operators without acknowledging the likelihood of many more operators in a common facility. Typically, there is anywhere from 8-15 operators in a CRCF. Moreover, the Master Plan analysis "assumes the area currently leased by the rental car agencies is adequate to accommodate current operating patterns." (Table II-6.19). This is patently incorrect. Any current operator can testify to the grossly inadequate space within which it now operates. Therefore, any conclusions or recommendations based upon such an assumption is fatally flawed.

An example of an erroneous conclusion derived from this flawed assumption can be found at page V-2.235 that declares the rental car space requirements for 2015 are estimated to be 3.1 million square feet, or 71 acres. Projects currently in design phase for markets smaller than LAX exceed those

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projections. For Phoenix Sky Harbor Center, a \$273 million rental car market, a consolidated project is being developed on a 130-acre parcel. McCarron International in Las Vegas, a \$202 million rental car market, is planning a project on approximately 70 acres. LAX is currently a \$417 million rental car market. Therefore, its unclear how one can conclude that 71 acres is adequate for the LAX market of 2015.

**Response:**

It is acknowledged that the space available in Alternatives A, B, and C would not be sufficient to accommodate all of the demand for all functions that all rental car agencies would desire in 2015. In these alternatives, there is simply not enough space within the confines of these airport alternatives for all of the desired functions. However, the new Enhanced Safety and Security Plan, Alternative D, was specifically designed to accommodate a much broader range of rental car functions. That alternative accommodates a 7.87 million square feet facility, compared to Alternatives A, B, and C, which accommodate 3.4 million square feet. This is simply a function of the runway, cargo, and terminal arrangements in each alternative and the space available for the rental car facility.

**PC02205-7**

**Comment:**

- The CRCF will be multi-level with quick turnaround service facilities as well as ready/return parking stalls on each floor. This design facilitates the most efficient use of space minimizing car movement which also improves air quality. Maintenance and administrative facilities must be in close proximity to the core building.

**Response:**

Please see Response to Comment PC02205-6 regarding the consolidated rental car facility.

**PC02205-8**

**Comment:**

- The building must be configured in such a manner that the majority of ready/return parking is within approximately 300 feet of the customer service area to provide acceptable customer service standards.

**Response:**

Please see Response to Comment PC02205-6 regarding the consolidated rental car facility.

**PC02205-9**

**Comment:**

- The design should incorporate the "mini-mall" concept in the customer service area. This concept transcends the traditional linear counter scheme that was derivative of its location within long, narrow airline terminals. The "mini-mall" allows provides greater flexibility and creativity when incorporating business centers and other customer and employee oriented amenities.

**Response:**

Please see Response to Comment PC02205-6 regarding the consolidated rental car facility.

**PC02205-10**

**Comment:**

BUSINESS TERMS

In addition to the location and the above stated design features, there are certain business terms, or financing components, which are fundamental to the development of the CRCF including:

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- Double busing is the cornerstone of fail-safe financing. Without double busing, the requirement that all rental car customers be transported via a common system only from the terminals to the CRCF, the revenue stream which pays the finance instrument is uncertain. The result will be unfavorable bond rating and terms.

**Response:**

Any off-airport rental car operators would be required to drop off and pick up customers at the consolidated facility. No rental car buses would be allowed at the terminal curbside.

**PC02205-11**

**Comment:**

- A mandated Customer Facility Fee (CFC) will constitute the revenue source for the repayment of Special Facility Bonds. CFCs are the norm in CRCF financing across the country including Denver, Albuquerque, Minneapolis and many others in the planning stages.

**Response:**

A CFC would be pursued for the new facility.

**PC02205-12**

**Comment:**

- A facility lease coterminous with the bond issue is also critical to obtaining an optimal bond rating and financing terms.

**Response:**

A facility lease coterminous with the bond issue would be pursued.

**PC02205-13**

**Comment:**

TRANSPORTATION

If the development of the CRCF precedes the people mover system, a common bus system will be necessary to transport the customer from the terminal to the CRCF. This element of the project also needs to be closely examined, not just in relation to the location as discussed above, but in the context of the latest in alternative fuel technology. Specifically, the latest in clean diesel technology must be understood. Today, experts acknowledge certain clean diesel fuel meets the most stringent air quality standards currently required for urban buses and is a far safer alternative fuel than the suspect CNG technology. Avis urges the identification of clean diesel as an acceptable alternative fuel for use in the CRCF transportation system.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Although it is not anticipated that a bussing operation would be needed, should a consolidated bussing operation be necessary, all available fuel sources would be examined and the most efficient and cost effective fuel would be selected.

**PC02205-14**

**Comment:**

TIMETABLE

Finally, the timing of the CRCF development is crucial to virtually all rental car operators since current operations take place to the northeast of the airport along the Airport Boulevard and Arbor Vitae



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project, based on the local and regional environmental setting of the project site. It is not within the scope or purpose of the EIS/EIR to provide a comparison of LAX to other airports in the nation.

#### PC02206-2

##### Comment:

The section cites a British study (footnote reference 16) examining the effect of a 90 to 100dB SEL aircraft noise. "Allowing for the noise level reduction of the structure, this data indicates that indoor single-event sound levels of 70 to 80 dB will cause less than a 2 percent chance of sleep disturbance.16"

I would have to guess that the intent of citing this study is to imply a 70 to 80 dB sound disturbance only causes sleep disturbances in less than 2% of the cases. Therefore, the proposed 65 dB CNEL sound level should be acceptable to affected residences, since it should cause even less sleep disturbances because it ranges 5 to 15 dB less than the British study.

1) How can 70 to 80 dB not wake more than 2% of people, since many common noises including an alarm clock, phone ringing and normal conversation are generally lower in sound levels but will wake the vast majority of the population?

I personally measured our three alarm clocks (62-73 dB@3 ft distance) and four telephones (65-74 dB @ 6 ft distance) using a calibrated laboratory type (Lucas CEL Instruments Ltd Model EL-231 s/n 3499090) sound level meter. Stated accuracy of the device is +1 dB at reference level. I found all readings to be less than the respective ranges in the attached reference document entitled "Typical Noise Levels".

2) If the information in the British study is correct, then why is the vast majority of the world able to be waken by a common alarm clock, phone etc., which is quieter than the 70-80 dB single event that supposedly wakes less than 2% of the people?

3) How can any of this section be considered valid when such blatant technical contradictions exist with the presentation of simple data?

##### Typical Noise Levels

Take a look at the noise levels of many common appliances and events around the house. You might be surprised. All sounds are measured at the distance that a person would typically be from the source.

Device	dBA
Grand Canyon at Night (no roads, birds, wind)	10
Quiet basement w/o mechanical equipment	20
Quiet Room	28-33
Computer	37-45
Refrigerator	40-43
Typical Living Room	40
Forced Hot Air Heating System	42-52
Radio Playing in Background	45-50
Background Music	50
Bathroom Exhaust Fan	54-55
Microwave	55-59
Normal Conversation	55-65
Clothes Dryer	56-58
Printer	58-65
Window Fan on High	60-66
Alarm Clock	60-80
Dishwasher	63-66
Clothes Washer	65-70
Phone	66-75
Push Reel Mower	68-72
Inside Car, Windows Closed, 30 MPH	68-73

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Handheld Electronic Games	68-76
Kitchen Exhaust Fan, High	69-71
Inside Car, Windows Open, 30 MPH	72-76
Garbage Disposal	76-83
Air Popcorn Popper	78-85
Hairdryer	80-95
Electric Can Opener	81-83
Vacuum Cleaner	84-89
Coffee Grinder	84-95
Handheld Electric Mixer	86-91
Lawn Mower	88-94
Air Compressor	90-93
1/4" Drill	92-95
Food Processor	93-100
Weed Whacker	94-96
Leaf Blower	95-105
Circular Saw	100-104
Maximum Output of Stereo	100-110

**Response:**

Comment noted. This Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Based on careful review of numerous studies and research related to nighttime awakenings from single event noise, LAWA developed a threshold of significance to be used in the CEQA analysis of the four build alternatives for the LAX Master Plan. The development and application of this threshold relative to the four build alternatives were presented in the aforementioned Sections 4.1 and 4.2 of the Supplement to the Draft EIS/EIR. The analysis of sleep disturbance in Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR is superseded by the information and analysis presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR. The single-event noise level (SEL) of an aircraft represents the total energy generated by the aircraft over the duration of the fly-over (event), where the duration is defined as the time when the sound level first exceeds a threshold level (normally just above the background noise level) to the time that the sound level drops back down below the threshold. Depending on the duration of the event an aircraft SEL tends to be 5 to 15 dBA higher than the event's maximum noise level (Lmax). An event with a 70-80 dBA SEL may have a maximum noise level of 55 to 75 dBA Lmax for a very short period of time. Therefore, it is not appropriate to compare the 70-80 dBA SEL generated by an aircraft to the 73-74 dBA Lmax generated by an alarm or telephone.

**PC02206-3**

**Comment:**

Overview page 4-1039 states: "An analysis of single noise exposure for LAX indicates that noise levels of 109 dB, the highest peak single event noise level affecting residents near LAX, is limited to a cumulative total of less than 20 minutes from all of the single event aircraft flyovers that occur daily under the environmental baseline." These statements imply that this data was measured while aircraft were flying in their normally approved flight path. However, on frequent occasions jets will perform an early turn which shortens their flight route and saving time and fuel.

A statement was made elsewhere in the report regarding mobile construction equipment generated sound. Stating sound decreases 6 dB for a doubling in distance or more conservative number of 4.5 dB for a doubling in distance. For the sake of approximation, applying the same sort of a distance sound relationship to the 109 dB peak figures will yield much higher sound levels. These levels are far more excessive and can damage hearing very quickly. Exposure limits for 110 dB are 30 minutes per day, and less than 15 minutes for 115 dB per code of Federal Regulations Title 29, volume 5, parts 1910.95. (Excerpt is attached.)

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**Response:**

Comment noted. Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss.

**PC02206-4**

**Comment:**

1 Tests need to be made to measure the highest sound levels during early turns in the most severely impacted areas to determine if sound levels exceed the safe level of damaging hearing.

**Response:**

Comment noted. Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss.

**PC02206-5**

**Comment:**

2 Detailed sound level studies need to be made to in the "proposed west terminal" areas under the flight path at the west end of the airport. Even limited exposure could damage passengers hearing at those high sound levels.

**Response:**

Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss. The location of the West Terminal would be at, or near, noise modeling grid point location F05 shown on Figure 4.1-1 in the Draft EIS/EIR. As can be determined in reviewing the Time Above (TA) tables referenced in Response to Comment AL00017-246, the projected exterior noise levels at that grid point location would be less than those at Dockweiler Beach, which has been identified as the location with the maximum duration of TA 95. Based on the conclusion that no significant impact related to hearing loss would occur at Dockweiler Beach, no significant impacts are expected to occur at the West Terminal; notwithstanding the fact that passengers and visitors at the West Terminal would be indoors and not exposed to exterior noise levels.

**PC02206-6**

**Comment:**

3 Additionally, detailed sound level studies need to be made in areas at the west end of the airport including Dockwiler beach and bike path to ensure sound levels do not exceed allowable limits exposing unsuspecting people to hearing damage.

**Response:**

Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX, including at Dockweiler Beach, are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss.

**PC02206-7**

**Comment:**

4 What is the airport's detail plan for how to protect the public from all three of the above situations which could easily exceed safe levels of noise exposure damaging hearing?



**Response:**

Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss.

**PC02206-8**

**Comment:**

Any proposed runway changes, including moving or 24L and 24R, extending 24L over Sepulveda Blvd. or adding an additional runway on the north side of the airport will significantly change the flight path for houses directly bordering the airport. Any changes will cause all of these houses to be further impacted by airport noise.

It is my belief that these reports drastically understate how many additional homes will be required to facilitate implementation of these plans and mitigate sound to the 65 dB CNEL.

1 How can the runways and flight path be changed so much without significantly increasing the sound level to well in excess of 65 dB?

**Response:**

Comment noted. The commentor is correct in identifying that additional residences may be impacted with the proposed runway changes and or runway additions. In the vicinity of the improvements described by the commentor, the noise pattern would shift northward into the community by the distance of the relocation of the runways. However, some residences in other areas may also benefit as a result of the various alternatives. Please see Section 4.2, Land Use, and Appendix 1, Land Use Technical Report, of the Draft EIS/EIR for further information on noise related changes that exceed the 65 dB noise level. Aircraft noise mitigation is described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provides mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02206-9**

**Comment:**

2 What assurances do the residences have that the number of properties required for any of the alternatives is not understated to aid in project approval, only to be subsequently taken as deemed necessary to mitigate noise?

**Response:**

The 65+ CNEL contours utilized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR are consistent with federal and state guidelines for noise compatibility planning. The Aircraft Noise Mitigation Program is based on the 1992 fourth quarter 65 CNEL noise contour, with the contour boundary being reviewed by the State of California and Los Angeles County on a quarterly basis. Please see Topical Response TR-LU-3 regarding the aircraft noise mitigation program, in particular Subtopical Response TR-LU-3.14 regarding impacts of the master plan build alternatives.

Chapter 3, Alternatives (subsection 3.2), of the Draft EIS/EIR describes property acquisition that would occur under Alternatives A, B, and C, and Appendix P of the Master Plan includes a corresponding list of properties (by alternative and parcel) that would be acquired. Acquisition that would occur under Alternative D is presented in Chapter 3, Alternatives (subsection 3.2), of the Supplement to the Draft EIS/EIR and Chapter 2 of the LAX Master Plan Addendum lists corresponding properties. It should be noted that no residential acquisition is proposed under Alternative D. However, under Alternative D, acquisition of 9-12 homes may be required should the construction of a new interchange at I-405 and Lennox occur, as proposed under mitigation measure MM-ST-13 of the Supplement to the Draft EIS/EIR.

The property acquisition was determined based on the airport boundary associated with each build alternative, as needed to accommodate proposed airport facilities. Proposed airport boundaries for

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each build alternative were not based on noise levels. Because the Draft EIS/EIR and Supplement to the Draft EIS/EIR are program-level documents, the precise number of properties to be acquired was presented in as much detail as was known at the time these documents were prepared. While it is possible that implementation of specific projects within the LAX Master Plan may require acquisition of residential properties beyond those identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, subsequent development of individual projects within the LAX Master Plan boundaries would be subject to additional environmental review and public notification.

As described in Section 4.4.2, Relocation of Residences or Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, any residential uses acquired by LAWA would be fairly compensated and relocated under the Uniform Act.

As described in Section 4.2, Land Use (subsection 4.2.3), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, residential acquisition to mitigate noise in the Manchester Square and Belford Area is presently underway as part of LAWA's Voluntary Residential Acquisition/Relocation Program. As described in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Supplement to the Draft EIS/EIR, and applicable to all build alternatives, should residential acquisition under this Program not be completed by the time the Master Plan is approved, the City of Los Angeles will use the most appropriate means available to ensure that designated areas are available, consistent with the construction sequencing plan. Residents within the Manchester Square and Belford area are currently exposed to high noise levels (defined as 65 CNEL or greater) and therefore they have requested that LAWA purchase their properties in lieu of soundproofing. Currently under the ANMP, incompatible noise sensitive uses may be converted to compatible land uses either through sound insulation of structures or acquisition of property followed by conversion to a compatible use (such as commercial or industrial). With the exception of the Manchester Square and Belford Program, residential sound insulation is the primary and preferred method used by the City of Los Angeles to achieve land use compatibility.

#### **PC02206-10**

##### **Comment:**

3 A detailed noise study must be undertaken through the use of sound sensors arranged in a transposed orientation to respective resulting distance from existing homes to the proposed runway locations. Such a study can be done using the existing runways and with sensors located at the same distances and orientation as where the homes would be for the various alternatives. This sound study is essential to provide better insight into what future sound levels will be if any modifications are made.

##### **Response:**

Comment noted. Such a study was done and is included in Section 4.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. The commentor describes the theory behind the noise level computations of the Integrated Noise Model. Estimated noise levels are computed based on the relationship between ground positions and the proposed locations of the runways. The noise curves in the model are based on scientific testing and measurement of aircraft in a real-world environment and are adopted for use at all airports in the United States and many other countries. Locally measured noise levels have less reliability for the projection of noise patterns for non-existent conditions. However, in California, mitigation of impacted residences is based on the Quarterly Noise Reports which rely on measured noise levels rather than the modeled noise levels prepared for the Draft EIS/EIR. The modeled levels provide a projection of the estimated number of homes that will be impacted by different alternatives for planning purposes. For additional information, please see Topical Response TR-N-1 regarding the noise modeling approach.

#### **PC02206-11**

##### **Comment:**

4 The same sound level study must be made for flight operations in the reverse (take off to the east for storm conditions). This sound level far exceeds all other conditions due to the much closer proximity of the aircraft under full power. This must be considered even though this only occurs for several days per year, since it is worst case condition.

**Response:**

Please see Response to Comment PC02206-6. Easterly departures are included in the modeling process, albeit for only 5 percent of the time. The single event noise footprints provided in Appendix D of the Draft EIS/EIR will allow the commentor to project the noise levels that might be present in areas east of the airport if the traffic flows were reversed. Public annoyance with aircraft noise has been shown in several studies to be most closely aligned with the average cumulative noise level rather than with infrequent single events.

**PC02206-12**

**Comment:**

Undoubtedly, the EIS/EIR are lengthy and comprehensive collections of written matter reports, etc. with many people having contributed to the ultimately published version. I have participated and been responsible for writing many technical reports myself which have been submitted to the U.S. Military and prime contractors in the defense industry. In all reports that I have ever seen, there was a signature page for the purpose of holding someone accountable for the data and information contained therein.

Although there are over 12,000 pages, I looked extensively for signatures in the report that would implicate that someone was certifying that the information contained therein was true and correct. This is a legal document on which our politicians will make critical decisions. The people of Los Angeles need to know who is responsible for all sections of the report.

1 How can it be that there are no signatures attesting to the reports accuracy, truth, correctness and complete disclosure?

**Response:**

Section 7.1, List of Preparers, of the Draft EIS/EIR presents the principal preparers of the document.

**PC02206-13**

**Comment:**

2 Were all test facilities and labs, etc. ISO 9000 certified to provide some level of assurance that the equipment used was calibrated, properly functioning and properly used by competent technicians?

**Response:**

Such information is provided where appropriate, as in the case of the completion of noise measurements along the proposed alignments of the LAX Expressway and State Route - 1 improvements (see Attachment 2 of Appendix K).

**PC02206-14**

**Comment:**

A recent PBS special entitled "Air Force 1" cited LAX as the biggest security problem in the country as a destination transporting the president.

1 The controller can be heard clearing AF1 to land on 24L, presumably because there is no tunnel, and it provides the greatest distance from other surrounding roadways and buildings. How will LAX be able to provide security in the future for AF1 when the new terminal will take all west end airfield space?

2 How will the airport deal with potential terrorist situations where the plane needs to be isolated and parked as far away from buildings other planes etc. during a crisis? How will this be possible with the added west terminal facilities, additional aircraft and cargo traffic and support operations?

3 LAX has been a target of a terrorist plan to bomb New Years 2000, ending in an arrest and conviction. How can LAX ever secure the two runways which are underpasses for vehicles from some Tim McViegh type truck or bus bomb?

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4 With LAX currently handling nearly 80% of both passenger and cargo capacity, what are the contingency plans for a major disaster at LAX due to the loss of 3 runways as a result of tunnels collapsing from earthquake or terrorist attack?

5 The use of a tunnel under a runway seems like an inherent bad idea. List all other airports in the country that have runways over active roadways?

**Response:**

Comment noted. Space for remote parking under Alternatives A, B or C would be in conjunction with the apron created for increased cargo space. Space would be available in a proportion of the existing remote pads under Alternative D, as described and evaluated in the Supplement to the Draft EIS/EIR. The existing structural capacity of the runway bridge over Sepulveda to resist a truck bomb has been analyzed and found to be adequate. Any affected runways would likely be closed until a structural investigation was performed following an explosion. The new bridge proposed for Alternatives A, B or C would be constructed to resist that type of bomb. Please also see Response to Comments PC01881-31, AL00051-93, and PC02131-5 regarding safety and security and disaster contingency plans.

**PC02206-15**

**Comment:**

Two of the Westchester, Playa Del Rey and ElSegundo's biggest complaints over the years have been early turns of jets and noise mitigation. Looking at how LAX dealt with these complaints, it's easy to see how these residents are skeptical of LAX's handling of these and other problems in the future.

**Response:**

Comment noted. Please see Topical Response TR-N-4 regarding aircraft flight procedures. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program for additional information regarding filing noise complaints and LAWA's handling of noise complaints.

**PC02206-16**

**Comment:**

Sound mitigation was held up and delayed by LAX: 80% of the money to sound proof the homes affected most by airport noise was provided over ten years ago by the U.S. Government. The remaining 20% was held up by LAX and the city for years in effort to get participants to give up all rights to any future litigation, "the get out of class action suit free card". Then, when eligible homes did not accept their "deal", they were deemed "automatically mitigated" and would be ineligible for any legal action anyhow. Thankfully, that was recently defeated (title 24) and residents can not automatically be mitigated.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR; however, see Subtopical Response TR-LU-3.13 regarding aviation easements.

**PC02206-17**

**Comment:**

How will LAX pay for the potential class action lawsuits that are sure to result from runway reconfiguration which will affect nearly every home in Westchester, PDR and El Segundo and Inglewood? Will there be sufficient funds generated at LAX to pay for these suits?

In the event that LAWA is unable to pay for any resulting judgement from these suits, will the money come from LA city funds? If so, how will the city fund the payment of these suits?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

#### PC02206-18

**Comment:**

Two of the Westchester, Playa Del Rey and El Segundo's biggest complaints over the years have been early turns of jets and noise mitigation. Looking at how LAX has dealt with these complaints, it's easy to see how these residents are skeptical of LAX's handling these and other problems in the future.

**Response:**

The content of this comment is identical to comment PC02206-15; please see Response to Comment PC02206-15.

#### PC02206-19

**Comment:**

Early turns: El Segundo and PDR's biggest complaint is early turns of aircraft. After years of complaints, LAX established a phone number for these early turn complaints. Still the early turns continue probably because it saves time and money. El Segundo has installed remote video cameras as proof of flight and possible plane ID. Early turns will only be worse for Westchester and PDR, since moving and extending east the North runway will allow for earlier lift-off, permitting even earlier turns. Why is it incumbent upon the residents to report the location of errant aircraft? Trucking companies have been tracking their fleets for years with GPS transponder devices so they know the exact position, speed and path of every truck and driver at all times.

1 Why hasn't LAX applied this technology to automatically catch the offending aircraft and send them their fines?

**Response:**

It is not necessary for El Segundo to track aircraft flight locations. LAX uses an automated noise and operations monitoring system that provides daily records of flight operations by virtually all aircraft using the facility. The FAA's Automated Radar Terminal System (ARTS) records are accessed by software owned and operated by the Department of Airports' Noise Management Bureau to obtain location and other descriptive information related to each arrival and departure. This information is processed to assign each aircraft to one of several predefined flight track corridors and the resultant information is loaded into a relational database. The database includes aircraft type as designated by radar, runway and flight track assignments, user identification and flight number, type of operation (approach or take off), and its time of occurrence. Records of flights are extracted from this database with proprietary software developed for and owned by the Noise Management Bureau to produce a compiled report of operations for any period desired. The Noise Management Bureau will continue to use this system in meeting its responsibility to regularly monitor and report on noise conditions in the airport environs. Section 2.1.5 of Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR describes this process in greater detail. The system is not used to catch "offending aircraft and send them their fines" because early turns are not violations of any rules, but rather an operating practice to be avoided to the extent practicable. Furthermore, there are no fines established for any aircraft operation in flight. Also See Topical Response TR-N-3 regarding aircraft flight procedures, in particular Subtopical Response TR-N-3.1 and Subtopical Response TR-N-3.2, and Topical Response TR-N-7 regarding noise abatement measures/enforcement, in particular Subtopical Response TR-N-7.1 and Subtopical Response TR-N-7.2.

#### PC02206-20

**Comment:**

2 How will LAX pay for the potential class action lawsuits that are sure to result from runway reconfiguration and increased early turns which will effect every home in west Westchester, PDR and El Segundo?

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**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02206-21**

**Comment:**

The latest propaganda from LAWA and the FAA is that the airport needs to be modernized because there are too many planes in too small a space to be efficiently moved around.

**Response:**

Safety impacts were addressed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14c of the Draft EIS/EIR and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02206-22**

**Comment:**

I believe it was about two or three years ago that I was at a meeting where a FAA official said that their study concluded it was safe to reduce the plane spacing from what I think was five minutes to the current two or three minutes. Now the FAA is saying that they need to reconfigure runways because of safety issues.

1 Is that because they put too many planes on the ground at a time?

**Response:**

Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02206-23**

**Comment:**

2 Why not revert back to a longer plane interval spacing?

**Response:**

Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02206-24**

**Comment:**

3 If this is really a safety issue, why are airlines and the FAA risking passengers/airline employees lives by continuing to operate in an unsafe condition?

**Response:**

Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02206-25**

**Comment:**

The recent terrorist events which resulted in ceasing of LAX operations dramatically demonstrated the result of LAX traffic on the 405 freeway.

Detailed traffic studies need to be performed, not on the best case plan or idealized plan which includes green line rider-ship and people riding large full busses. Studies need to be made on the basis of just extrapolating the current method that people use to get to LAX. Extending the green line into LAX may

have little rider-ship because most people don't have close access get on the train from their home. Hence, what proof is there that the green line rider-ship will truly be utilized to get to LAX to reduce 405 traffic?

**Response:**

The ridership for the Green Line extension in the technical analysis for the LAX Airport Master plan was kept very conservative (5 percent or less). Please see Topical Response TR-ST-5 regarding the rail/transit plan. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02206-26**

**Comment:**

Raising the parking prices will cause people to have others drive them to the airport causing two round trips instead of one which will increase 405 traffic.

**Response:**

The master plan is not advocating any change in parking rates. If a change were to be contemplated, a study would be conducted by LAWA to determine the effects on traffic volumes.

**PC02206-27**

**Comment:**

Traffic on the 405 is already extremely slow during rush hour. Expanding LAX will undoubtedly cause additional traffic from cars and trucks. The EIR/EIS reports confirm this traffic can't be mitigated, so they will have to accept the responsibility for causing this increased traffic.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4.

**PC02206-28**

**Comment:**

How will LAX pay for the potential class action lawsuits that could result from angry commuters on the 405 freeway as a result of traffic overload? Will there be sufficient funds generated at LAX to pay for these suits? There is already a web site informing and gathering class members (405commute.org).

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR.

**PC02206-29**

**Comment:**

To what extent is the city willing to be obligated to paying for the any problems which could result from an expansion project gone wrong?

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**Response:**

This is not a comment of the contents of the Draft EIS/EIR.

**PC02206-30**

**Comment:**

Who will assume the risk and pay for an expansion project that is not able to be completed due to a drastic reduction in passenger/airline demand, like the current situation?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02206-31**

**Comment:**

Will all the funds be secured through bonds etc. before the project begins including contingency funds for inflation and construction problems?

**Response:**

Project funding is not an environmental issue under NEPA or CEQA; therefore, it is not addressed in the EIS/EIR. No tax dollars from the City of Los Angeles General Fund will be used to pay for any of the proposed improvements.

**PC02206-32**

**Comment:**

Why is Los Angeles providing nearly all the air transportation infrastructure for all of Southern California?

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02206-33**

**Comment:**

Will the city of Los Angeles be assuming any of the financial risks associated with the expansion? If so why are we assuming this risk for places like Orange County which is estimated to utilize nearly 1/3 of LAX's capacity?

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02206-34**

**Comment:**

The section cites a British study (footnote reference 16) examining the effect of a 90 to 100dB SEL aircraft noise. "Allowing for the noise level reduction of the structure, this data indicates that indoor single-event sound levels of 70 to 80 dB will cause less than a 2 percent chance of sleep disturbance.16" I personally measured our three alarm clocks (62-73 dB@3 ft distance) and four telephones (65-74 dB @ 6 ft distance) using a calibrated laboratory type (Lucas CEL Instruments Ltd Model EL-231 s/n 3499090) sound level meter. Stated accuracy of the device is +-1 dB at reference



level. I found all readings to be less than the respective ranges in the attached reference document entitled "Typical Noise Levels".

1 If the expected indoor single noise event is expected to be in the range of 70 to 80 dB how can people be expected to sleep through the noise event, since many common noises including an alarm clock, phone ringing and normal conversation are generally lower in sound levels but will wake the vast majority of the population?

**Response:**

Comment noted. Please see Response to Comment PC02206-2.

**PC02206-35**

**Comment:**

2) How can residents in the impacted sound area be expected to sleep with cargo operations proceeding throughout the night? Is it reasonable to expect a person to sleep through single noise events occurring at a frequency of several times per hour, that exceed the magnitude of their alarm clocks, phone ringers, etc?

**Response:**

Comment noted. Please see Response to Comment PC02206-2 and Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02206-36**

**Comment:**

3) Are the LAWA board members able and willing to sleep through this type of noise? Would these same members or any normal person not be outraged if a hotel or resort they were staying at subjected them to repetitive noise events of this magnitude and frequency? Now imagine that you are not allowed to check out or change rooms and the noise will only continue and you have no recourse. This is the position that these residents potentially are being faced with. How can LAWA justify subjecting these residents to this arrangement with no recourse?

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. Please see Topical Response TR-N-5 regarding nighttime aircraft operations and Topical Response TR-N-4 regarding noise mitigation.

**PC02206-37**

**Comment:**

4) What is LAWAS plan to mitigate these residents noise impact?

**Response:**

Comment noted. Aircraft noise mitigation is described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provides mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR include an analysis of single event noise levels that may result in nighttime awakenings as a result of developing the Master Plan alternatives. Mitigation Measure MM-LU-2 would revise the Aircraft Noise Mitigation Program to include residential uses newly exposed to high single event noise levels (defined by the 94 dBA SEL noise contour). Also, please see Topical Responses TR-LU-5 and TR-N-4 regarding noise mitigation.

### 3. Comments and Responses

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PC02207

Erskine, John

Airport Trade Center

9/24/2001

PC02207-1

**Comment:**

This firm represents the owners of the Airport Trade Center ("ATC"), a four-building business office complex located at 9111 S. La Cienega Boulevard, at the intersection of Arbor Vitae Street and La Cienega Boulevard in the City of Inglewood. This letter provides the comments of the ATC with respect to the above-captioned matter. ATC representatives want to express that they do not oppose the concept of expansion of Los Angeles International Airport ("LAX"), if done in a manner that does not adversely and unnecessarily impact Inglewood property owners and businesses such as ATC. However, as set forth below, the Master Plan and EIS/EIR for the LAX expansion project, in particular the traffic analysis which provides justification for the location of the LAX Expressway connecting ramps to the 405 Freeway, are not supported by either the traffic analysis or evidence regarding future demand and usage of LAX.

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway.

PC02207-2

**Comment:**

I. INTRODUCTION

On January 18, 2001, Los Angeles World Airports ("LAWA") and the Federal Aviation Administration ("FAA")<sup>1</sup> released a Draft LAX Master Plan ("Master Plan") and Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") to describe and analyze plans for expansion of LAX over the next fifteen years.

Pursuant to applicable provisions of the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"), the public and affected property owners are permitted to review and comment on the Master Plan and EIS/EIR. (CEQA Guidelines, § 15087.) The ATC hereby submits its comments on the Master Plan and EIS/EIR.

As LAWA is aware, the City of Inglewood submitted extensive comments on the Master Plan and EIS/EIR to LAWA on July 10, 2001. The ATC incorporates by reference the City of Inglewood's comments, and the exhibits attached thereto, in their entirety.

ATC respectfully submits that the Draft EIS/EIR fails to satisfy the requirements of CEQA and NEPA because, among other deficiencies, the EIS/EIR specifically fails to analyze the traffic, visual, vibration, lighting, access, noise, air quality, and construction impacts on the City of Inglewood, and on property owners within the City, from the LAX Expansion, the LAX Expressway, which is a component of all alternatives analyzed and discussed in the EIS/EIR for such expansion, and more specifically, the impacts and potential property displacement caused by the linkage of the southbound 405 Freeway with the LAX Expressway.

<sup>1</sup> For ease of reference, authorship of the LAX Master Plan Draft EIS/EIR will be attributed to LAWA herein.

**Response:**

Please see Responses to Comments PC02207-3 through PC02207-15 for responses to the specific concerns raised in the comment.

#### PC02207-3

**Comment:**

Further, in light of the impact of the national tragedy that occurred on September 11, 2001, and the continued, adverse economic impact of security threats and potential Middle East conflicts on commercial airline domestic and overseas travel demand, ATC respectfully requests that LAWA extend its comment period for the Draft EIS/EIR, provide additional hearings on the EIS/EIR, and specifically analyze the scope of and necessity for the expansion project at the present time.

**Response:**

In response to the events of September 11, 2001, LAWA and the FAA rescheduled the six hearings originally planned to be held in September, 2001 to October and November, 2001. In addition, the public comment period was extended to November 9, 2001, for a total of 295 days. Following input from the public on the Draft EIS/EIR, and the events of September 11, 2001, Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02207-4

**Comment:**

II. STUDY OF THE EFFECTS OF THE PROPOSED LAX EXPRESSWAY IS INADEQUATE AND MUST BE EXPANDED; LAX EXPRESSWAY CONNECTION TO SOUTHBOUND 405 FREEWAY UNNECESSARILY AND ADVERSELY IMPACTS THE ATC BUSINESS COMPLEX

A. The Study of the Effects of the Proposed LAX Expressway is Inadequate and Must be Expanded to Analyze and Minimize Impacts of Same.

The proposed LAX Expressway is designed, in theory, to facilitate the flow of traffic to LAX to meet projected increases in both annual passenger traffic and cargo demand at LAX. The LAX Expressway would consist of four vehicle lanes added to I-405, beginning south of the Sepulveda Boulevard overpass, extending to La Cienega Boulevard, and connecting to an airport ring road at Arbor Vitae Street. The airport ring road is designed, in theory, to facilitate traffic flowing around LAX.

The Draft EIS/EIR proposes two LAX Expressway alignment alternatives. Alternatives A ("Added Runway North") and C ("No Additional Runway") both propose that the LAX Expressway be built along side the I-405 freeway to provide direct freeway access to the airport via a connection to an airport ring road. Alternative B ("Added Runway South") proposes that the LAX Expressway be built along side the I-405 to provide direct freeway access to the airport via the MTA railroad right-of-way adjacent to Florence Avenue, and a connection to the airport ring road.

**Response:**

Comment noted. Appendix K of the Draft EIS/EIR presents the specific descriptions of the LAX Expressway alternatives beginning on page 16 in Section 3.1.2, Alternative 2 - Split Viaduct, and in Section 3.1.3, Alternative 3 - Single Viaduct. Appendix K of the Draft EIS/EIR describes the Affected Environment of the proposed LAX Expressway alternatives in Section 4 and Environmental Consequences of the alternatives in Section 5. Please see Topical Response TR-APPK-1 regarding refined environmental impact analysis of the proposed LAX Expressway. It should be noted that Alternative D, Enhanced Safety and Security Plan, has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative and would not include construction of the LAX Expressway.

#### PC02207-5

**Comment:**

Based on Traffic Engineer Paul E. Cook's review<sup>2</sup> of the traffic analysis in the Draft EIS/EIR, LAWA's review of the impact of the LAX Expressway must be revised because it fails to consider impacts of the

### 3. Comments and Responses

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LAX Expressway on the City of Inglewood. (Cook Report, p. 7.) The traffic analysis does not study the effects of the LAX Expressway or the airport ring road on the City of Inglewood, and more specifically, on key business properties and employment centers such as the ATC business complex. LAWA's failure to analyze and thoroughly evaluate these critical traffic/transportation links renders the Draft EIS/EIR inadequate.

Further, even though the proposed LAX Expressway borders areas in the City of Inglewood, including the ATC business complex, the Draft EIS/EIR states, "this facility is proposed within existing rights-of-way and would not intrude into Inglewood or interfere with access to community services." (Draft EIS/EIR, p. 4-436.) The LAX Expressway will impact the City of Inglewood. Although the plans for the LAX Expressway are included in Appendix K (Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements) of the Draft EIS/EIR, the analysis in Appendix K should be expanded to include a detailed analysis of the potential effects of the LAX Expressway on communities and businesses in the City of Inglewood, including the ATC.

2 Paul Cook, of Paul E. Cook and Associates, has prepared a report entitled "Identification and Evaluation of Key Traffic and Transportation Related Issues in the LAX Master Plan Draft EIR/EIS," dated May, 2000 ("Cook Report") (attached to City of Inglewood's Comment Letter as Exhibit "G").

**Response:**

Please see Responses to Comments AL00018-13 and PC02207-8.

**PC02207-6**

**Comment:**

B. The LAX Expressway Connection to Southbound 405 Freeway Would Unnecessarily and Adversely Impact the ATC Business Complex.

As indicated previously, the ATC property is located at the northwest intersection of La Cienega and Arbor Vitae. This office complex contains 109,000 square feet of fully leased business office space in four buildings located on 4.3 acres of property.

Both Alternatives A and C would unnecessarily and adversely impact the ATC business complex. Preferred Alternative C, as well as Alternative A, includes an LAX Expressway connection with the southbound 405 Freeway at Arbor Vitae and La Cienega. ATC, for the reasons outlined herein, does not believe that LAWA has adequately analyzed the need for the Expressway, or its connection in this location to the 405 Freeway, due to an inadequate traffic impact analysis.

However, assuming *arguendo* that such a connection was necessitated by current or future traffic demands of LAX or the LAX expansion project, it appears that such connection can easily be made south of the locations currently identified in Alternatives A and C, on City of Los Angeles/LAWA property.

While the relocation of the 405 Freeway connecting ramps to the Expressway in a location south of the location proposed in the Draft EIS/EIR and Master Plan would apparently reduce the amount of additional cargo space within the LAX expansion area, this *de minimis* impact on forecast cargo space needs should be well within an acceptable range of provision of additional cargo capacity, and would result in LAWA thereby more closely adhering to established principles and goals for the development of the Master Plan as follows:

1. LAWA has adopted Guiding Principles which include a statement that LAWA will:

"Balance LAX modernization plans with local community concerns."

As the City of Inglewood has pointed out, the Master Plan and EIS/EIR has not addressed impacts on the City of Inglewood, nor has it addressed community/property owners' concerns that key business parcels will be eliminated, thereby eroding the City of Inglewood tax base.

2. The LAX Master Plan Goals formulated early in the process to "ensure that the airport design concepts properly focus on the needs of the local community and the region," include Goal 5:

"Through enhanced urban design, maximize compatibility between LAX and the demand for housing, employment and service, and protect surrounding neighborhoods." (Emphasis added.)

Obviously, significant employment and business services will be lost if properties in the City of Inglewood such as the ATC business complex are eliminated to provide connecting ramps that could otherwise be located on City of Los Angeles property that does not contain existing employment.

3. Forecast demand for cargo areas is not so precise that a minor adjustment to the Manchester Square/Air Cargo Space areas cannot be made in order to avoid significant adverse impact on the ATC business complex. This is especially true in light of recent world events that should cause LAWA to reassess these forecasts.

**Response:**

The long-term cargo forecasts included in the Draft EIS/EIR and Supplement to the Draft EIS/EIR remain valid, even in light of recent world events. It is anticipated that the changes in the aviation industry due to recent events will not last through the 2015 forecast horizon. Please see Response to Comment PC00599-54.

The alignment of the proposed LAX Expressway was dictated by acceptable traffic engineering standards for design as well as the location of the Manchester Square cargo complex. A connection farther to the south would impinge on part, or all, of the Manchester Square cargo complex, negating some of the utility of the Expressway. Should one of these alternatives be selected, a more detailed analysis would be conducted of the exact alignment for the Expressway, and all feasible means would be taken to avoid unnecessary impacts to land uses. Also note that Alternative D does not include the LAX Expressway or the Ring Road. See also Topical Response TR-ST-2 regarding the congestion management program.

**PC02207-7**

**Comment:**

C. The Traffic Relief Congestion Package in the Draft EIS/EIR is Inadequate and Must be Expanded.

Section 4.3.2 of the Draft EIS/EIR, relating to off-airport surface transportation, includes a package of three congestion relief measures ("Congestion Relief Package"). The purpose of the Congestion Relief Package is to link the regional freeway system to the airport and reduce off-airport congestion. One component of the Congestion Relief Package is to tie all freeway connections into a ring road that connects motorists directly to all parts of the airport.

The Congestion Relief Package is inadequate and must be expanded. (Cook Report, pp. 6-7.) The LAX Expressway borders areas in the City of Inglewood; however, on preliminary review, it appears that South Bay Cities are excluded from the relief package. (Cook Report, p. 7.) There is a gap in the analysis of impacts of the Congestion Relief Package to the City of Inglewood. LAWA should revise the Draft EIS/EIR to include the South Bay Cities in the Congestion Relief Package.

**Response:**

The congestion relief improvements include elements south of the airport. The congestion relief package has been shown to be effective in mitigating project-related impacts as well as improving the traffic flow around the airport, as shown in Section 4.3.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Response to Comment PC02223-38 regarding the fact that there is no gap in the analysis regarding the City of Inglewood and Topical Response TR-ST-2 regarding definition of the traffic study area.

**PC02207-8**

**Comment:**

LAWA should also conduct an extensive evaluation of the impacts of the LAX Expressway upon the citizens and businesses of the City of Inglewood, including impacts to the ATC.

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**Response:**

Section 5.3.1.5, Relocation of Residents and Businesses, of Appendix K of the Draft EIS/EIR addressed impacts to residents and businesses at a programmatic level of analysis. Please see Topical Response TR-APPK-1 regarding refined analysis of LAX Expressway impacts.

**PC02207-9**

**Comment:**

D. The Draft EIS/EIR is Inadequate Because it Does Not Include Any Indication on How the Implementation of the Proposed LAX Expressway will be Funded.

The Draft EIS/EIR includes a section on funding. The total program cost of the project is \$12 billion dollars. The Draft EIS/EIR suggests that funding for the project could come from a combination of private, state, local and federal funding sources. (Draft EIS/EIR, p. 2-19.) Although the Draft EIS/EIR describes a few potential funding programs, there is no indication on how the implementation of the proposed LAX Expressway will be funded. (Cook Report, pp. 5, 7.) The uncertainty of how the LAX Expressway will be funded raises the issue of whether the LAX Expressway and the airport ring road are even feasible.

LAWA should revise the Draft EIS/EIR and take necessary steps to ensure that funding of this aspect of the LAX Master Plan is secured. The Draft EIS/EIR must include identification of the source of funding for the proposed LAX Expressway and the airport ring road.

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02207-10**

**Comment:**

E. The Draft EIS/EIR Fails to Include Analysis of Visual Impacts, Vibration Impacts, Lighting Impacts, and Access Impacts of the LAX Expressway.

LAWA has not yet completed any analyses that address the following impacts of the LAX Expressway: aesthetic/visual impacts, vibration impacts, lighting impacts, and access impacts. (Draft EIS/EIR, p. 5-27.) LAWA has stated that these studies will be completed with the final design of the LAX Expressway. In addition, LAWA concedes that a detailed analysis of the environmental impacts of the LAX Expressway is forthcoming and is not included in the Draft EIS/EIR:

While this EIS/EIR provides an assessment of environmental impacts of the Expressway, a more detailed study is forthcoming as a Project Study Report (PSR) for Caltrans. That study will provide a highly detailed analysis of potential alignments, and traffic and noise impacts.

(Draft EIS/EIR, p. 4-295.)

These studies must be included in the Draft EIS/EIR. Both CEQA and NEPA require LAWA to include information in the Draft EIS/EIR that will inform decision makers and the public about the potential, significant environmental effects of the LAX Master Plan. The LAX Expressway is a significant roadway development proposed by the LAX Master Plan, and studies of the impacts of the LAX Expressway are critical in evaluating the impacts of the LAX Master Plan as a whole. The public cannot make an informed decision or submit informed comments without such information. Any such analysis must include properties within the City of Inglewood, to document proposed roadway elevations, setbacks, and landscaped buffer areas, to determine the extent to which existing views and conditions are degraded by the LAX Expressway. The legal defensibility of the Draft EIS/EIR is questionable, based on LAWA's omission of the study of these impacts.

**Response:**

Appendix K does not provide for a project level or detailed analysis of the proposed Expressway for shade/shadow/lighting, vibration, and access impacts in that it is merely a project element of a larger Master Plan. Hence, only a programmatic level of analysis is warranted to identify potential issue areas requiring further analysis at the time the project element is initiated. Upon adoption of either Master Plan proposed alternative that includes these off-airport roadway improvements, a more detailed CEQA review would be conducted in support of the Project Study Report (PSR) required by Caltrans. The Caltrans PSR and Project Report would include design plans that address roadway elevations, setbacks, and landscape buffer areas in sufficient detail as to conduct the supplemental CEQA analysis for aesthetic/visual, vibration, lighting and access impacts. Please see Topical Response TR-APPK-1 for clarification of supplemental analysis at the specific project level stage. Please note that Alternative D does not include the LAX Expressway or the proposed ring road. Alternative D is LAWA staff's preferred alternative.

**PC02207-11**

**Comment:**

F. The Study of Air Quality Related Impacts of the Proposed LAX Expressway is Inadequate and Must be Expanded.

According to LAWA, the proposed ring road and LAX Expressway will play a major role in reducing traffic congestion and air quality emissions in the vicinity of LAX. Although construction of the LAX Expressway and the ring road are not listed as "mitigation measures," the construction of these roadway improvements is the basis for many of the Environmental Action Plan emission reductions. (Draft EIS/EIR, p. 4-461.) The Draft EIS/EIR states that features such as the LAX Expressway and the ring road "would substantially reduce air pollutant emissions due to increased airport activity levels." (Id.) This assumption of increasing capacity to improve traffic flow to reduce air pollution should be further examined in light of other potential mitigation measures.

**Response:**

It is anticipated that improved local traffic flow in the LAX vicinity would limit the occurrence of "stop and go" traffic, serving to reduce the accumulation of air pollutant emissions from idling vehicles. However, the purpose of the proposed LAX Expressway is not solely to reduce air pollutant emissions from vehicles. As stated on page 3 of Appendix K of the Draft EIS/EIR, the purpose and need for the proposed LAX Expressway are to: minimize traffic on local streets north of the airport; separate airport-related traffic from non-airport related traffic; provide added roadway capacity between the I-405 and LAX; contribute to improving circulation and congestion in local communities to the north of the airport. Section 4.6.5, Master Plan Commitments, of the Draft EIS/EIR specified LAX Master Plan Commitments intended to address air quality impacts, while Section 4.6.8, Mitigation Measures, of the Draft EIS/EIR specified air quality mitigation measures to be implemented with the LAX Master Plan. In addition, please see Topical Response TR-APPK-1 for additional information about the current and future environmental impact analysis of the proposed LAX Expressway improvements discussed in Appendix K of the Draft EIS/EIR. As noted in this topical response, this future refined project level analysis of the proposed LAX Expressway improvements would include a focused air quality analysis and mitigation measures. Alternative D does not include the LAX Expressway or the ring road.

**PC02207-12**

**Comment:**

In addition, the analysis of the impacts of implementing mitigation measures for the impact of increased air emissions on the City of Inglewood is inadequate. While most of Inglewood is within the Land Use Study Area noted in Figure 4.2-1, there is little or no analysis of the impacts on affected property owners, employees and residents within the City of Inglewood from the mitigation measures and roadway improvements. LAWA should revise the Draft EIS/EIR to include analysis of the impacts of the mitigation measures and roadway re-configurations upon the City of Inglewood, and specifically on the ATC business complex.

### **3. Comments and Responses**

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**Response:**

The content of this comment is identical to comment PC02303-12; please refer to Response to Comment PC02303-12.

**PC02207-13**

**Comment:**

G. The Study of Construction Impacts of the Proposed LAX Expressway is Inadequate and Must be Expanded.

The analysis of construction impacts of the LAX Expressway upon the City of Inglewood is inadequate. The Draft EIS/EIR provides that the construction of the LAX Expressway and the ring road will involve critical issues such as road closure, maintenance of traffic, and handling of additional traffic. The Draft EIS/EIR focuses only on the immediate construction zone, and does not discuss impacts to nearby businesses or communities in the City of Inglewood. (Draft EIS/EIR p. 4-868.)

**Response:**

Please see Response to Comments AL00018-13, AL00018-68, AL00018-69, AL00018-116, AL00018-123, and PC02207-8. Also refer to Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR for a summary of Master Plan Commitments and mitigation measures related to off-airport surface transportation that would apply during the construction period to minimize traffic impacts.

**PC02207-14**

**Comment:**

The construction of the LAX Expressway will involve tunnel construction and underground excavation. The potential impacts of settlement, ground loss, and earth movement can affect or damage the ground surface, utility lines, roadways and nearby structures. (Draft EIS/EIR p. 4-887.) The Draft EIS/EIR has a gap in its analysis, as it does not discuss the impacts of tunnel construction and underground excavation on the City of Inglewood. The Draft EIS/EIR should be revised to discuss these impacts of construction to the City of Inglewood and more particularly, to the ATC.

**Response:**

The proposed LAX Expressway alternatives analyzed in Appendix K of the Draft EIS/EIR are planned as elevated structures and would not involve tunnel construction or lateral underground excavation within the City of Inglewood or near the ATC. As such, a detailed analysis of geology and soil impacts resulting from these construction processes is not presented in Appendix K of the Draft EIS/EIR. It is anticipated that vertical excavation for the installation of support pillars for the proposed elevated Expressway structure(s) would occur in areas along Arbor Vitae Street and the I-405 freeway within the City of Inglewood.

A focused analysis of construction impacts and mitigation measures for the proposed LAX Expressway will be conducted if the project is carried forward in the planning process and detailed design plans are ultimately developed. Future analysis would include a detailed geotechnical investigation and include all affected areas in the City of Inglewood. Please refer to Topical Response TR-APPK-1 for additional information and clarification.

**PC02207-15**

**Comment:**

The Draft EIS/EIR also indicates that noise from construction equipment and activities would be significant and unavoidable along the LAX Expressway and along portions of the ring road. (Draft EIS/EIR, p. 4-891.) The Draft EIS/EIR does not study the effects of these noise impacts on the City of Inglewood and its communities and businesses. The Draft EIS/EIR should be revised to address these impacts.



**Response:**

Section 5.6, Noise, of Appendix K of the Draft EIS/EIR includes an analysis of noise impacts to properties adjacent to the LAX Expressway and State Route 1 improvements.

Please refer to Responses to Comments AL00018-13, AL00018-68, AL00018-69, AL00018-116, and AL00018-123.

**PC02207-16**

**Comment:**

III. CONCLUSION

ATC respectfully requests that LAWA either eliminate the LAX Expressway/405 Freeway linkage as set forth in Alternatives A and C, or relocate the connecting ramp south of the ATC property or in an alternative location to within the jurisdiction of the City of Los Angeles.

**Response:**

Comment noted. Alternative D would not include the LAX Expressway.

**PC02207-17**

**Comment:**

Further, since the Draft EIS/EIR also fails to comply with the procedural and substantive requirements enunciated in NEPA and CEQA, LAWA should revise the Draft EIS/EIR, and reconsider the need for the level of expansion of LAX described in the Master Plan, in light of the comments set forth herein.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided comprehensive analysis of Alternative D and was circulated for public review and comment.

**PC02207-18**

**Comment:**

Finally, in light of recent world events, the region's air traffic demand has decreased and will continue to decrease considerably, and may never return to previous levels or reach forecast demand utilized as a basis for the Master Plan Expansion. This significant change in the commercial aviation business, alone, should cause LAWA to revisit the expansion as proposed in the Master Plan, and in particular, reexamine the presently unfunded circulation improvements to minimize the impact on existing property owners and the cost of same.

**Response:**

Please see Response to Comment PC02143-6 regarding periodic upturns and downturns in aviation activity as related to long-term aviation demand projections. As indicated therein, the aviation demand projections used for the Master Plan are still considered to be valid, even in light of the events of September 11, 2001 and the recent economic recession.

### 3. Comments and Responses

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**PC02208**

**Nelson, David**

**Playa Vista**

**9/24/2001**

**PC02208-1**

**Comment:**

Thank you for this opportunity to comment on the LAX Master Plan Draft EIS/EIR. Our comments are limited to observations regarding the adequacy of the technical analysis provided in the report. As such, it is not our intent to express a position in favor of or in opposition to the LAX Master Plan. Rather, we mean our comments to assist in the finalization of a complete and accurate environmental document.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02208-2**

**Comment:**

Overall Comments

1. All alternatives evaluated in the EIS/EIR are predicated on the same ground access plan. As a result, the report may be vulnerable to criticism that it does not adequately address alternatives with meaningful differences in surface transportation and circulation. No explanation is provided regarding the rejection of terminal expansion to the east or alternatives to the proposed Ring Road.

**Response:**

The commentator applies an incorrect standard in stating that all feasible alternatives must be evaluated. Section 15126.6 of the State CEQA Guidelines states that "An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." As indicated in Topical Response TR-ALT-1, the Draft EIS/EIR and Supplement to the Draft EIS/EIR properly consider a reasonable range of alternatives. Nevertheless, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - includes a ground access plan that is different from the other three build alternatives. In addition, Alternative D provides new passenger facilities to the east of the existing airport facilities, and does not include a ring road.

**PC02208-3**

**Comment:**

2. The mitigation measures proposed by the EIS/EIR do not contain information regarding when and by whom the measures are to be implemented. As a result, the relationship between the timing of impacts and their mitigation cannot be established.

**Response:**

Please see Response to Comment AR00003-63 regarding the mitigation monitoring and reporting program.

**PC02208-4**

**Comment:**

3. The EIS/EIR does not evaluate any alternatives that would result in impacts less than the preferred Alternative C. Such an analysis is required under CEQA Guidelines Section 15126.6 (a).

**Response:**

Please see Responses to Comments AL00033-315 and PC01094-4.

**PC02208-5**

**Comment:**

Traffic

1. The future traffic network assumptions in the traffic analysis are unclear. The EIS/EIR should specifically identify and describe all planned and programmed roadway improvements within the study area (i.e., Sepulveda Boulevard, Lincoln Boulevard, Culver Boulevard, etc.) which are assumed to be in place for both the 2005 and 2015 scenarios.

**Response:**

Please see Response to Comment AR00003-21 regarding cumulative impacts. Also, please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and results.

**PC02208-6**

**Comment:**

2. The EIS/EIR does not clearly articulate the relationship between local access streets and the proposed Master Plan transportation elements (i.e., the Expressway, Ring Road, and Westside terminal). For instance, the EIS/EIR (Figure 4.3.2-4) asserts that there would be a decrease in airport-related traffic along Pershing Drive and Culver Boulevard north of the airport, but does not provide any justification for this assertion. If the intent is to prevent traffic from the north using Pershing Drive as a direct access to the new Westside terminal, then this point needs to be more clearly articulated and a mitigation measure adopted to ensure such access is not allowed.

**Response:**

Only Alternatives A, B, and C include a Ring Road. (Alternative D does not, as summarized in the Supplement to the Draft EIS/EIR.) It is true that the Ring Road configuration will eliminate direct access from Pershing Drive north of the Ring Road to the West Terminal. The intersection of Pershing Drive and Westchester Parkway is revised with the Master Plan. Most of the turning movements will still be allowed, but a few movements will be eliminated. It will still be possible to turn right or left from southbound Pershing Drive onto Westchester Parkway and/or Sandpiper Street. It will also be possible to turn right or left from Westchester Parkway or Sandpiper Street onto northbound Pershing Drive. The turning movements that will be eliminated will be the north/south through trips on Pershing Drive, the eastbound right turn from Sandpiper Street to southbound Pershing Drive, the northbound left turn from northbound Pershing Drive to westbound Sandpiper Street, and all U-turns. These movements have been eliminated in order to avoid large increases in trips on Pershing Drive and other arterial streets in Playa Del Rey and El Segundo, as well as to improve operations of the access road system to the West Terminal. Also see Response to Comment PC02181-10.

**PC02208-7**

**Comment:**

3. The traffic analysis fails to provide meaningful analysis of future transit operations in the vicinity of the proposed project. While the Green Line extension is discussed, there is no proposal for or analysis of other forms of transit including bus systems, shuttles, etc. Discussion of such systems is limited to on-site circulation and should be expanded to include transit proposals serving the communities in proximity to LAX.

**Response:**

Transit is envisioned to play a big role in transporting workers and passengers to/from the airport. In addition to the Green Line extension, a notable transit feature of the LAX alternatives is the development of a robust system of FlyAways strategically placed around the region connected by high-speed bus service that travels directly to terminals. Please see Topical Response TR-ST-5 regarding

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the rail/transit plan (see Subtopical Response TR-ST-5.4 regarding Metro Green Line extension to the West Terminal Complex) for more information.

#### PC02208-8

**Comment:**

4. The Green Line extension is not discussed in sufficient detail. The technical feasibility of this proposal should be evaluated.

**Response:**

Please see Topical Response TR-ST-5 regarding the rail/transit plan (see Subtopical Response TR-ST-5.4 regarding Metro Green Line extension to the West Terminal Complex) for more information.

#### PC02208-9

**Comment:**

5. A number of intersections and roadway segments are impacted significantly by the alternatives addressed in the EIS/EIR. An examination of the locations of significantly impacted intersections shows that several lie at the boundaries of the Tier II study area. This distribution of impacts calls into question the adequacy of the size of the study area. In this context, the chance that all potential significant impacts have not been identified is high.

6. The performance of a number of intersections seems to improve in the "with mitigation" scenario even though no direct or explainable indirect improvements are provided at these locations. Such observations call into question the validity of the analysis. Examples of this condition can be observed in the projected levels of service in 2015 at the following intersections:

- Centinela Blvd./Culver Blvd.
- Centinela Blvd./Jefferson Blvd.
- Jefferson Blvd./I-405 ramps
- Centinela Blvd./SR 90 ramps
- Lincoln Blvd./Bali Way

7. The traffic study projections seem to indicate greatly improved traffic conditions at almost all of the intersections referenced under number 6, above, compared to existing conditions. The analysis fails to support this conclusion.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-ST-2 for a discussion of the study area and facilities analyzed. The comment refers to Table 4.3.2-24, which shows that intersection levels of service improve at some intersections even when no direct mitigation is proposed. The reason that a computer model is used in the analysis is to be sure that changes in traffic demand from both direct and indirect causes can be properly assessed. In this case, the mitigation program for Alternative C includes the widening of Arbor Vitae Street from four to six lanes between I-405 and Airport Boulevard. This widening allows for more airport traffic to use the proposed LAX Expressway. This increase in the use of the LAX Expressway causes trips to divert from arterial streets to I-405 several miles north of the actual improvement. An indirect result of the improvement is the reduction in arterial street volumes on Centinela Avenue and Jefferson Boulevard. This creates the improvements in intersection LOS cited in the comment. Table 2.3 of Technical Report 3b identifies numerous improvements to the regional transportation system that are assumed to be implemented in the future. These improvements include adding capacity to the Marina Freeway (improvements #83-87), adding capacity to Centinela Avenue near Jefferson Boulevard (improvement #12), and HOV lanes on all of I-405 north of the airport (improvements #66-68). These improvements will have a profound effect on traffic circulation throughout the area. Even with substantial growth in overall traffic levels throughout the region, these improvements will result in improved levels of service at some intersections, including some of those cited in this comment, due to direct causes (capacity increases) or indirect causes (shifts of traffic to widened freeways and/or HOV lanes).

**PC02208-10**

**Comment:**

Environmental Justice/Socioeconomics

1. Implementation of the LAX Master Plan will generate a substantial number of construction and permanent jobs. LAX should consider adopting a program similar to the Playa Vista Job Opportunities and Business Services (PVJOBS) program, which reserves ten percent of all construction jobs performed at Playa Vista for at risk youth and adults. The program has proven so successful at Playa Vista that we have begun to expand it to include contractors beyond Playa Vista. In addition, a program similar to the Playa Vista Emerging Business Program to assist minority-owned and smaller emerging businesses in securing contracts with LAX in construction and services could be a key component of the LAX Master Plan Environmental Justice Program.

**Response:**

Please see Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Final EIS/EIR and Topical Response TR-EJ-2 regarding the environmental justice program, economic benefits, and employment benefits.

**PC02209**

**Quinn, Julia**

**Friends of Sunset Park  
Neighborhood Assoc., Ocean  
Park Community Organization &  
Other Residents of Santa  
Monica, Venice, Mar Vista &  
West Los Angeles**

**9/22/2001**

**PC02209-1**

**Comment:**

In view of the recent events, I believe that further jet traffic at Santa Monica Airport also provides a security risk to Westside residents.

**Response:**

Comment noted. Please see Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

**PC02209-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.

**PC02210**

**Burns, Bruce**

**None Provided**

**9/22/2001**

**PC02210-1**

**Comment:**

Los Angeles International Airport should not be expanded in any way.

LAWA is too small for the existing traffic and its airspace is dangerously crowded.

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Especially now, since the terrorist attacks on September 11th, vital facilities like airports should be geographically dispersed and not concentrated in one location.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-SEC-1 regarding security issues.

**PC02211          Burns, Barbara          None Provided          9/23/2001**

**PC02211-1**

**Comment:**

Los Angeles International Airport is endangering public health and safety in at least two major ways.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02211-2**

**Comment:**

Surface streets near LAX are gridlocked already, so expansion of the airport is more than impractical, it is foolhardy. Also, the 405 Freeway, the main multi-lane highway to LAX, is already at capacity.

After the September 11th terrorist attacks during the several days LAX was closed or offering limited service, traffic on the local streets and the 405 Freeway was vastly reduced. Local street traffic was reduced by 60% and 405 Freeway traffic by 40% according to one estimate.

It is obvious that LAWA cannot handle more passenger and cargo planes at LAX because access to the airport is gridlocked already.

**Response:**

Comment noted.

**PC02211-3**

**Comment:**

Similar congestion exists in the airspace over the central and western part of Los Angeles because of excess volume flying into LAX.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02211-4**

**Comment:**

The congestion on the streets, highways and in the air are putting thousands of citizens at risk daily from airplane crashes, traffic accidents, air pollution and noise impact.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and

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Safety, noise in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-HRA-3 regarding human health impacts.

**PC02212      Krall, Frank      None Provided      9/22/2001**

**PC02212-1**

**Comment:**

We live in Playa del Rey, and we must comment on the Master Plan. First, LAX is part of a community which has cities, El Seg., Ing., W.C., PDR., C.C., Mar Vista, Venice, MDR, and S.M., even. The Master Plan fails to address the overall impact on these neighbor communities.

**Response:**

Comment noted. The study area considered for each of the 27 environmental disciplines presented in Chapter 4 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR varies depending on the nature of the relevant issues and the potential for significant impacts to occur within a defined area. Section 4.4.4 focuses primarily on the area west of the San Diego Freeway because that area is most likely to be significantly affected by alteration of surface transportation patterns, changes in land use, or from other related activities or development. Such impacts would not be significant in more distant areas. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated other potential impacts, such as traffic (Section 4.3.2), noise (Section 4.1), air quality (Section 4.6), and human health and safety (Section 4.24).

**PC02212-2**

**Comment:**

The new express way on the North side enters onto the San Diego Fwy 3.2 miles further South than it is necessary. This plan causes additional traffic on the S.D. Fwy. 3.2 miles more than is needed to the North of LAX.

**Response:**

Several alignments of the LAX Expressway were reviewed during the analysis, as summarized in Appendix K. The general alignment selected provided the best combination of effectiveness and minimal environmental impacts. However, details regarding the alignment will be refined during the design phase of the project. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

**PC02212-3**

**Comment:**

Secondly, with the majority of traffic going to be routed to the West end for parking and entrance to Airport, closing off Pershing to force traffic N.B. Eastward to the S.D. Fwy. is wasteful, and not in the best interest of the Northern cities.

Thirdly, we have a major issue with Ballona wetlands being preserved. The LAX Master Plan can and must take this issue in its consideration at being an asset to we who live as neighbors.

In conclusion, I want to state what should be done to address these three issues. The Master Plan closes Pershing Dr. on the North. This is wrong. Pershing is a (5) five lane street and must be made a one way street North Bound. With the South bound street being Plaso Del Mar. Both from Culver Blvd. using Culver as a turn around. The extension of the Marina Del Rey Fwy West alongside the North side of Ballona Creek, and then a bridge over the creek to the west side of the marsh where it will turn South to Culver Blvd. This will allow the removal of the now Culver Blvd. South of Ballona Creek to Pershing Dr.

### **3. Comments and Responses**

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See map. (See original letter for map.)  
Using the MDR Fwy plan.

From point (X) to X is shorter, than using the LAX master plan. Using a more direct route 1) puts N.B. & SB traffic off the San Deigo Fwy 3.2 miles more to the North. 2) only 3 new miles of Fwy is needed. 3) Access to Admalty way from MDR Fwy will be established. 4) Culver Blvd which divides Ballona Wetlands into two halves will be gone. 5) Access to the west side of the airport is a more direct route. 6) All of the cities North of MDR Fwy will have greater access to move southward on the west. 7) The Licoln RTD will be made available on this west access all the way to the airport for the S.M. area.

**Response:**

Please see Response to Comment PC01454-1 regarding project components. See also Response to Comment PC01086-4 regarding the future Pershing Drive access to the west.

**PC02212-4**

**Comment:**

8) The wetlands will benefit. 9) People will get around LAX faster. 10) The community will be better served.

**Response:**

Please see Response to Comment PC01454-1 regarding project components.

**PC02213**

**Dickieson, Bruce**

**Friends of Sunset Park  
Neighborhood Assoc., Ocean  
Park Community Organization &  
Other Residents of Santa  
Monica, Venice, Mar Vista &  
West Los Angeles**

**9/22/2001**

**PC02213-1**

**Comment:**

Come spend a Saturday at our house and enjoy the noise & the jet fumes!!

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. Please see Response to Comment PC00045-4 regarding fumes and Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02213-2**

The remainder of this comment letter is identical to form letter PFF; please refer to the responses to form letter PFF.



PC02214

Backes, Anne

None Provided

7/21/2001

PC02214-1

**Comment:**

Environmental Documentation of LAX Projects Prior to Baseline Year - CEQA requires a description of the current environmental conditions, or environmental setting in Mitigated Negative Declarations (MND) as well as EIRs. What projects have occurred at LAX since 1975? What kind of environmental documentation was done for each of these projects? What were the environmental conditions at the time of these projects and how did the environmental conditions change as a result of these projects? How were the cumulative impacts of these past projects assessed and tracked with relationship to each other at the time the environmental documentation for each was done? What assessment of cumulative impact analysis was included for projects since 1975? Were health effects studies ever done for the original airport construction, or for the projects that have occurred since 1975? How were the cumulative impacts addressed for these projects at the time the environmental documentation was done? How many MNDs or negative declarations (ND) were filed for these past projects? To what degree were cumulative impacts considered prior to the decision to do an MND or ND for these projects?

Section 15154 (b) of the CEQA Guidelines states, "A lead agency shall not adopt a negative declaration or mitigated negative declaration for a project described in subsection (a), (subsection (a) refers to projects within 2 nautical miles of a public airport), unless the lead agency considers whether the project will result in a safety hazard or noise problem for persons using airport or for persons residing or working in the project area." If the MND for the Arborvita area was in response to noise impacts resulting from LAX expansion, why was a separate MND done for this aspect of the LAX expansion? Why was this not included in the DEIR?

**Response:**

The cumulative impact analysis conducted for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR considered past, present, and probable future projects. Please see Response to Comment AL00018-19 and Topical Response TR-GEN-3. The adequacy of past environmental review for any projects already approved and/or undertaken at LAX is not within the purview or scope of the LAX Master Plan EIS/EIR.

PC02214-2

**Comment:**

DEIR does not consider the Project as a whole -  
A Negative Declaration was filed for the relocation of residents of the Arbor Vita area. The reason for the resident's request to relocate is directly related to expansion at LAX, and therefore, related to the Project and should be included in the DEIR. Why did LAWA exclude the relocation of residents in the Arbor Vita area from the DEIR? Why was the buy-out of Manchester Square not included in the discussion of the DEIR? By excluding Manchester Square buy-out, how can LAWA have "considered the project as a whole" as required by CEQA? The Manchester Square should not have been separated because the impacts, which led to the neighborhood requesting relocation, are a result of the expansion at LAX.

**Response:**

Comment noted. As described in Chapter 3 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the voluntary acquisition program for Manchester Square is a separate action by LAWA and completion of that program is proposed to occur independent of, and prior to, implementation of the LAX Master Plan. Please see also Response to Comment PC00499-3.

### 3. Comments and Responses

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#### PC02214-3

**Comment:**

Regional approach was not considered as an alternative  
Why wasn't a regional approach considered as an alternative in addition to A, B, and C? According to Section 15126.6 of the CEQA guidelines, "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." In other words, alternatives that can avoid or lessen impacts should be evaluated. A regional approach would avoid or lessen impacts related to traffic and noise in the Playa Del Rey, Westchester, the El Segundo area by distributing these impacts over a wider area, namely, throughout Southern California. If LAWA disagrees with the statement in the previous sentence, can LAWA please expand on why it has concluded that a regional approach would not substantially avoid or lessen impacts in the communities contiguous to the LAX airport?

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Topical Responses TR-RC-1 regarding the role of the LAX Master Plan in a regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and shifts the accommodation of future aviation demand to other airports in the region.

#### PC02214-4

**Comment:**

Inappropriate/Inadequate Mitigation of Impacts and Failure to Consider Subsequent Impacts from Mitigation Measures Regional Approach - The noise impacts to residents to the north and south of the airport are just as adversely impacted by noise as the citizens in the Arbor Vita area. Although the flight path is partially over the ocean this does not alleviate or lessen the noise impacts to residents living adjacent to the ocean. Why were all residents adversely impacted by noise levels not offered to relocate? Those living directly north of the flight path, along the ocean are equally impacted by noise and should therefore be offered a buy-out. Aircraft take-off over the ocean and noise levels during take off are louder than landing.

**Response:**

Please see Topical Response TR-LU-5 regarding noise impacts and noise mitigation measures. As presented in Section 4.2.6 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, the areas exposed to high noise levels as defined by the 65 CNEL noise contour, or high single event noise levels as defined by the 94 dBA SEL noise contour to the north in the communities of Westchester and Playa del Rey and to the south in the City of El Segundo under the build alternatives have actually decreased compared to 1996 baseline and Year 2000 conditions. As indicated in Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, noise impacts would occur primarily to the east of the airport, including the Arbor Vitae area, with some impacts occurring to the north of the airport. No areas would be newly exposed to the 65 CNEL or 94 dBA SEL to the south of the airport within the City of El Segundo. All areas newly exposed to the 65 CNEL or 94 dBA SEL would be eligible for mitigation under the revised Aircraft Noise Mitigation Program (ANMP), as described in mitigation measures MM-LU-1 and MM-LU-2 of the Supplement to the Draft EIS/EIR.

As described in Section 4.2, Land Use, of the Draft EIS/EIR, the Voluntary Residential Acquisition/Relocation Program for the Manchester Square and Belford area is a separate program from the LAX Master Plan and was established based on interest from homeowners and residents who requested that LAWA purchase their property in lieu of soundproofing. However, LAWA's preferred method of achieving land use compatibility is through sound insulation rather than acquisition. See also Topical Response TR-LU-3 for a description of the ANMP and how eligibility and priority for soundproofing are established.

The mitigation measures contained in Section 4.2 of the Supplement to the Draft EIS/EIR would not result in subsequent impacts. Mitigation measures MM-LU-1, MM-LU-2, and MM-LU-4 provide for the installation of soundproofing in residences and eligible schools. The installation of such soundproofing (i.e., windows and insulation) would not result in significant secondary impacts. Other mitigation measures require that a study be conducted regarding the relationship between aircraft noise levels and the ability of children to learn (MM-LU-3) and that the noise monitoring program be upgraded and expanded (MM-LU-5). These measures would not result in secondary effects.

#### PC02214-5

##### Comment:

Acquisition of a Buffer Zone - These areas contiguous to LAX are currently, and in the future will be severely affected by traffic, noise and air impacts due to LAX expansion. The purchase of these areas surrounding LAX would provide an excellent buffer zone within which the City of Los Angeles could truly build a "gateway to the world" international airport. The EIR and Master Plan both expand on the amount of money the expansion of LAX will make for the City of Los Angeles. Could LAWA please expand on the reasons why residents contiguous to LAX and adversely affected by negative unavoidable impacts were not offered a buy-out? Further, I appreciate LAWA's efforts to comply with the Environmental Justice requirements. However, this same consideration should be given to all adversely impacted citizens and not just those in lower income neighborhoods.

According to the LA Guide to Environmental Compliance, "such incompatibility may result from environmental impacts associated with the proposed land use. Examples of incompatibility include land uses which create noise, odor, safety hazards, visual or other environmental impacts which conflict with surrounding land uses and the activities and conditions typically associated with those land uses." LAX, by virtue of its function, is incompatible with its surrounding land uses. DEIR states that even with the "no project alternative", there will be impacts for which mitigation is not possible. In order for LAX to responsibly and effectively expand, wouldn't it be prudent to discuss an alternative that considers buying out areas surrounding the airport to create a buffer zone? Why was this alternative not considered? Why hasn't the LAWA considered the purchase of property as a buffer zone to lessen the impacts of noise, traffic and air and all the adverse health effects associated with these impacts? Why hasn't the purchase of surrounding land for expansion and buffering purposes been considered? If the city truly wants to be the gateway for the West Coast, it should acquire the necessary property. Purchase of some neighboring communities would afford the opportunity for nearly unlimited expansion and the opportunity to truly become the international gateway the City desires.

##### Response:

Comment noted. Please see Response to Comment PC02214-4 above regarding acquisition. As noted in Topical Response TR-LU-3, acquisition involves a higher cost per unit in initial investment and takes longer to implement than soundproofing.

In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, and human health and safety in 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1, S-2a, S-2b, S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02214-6

##### Comment:

What was the specific criteria for noise and air impacts which resulted in the decision to buy out of all the homes directly West of LAX? Due to the expansion that has occurred at LAX and including the expansion proposed in the DEIR, isn't it logical that the circle of influence of these criteria has expanded and thus more land should be bought out to safely buffer airport noise and air impacts? If LAWA has determined the window mitigation program to be adequate, why wasn't the window mitigation adequate when the original homes and property were purchased? Please expand on the reasoning that, although

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LAX has expanded and adverse impacts have increased, that less mitigation, (namely simple window replacement) is adequate?

**Response:**

Please see Response to Comment PC02214-4.

**PC02214-7**

**Comment:**

Comments on Mitigations

Buy out of all residents exposed to the 65Db impacts not considered. If LAWA sincerely wanted to adequately and equitably construct an international gateway to the world airport, it could accomplish this by buying out every residence within the 65 dB area. This, and only this, would show a good-faith effort to compensate citizen for impacts, which according to the DEIR are impossible to mitigate.

**Response:**

Comment noted. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

**PC02214-8**

**Comment:**

Windows

Section 15131 (b) of the CEQA Guidelines states, "Economic or social effects of a project may be used to determine the significance of physical changes caused by the project." The mitigation of installation of soundproof windows to lessen the sound impacts does not take into account the physical changes caused by the mitigation. Does LAWA think that people will remain enclosed in their homes? People living near the ocean rarely have air conditioning. This window mitigation assumes that people live indoors all the time and keep all window closed. It does not address the potential increased cost of fans and/or air-conditioning, which would need to be installed to keep the house cool during the summer. Where does the DEIR address the impacts of living in a sealed home on energy use/consumption? Where does the DEIR address the impact to people who will now have to purchase air conditioning and circulation systems? Where does the DEIR address the added energy consumption cost to resident?

Cause and effect impacts - Energy

In light of the recent energy crisis, the increased cost of energy could be a major impact, especially for elderly residents on fixed incomes. Where does the DEIR address the adverse impacts caused by the very mitigation measures it proposes? How will LAWA mitigate the increased energy costs to run air conditioners and fans, which were not necessary prior to the window replacement? Does the LAWA propose to pay the increased costs for these residences?

**Response:**

Please see Topical Response TR-LU-3 for a description of the residential sound insulation provided under the Aircraft Noise Mitigation Program (ANMP). Air circulation or air conditioning systems and the installation of acoustically-rated doors and windows are included as part of sound insulation. The use of these doors and windows prevents cooling loss and therefore increases the effectiveness of the air conditioning or ventilation system. Current participants have not expressed any concern to LAWA about increased electrical bills. Regarding the recent energy crisis experienced in 2000-2001 the City of Los Angeles did not experience any supply shortfalls, and sold surplus electricity to meet the shortfalls experienced by other utilities.

**PC02214-9**

**Comment:**

Consideration of Outdoor Noise as a Significant Adverse Impact - While I understand that LAWA can't mitigate for aircraft outdoor noise, it should be considered as an impact and should also be considered

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as reason to offer relocation to impacted residents. This mitigation does not address the impacts of outdoor noise. Where the impacts of outdoor noise considered?

**Response:**

See Topical Response TR-LU-4 regarding outdoor noise levels.

**PC02214-10**

**Comment:**

Traffic Mitigation - Section 15126.4 (2) of the CEQA Guidelines states, "Mitigation's measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." Does LAWA have all approvals necessary to accomplish the traffic mitigations it proposes?

**Response:**

This Draft EIS/EIR and Supplement to the Draft EIS/EIR are one step in the process of obtaining the necessary approvals. Further analysis may be necessary after approval of the Draft EIS/EIR and Supplement to the Draft EIS/EIR; however, all necessary approvals and permits would be obtained prior to project implementation.

**PC02214-11**

**Comment:**

What source of funding will the LAWA and the City of Los Angeles use to pay for the mitigations, including the new freeway accesses?

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02214-12**

**Comment:**

Adverse Economic Impacts to Local Residents - The DEIR discusses the economic benefits for the City of Los Angeles that will result from the proposed project. Why doesn't the DEIR discuss ways that impacted citizens will be compensated for exposure to adverse impacts with all the money made from the LAX expansion? Has the cost of alleviating future health effects caused by exposure to air and noise impacts been assessed?

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the environmental effects of the proposed alternatives, including "effects" as defined in 40 CFR 1508.8 of NEPA, which include, among other topics, economic impacts, and considers both adverse and beneficial effects of each alternative. Mitigation measures are provided in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for significant adverse impacts, such as those related to noise impacts (see Section 4.1, Noise, and Section 4.2, Land Use, of each document, along with the supporting documentation found in Appendices D and S-C and Technical Reports 1 and S-1) and air quality (see Sections 4.6, Air Quality, and 4.24.1, Human Health Risk Assessment, along with the supporting technical documentation found in Appendices G and S-E and Technical Reports 4, 14a, S-4 and S-9a). Those mitigation measures serve to reduce the adverse impacts, which in some cases, depending on the particular alternative, would be reduced to a level less than significant. The costs of those mitigation measures would be borne by LAWA as part of the project costs. Moreover, a new alternative - Alternative D - was added subsequent to publication of the Draft EIS/EIR and provides for a build alternative that would have fewer/lesser environmental impacts than the other build alternatives, and in many aspects would be environmentally superior to the No Action/No Project Alternative. This is especially true relative to traffic, air quality, and human health risk impacts, which would be substantially less (better) under Alternative D than under the No Action/No Project Alternative (see Section 3.6, The CEQA Environmentally Superior Alternative, of the Supplement to the Draft EIS/EIR). Also, aircraft noise exposure impacts would, in general, be less under Alternative D than under the No Action/No Project

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Alternative. The costs for Alternative D and the associated mitigation measures, which would enable future operation of LAX to have less of an impact on the environment and surrounding community than would otherwise occur under the No Action/No Project, would be borne by LAWA, and not by local taxpayers through City's General Funds.

#### PC02214-13

**Comment:**

In both the air, noise and traffic sections, the DEIR discusses the thresholds of impacts as being the difference between the baseline and the final measured levels. This difference is said to be within an acceptable range. In other words, the baseline level is assumed to be zero. This makes a number of tables showing air quality data appear better than they really are. The data is misleading to the layperson. It misrepresents what the real totals are and does not disclose the actual level of impact. It is not until the reader looks to the Appendices where the reader is shown the true numbers compared to the regulated levels. Please expand on LAWA's reason for presenting the data in this fashion. Why did LAWA print the most useful tables with the most important information in the appendices?

**Response:**

Please see Topical Response TR-GEN-1 regarding the appropriate baseline for determining the significance of project impacts. In accordance with federal and state requirements, for purposes of determining significance, the Draft EIS/EIR and Supplement to the Draft EIS/EIR compare future project-plus-background concentrations to the National and the California Ambient Air Quality Standards (NAAQS and CAAQS, respectively).

#### PC02214-14

**Comment:**

Increased Use of Reclaimed Water - Where does the DEIR discuss that reclaimed water use will increase in the San Fernando Valley due to displaced surface and groundwater needed to serve the expanded LAX?

**Response:**

The potential for displacement of surface/groundwater potable supplies with recycled potable water in various parts of the LADWP service area is largely dependent upon the existing and planned local water supply/distribution infrastructure in each area of the metropolitan area, which is the responsibility of LADWP. Accordingly, as is the case with all development projects in the Los Angeles area, water sources for public supply are determined by LADWP, as necessary; regardless of where development occurs, water supplied to the LADWP distribution system comes from a variety of mixed sources. Please also see Response to Comment PC01222-11.

#### PC02214-15

**Comment:**

Air Quality

Comments on Appendix G. Air Quality Impact Analysis

Page 4, Section 2.1.3.1, Mobile Sources, Aircraft Operations - the DEIR states, "EDMS3.2 does not calculate emissions of PM10 from aircraft, so these emissions were calculated as described in more detail below. "Three sources used to develop a PM10-Emission index are listed. Two of the three are dated November 1994 and September 1985 respectively. (In fact the 1985 publication uses pre 1980 emission factors.) In light of both technical advances and health effects studies related to PM10 exposure, these two sources of information seem outdated. Why didn't LAWA use more recent data, instead of using 1980 data?

For example, drinking water quality and storm water quality standards have become much more stringent in light of new health effects studies. It makes sense that the same would hold true for air quality standards. Why is the LAWA not being as stringent in meeting the public concerns regarding air quality?

**Response:**

As stated, the PM emission factors developed for this analysis represent the most realistic, thorough and up-to-date data for commercial aircraft currently available and help to advance the information contained in the 1985 and 1994 reports. Because these more recent emission factors are based on a.) an aggregate from all aircraft operational modes (i.e., take-off, landing, climbout, etc.) and b.) a predominately older aircraft fleet (i.e., B727, B737, DC10, etc.), they are considered to be conservatively high values relative to those expected from the fleet at LAX. As a result, it is not expected that the results from the analysis has significantly under predicted the potential impact of PM emissions from aircraft. Please see Response to Comment AR00003-53 regarding PM emission factors.

**PC02214-16**

**Comment:**

G. Air Quality Impact Analysis 2.1.3.1, Mobil Sources, Aircraft Operations, page 4, Aircraft Operations, the DEIR states, "Emissions associated with the use of reverse thrust on aircraft engines were not quantified. Currently emission factors have not been developed for reverse thrust. The relative time that aircraft use reverse thrust compared to the time spent in other operational modes is minimal, thus emissions for this mode is assumed to have minimal impact on emission inventories." How does LAWA justify the assumption that the impact of such emissions is minimal and need not be quantified?" Approximately 2000 flights go in and out of LAX every day. At 7 seconds per landing, this equates to 4 hours per day of this kind of emission. Please expand on why LAWA assumes that because emission factors have not been developed for reverse thrust that the impacts are insignificant. How does the LAWA justify stating that the reverse thrust emissions are assumed to have minimal impact on emission inventories and yet the lead agency considers the impacts from charbroiling at a restaurant to be significant? (Table 5, page 18) Considering the number of aircraft landing, taxiing and taking off from LAX, even a few seconds of a particular engine operation should not be considered negligible.

**Response:**

Please see Response to Comment AF00001-21 regarding the use of reverse thrust in air quality emissions estimates.

**PC02214-17**

**Comment:**

Off Airport, Pg. 16, Why didn't the DEIR examine the air impacts that would occur if a regional approach were taken rather than all increases in air traffic going through LAX. Please expand on LAWA's reason for not evaluating noise, traffic and air impacts distributed within airports throughout Southern California rather than concentrated in the LAX area. How did LAWA conclude that a regional approach would not avoid or lessen impacts?

**Response:**

Subsequent to the publication of the Draft EIS/EIR, a new alternative - Alternative D - was added to the range of alternatives currently being considered for the LAX Master Plan. Alternative D, which is designed to limit future (2015) activity at LAX to a level comparable to that of the No Action/No Project Alternative, is consistent with the policy framework of the SCAG 2001 RTP Regional Transportation Plan that emphasizes the need to accommodate future regional aviation demand through improvements at other airports in the region. The environmental impacts associated with SCAG's regional aviation plan are addressed in the Final EIR for the SCAG 2001 RTP. The environmental impacts specific to Alternative D are fully addressed in the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

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#### PC02214-18

**Comment:**

Same Section page 5, top paragraph, the DEIR states, "Alternatives A and B were assumed to have the same number of operations and associated impacts as Alternative C in 2005.... Since the SIMMOD model was not run for Alternatives A and B in 2005, those small differences in taxi and queue times could not be incorporated into the analysis for those alternatives, but the differences were considered to be minor." Please explain more simply why LAWA didn't run the models with the corresponding data, or elaborate more specifically as to why they made the above assumption? Table 3 on page 8, did not help me to understand this.

**Response:**

The project implementation phasing for each alternative in 2005 results in an airfield that operates in the same way at this point in the development of each. The limitations of these airfield layouts would be similar and therefore the operational activity and associated taxi and queue times would also be similar. Given these similarities, it was not necessary to simulate each case.

#### PC02214-19

**Comment:**

Attachment C. in Technical Report 4, Air Quality  
G. Air Quality Impact Analysis, Section 2.1.3.2, page 19, top, The DEIR states, "Specific sources that were identified in the LAX Master Plan to be replaced/decommissioned due to the reconstruction or elimination of their associated facilities were deleted from the estimates for the alternatives." There is a distinct difference between replaced and decommissioned. If a source is to be replaced, then emissions from the replacement source should be considered. Why weren't the emissions from these replacement sources included in the analysis? Full disclosure of impacts cannot be made if impacts from these replacement facilities are not included.

**Response:**

The commenter is correct that "replacement" and "decommissioning" are distinctly different, whereas the construction of the sentence in Appendix G, Section 2.1.3.2 on page 19 using the phrase "replaced/decommissioned" does give the impression that these two words could be considered interchangeable. The choice of terminology was incorrect and confusing. For clarification, any emission sources that were expected to be replaced as a result of any build alternative in the Master Plan were indeed included in the air quality analyses.

#### PC02214-20

**Comment:**

Where are impacts of VOC from fuel dumping assessed? If so, what section discusses this?

**Response:**

Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

#### PC02214-21

**Comment:**

G. Air Quality Impact Analysis, page 23, Natural Gas Combustion, the DEIR states, "Some land owned by LAWA adjacent to LAX is part of an approved LAX Northside development that has not yet been commercially developed. It is assumed that under the No Action /No Project alternative in the 2005 and 2015 horizon years, commercial development in this area would progress under the approved LAX Northside EIR project (the EIR was approved in 1984)." Could LAWA discuss how the conclusions for cumulative impacts for the 1984 EIR were accounted for in the current DEIR?



**Response:**

The LAX Northside EIR developed in 1984 provided general information on the proposed land use (including approximate areas to be developed under several commercial categories, such as business park, offices, hotels, etc.). This data was used in conjunction with currently available models from U.S. EPA (AP-42), CARB (EMFAC 2002), and the SCAQMD CEQA Handbook to determine emissions from the LAX Northside project in 2005 and 2015. Essentially, the emission estimates for the LAX Northside Project have been updated to reflect the use of more accurate emission models. These updated emissions are included in the No Action/No Project emission inventories.

Please see also Response to Comment AL00018-60 regarding cumulative impacts.

**PC02214-22**

**Comment:**

G. Air Quality Impact Analysis Section 2.2.2, Receptors. The DEIR states, "The height of all receptors was set to 1.8 meters above ground level (EDMS default), the approximate breathing height of adults standing on the ground." It would have been more prudent to include analysis for the breathing level of people in wheelchairs, and small children. Data collected at this level would address impacts to sensitive receptors, including the elderly and small children. Why wasn't analysis also conducted at this lower height?

**Response:**

The use of the 1.8-meter (~ 6 feet) breathing height is standard practice in pollutant dispersion modeling. Although those particular groups the commentor mentioned are sensitive to effects of air pollution, the effects are not solely limited to them. The 1.8-meter height is presumed to account for the majority of the population.

**PC02214-23**

**Comment:**

G. Air Quality Impact Analysis - Table 7, page 26 The listing of Discrete Receptors is very helpful, it would have been more helpful to see the corresponding results in another table. Where are the results of the analysis on the Discrete Receptors in Table 7? G. 2.2.3, Land Use Classification, the DEIR states, "Note that the selection of urban dispersion coefficients in EDMS 3.2 is limited to aircraft in the takeoff mode, as well as stationary sources including GSE." Why don't the coefficients include aircraft in the landing mode and how would results differ?

**Response:**

The results of the modeling at discrete receptors are included with the total results. Impacts at any discrete receptors do not exceed the maximum concentrations listed in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Users of EDMS 3.2 are unable to choose dispersion coefficients for modeling of aircraft landings. Therefore, internal default settings are used.

**PC02214-24**

**Comment:**

PM10 calculations in Attachment H to Technical Report 4, Air Quality - What kind of public outreach effort was taken with respect to all technical evaluations and the generation of these models and the selection of assumptions that were input into these models? Why didn't the LAWA seek public input as to which constituents were of most concern?

**Response:**

Prior to undertaking the air quality analyses contained in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, LAWA prepared an Air Quality Assessment Protocol that identified all of the models, sources of input data, assumptions, etc. used and/or developed in support of the assessments. This Protocol was reviewed and commented on by the SCAQMD, and any necessary changes were made. This agency was apprised of any updates and advancements made to the models, emission factors,

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etc. that occurred while the assessments were conducted. Public Meetings were also held in connection with the Draft EIS/EIR where the air quality analysis approach and results were presented and discussed.

#### **PC02214-25**

**Comment:**

LAX airport is already operating beyond its current operating permit capacity. What government entity authorize that LAX could to operate beyond its permitted capacity? How, and from which entity was this authority granted? Are there any other airports in California that operate beyond their current operating permit capacity?

**Response:**

Please see Topical Response TR-GEN-3 regarding the existing activity level at LAX and legal limitations on LAWA's ability to control activity levels.

#### **PC02214-26**

**Comment:**

Not appropriate - suggest proportional mitigation this is proportional to the impact Distribution of Funds Generated for LAX Expansion Could LAWA expand on how and where funds from the LAX expansion will be spent? Will most all the financial benefits be returned to better the local areas adversely affected by the project? If 80 percent of the impacts will occur in this area, then 80 percent of the revenue should be spent in the impacted area to mitigate adverse impacts.

**Response:**

Comment noted.

#### **PC02214-27**

**Comment:**

Public disclosure  
How can a lead agency mitigate an impact it cannot quantify? Because it is not quantified in an any existing study does not preclude the agency from conducting its own study. Stating the data is not available and therefor assuming that there is not substantive impact is inadequate disclosure by the standards of CEQA. For example, numerous studies have been done on sleep disturbance, particularly in Europe. Inadequate data will result in inadequate disclosure and make it impossible for decision-makers to make informed decisions. Could LAWA please expand on its efforts to find current information on long-term health effects of sleep disturbance and other areas where the DEIR states that data was not available?

**Response:**

Please see Response to Comment AL00017-52. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption in Section 4.1, Noise, with supporting technical data and analyses provided in Appendix S-C1. Please also see Topical Response TR-N-5 regarding nighttime aircraft operations.

#### **PC02214-28**

**Comment:**

Adequacy of Disclosure  
Sect 15151 Section 15150 of the CEQA Guidelines states," An EIR should be prepared with a sufficient degree of analysis to provide dicisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of a EIR is to be reviewed in the light of what is reasonably feasible...the EIR should summarize the main points of disagreement

among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." Please expand on why, in light of references made above, LAWA believes it has made a good faith effort. Especially with reference to the old data selected in many cases.

**Response:**

Comment noted. The nature of, and basis for, the information used in the Draft EIS/EIR analyses are provided in the "General Approach and Methodology" discussion within each of the 27 environmental disciplines presented in Chapter 4 of the document. Additional explanation is provided, where appropriate, within the related appendices and technical reports. A discussion and evaluation of updated information is provided within Chapter 4 of the Supplement to the Draft EIS/EIR.

**PC02214-29**

**Comment:**

Discussion of "Blackout Period"

Is there currently a "blackout" period where no aircraft can fly at LAX. My recollection is this time period was between 11:30pm and 5:30 am. Does this blackout period apply to all aircraft, passenger, and cargo? If there is a blackout period, why do plane still fly into and out of LAX between 1:30 am and 2:30 am practically every night?

**Response:**

There is no period of time during which aircraft may not operate at LAX. Please see Topical Response TR-N-7 regarding noise abatement measures/enforcement.

**PC02214-30**

**Comment:**

Noise Impacts

Why does it appear that Technical Report 14b. Health Effects of Noise Technical Report selectively discloses information and impacts?

**Response:**

Technical Report 14b of the Draft EIS/EIR summarizes the main findings of several studies and reports related to the health effects of noise and provides specific citations of the subject studies and reports. The comment provides no indication of where or how the conclusions of the referenced studies and reports have not been accurately summarized.

**PC02214-31**

**Comment:**

Technical Report 14b, Introduction, page 1, the DEIR states, "Factors that contribute to an individual's reaction to noise include the sound level, frequency, and duration..." Why doesn't the study include ambient noise as something an individual's reaction to noise is based on? The problem is that the baseline noise levels are already high. The ambient noise for people living close to LAX is already too high, so looking at the difference between the baseline level that is already too high, and another increase on top of that level makes the total level seem less that it truly is.

**Response:**

Section 4.1, Noise, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR provided information regarding existing noise levels at and around LAX. Under the requirements of NEPA, the environmental effects of each build alternative are to be measured against the environmental conditions that would otherwise occur under the No Action/No Project Alternative. Under the requirements of CEQA, the environmental impacts of the proposed project and alternatives are to be measured against the environmental conditions that existed at the time of the Notice of Preparation. The noise impacts analyses for the Draft EIS/EIR and the Supplement to the Draft EIS/EIR were completed in accordance with those requirements.

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#### PC02214-32

**Comment:**

What recent studies have been conducted on the health effects of long-term sleep disturbance?

**Response:**

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Based on careful review of numerous studies and research related to nighttime awakenings from single event noise, LAWA developed a threshold of significance to be used in the CEQA analysis of the four build alternatives for the LAX Master Plan. The development and application of this threshold relative to the four build alternatives were presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR. Although the analysis of sleep disturbance in Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR is superseded by the information and analysis presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR, other health effects of noise are described in Section 4.24.2 of the Draft EIS/EIR and Technical report 14b.

#### PC02214-33

**Comment:**

Technical Report 14b, Physiological Health, page 1, the DEIR states, "Hearing loss has been conclusively linked to noise exposure; however, research regarding other physiological effects is not conclusive." Did it occur to LAWA that perhaps more research needs to be done? This subject has been studied extensively, especially in Europe. Did LAWA, or its consultant really make a genuine effort to obtain recent studies?

**Response:**

Numerous studies and reports were reviewed in the evaluation of health effects of noise, including information from as far back as the mid-1970's to as current as June 2002 (for the noise analysis completed in the Supplement to the Draft EIS/EIR), and included local, national, and international sources. Inasmuch as many of the more recent reports reference and build upon the analysis and conclusions of earlier hallmark studies in the field of health effects of noise, it is not unusual or inappropriate to cite studies completed over the last few decades. The comment does not provide any specific references to recent studies that should have been used in the analysis.

#### PC02214-34

**Comment:**

2.2 Physiological Effects Other Than Hearing Loss

The DEIR states, "The researches felt that their results confirm the link between chronic exposure to noise and elevation of stress hormones, elevation of resting blood pressure, and differential cardiovascular reactivity." Would it not make sense to relate these physiological effects to lack/disturbance of sleep as well?

**Response:**

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

#### PC02214-35

**Comment:**

Thresholds of significance should be adjusted to reflect the difference between the magnitude of noise during the day Vs the magnitude of that same noise impact at night, when the ambient noise level is much lower. Noise disturbance at night should be treated the same as a toxin with an acute effect. During the last year, large jets land/or take off at LAX every night between 2:00 and 3:00am. On Friday

nights, the noise of landing and departing planes is constant until 10:00 pm. Plane traffic increases dramatically every morning at 6:00am. These general patterns of operation do not even afford residents in our area with the same consideration given to residents impacted by temporary construction projects within the City of Los Angeles. Hours of construction are limited to 8:00am to 3:pm for many projects. The DEIR refers to a "blackout time". Every night planes takeoff and land during those so-called blackout hours. Is there some kind of penalty assessed in a plane lands during this "black-out" time period?

**Response:**

The CNEL metric used to evaluate the significance of impacts incorporates a 10 decibel penalty on all nighttime operations, in part to account for the difference between daytime and nighttime ambient noise levels. Please see Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Responses TR-N-2.1 and TR-N-2.4. The commentor referred to the phrase "black out time", which is not used within the noise section of the Draft EIS/EIR. However, based on recent Court of Appeal ruling in the "Berkeley Jets" case at Oakland International Airport, additional sound insulation is recommended for areas exposed to single event Sound Exposure Levels (SEL) in excess of 94 decibels if a recommended restriction on easterly departures during the night hours fails the required tests under FAR Part 161. This mitigation measure (MM-LU-2 - Incorporate Residential Dwelling Units Exposed to Single Event Awakenings Threshold into Aircraft Noise Mitigation Program) is identified in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR. For information on operating penalties, please see Topical Response TR-N-7 regarding noise abatement measures/enforcement.

**PC02214-36**

**Comment:**

Does the restriction in flight time apply to freight planes as well? Is there any type of plane that is allowed to land at LAX regardless of the time on night?

**Response:**

The LAX Noise Abatement Rules and Regulations apply equally to all aircraft users. There are no restrictions on the type of aircraft that may land at LAX during the night hours. Please see Topical Response TR-N-7 regarding noise abatement measures/enforcement.

**PC02214-37**

**Comment:**

If so, what means have other airports used to prevent take-offs and landings during the middle of the night?

**Response:**

There are a number of airports in Southern California and elsewhere throughout the United States that have achieved full or partial curfews or other nighttime noise restrictions (limits on the loudness of individual aircraft) either through litigation (John Wayne & Long Beach) or through voluntary measures (Burbank). These airports had these restrictions in place when Congress passed the Airport Noise and Capacity Act of 1990. As a result, these restrictions were "grandfathered" and are not subject to the requirements of FAR Part 161-Notice and Approval of Airport Noise and Access Restrictions. Section 7.1.2 and Section 7.1.2.1 of Appendix D "Aircraft Noise Technical Report" of the Draft EIS/EIR describes this process in greater detail.

**PC02214-38**

**Comment:**

2.2, page 3, last paragraph, the DEIR states, "The relationship between noise and these effects has not yet been quantified." The text then references a 1982 report written by the US Environmental Protection Agency. Why wasn't a more recent report used as a reference? Should explain why more

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recent data was not reasonable to acquire...it would seem that older data might not provide the decision makers with enough data to make informed decisions

**Response:**

Please see Response to Comment PC02214-33 regarding the extent of studies and reports reviewed relative to the health effects of noise.

**PC02214-39**

**Comment:**

3. Psychological Health, page 3, the DEIR states, ".....sleep disturbance, learning effects, and work performance effects. Many findings from survey reports show that there is little reliable evidence on the relationship between noise exposure and mental health." Again, surely there must be more recent data than the 1987 report referenced here. Why didn't LAWA use more recent data?

**Response:**

Please see Response to Comment PC02214-33 regarding the extent of studies and reports reviewed relative to the health effects of noise.

**PC02214-40**

**Comment:**

3.2 Sleep disturbance, page 4, the DEIR states, "A greater variable though, is whether windows are open or closed." Most people have windows open at least somewhat at night. People living within earshot of the ocean waves sleep with their windows open and have paid a premium for that benefit. LAWA's only mitigation is to sound proof windows, which require that windows be closed in order to be soundproof. This is not adequate compensation for what these people have paid for and will be losing. Why has LAWA not offered to compensate these citizens by buying their property so they can relocate? Where does the soundproofing mitigation take into account the added cost of running an air filter system and air conditioning? Will LAWA reimburse citizen for their increased power bills?

**Response:**

The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1, and Technical Report S-1. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program and Topical Response TR-LU-5 regarding noise mitigation.

**PC02214-41**

**Comment:**

3.2, page 4. The DEIR states, "field studies were also conducted, in which subjects were exposed to noise in their own homes, using real or simulated noise." The studies referenced range in age from 1975 to 1989. A study that is a quarter of a century old would be hard pressed to adequately represent the advances made in scientific study that have occurred since. Why did LAWA use these older studies, particularly one that is over 25 years old?

**Response:**

Please see Response to Comment PC02214-33 regarding the extent of studies and reports reviewed relative to the health effects of noise.

**PC02214-42**

**Comment:**

Certainly, LAWA could have commissioned a study on sleep in the actual area of the LAX expansion. LAWA has planned for this expansion for years and should have had ample time to find all the pertinent studies that might be necessary.

**Response:**

As described in Section 4.24.2, Health Effects of Noise, of the Draft EIS/EIR and further discussed in Technical Report 14b of the Draft EIS/EIR, several studies have been conducted at major airports around the world evaluating the relationship between aircraft noise levels and sleep disturbance, with varying results and conclusions. While there is some consensus that there is a relationship between aircraft noise levels and nighttime awakenings, there is no agreement within the scientific community as to the degree of the effects or the level at which they become significant. Based on careful review of numerous studies and research related to nighttime awakenings from single event noise, LAWA developed thresholds of significance to be used in the CEQA analysis of the four build alternatives for the LAX Master Plan. The development and application of these thresholds relative to the four build alternatives were presented in Section 4.1, Noise, of the Supplement to the Draft EIS/EIR.

**PC02214-43**

**Comment:**

3.2 page 5 a 1990 study, "indicates that awakenings can be expected at a much lower rate. This research showed that once a person is asleep, it is unlikely that the individual will be awakened by single-event noise ". This study assumes a person is fully asleep. How can LAWA justify subjecting people to more noise that they already endure without giving them an opportunity to relocate? Would the one airplane every 20 minutes starting at 1:20 am until 3:40 am be considered a group of single-noise events? If so, does this allow LAWA to lessen the impact of this noise in the calculation of whether it is an adverse impact or not?

**Response:**

As described in Section 6.1.2 of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR, the analysis of single-event noise relative to nighttime awakenings was based on the calculation of a noise contour line that represented the area exposed to at least 1/10 of an aircraft operation on the average annual day that exceeded the 94 or 96 decibels of Sound Exposure Level (SEL). This equates to a probability of 1 percent that a person living on the contour line would be awakened by aircraft noise on any given night. As such, this is not an averaging of multiple noise events over a certain time period (i.e., one airplane every 20 minutes starting at 1:20 am until 3:40 am as suggested in the comment) and is not considered to somehow lessen an impact. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02214-44**

**Comment:**

What were the results of the re-evaluation of the environmental assessment on the El Segundo Blue Butterfly?

**Response:**

Due to the location of this comment under the noise subheading of the comment letter, it was assumed that the commentor was referring to the results of the evaluation of noise on the El Segundo blue butterfly. Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR included an analysis of indirect effects of jet exhaust emissions, fugitive dust, and light and glare on the El Segundo blue butterfly. Impacts from noise were not evaluated as the El Segundo blue butterfly has no auditory organ and therefore no sense of hearing.

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#### **PC02214-45**

**Comment:**

What source of funds will provide the money to implement the traffic mitigations?

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

#### **PC02214-46**

**Comment:**

Did they do a health risk assessment associated with traffic impacts?

**Response:**

Emissions associated with on- and off-airport traffic were estimated and included in the evaluation of health impacts, as discussed in Section 4.24.1, Human Health Risk Assessment (CEQA), and Technical Report 14a of the Draft EIS/EIR and Section 4.24, Human Health and Safety, and Technical Report S-9a, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

#### **PC02214-47**

**Comment:**

The LA City Council would be hypocritical to approve an ordinance within the City banning smoking because of health effects associated with second hand smoke and yet it will approve subjecting communities to the effects of toxic particulate matter by approving this expansion. Why does the DEIR constantly discuss the financial benefits to the City of Los Angeles, and does not adequately discuss long-term health effects associated with the operation and expansion of this airport?

**Response:**

Human health impacts are addressed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-3 regarding human health impacts.

#### **PC02214-48**

**Comment:**

Where will the revenue generated from the airport go? They should not all go to the general fund. That would not be equitable. The majority of funds should be spent in the communities impacted by the expanded airport as mitigation. The DEIR already states that major impacts cannot be mitigated, the City should at the very least show a good faith effort to mitigate as much as possible, and using the majority of revenue generated from the expansion to improve the communities surrounding the airport would be some measure of mitigation. If an impact cannot be mitigated with an in-kind mitigation measure, (which the DEIR states is the case for numerous impacts), then another type of mitigation should be made. In fact, a citizens committee made up of members of the surrounding community should be organized to oversee the spending of the funds.

Many aspects of the impacted Cities could be improved, both functionally and aesthetically.

**Response:**

Comment noted. Please see Response to Comment AR00003-63. Also please refer to Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding measures to ensure compatibility of land uses and Section 4.21 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding programs to enhance the aesthetic qualities of the airport area and the surrounding communities.



**PC02214-49****Comment:**

The fact that the lead agency made a minimal effort shows lack of consideration for the community. Public meetings during which a 2.5 hour overview of the project is not adequate when the DEIR consists of a six foot stack of paper. It is admirable that the EIR was put on the Internet, however, the format could have much more user friendly. Further, there are many elderly citizens impacted by the project and most of them are not comfortable with the Internet as a means of obtaining information. The sheer volume of this EIR made it a daunting task to read. The lead agency should have conducted a series of informational workshops throughout the community. These workshops would have explained in detail each chapter. Why wasn't a simple executive summary mailed to impacted residents?

**Response:**

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

**PC02214-50****Comment:**

LAND USE COMPATIBILITY

Table 23, 24 and 25 should be written in the same format with the same units to allow for ease of comparison. The current tables in the DEIR have different units:

Table 23 - ppm,  $\mu\text{g}/\text{m}^3$

Table 24 -

Table 25 - lbs/day, tpy

Column on "Baseline Air Quality" states either ppm or  $\mu\text{g}/\text{m}^3$ . A conversion factor from lbs/day would help to relate this level to the relevant measurement units used in Tables 23 and 24.

**Response:**

The comment is unclear as to what document is being referred to. There are no Tables 23, 24, and 25 in the document. It appears, however, that the comment is questioning the use of different air pollutant measurement metrics in Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR (i.e., ppm,  $\mu\text{g}/\text{m}^3$ , lbs/day, tpy). The metrics presented in the Air Quality are consistent with those set forth in the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS) and the South Coast Air Quality Management District (AQMD) Thresholds of Significance - all of which were used as thresholds of significance for the analysis of air quality impacts associated with each Master Plan alternative.

**PC02214-51****Comment:**

Section 1, Introduction - the DEIR states, " With or without implementation of the proposed LAX Master Plan, the amount of air traffic, surface traffic, and airport activities would increase at LAX as compared to the environmental baseline. As a consequence of the increase in airport activities, emissions of criteria air pollutants from mobile, stationary, and area sources associated with LAX are expected to increase. "Does LAWA mean to imply that LAX will expand regardless of changes to infrastructure and a capacity to deal with such increases? Is this not the reason for the proposed project? The DEIR further states, "However, implementation of the proposed LAX Master Plan provides unparalleled opportunities to mitigate those increases." This opening statement in the DEIR is inappropriate because it implies that the only way to improve the quality of life and the environmental impacts of growth is by implementing the proposed project. Why the introduction inappropriately biased for the approval of the proposed project? Especially in light of the fact that significant adverse impacts that cannot be mitigated will occur due to the proposed project. This introductory language should be deleted. Further, the statement should be deleted because it is misleading to the layperson. At the

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very least, a copy of the Executive summary could have been sent to all residents contiguous to the LAX complex.

**Response:**

Comment noted. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

**PC02214-52**

**Comment:**

According to the summary document, page 4-2, "Population Exposed to Aircraft Noise Above 65 CNEL in 2015" the No Project alternative shows the least amount of additional people exposed to this noise threshold.

**Response:**

Comment noted. The type of information described in the comment does not appear on page 4-2 of the Draft EIS/EIR. Tables 4.1-9, 4.1-10, 4.1-13, and 4.1-16 of the Draft EIS/EIR present information pertaining to population exposed to aircraft noise levels above 65 CNEL in 2015, compared to environmental baseline conditions, for the No Action/No Project Alternative, Alternative A, Alternative B, and Alternative C, respectively. Table S4.1-24 presents comparable information for Alternative D. While the No Action/No Project Alternative would result in least number of people exposed to such noise levels in 2015 compared to Alternatives A, B, and C (i.e., 44,330 compared to 44,380, 60,830, and 44,580), Alternative D would result in even fewer people exposed to such noise levels (42,980). Alternative D is evaluated in the Supplement to the Draft EIS/EIR.

**PC02214-53**

**Comment:**

Page 4-6 last item, "LAX Interim Plan" Whether or not the Proposed Project fulfills or does not fulfill the "Master Plan as a comprehensive, long-term plan." Should be secondary to the evaluation of the environmental impacts to the citizens living around and impacted by the proposed project, therefore, it should be deleted as a consideration in this table.

**Response:**

Comment noted.

**PC02214-54**

**Comment:**

The DEIR attempts to show the NA/NP alternative as environmentally inferior, however the analysis does not take into account that inability to meet the needs of increased traffic will result in traffic moving elsewhere. If the facilities are not in place to deal with the increased traffic, the business will eventually go elsewhere.

**Response:**

The conclusion of the Draft EIS/EIR that Alternative C would have the least negative impacts to the communities and the region has been superseded by that of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

**PC02214-55**

**Comment:**

Page 4-18 Noise, LAWA describes its "LAX Aircraft Noise Mitigation Program, and offering increased acquisition and relocation program. Both of these measures could be implemented to provide additional

benefits for minority and low-income individuals and communities." These same considerations should be given to any citizen regardless of income or ethnicity.

**Response:**

Comment noted. Please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program.

**PC02214-56**

**Comment:**

Same page - Air Quality and Health Effects - The DEIR states that, "Increased emissions of Nox, particulate matter and toxic air pollutants associated with all of the build alternatives, could have significant impacts throughout. However, due to the lack of available background data and limited information of the cumulative effect of multiple air pollutants, the effect of the LAX Master Plan on cumulative health risks among minority and low-income populations cannot be quantified or fully analyzed." Why hasn't an effort been made to obtain this kind of information? Considering all the other information gathered and studies conducted for this EIR it seems there would have been time to conduct these studies. Why isn't LAWA as concerned with the cumulative health risks among all populations, not just minority and low-income?

**Response:**

Methods are still being developed to evaluate cumulative risks for chemicals sharing a common mechanism of toxicity. For example, EPA released a preliminary assessment of the cumulative risks of organophosphorus pesticides in December 2001. The preliminary assessment focused on methods to describe the risk. A revised document was subsequently released in June 2002; the revised risk assessment presents a range of risk estimates that reflect the variability inherent in an assessment of such scope (EPA, 2002).

The text cited in this comment comes from Section 4.4.3, Environmental Justice. Environmental justice policies recognize that environmental justice issues have been raised more in the context of low-income and minority communities. As stated in the California Air Resources Board (CARB) Neighborhood Assessment Program Work Plan (2000), representatives from some communities and environmental groups have for some time maintained that minority communities and communities of lower economic status are more impacted by environmental pollution than other communities.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR provide detailed evaluations of health risks for populations that may be impacted by the LAX Master Plan, including adult and child residents, school children, and workers. Toxicity criteria used in the risk assessment incorporate conservative assumptions designed to protect even the most sensitive individuals, such as children and the elderly. In addition, the Supplement to the Draft EIS/EIR provides maps that quantify risk ranges within community boundaries or locations for each of the alternatives. However, the risk assessment does not quantitatively evaluate the effect of the LAX Master Plan on differential cumulative health risks among minority and low-income populations due to the technical difficulties associated with such a task. These difficulties have been noted by other agencies, such as the EPA and ARB. In ARB's Neighborhood Assessment Program Work Plan (2000), they recognize that, "from an air quality perspective, evaluating environmental justice issues and identifying differences in impacts among communities will require determining cumulative exposures, which is a technically difficult task." As stated in the work plan, no clear guidance exists as to how to assess air pollution impacts at the neighborhood-scale. One of the objectives of ARB's work plan is to develop guidelines, including technical protocols and methodologies, for conducting neighborhood impact assessments.

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

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

Given the recognized difficulties and tools available for evaluation of cumulative risk, both within groups of chemicals that have common mechanisms of toxicity and within populations with differential health status and health care availability, the approach provided in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR is appropriate. With regard to environmental justice issues, the report notes that "LAWA will work in cooperation with the affected communities and appropriate regulatory agencies to support and participate in long-term studies that would contribute to an understanding of these types of environmental impacts."

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

#### PC02214-57

##### Comment:

4-25 off Airport Emissions Key Conclusions-the DEIR explains that, "For CEQA purposes, the three Master plan alternatives have also been compared to the Environmental Baseline to determine whether they exceed the threshold of significance. By 2015 the analysis shows that all three Mast Plan alternatives would result in unavoidable significant impacts for all five criteria pollutants". Are the City of Los Angeles and the LAWA ready to deal with health related law suits resulting from their expansion project? Why doesn't the city either choose a regional approach or buy out all the citizens impacted this project to create a buffer area around LAX?

##### Response:

Comment noted. As described in Chapters 1, 2, and 3 of the Draft EIS/EIR and further explained in Chapter 3 of the Supplement to the Draft EIS/EIR, formulation of the build alternatives occurred within a regional context and each of the proposed alternatives represents a variation of how LAX will fit into a regional plan for the future. Subsequent to the publication of the Draft EIS/EIR, Alternative D, the Enhanced Safety and Security Plan, was added to the range of alternatives being considered. Notwithstanding that all of the proposed alternatives are part of a regional plan, as pointed out above, Alternative D is responsive to the types of concerns expressed by various commentor's on the Draft EIS/EIR that a certain type of regional plan be adopted. Also please refer to Topical Response TR-HRA-3 regarding human health impacts.

#### PC02214-58

##### Comment:

Page 4-53 Human Health Risk Assessment" Reasons for potential decreases include, but are not limited to: Anticipated reduction in older, more polluting engines in aircraft and vehicles resulting from federal mandates to phase-in clearer engines (all alternatives)" What time frame is associated with these mandates and the actual implementation of these potential decreases? When would beneficial effects to human health be realized?

##### Response:

LAWA has committed to providing incentives to help promote clean vehicle fleets and "best-engine" technology; however, timeframes for implementation as a result of these incentives cannot be predicted with absolute certainty. As discussed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, although cleaner aircraft engines may come into use in the future, the air quality impact analysis used current engine emission values for all alternatives and all horizon years. The air quality impact analysis did not assume that older engines were replaced with newer ones. Therefore, the predicted impacts are conservative, since fleet turnover will take place. The timeframe with which this will occur is not predictable in nature.

**PC02214-59**

**Comment:**

Development of the West Terminal Area - The DEIR states, "This shift to the east helps spread emission from east to west and reduces the impact of emissions on air quality in off-airport areas." What areas and population is the DEIR referring too? This change moves impacts closer to the population living in Playa Del Rey adjacent to the coastline. The residential area bounded by Vista Del Mar, Waterview and Purshing is directly north of the west boundary of LAX. By shifting activities west, this will bring LAX activities closed to this particular neighborhood. Could LAWA please provide the thought process and data that supports the above statement, specifically the effect of this shift to the community bounded by Waterview, Vista Del Mar and Purshing?

**Response:**

Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR discusses potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a community basis. Technical Report S-9a of the Supplement to the Draft EIS/EIR discusses potential impacts on a community basis in greater detail.

**PC02215**

**O'Hanlon, Theresa**

**None Provided**

**8/9/2001**

**PC02215-1**

**Comment:**

3 major projects are being built or proposed for our Westchester community: Playa Vista, Howard Hughes Center and LAX expansion. We have been told with the introduction and construction of these projects that there will be little or no impact on our quality of life. Of course the developers of each of these projects has tunnel vision with regard to their own project - but has anyone done a survey about how these 3 major projects impact each other? People buying million dollar homes in Playa Vista don't want a huge airport with its noise & air pollution, movie goers at the H.H. Center won't want to go there if there is airport traffic blocking the way and travelers won't get to the new big airport with a new city (Playa Vista) in the way. Since we can't stop Playa Vista or HH Center and their impact is already being felt on Jefferson & Sepulveda let's not make it worse with the airport expansion.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. In addition, please see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02216**

**Flanagan, Daniel &  
Corlene**

**None Provided**

**9/21/2001**

**PC02216-1**

**Comment:**

The purpose of this letter is to state that, as homeowners, taxpayers and residents of the Westchester community, we are vehemently opposed to any further expansion of Los Angeles International Airport.

We are a young family with two small children (ages 2-1/2 years and 7 weeks) and have chosen to raise our children in the same neighborhood we grew up in, provided the quality of life is such that we can.

We share the same concerns as our neighbors. We want our community to remain as is. We do not want expansion to take more homes, to take away our shopping center or make the traffic congestion in

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and around the airport worse. We have all heard the "plan" to mitigate the traffic, but the human element has been omitted

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, social impacts in Section 4.4, Social Impacts, and residential and business relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. Supporting technical data and analyses are provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As indicated in TR-LU-2, Alternative D does not include any residential acquisition or acquisition within the Westchester business district.

**PC02216-2**

**Comment:**

Noise is already unbearable. For those who qualify for airport-paid soundproofing of their homes, we ask you this..."Must those families remain inside, with windows and doors closed, at all times, in order to escape the noise from ground and air traffic? When do the children get to play outside? Where is the quality of life?"

**Response:**

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels, Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels, Topical Response TR-LU-3 for a description of the residential soundproofing program, and TR-LU-1 regarding quality of life impacts. Outdoor noise levels from 1996 baseline traffic noise and combined aircraft and roadway noise were presented in Section 4.1, Noise (subsection 4.1.3.2) of the Draft EIS/EIR. Outdoor noise levels from Year 2000 traffic noise and combined aircraft and roadway noise were presented in Section 4.1, Noise (subsection 4.1.3.2) of the Supplement to the Draft EIS/EIR. To achieve the full benefits of sound insulation windows need to be closed.

**PC02216-3**

**Comment:**

Air pollution is a concern of all citizens. We have heard residents in Orange County state that developing El Toro Air Base into a commercial airport is unacceptable because the pollution could harm the health of persons living in a retirement community nearby. We do not want anyone's health to become compromised, but is the health of retired individuals living in Orange County more important than that of small children living in Westchester? In fact, Westchester has both the elderly and the very young among its residents.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase. Please also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. As stated in Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.7.3) of the Supplement to the Draft EIS/EIR, LAX emissions under Alternative D would reduce cumulative cancer risks for all areas near the airport relative to the other future year alternatives, including the No Action/No Project Alternative.

**PC02216-4**

**Comment:**

Finally, LAX has been the target of terrorist attacks in the past and we are told by authorities that it remains on the "list" of likely targets. On September 11th, the unthinkable happened in our country. Given that such a horrific thing could actually happen, does it make any sense at all to expand LAX. Does it not make far more sense to have regional airports so that the enemy cannot cripple our air transportation in one strike.

**Response:**

Comment noted. Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02216-5**

**Comment:**

The only thing that makes any sense at all is for the burden (and the advantages) to be shared equally by all...that means the people that sit in their pristine Orange County communities, the people of Riverside and San Bernardino Counties and those in Ventura County, as well. The residents of Westchester, Playa del Rey, Inglewood, El Segundo, Hawthorne have already given enough. It is now time to do the right thing.

Take a regional approach to solving the problem of growth in the air transport industry.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02216-6**

**Comment:**

There is simply no way LAX can be expanded and still allow for quality of life for the many, many hardworking, decent people that live in the area surrounding LAX.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02217**

**Younglove, Esq.,  
Sonia**

**None Provided**

**9/24/2001**

**PC02217-1**

**Comment:**

The draft Environmental Impact Statement (EIS) and Environmental Impact Report (EIR) for the proposed LAX Master Plan is fatally flawed and should be rejected by LAWA and the FAA. Judicial scrutiny of the LAX Master Plan EIS/EIR would undoubtedly determine that its' inadequacies prevent it from being in compliance with CEQA as well as other California and federal laws.

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**Response:**

Comment noted. Please see Responses to Comments below.

**PC02217-2**

**Comment:**

INTRODUCTION

The LAX Master Plan EIS/EIR fails to mitigate many of the environmental impacts such as increased aircraft overflight noise; increased traffic; increased air pollution; destruction of the existing quiet residential communities through the creation of the LAX Expressway and Ring Road; increased cargo aircraft flights with late night overflight noise; negative impact on adjacent coastal recreational areas--beaches, boating, surfing, swimming; and increased safety problems. These environmental impacts affect not only the residents in the immediate vicinity of LAX--Westchester, but also the residents of adjacent communities such as Culver City, Inglewood, El Segundo, Manhattan Beach, Playa del Rey, and Marina del Rey.

**Response:**

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, traffic impacts in Section 4.3, Surface Transportation, community disruption impacts in Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, air quality impacts in Section 4.6, Air Quality, coastal zone impacts in Section 4.14, Coastal Zone Management and Coastal Barriers, recreation impacts in 4.26.3, Parks and Recreation, and safety impacts in Section 4.24.3, Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-MP-1 regarding air cargo activity and demand, Topical Response TR-N-5 regarding nighttime aircraft operations, Topical Response TR-LU-1 regarding impacts to quality of life, and Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D does not include the LAX Expressway or Ring Road.

**PC02217-3**

**Comment:**

Furthermore, the LAX Master Plan EIS/EIR fails to address the possibility of an alternative regional solution to the problem. The City of Los Angeles owns two additional airports-Ontario and Palmdale. However, the LAX Master Plan EIS/EIR does not explore the possibility of expanding those airports to fulfill the projected need of additional passenger and cargo flights.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to Ontario International and Palmdale Regional airports. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and shifts the accommodation of future aviation demand to other airports in the region.

**PC02217-4**

**Comment:**

Only four alternatives have been considered: "No Action/No Project," "Alternative A," "Alternative B," and "Alternative C." The project misleadingly entitled "No Action/No Project" still allows for future passenger growth to approximately 79 Million Annual Passengers (MAP) and the accommodation of approximately 3.1 Million Annual Tons (MAT) of cargo-a staggering 2,279 daily flights by 2015.



**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient, and efficient. Also refer to Topical Response TR-GEN-2 regarding No Action/No Project Alternative assumptions.

**PC02217-5**

**Comment:**

The last expansion approval in 1984 was to 40 MAP yet we are currently at 65 MAP. When was this increase approved?

**Response:**

Comment noted. Please see Response to Comment AL00017-121 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX. Please see Topical Response TR-GEN-3 regarding actual versus projected activity levels. Please see Response to Comment AL00018-19 regarding cumulative impacts.

**PC02217-6**

**Comment:**

In addition, the LAX Master Plan EIS/EIR fails to address the fact that even without any expansion of LAX whatsoever, the existing problem of the substantial adverse environmental impacts with the current airport MAP and MAT still has not been resolved.

**Response:**

The 1996 environmental baseline accounts for the incremental increases in activity at LAX that have occurred up to that point, including airport-related traffic, noise, air pollutant emissions, and other environmental factors that affect the surrounding community. The impacts analysis within the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the environmental effects projected to occur with ongoing increases in activity projected to occur by 2015. The mitigation measures presented in the subject documents provide for both on-airport and off-airport improvements to reduce LAX's impacts to the local community; improvements that would not otherwise occur outside of the Master Plan and EIS/EIR processes. It should be noted that mitigation measures adopted as part of project approval are subject to the monitoring and reporting requirements of CEQA. Similarly, mitigation measures set forth as part of the Record of Decision (ROD) are monitored.

**PC02217-7**

**Comment:**

DISCUSSION

CEQA states that a project will not be approved if it would result in a significant environmental impact, or if feasible mitigation measures or alternatives cannot avoid or substantially lessen the impact. Cal. Pub. Res. Code §§ 21000, et seq. A project with significant impacts will be approved, but only when there are specific economic, social, or other considerations that make it infeasible to substantially lessen or avoid an impact. *City of Santee v. County of San Diego*, 214 Cal. App. 3d 1438, 1450 (1989). According to the court in *Santee*, the approving agency must balance the benefits of a proposed project against its adverse environmental effect. If the benefits outweigh those effects, they may be considered acceptable. *Id.* at 1450. That also means if the benefits do not outweigh the adverse environmental effects, the project must be rejected.

The LAX Master Plan EIS/EIR does not satisfy the standards of CEQA or the *Santee* exception. There are no feasible mitigation measures to substantially lessen all of the adverse environmental impacts. Therefore, the LAX Master Plan EIS/EIR must be rejected.

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**Response:**

Comment noted. Under both NEPA and CEQA, a project can be approved despite significant, unavoidable impacts. If a project would result in significant effects which cannot be avoided or substantially lessened, the agency must prepare a written statement of overriding considerations. Economic, legal, social, technological, or other project benefits are all possible bases for a statement of overriding considerations. See Pub. Res. Code § 201081(b); 14 Cal. Code Regs § 15093(a). Accordingly, projects are regularly approved on the basis of policy considerations despite unmitigated environmental effects. See, e.g., *San Francisco Ecology Ctr. V. City & County of San Francisco* (1975) 48 Cal.App.3d 584, 596-97 (goals of making international airport more convenient, safe, efficient, and quiet were valid overriding considerations).

**PC02217-8**

**Comment:**

Expansion of LAX Will Increase Collision Risks

Two June, 2001 Los Angeles Times articles entitled, "L.A. Runways Are Worst in Near Crashes," and "No. 1 in Airfield Close Calls, LAX Finds Solutions Elusive" indicate that "[e]fforts to find new technologies that will increase runway safety have yet to bear fruit. The FAA is deploying a system that uses ground radars to alert controllers when a plane has trespassed on an active runway. Two of the systems will be installed at LAX, but critics say the technology isn't sophisticated enough to prevent all incursions" (emphasis added). How many near-collisions or crashes will occur as the number of flights increases so drastically?

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02217-9**

**Comment:**

The Noise Is Not Adequately Mitigated<sup>1</sup>

Even if every single impacted structure were to be sound-proofed, residents would still be bombarded by the overflight noise while trying to relax in their backyards.

<sup>1</sup> "9,000 residents still await progress and remain affected by aircraft noise. . . . Over 7,500 additional units remain affected by 65 or greater DNL. Outdoor living pleasures are seriously hampered or detrimentally affected." (August 25, 2000 letter to the FAA from the City of Inglewood containing comments concerning the development of an Aviation Noise Abatement Policy 2000) (<http://www.cityofinglewood.org/depts/ComDev/RSI/FAANoisePolicy2000.htm>)

**Response:**

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels, including thresholds used to identify significant noise levels. Also, see Topical Response TR-LU-3 for a description of the residential soundproofing program and progress in implementing the ANMP. As stated in Section 4.2.3 of the Supplement to the Draft EIS/EIR, Inglewood continues to make progress in implementing their ANMP. As of June 2002, 2168 units are compatible within Inglewood either through soundproofing or acquisition.

**PC02217-10**

**Comment:**

Furthermore, the LAX Master Plan EIS/EIR discusses only noise impacts above 65 dB. The false assumption is that any noise at or below 65 dB is not disruptive or detrimental to the health and welfare of the citizens. However, *Thresholds of Significance: Criteria for Defining Environmental Significance/CEQA Technical Advice Series* (Governor's Office of Planning and Research, Sept. 1994,

at 79) indicates that where residential areas are involved, proposed projects with "exterior noise levels exceeding 55 decibels" must be investigated and addressed.

**Response:**

Please see Topical Responses TR-N-2, in particular TR-N-2.2 and TR-N-2.3 regarding the 65 CNEL threshold and evaluating impacts below the 65 CNEL. Based on 1992 Federal Interagency Committee on Noise (FICON) criteria, Section 4.2.6 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR identify noise-sensitive uses newly exposed to an increase of 3 CNEL within the 60-65 CNEL contour and an increase of 5 CNEL below the 60 CNEL for informational purposes. The complete sentence in the document referenced by the commentor states, "Where residential land uses are proposed with exterior noise levels exceeding 55 decibels, a noise study may be required to investigate special noise insulation features that maintain interior noise levels at or below 45 decibels when doors and windows are closed." No residential uses are proposed under any of the LAX Master Plan alternatives. With regard to existing residential areas, as stated under mitigation measure MM-LU-1 and MM-LU-2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, noise-sensitive uses newly exposed to 65 CNEL or 94 dBA SEL noise levels would be incorporated into the revised Aircraft Noise Mitigation Program (ANMP). The revised ANMP would provide sound insulation to noise-sensitive uses in order to achieve land use compatibility by reducing interior noise levels to 45 CNEL. See also Topical Response TR-LU-3 for a description of the ANMP.

**PC02217-11**

**Comment:**

The Traffic is Not Adequately Mitigated

There are no mitigation measures to lessen the freeway congestion-- particularly on the 405 freeway. The suggestion in the LAX Master Plan EIS/EIR that the 405 freeway would not be impacted by the additional air traffic is absurd. All the departing and incoming passengers and cargo to and from LAX obviously means more cars, vans, trucks, and buses on the streets and freeways surrounding the airport. Why was the additional access road to the 405 freeway near LAX recently approved by the Los Angeles City Council if not to provide additional access for the increased LAX traffic entering the 405 freeway? Anyone who drives on the 405 freeway is aware of the almost constant existing congestion. How can any reasonable person believe that the freeway traffic will not be impacted by the airport expansion?

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-ST-2 regarding the Congestion Management Program and Topical Response TR-ST-4 regarding airport area traffic concerns

**PC02217-12**

**Comment:**

Air Pollution is Not Adequately Mitigated

There are no mitigation measures to lessen the toxic air contaminants. The communities of large airports are subject to vehicular traffic through the airport and nearby areas that produce hydrocarbon emissions in a magnitude of 2,500 tons per year. Motor vehicles produce 24,000 tons per year of carbon monoxide. Aircraft produce at least 6,000 tons per year, and the support equipment 5,000 tons. NOx emissions are higher from aircraft-3,500 tons per year-while vehicular traffic adds 2,500 tons per year.<sup>2</sup> Although measures may exist to reduce these emissions somewhat (i.e., reduce vehicular traffic by use of alternative methods of transportation), the reality is that substantially increasing the MAP and MAT at LAX will proportionately increase the toxic air pollution in the communities surrounding LAX.

2 John Holmes, CEPA Air Resources Board, Research Note 95-4, Air Pollution Mitigation Measures for Airport-Related Activities (1995) at 2.

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**Response:**

While increases in the MAP and MAT at LAX can have a direct effect on air emissions and concentrations, they are not the only factors having a direct impact. As technologies improve and new regulations or guidelines are approved, many emission sources, including on-road vehicles and aircraft, produce fewer air emissions. Changes in fleet mixes, in types of equipment used, or in the use of different fuels can offset a potential increase in emissions resulting from increasing MAP and MAT at an airport. Please see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, with additional technical data in Appendix S-E and Technical Report S-4, for additional information on the calculation of future emissions for all alternatives, future emission factors, and an updated discussion of air quality mitigation measures.

Also, please see Section 4.24, Human Health, of the Supplement to the Draft EIS/EIR. This section contains a very detailed human health analysis, including a Human Health Risk Assessment, which shows that cancer risk would be below CEQA's approved threshold of significance for this environmental source category.

**PC02217-13**

**Comment:**

The Burden of LAX Expansion Outweighs Any Benefits

Obviously, as the population increases in the near and far future, there will be a greater need for additional air transportation. However, the benefits of the expansion of LAX do not outweigh the adverse environment effects, especially when there are alternatives to satisfy the air traffic needs in the future-such as Ontario and Palmdale.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02217-14**

**Comment:**

Furthermore, why should the communities surrounding LAX shoulder the entire burden of the increased air traffic needs of citizens from Orange County who use LAX but refuse construction of an airport in their own community (e.g., El Toro)?

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

**PC02217-15**

**Comment:**

The LAX EIR/EIS Fails to Consider Regional Alternatives

California law requires that "[a]ttention should be paid to alternatives capable of substantially reducing or eliminating any environmentally adverse impacts, even if those alternatives substantially impede the attainment of the project objectives, and are more costly." *City of Rancho Palos Verdes v. City Council of the City of Rolling Hills Estates*, 59 Cal. App. 3d 869, 891 (1976). See also *Foundation for San Francisco's Architectural Heritage v. City and County of San Francisco*, 106 Cal. App. 3d 893, 909 (1980). Palmdale wants expansion of its airport. So does Ontario. Clearly these alternatives would avoid placing a disproportionate burden of the environmental hazards associated with airports on the

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residents of communities surrounding LAX. Ironically, LAWA would save two to four billion dollars by expanding Ontario airport instead of LAX. (See Southern California Association of Governments, Technical Appendix G.)

The holding of Rancho Palos Verdes and Foundation for San Francisco require that attention should be paid to alternatives, however the LAX Master Plan EIS/EIR fails to do so. CEQA also mandates that "[t]he EIR shall include a detailed statement setting forth . . . [a]lternatives to the proposed project." Cal. Pub. Res. Code § 21100(b)(4). The LAX Master Plan EIS/EIR does not discuss all the possible alternatives. Therefore, the LAX Master Plan EIS/EIR does not comply with California law and must be rejected.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to Ontario International and Palmdale Regional airports.

Regarding the commentor's assertion that California law requires an EIR to discuss all possible alternatives, Section 15126.6 of the CEQA Guidelines states that "an EIR need not consider every conceivable alternative to a project."

**PC02217-16**

**Comment:**

CONCLUSION

For all the above reasons, the LAX Master Plan EIS/EIR is flawed and should be rejected by LAWA and opposed by the FAA.

**Response:**

Comment noted.

**PC02218 Cassman, Esq., Alan None Provided**

**9/21/2001**

**PC02218-1**

**Comment:**

I spoke at the Hearing last June at the Furama Hotel. My wife Mary Ellen and I have resided in Los Angeles since 1948 and in Westchester since 1951. I have practiced law for over 50 years. We belong to many civic and community organizations, and I can tell you that there never has been such an overwhelming majority opposing governmental action as exists in this case.

**Response:**

Comment noted.

**PC02218-2**

**Comment:**

Since I began a draft of this letter, the terrorist attacks on New York City and Washington, D.C. have brought into even sharper focus the inherent danger of building such a massive expansion in this heavily populated, already congested metropolitan area. How much better it would be if future growth were distributed more evenly throughout the southern California area, so that a terrorist attack on any one airport would not be as paralyzing to the entire region.

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**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02218-3**

**Comment:**

While I am not at this point able to frame all the questions I would like you to answer, I am concerned about the comment made by Lydia Kennard at a community meeting September 21st, sponsored by Congresswoman Harman. Miss Kennard said, there are structures at the airport which are "obsolete" from the standpoint of security.

I would like to know whether any of the alternative build outs of the Master Plan are designed to provide maximum safety in the event of terrorist attacks, and at the same time correct the obsolescence which exists.

**Response:**

Comment noted. All of the proposed build options would correct the obsolescence existing in the present terminals. LAWA is presenting Alternative D, Enhanced Safety and Security Plan, as a proposed non-expansion improvement to LAX with additional security and safety improvements. There are no "unsafe" structures at LAX, but there are some structures which could be made "safer."

**PC02218-4**

**Comment:**

In addition the EIR/EIS is fatally flawed as it is based upon maximum annual passenger estimates (known as MAP) that are not realistic and I believe even deceptive. The previous Master Plan, adopted in 1978, stated that 40 million MAP was the maximum allowable growth. That plan also indicated that growth above 40 million MAP would be handled at other sites; specific mention was made of Palmdale and Ontario. Until the recent tragedy, LAX was pushing 70 million MAP for the current year. Where were the mitigations that should have been in place to shield the larger community from this massive overuse? The 1978 Master Plan would never have been approved had it requested 78 million MAP, which figure is the number of passengers that the EIR/EIS now contends may be allowed at LAX if no expansion is permitted.

LAWA appears to consider a Master Plan as a license for uncontrolled expansion. Since it is apparent that LAWA is unable to discipline itself to live within prescribed MAP limits, why should we believe they will do so in the future?

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX and the ability to mitigate the impacts of growth in airport activity and legal limits on the ability to control activity levels at airports.

**PC02218-5**

**Comment:**

Will you kindly respond specifically to the following inquiries.

**Response:**

Please see Responses to Comments below.

**PC02218-6**

**Comment:**

1. Is there any way LAWA can limit the MAP number under existing law?

**Response:**

Airport operators and the Federal Aviation Administration (FAA) do not have the authority to limit future activity at airports. It is not possible to control the interests of the flying public (the passenger demand) so there is also no way to constrain the ways to meet the demand. The decisions airlines make as to where and when to operate their choice of aircraft and when to provide additional flights are largely based on the markets they serve, passenger and cargo demands, and profitability. In other words, the airlines would fly where and when passengers want to fly to stay financially healthy and viable.

The number of millions of annual passengers would be constrained only by the capacity of the airport's facilities. The Master Plan analyzed the capacity offered by each alternative and the future delays that would result at LAX in determining the level of activity that will likely occur at LAX by 2015. The activity levels for each alternative were developed by considering the airlines' likely reaction to increasing congestion. Each of the Master Plan alternatives was designed to maximize the amount of traffic that could be served in the limited space available. See Chapter V, Section 3.3.2 of the Draft LAX Master Plan for a discussion on the activity levels for each alternative.

**PC02218-7**

**Comment:**

2. Is it true that the State Department has the authority to control the number of passengers and the number of flights for international carriers?

**Response:**

Partially. Please see Section 1.3.5, International Demand in the Draft Master Plan Addendum for a detailed description of how bilateral agreements impact international air travel.

**PC02218-8**

**Comment:**

3. Is it possible for LAWA to use its leadership to persuade the airline carriers of the need for a regional plan for air traffic?

**Response:**

Since passage of the federal Airline Deregulation Act of 1978, the airlines make the decision about which airports they will serve. As a general rule, airlines will choose to serve the airports near the highest concentrations of conveniently located customers. Within this general framework, however, airlines must make strategic decisions about air service to maximize their investments and gain competitive advantages. For instance, in regions with multiple airports, airlines tend to concentrate their air service at a single, well-located primary airport for reasons of economic efficiency. Concentrating service at a dominant airport also facilitates connecting service, which can significantly increase an airline's market and allow even greater frequencies to more destinations. The airlines will provide service where passenger demand and adequate airport facilities exist. Please see Topical Response TR-RC-2 regarding the role of deregulation in aviation planning that discusses airline response to market demand, deregulation, and airport pricing models, and Topical Response TR-RC-5 regarding the role of airline economics in shifting operations to regional airports.

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#### PC02218-9

**Comment:**

4. Wouldn't it be equitable for air traffic to be divided, on a reasonable basis, among the several areas of southern California?

**Response:**

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

#### PC02218-10

**Comment:**

5. How can LAWA justify such a massive growth on a relatively small, isolated airport property?

**Response:**

Please see Response to Comment PC01790-3 for a discussion of how the size of an airport relates to activity levels and the addition of Alternative D to the Master Plan process.

#### PC02218-11

**Comment:**

6. In what ways are existing structures obsolete, from a security point of view?

**Response:**

Existing structures do not have adequate space for security without compromising passenger flow patterns and concession space. They also have not been constructed with materials in a way to limit bomb damage. Please also see Response to Comment PC02218-3.

#### PC02218-12

**Comment:**

7. Does the EIR/EIS attempt to address the issue of potential damage from a terrorist attack?

**Response:**

The Supplement to the Draft EIS/EIR addressed Alternative D, the Enhanced Safety and Security Plan. Among other goals, Alternative D is designed to protect airport users and critical airport infrastructure in response to the increased risk of terrorism aimed at aviation and commercial assets. Potential damage from a terrorist attack on airport facilities that could lead to off-site consequences, as well as the consequences of an aircraft accident are provided in Section 4.24.3, Safety (CEQA), of the Supplement to the Draft EIS/EIR with supporting information in Technical Report S-9b. Please also see Response to Comments AL00051-93, PC01881-31, and PC02131-5.



**PC02218-13**

**Comment:**

With the election of the new Mayor, who - along with all of his opponents in the primary and general elections - signed a pledge opposing the expansion provided for in the proposed Master Plan, it is time that the will of the people be heard. To become a city of the future, an airport the size of Palmdale, with its 18,000 acres, will be essential. The Master Plan's anticipated growth is unthinkable on the 3600 plus acres at LAX.

**Response:**

Please see Response to Comment PC00578-1 regarding the development of Alternative D-Enhanced Safety and Security Plan, which was developed at the direction of Mayor James Hahn.

**PC02219      Venskus, Sabrina      Ballona Wetlands Land Trust      9/24/2001**

**PC02219-1**

**Comment:**

I am writing you to express our support for the purchase of the West Bluff of the Ballona Wetland ecosystem as mitigation for the loss of habitat of the rare Riverside Fairy Shrimp recently found at LAX. The United States Fish and Wildlife Service supports this mitigation.

The West bluff is one of the only vernal pools left in the City of Los Angeles. It is featured in recent photographs and on historical maps. It is a vital part of the last coastal wetland system left in Los Angeles County. We think the purchase of the West Bluff would be a perfect solution to LAX's needs for mitigating loss or environmental resources.

**Response:**

Comment noted. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation.

**PC02220      Gersetenberger,      El Segundo Employers      9/24/2001**  
**Todd      Association**

**PC02220-1**

**Comment:**

In keeping with ESEA's charter and mission, our comments will be restricted to ground access and related surface transportation issues. Individual ESEA members may, of course, choose to comment on all aspects of the Project.

**Response:**

Comment noted.

**PC02220-2**

**Comment:**

ESEA Board Position

ESEA's Board of Directors has adopted the following position with respect to the Project:

**Response:**

Please see Responses to Comments below.

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#### PC02220-3

**Comment:**

"With respect to job creation and other economic benefits that are anticipated to result from an expansion of the Los Angeles International Airport (LAX), ESEA supports this activity. However, in light of concerns about traffic, environmental, and other impacts which may result from expansion, ESEA supports LAX expansion only under these conditions:

- The design concept that is selected achieves the expansion in a responsible, acceptable manner that mitigates traffic and other impacts. In this respect, the proposed expansion is no different than any other regionally significant development, such as Playa Vista, for which such mitigations are and should be required.

- Development of mitigation measures must recognize that travel patterns in the area are a complex mix of both airport and non-airport related trips, and that solutions which give non-airport trips secondary or derivative priority are not acceptable.

- Mitigation measures which are ultimately agreed to must be: accompanied by explicit and realistic funding and implementation plans and schedules; funded from airport-generated revenues; and should not be funded from regional transportation funds, such as the MTA Call-for-Projects, or through other subventions or earmarks of Federal, state or local transportation funds.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The traffic analysis was carefully conducted to ensure that the expansion would take place in a responsible manner that mitigates traffic and other impacts. The computer modeling that was used was a highly complex and detailed model that accounted for the different travel patterns of both airport and non-airport traffic. In fact, the analysis separately modeled five different types of traffic, with each type separated into both low-occupancy and high-occupancy vehicles. All trips were studied on an equal basis. No trip had "priority" over any other type of trip in the analysis. This is discussed in Technical Reports 3b and S-2b. Also, please see Response to Comment AL00008-6 regarding funding.

#### PC02220-4

**Comment:**

The ESEA Board of Directors finds that the Project as presented in the Draft EIS/EIR fails to meet these criteria.

In addition, the ESEA Board of Directors has adopted the following principles which, in its view, should guide the public decision-making process with respect to the Project:

**Response:**

Comment noted. Please see Responses to Comments to PC02220-3 above and PC02220-5 through PC02220-8 below.

#### PC02220-5

**Comment:**

- Planning/Goals: The issues involved should be addressed in a regional context. The proper focus of the analysis should be on how the benefits and burden of accommodating growth in air travel can be equitably distributed to the system of airports in Southern California. Although the DOA regularly cites regional needs and regional growth, there has not been a corresponding focus on regional solutions to finding the most cost-effective method of meeting passenger and cargo needs over the next twenty years.

**Response:**

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

**PC02220-6**

**Comment:**

- Funding: Funding for whichever alternative is pursued, including agreed to mitigation measures, should come from identified, airport-generated sources of funding (e.g., PFCs), not from regional sources of funds for which cities and localities generally compete. The EIR/EIS should also specify a fully-funded, comprehensive ground access plan which is approved by appropriate agencies (e.g., Caltrans, MTA) and which is found by SCAG to be consistent with the Regional Transportation Plan and in conformance with the Federally-approved Air Quality Management Plan for the South Coast Air Basin.

- Comprehensive Subregional Transportation Planning: Mitigation measures identified in the EIR/EIS should include a comprehensive program to reduce surface congestion and the upgrading of the regional roadway grid in the South Bay cities. This should include an appropriate connection between the proposed LAX People Mover and the existing Metro Green Line, via an alignment and technology which is found to best meet regional, subregional, and airport-related mobility and access objectives.

**Response:**

A specific funding plan has not yet been adopted for the Master Plan; however, it is anticipated that a joint funding effort will be pursued, involving Federal and State grants and other efforts. Much of the project will likely be funded with airport-generated revenues, such as concession fees, landing fees, revenue bonds, leases, and passenger facility charges (PFCs). It is not anticipated that any local tax revenue would be used for this project. Also, please see Topical Response TR-ST-2, regarding the airport's funding abilities outside of the airport and SCAG's RTP. The mitigation plans for each alternative were developed to mitigate the impacts of the Master Plan. They are not intended to mitigate or relieve existing congestion that is not caused by the Master Plan. All alternatives include a direct connection between the people mover and the Green Line.

**PC02220-7**

**Comment:**

- Baseline for Mitigation Measures: Mitigation measures should be developed with respect to the previously approved, not current, level of operations, i.e., to a baseline of 40 million annual passengers (MAP), not the current level of 67. Were the DOA to be allowed to "grandfather in" the current level, it would in effect be exempt from mitigating the impacts of nearly 20 million annual passengers.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.2, regarding the definition of baseline scenarios and incorporation of local/regional plans and programs. Under NEPA and CEQA guidelines, mitigation measures are intended to mitigate impacts of the proposed project, not existing pre-project impacts.

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#### PC02220-8

**Comment:**

- Congestion Management Plan: under the MTA's Congestion Management Plan, a city may be required to expend its CMP "credits" to compensate for traffic impacts that are not fully mitigated. The plan for LAX expansion should not be exempt from the CMP, and the City of Los Angeles' CMP credit balance should be drawn down as necessary in connection with any expansion of LAX.

**Response:**

The accumulation and/or drawdown of City "credits" under the Congestion Management Program for Los Angeles County is not a procedure that is reported within the Draft EIS/EIR. This is a procedure that will be worked out between the City of Los Angeles and the Los Angeles County Metropolitan Transportation Authority following adoption of the LAX Master Plan. As described in Technical Report 3b, Section 6.3, the CMP debits and credits for the LAX Master Plan have not yet been quantified. Once the final ground access plan is defined for the project, a complete quantification of debits and credits will be made. The City of Los Angeles Department of Transportation has agreed that CMP debits and credits for the LAX Master Plan will be used to either add or subtract from the City's CMP credit balance once the final ground access plan is defined.

#### PC02220-9

**Comment:**

Here again, the ESEA Board of Directors finds that the Project as presented in the Draft EIS/EIR does not satisfy these principles.

We find it disturbing that mitigation measures are primarily north of the airport to the detriment of our area. Little attention is paid to streets and freeways south of the airport. Mitigation measures appear to be limited to Los Angeles Department of Transportation jurisdictions with little regard to traffic problems elsewhere.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The Draft EIS/EIR and Supplement to the Draft EIS/EIR analyze 14 intersections in or immediately adjacent to the City of El Segundo. These are identified in Attachment D to Technical Report 3b. Significant impacts are identified and mitigation measures recommended. Please refer to the Topical Response TR-ST-2 regarding surface transportation analysis methodology for additional discussion of the study area and identification of facilities analyzed. Mitigation measures are recommended at ten of these intersections in Tables 4.3.2-27 and 4.3.2-28 for Alternative C. Three roadway links are analyzed in the city of El Segundo. One of these requires mitigation in Alternative A only. (Mitigation is discussed in Section 4.3.2.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.)

#### PC02220-10

**Comment:**

We find it especially disturbing that funding sources have not been identified for recommended traffic mitigation measures and that previously approved ground transportation projects of other jurisdictions are used to mitigate impacts without any discussion of their funding and expected completion dates. Nor is there any commitment to implement such mitigation measures as have been identified.

The Draft EIS/EIR states that the total cost of the project is \$12 billion, but is almost totally devoid of specifics of the sources of the \$12 billion. Section 2.8 ("Funding") is repeated here in its entirety:

"Full implementation of the proposed projects in the first phase (2005) of the preferred alternative C is expected to cost approximately \$7.2 billion. Implementation of the second phase (2015) of the

preferred alternative C is projected to cost \$4.2 billion more, for a total program cost of up to \$12 billion. The development could be financed using a combination of private, state, local and federal funding. Potentially, Federal funding for airfield and other public use improvements may be requested from the Airport Improvement Program, a Federal grant-in-aid program authorized by the Airport and Airway Improvement Act of 1982, as amended, administered by the FAA and financed from the Aviation Trust Fund. Funding from the Aviation Trust Fund could provide funds for the capacity and airfield-related projects. The Aviation Trust Fund is derived primarily from a nationwide tax on airline passenger tickets, cargo shipments, aviation fuel, and tires.

"FAA approval may also be requested for authority to impose Passenger Facility Charges collected by the airlines directly from passengers using LAX. Federal funding for roadway improvements projects may also be pursued through the Transportation Efficiency Act of the 21st Century (TEA-21). State funding may be requested from Caltrans through the Regional Transportation Improvement Program administered by SCAG or from the [Los Angeles] Metropolitan Transportation Authority through its call-for-projects process. Local funding may be derived from the issuance of new debt, tenant funds, and airport funding. In addition to the capital projects themselves, the structure of the financing plan will ultimately affect the cost of implementation." [Emphases added.]

This discussion of funding for the Project, including mitigation measures, is vague, to say the least, and totally inadequate.

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02220-11**

**Comment:**

Conclusion

Previous experience strongly suggests that our concern about the caps on the number of flights, the inadequacy of identified mitigation measures, and the lack of funding for mitigation measures is completely justified. When the airport was expanded in the early 1980s, the EIS/EIR called for expansion to be capped at 40 MAP. That cap proved meaningless; hence, our concern about the caps proposed in the current Master Plan. Moreover, the mitigation measures identified at that time were inadequate (and similarly not funded) at the 40 MAP level, let alone at today's 67 MAP level of operation. No measures have been implemented to mitigate this 27 MAP increase over the EIS-approved level. It is our view, therefore, that mitigation measures for the current Master Plan must be developed using 40 MAP as the baseline. In addition, conditions of approval must contain specific funding sources, schedules, legally binding commitments to implement signed by the responsible agencies, and remedies in the case of non-performance. Without such funding sources, implementation commitments and remedies, any mitigation measures must be considered illusory.

**Response:**

Comment noted. Please see Topical Responses TR-GEN-1 regarding the environmental baseline and TR-GEN-3 regarding actual versus projected activity levels. In accordance with the requirements of NEPA and CEQA, a mitigation monitoring or reporting program will be prepared in conjunction with project approval. The FAA will require mitigation monitoring in conjunction with approval of the Record of Decision (ROD). LAWA will incorporate all approved Master Plan commitments and mitigation measures into a reporting or monitoring program. The reporting or monitoring program will be adopted at the time of Master Plan approval and will be designed to be fully enforceable through permit conditions, agreements or other measures. Funding for the mitigation is anticipated to occur through various means such as concession fees, federal and state grants, landing fees, revenue bonds, leases, and passenger facility charges, as allowed by law. Please see Response to Comment AL0008-6 for more information on funding, and Response to Comment AL00017-121 regarding the mitigation of impacts on the community from activities at LAX.

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#### PC02220-12

**Comment:**

It is the conclusion of the ESEA Board of Directors that the LAX Master Plan EIS/EIR is seriously flawed with respect to ground access and related transportation impacts, including mitigation measures, and that the EIS/EIR requires substantial revision and re-circulation to more accurately reflect the proposed project's impacts on the local and regional transportation networks. Those revisions should include a full disclosure of all proposed mitigation measures, a detailed funding plan, a legally binding commitment to carry out the mitigations, and a mitigation monitoring program.

Our detailed comments are attached. ESEA hopes that Los Angeles World Airports and State and Federal government officials will recognize the need to adequately address the issues raised herein. ESEA appreciates this opportunity to comment on the LAX Master Plan Draft EIS/EIR.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Please also see Response to Comment PC02220-11 above regarding the funding and implementation of mitigation measures. In addition, please see Responses to Comments PC02220-13 through PC02220-19 below.

#### PC02220-13

**Comment:**

SPECIFIC COMMENTS

1. The Analysis Gives Inadequate Consideration to Surface Traffic Impacts On South Bay Communities.

The Draft EIS/EIR analyzed 61 intersections, with an additional 15 intersections selected for focused analysis. Only nine of the 76 intersections were south of the I-105 (Century) freeway. The apparent explanation for the focus on the north side of the airport is presented in the Draft EIS/EIR, pages 4-284 - 4-289:

"South of LAX, there is a higher percentage of LAX traffic on I-405 and a lower percentage on the arterials, indicating that airport traffic is in fact staying on the freeway system as desired. However, this is not the result of I-405 operating well, but is more a result of the layout of the roadway network south of LAX. There are no alternative arterial routes that closely parallel I-405 south. In fact, south of LAX, all major arterial routes change to a north/south orientation, while I-405 south of Rosecrans Avenue continues in a northwest/southeast direction."

This explanation does not account, however, for at least three conditions acknowledged in the Draft EIS/EIR which exist south of the Airport: (1) airport traffic south of the airport represents a significant component of traffic on local streets; (2) interviews at freeway intersections south of the airport indicate a large percentage of airport trips; and (3) the Draft EIS/EIR claims a benefit from redistribution of traffic south of the airport off the freeway and onto local streets.

- Airport Traffic Represents a Significant Component of Traffic on Local Streets South of the Airport.

The Draft EIS/EIR notes that 8% of the afternoon peak on Sepulveda Boulevard south of El Segundo Boulevard is airport related, but concludes ". . . even if all the Airport bound traffic were removed, there would be little noticeable difference on most roads outside of the immediate vicinity of the airport, particularly during the morning and evening rush hours." (Draft EIS/EIR, page 4-289) The 8% reported in the Draft EIS/EIR is, however, more important to traffic flow than it appears. For example, the intersection of Sepulveda and El Segundo Boulevards has a reported 1996 Volume to Capacity (V/C) of .869 and a projected 2005 V/C ratio of 1.062 (Draft EIS/EIR, Table 4.3.2-23, page 4-334). Eight percent of the 1996 traffic represents an airport contribution at this intersection of .069. The benchmark of

"significant impact" is defined in the Draft EIS/EIR as a change in V/C ratio of .01 for an intersection operating at Level of Service ("LOS") F (Draft EIS/EIR, page 4 -291). Therefore, at the intersection of Sepulveda and El Segundo Boulevards, a contribution of .069 to the V/C ratio can hardly be considered as representing "... little noticeable difference ..."

- Freeway Ramp Data Shows Traffic Exiting the I-405 South of the Airport.

Master Plan, Chapter II, Section 7.3, reports the results of a survey conducted at area intersections during the A.M. and P.M. peak hours. The results of that survey call into question the assumption that traffic is not diverted off the I-405 onto local streets south of the Airport, where it demonstrates that more than 30% of the trips at northbound I-405 ramps at El Segundo were Airport related.

The Draft EIS/EIR Is Internally Contradictory with Respect to Use of Off-Freeway Traffic Routes South of the Airport.

The Draft EIS/EIR states, in pertinent part: "Further, although it would be ideal for airport access to be provided directly via freeways, the dispersion of Airport traffic onto many arterial and freeway routes does have a side benefit in that its impact is minimized on any given route" (Draft EIS/EIR, page 4-289). This statement directly contradicts the Draft EIS/EIR's initial assumption that the roadway system is designed such that freeway traffic is not diverted to the local street system south of the airport. If, in fact, airport traffic is diverted from the freeway, as claimed for traffic to and from the north, would not a similar set of traffic solutions be applicable to the south as well?

In addition, Master Plan, Table II-7.12 also sets forth data that calls into question the assumption of the limited diversion of freeway traffic onto local streets south of the airport. Table II-7.12 illustrates that, by absolute volume, only 3 of 30 "key roadway segments" carry more Airport related morning peak hour traffic than does Sepulveda Boulevard north of Rosecrans Avenue, and in the afternoon only four key segments carry more peak hour traffic than that intersection.

The failure to consider traffic impacts south of Rosecrans Avenue appears arbitrary. At a minimum, the Draft EIS/EIR and its technical appendices need to provide a much clearer statement of why the intersections evaluated were selected, and why no consideration was given to areas south of Rosecrans Avenue.

**Response:**

This comment is similar to comment AL00016-25. Please see Response to Comment AL00016-25.

**PC02220-14**

**Comment:**

2. The Cumulative Impacts of The Project are Often Significant and Not Mitigated.

Three scenarios were used as baselines against which to evaluate the surface traffic effects of the proposed Master Plan improvements:

- (1) Environmental Baseline;
- (2) Adjusted Environmental Baseline; and
- (3) the No-Project/No-Action alternative.

The Environmental Baseline is the existing condition pre-project. It includes existing roadways and land uses, and the current airport configuration.

The Adjusted Environmental Baseline uses the current airport configuration but assumes that future off-airport roadways and land uses already in the pipeline will be completed (see Section B.1 below).

The No-Action/No-Project Alternative is the converse of the Adjusted Environmental Baseline and assumes that off-airport development will remain constant, but currently approved airport projects will be completed.

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Using the Adjusted Environmental Baseline to assess cumulative impacts of the Project understates those impacts. The surface traffic analysis uses traffic volumes from airport and non-airport projects. (See, e.g., Master Plan § 2.6.2, page V-2.279). Therefore, it is at least partially a cumulative impact analysis.<sup>1</sup> Because the surface traffic analysis is based on cumulative traffic volumes, the significance of the direct impacts and the cumulative impacts are equated. However, the use of the Adjusted Environmental Baseline makes this equation between direct and indirect effects inappropriate. While comparing the Project to the adjusted future conditions may be appropriate for assessing direct impacts, the cumulative impact is the impact of all traffic relative to the existing condition, not expected future conditions as contained in the Adjusted Environmental Baseline.

The result of this improper equation of direct and indirect effects is material. The following Table (derived from Draft EIS/EIR, Table 4.3.2-24) for the a.m. peak hour illustrates the problem. The reported change in congestion between the existing conditions and Alternative C, the preferred project alternative, is often significant, while the comparison of Alternative C with the Adjusted Environmental Baseline (which incorporates future conditions) is not.

Using this concept of the Adjusted Environmental Baseline, the result is that the cumulative impacts of the Project are often significant and not mitigated even when the Project's direct effects have been.<sup>2</sup>

Intersection <sup>3</sup>	Existing	Adjusted	Alternative C	Difference	Difference
	V/C(LOS)	Baseline V/C(LOS)	(w/mit) V/C(LOS)	(w) Existing	(w) Adjusted
Aviation/El Segundo	0.835(D)	1.097(F)	0.865(F)*		
Aviation/Rosecrans	1.121(F)	1.164(F)	1.171(F)	+ .050	+ .007
Highland/Rosecrans	1.069(F)	1.211(F)	0.947(E)	- .122	- .264
Sepulveda/El Segundo	0.869(D)	1.190(F)	1.161(F)	+ .292	- .029
Sepulveda/Mariposa	0.730(C)	0.772(C)	0.803(D)	+ .073	+ .031
Sepulveda/Rosecrans	1.220(F)	1.275(F)	1.243(F)	+ .023	- .032
Vista Del Mar/Grand	0.749(C)	0.918(E)	0.729(C)	- .02	- .189
VistaDelMar/Imperial	0.465(A)	1.098(F)	0.903(E)	+ .438	- .195

\*Apparent error in Table 4.3.2-24 of the EIS/EIR (page 4-340)

1 "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects." (CEQA Guidelines, § 15355(b))

2 Note that if the comparison had been between Alternative C and the No-Project/No-Action Alternative, the difference would have been even greater, as the No-Project/No-Action Alternative provides for on-airport, potentially capacity-enhancing, improvements, but not off-airport surface traffic impact mitigation.

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

**Response:**

Please see Response to Comment AR00003-21 regarding cumulative impacts.

**PC02220-15**

**Comment:**

3. The Draft EIS/EIR Lacks a Mitigation Monitoring Program.

The Draft EIS/EIR, Chapter V is entitled "Environmental Action Plan". It is not specific as to whether this constitutes a Mitigation Monitoring Program required by CEQA (CEQA Guidelines § 15091(d)). If it does represent a Draft Mitigation Monitoring Program, it is inadequate. The Section lacks a clear statement of the party responsible for implementing the mitigation, the mechanism for enforcement of the mitigation and the timing of implementation.



**Response:**

Please see Response to Comment AR00003-63 regarding the mitigation monitoring and reporting program.

**PC02220-16**

**Comment:**

Moreover, it lacks detailed explanation of the way in which the diminution of traffic from the Northside Project, as well as other surface traffic mitigation measures will be achieved.

**Response:**

Please see Topical Response TR-ST-7 regarding LAX Northside/Westchester Southside traffic impacts and mitigation measures.

**PC02220-17**

**Comment:**

4. The Draft EIS/EIR Does Not Adequately Specify Mitigation Measures or Methods to Fund or Enforce Them.

CEQA requires that agencies identify the environmental impacts of a project, and implement mitigation measures to lessen the adverse environmental impacts. (CEQA Guidelines § 15002 (a)(3)). However, the Draft EIS/EIR fails to comply with CEQA by:

- (1) failing to provide a complete list of mitigation measures, and
- (2) failing to specify, at a minimum, a Draft Mitigation Monitoring Program to inform the public of how the project proponents intend to ensure the implementation of mitigation measures.

In addition, the Draft EIS/EIR fails to provide a specific funding plan to implement the proposed improvements.

- (1) The Draft EIS/EIR Delays Disclosure of the Full List of Mitigation Measures Until the Final EIS/EIR.

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

**Response:**

Please see Response to Comment AR00003-63. Please see Response to Comment AR00001-6 regarding proposed funding of Master Plan improvements.

**PC02220-18**

**Comment:**

- (2) The Draft EIS/EIR Fails to Provide a Draft Mitigation Monitoring Program

California Public Resources Code §21081.6 requires that a public agency "adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation." (Cal. Pub. Resources Code §21081.6 (a)(1)). If an EIR "identifies one or more significant environmental effects of the project," CEQA Guidelines §15091(a) require an agency to "make one or more written findings for each of those

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significant effects, accompanied by a brief explanation of the rationale for each finding." With these findings, the CEQA Guidelines mandate that "the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures." (CEQA §15091(d))

The Draft EIS/EIR violates CEQA Guidelines §1509(d) and California Public Resources Code § 21081.6 in that it fails to set forth a program that monitors or reports on each mitigation measure. Although the Draft EIS/EIR cites some mitigation measures to combat the environmental impacts of the Project, it makes no mention of the "permit conditions, agreements, or other measures" (CEQA Guidelines §15091(d)) which would ensure compliance with mitigation measures. In other words, it does not specify the steps necessary to ensure compliance, the responsible party to ensure compliance, or the resulting consequences should compliance not occur.

**Response:**

Please see Response to Comment AR00003-63 regarding the mitigation monitoring and reporting program.

**PC02220-19**

**Comment:**

Finally, the Draft EIS/EIR states that the total cost of the project is \$12 billion, but is almost totally devoid of specifics of the sources of the \$12 billion. Section 2.8 ("Funding") is repeated here in its entirety:

"Full implementation of the proposed projects in the first phase (2005) of the preferred alternative C is expected to cost approximately \$7.2 billion. Implementation of the second phase (2015) of the preferred alternative C is projected to cost \$4.2 billion more, for a total program cost of up to \$12 billion. The development could be financed using a combination of private, state, local and federal funding. Potentially, Federal funding for airfield and other public use improvements may be requested from the Airport Improvement Program, a Federal grant-in-aid program authorized by the Airport and Airway Improvement Act of 1982, as amended, administered by the FAA and financed from the Aviation Trust Fund. Funding from the Aviation Trust Fund could provide funds for the capacity and airfield-related projects. The Aviation Trust Fund is derived primarily from a nationwide tax on airline passenger tickets, cargo shipments, aviation fuel, and tires.

"FAA approval may also be requested for authority to impose Passenger Facility Charges collected by the airlines directly from passengers using LAX. Federal funding for roadway improvements projects may also be pursued through the Transportation Efficiency Act of the 21<sup>st</sup> Century (TEA-21). State funding may be requested from Caltrans through the Regional Transportation Improvement Program administered by SCAG or from the [Los Angeles] Metropolitan Transportation Authority through its call-for-projects process. Local funding may be derived from the issuance of new debt, tenant funds, and airport funding. In addition to the capital projects themselves, the structure of the financing plan will ultimately affect the cost of implementation." [Emphases added.]

This discussion of funding for the Project, including mitigation measures, is vague, to say the least, and totally inadequate.

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02221**      **Mendoza, Jerilyn**      **Environmental Defense**      **9/24/2001**  
**Lopez**

**PC02221-1**

**Comment:**

These comments were prepared primarily by the Los Angeles Environmental Justice Project Office of Environmental Defense. Our comments focus specifically on the environmental justice impacts of the Draft Los Angeles International Airport ("LAX") Master Plan.

On January 18, 2001, Los Angeles World Airports ("LAWA") and the Federal Aviation Administration ("FAA") released a Draft LAX Master Plan ("Master Plan") and Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") that are intended to describe and analyze plans for expansion of LAX over the next 15 years. The Master Plan and EIS/EIR, which comprise approximately 12,000 pages including appendices and some supporting technical documents, were released pursuant to the requirements of the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"). As discussed below, the tragic events of September 11 led to the cancellation of at least six public hearings scheduled for the month of September to solicit the views of citizens in Los Angeles. Though we believe that these hearings ought to be rescheduled, and the comment period extended to accommodate the hearings, we submit these comments now in the absence of a decision to grant an extension.

**Response:**

Comment noted. Please see Responses to Comments below. The public hearings on the Draft EIS/EIR planned in September 2001 were rescheduled and the comment period was extended resulting in a 295-day total review period.

**PC02221-2**

**Comment:**

We believe that the draft EIS/EIR is sufficiently deficient to warrant the preparation of supplemental draft for public comment. Many of these are discussed at length in the comments of other respondents, including those developed on behalf of Los Angeles County and the City of Inglewood, and we therefore limit our comments to the following issues:

- 1) LAWA failed to properly engage the public in seeking comments on the Master Plan and EIS/EIR. Specifically, LAWA did not hold an adequate number of hearings, and further, did not hold those hearings in an area geographically large enough to capture input from many of the most severely impacted communities.
- 2) LAWA ignored environmental justice principles in preparing the EIS/EIR, and further failed to engage low-income and minority populations in the decision-making process. These defects violate both federal and state law.
- 3) The EIS/EIR fails to provide reasonable mitigation proposals. Rather, the EIS/EIR bases much of its analysis on the future development of environmental justice mitigation measures. We believe this may violate the California Environmental Quality Act ("CEQA").
- 4) The EIS/EIR fails to properly consider necessary alternatives. Alternatives that take into account other regional airports and alternatives, such as those considered in the recently completed SCAG, must be evaluated in this DEIS. We believe failure to do so may violate the National Environmental Policy Act ("NEPA").
- 5) The EIS/EIR fails to consider recent and ongoing environmental health studies, and, as a result, is based upon incomplete and insufficient information. We request that appropriate environmental health and air quality studies, including the Air Quality and Source Apportionment Study, be completed, and

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the EIS/EIR be reviewed, revised, and subsequently re-circulated to the public for further comment based on the data provided by that study.

As a result of these deficiencies, we believe that the EIS/EIR is inadequate. We request that the deficiencies described be addressed in a supplemental EIS/EIR, and that the supplemental EIS/EIR be re-circulated to the public for review and comment.

**Response:**

Please see Responses to Comments PC02221-3 through PC02221-27 below for responses to the types of concerns expressed in this comment.

**PC02221-3**

**Comment:**

I. The Public Was Not Sufficiently Engaged In the LAWA Planning Process

Initially, the EIS/EIR public comment period was to close on July 25, 2001, six months from the date of its release. As part of the public participation process, LAWA scheduled three hearings on June 9, 2001, on the Master Plan and EIS/EIR. However, those three hearings were scheduled for the same time (noon to 7p.m.), on the same day (June 9, 2001), and at three locations within a five-mile radius of LAX. In this way, LAWA officials failed to recognize that impacts of LAX operations are felt throughout Los Angeles City and County, and implicitly precluded members of the wider community from participating in the public comment period.

Partly in response to public criticism of too few public hearings and at the request of Los Angeles Mayor James Hahn, LAWA extended the public comment period by two months and scheduled six additional public hearings to go forward throughout Southern California during the month of September. A number of community and environmental groups were planning to provide testimony at the public hearings scheduled for September 11, 12, 14, 15, 19 and 20.

Due to the tragic and terrifying events that unfolded on September 11, those public hearings were appropriately cancelled. However, these six hearings were not rescheduled, nor was the public comment period extended to allow for those hearings to go forward. Without these six hearings, there cannot be said to have been adequate opportunity for public comment on the proposal.

**Response:**

Please see Topical Response TR-PO-1 for a listing of all 8 public hearings, most occurring after the events of September 11, 2001. Also, please visit the web site, [www.laxmasterplan.org](http://www.laxmasterplan.org) for more project details and information.

**PC02221-4**

**Comment:**

Because air travel, airport management and aircraft safety have been changed by the events of September 11, 2001, airport and aircraft security have been undergoing minute review since September 11 by government agencies, security specialists, the media and the public. The security requirements set forth by the FAA, and soon to be developed by Congress, must be incorporated into the EIS/EIR for the Master Plan. As a result, any changes to the build alternatives, including but not limited to, changes to the proposed cargo facilities, the parking structures, the orientation of the runways, the proposed west terminal, or the ring road, must be included in any supplemental EIS/EIR and re-circulated to the public for review.

**Response:**

Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, includes a specific emphasis on safety and security provisions, including considerations that have come to the forefront relative to airport planning and operations following the terrorists attacks of September 11, 2001. The Supplement to the Draft EIS/EIR addressed the environmental impacts associated with Alternative D. As noted in

the Supplement to the Draft EIS/EIR, the design of Alternatives A, B, and C can be refined to incorporate security provisions pursuant to federal requirements.

#### PC02221-5

##### Comment:

##### II. Environmental Justice Principles Were Not Followed by LAWA's Public Participation Process

One of the challenges facing LAWA was ensuring that the public had adequate information about the EIS/EIR to provide meaningful comments on the proposed Master Plan. We recognize that LAWA took certain steps to secure comments from some local communities, but these steps, though perhaps well intentioned, were inadequate. Certain federal statutes and regulations require that LAWA ensure such participation:

- Title VI states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

- "The Environmental Justice (EJ) Orders amplify Title VI by providing that each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." ("Implementing Title VI Requirements in Metropolitan and Statewide Planning," U.S. Department of Transportation, TOA-1/HEPH-1.)

- "Planning and programming activities that shall have the potential to have a disproportionately high and adverse effect on human health or the environment shall include explicit consideration of the effects on minority populations and low-income populations. Procedures shall be established or expanded, as necessary, to provide meaningful opportunities for public involvement by members of minority populations and low-income populations during the planning and development of programs, policies and activities." ("Environmental Justice in Minority Populations and Low-Income Populations," U.S. Department of Transportation, Order DOT 5610.2 (emphasis added).)

In spite of specific statutory language and guidance provided by the U.S. Department of Transportation, LAWA has failed in its efforts to provide such meaningful opportunities to the public and specifically minority populations and low-income populations, as shown below:

##### Copies of the EIS/EIR Were not Readily Available to Poor Communities:

Although LAWA made the EIS/EIR, Master Plan and related documents available for free on its website, this implies that all members of the public have computer access at home or at work, as well as sufficient Internet access to review voluminous documents. This presumption is incorrect - many low-income families simply do not have these kinds of computer resources. For those without computers, the only other options were to review thousands of pages of material at certain local libraries, often open only during working hours, or purchase hard copies of the documents for review at home. LAWA asked for anywhere from \$169 to \$1,302 to provide hard copies of the EIS/EIR and the Master Plan, and most low-income residents simply could not afford hard copies of the documents.

LAWA should have made more free or low-cost hard copies of the documents available for local residents and/or low-income populations. The absence of such provisions erected barriers to the participation of many local residents.

##### Response:

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Please also see Response to Comment PC02236-15 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR in the Spanish language. Additionally, please see Response to Comment PC00178-2 regarding community noticing efforts provided by LAWA in support of the environmental justice workshops. Finally, please see Response to Comment PC02063-1 regarding environmental-justice related mitigation and benefits.

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#### PC02221-6

##### Comment:

LAWA Did Not Allow Sufficient Time to Comment: The full document circulated by LAWA is huge and often unwieldy, including the EIS/EIR, the Master Plan and the lengthy technical appendices. Six public hearings were cancelled and not rescheduled. In light of the length, subject matter and the late-occurring events of September 11, LAWA should have extended the time to comment to allow all citizens to knowledgeably provide input into the documents.

##### Response:

Comment noted. In response to the events of September 11, 2001, LAWA and the FAA rescheduled the six hearings originally planned to be held in September, 2001 to October and November, 2001. In addition, the public comment period was extended to November 9, 2001, for a total of 295 days.

#### PC02221-7

##### Comment:

LAWA Failed to Timely Address the Environmental Justice Issues Inherent in the Expansion Plan: According to the Environmental Justice section of the EIS/EIR, LAWA knew that low-income and minority groups would have an interest in expanded LAX operations back in 1995, and began having meetings with community groups at that time to address environmental justice issues. (EIS/EIR, p. 4-398-401, Table 4.4.3-1.) Yet LAWA did nothing to engage formally community residents interested in environmental justice impacts at that time. The Environmental Justice Task Force was not convened until June 2000, five years after the first meetings were held, and only a few short months before release of the EIS/EIR. In the EIS/EIR, LAWA fails to explain why an Environmental Justice Task Force was not convened six years ago to address environmental impacts on low-income or minority populations, nor were any details provided about the meetings LAWA did convene. Nowhere is it apparent that these meetings actually resulted in changes or amendments to LAWA's plan for LAX expansion.

LAWA Failed to Make the Membership and Intention of the Environmental Justice Task Force Readily Accessible to the Public: Aside from a vague reference to the Environmental Justice Task force in the exhibits section of the public hearings, there is virtually no information about the Environmental Justice Task Force on the LAWA website. It is impossible to find a list of hearing dates or times for the ongoing Environmental Justice workshops, a listing of the Environmental Justice Task Force members, selection criteria utilized by LAWA for Environmental Justice Task Force participation, or contact information for the Environmental Justice Task Force either individually or within the LAWA management structure. (As indicated above, the Internet is not the only or best way to distribute information to community members, but because LAWA has consistently pointed to their website as the repository for information, it is essential to note that the Environmental Justice Task Force on the website was woefully inadequate.) Thus, it is not clear to the average member of the public what the goals of the Environmental Justice Task Force are, how to ask questions of the Environmental Justice Task Force, or affect the Environmental Justice Task Force work plan.

LAWA Has Failed to Create and Maintain Importance of a Transparent Public Participation Process with respect to Environmental Justice: Partly in response to public criticism, LAWA chose to schedule Environmental Justice workshops separate from its hearings on the EIS/EIR. Again, it is unclear why these workshops were convened outside the EIS/EIR process, or what LAWA hopes to develop through the Environmental Justice workshop process. These workshops were scheduled only after the EIS/EIR was drafted and circulated for review, without an option for workshop participants to have a meaningful impact on the Master Plan before completion.

The National Environmental Justice Advisory Council ("NEJAC"), a federal advisory committee to the U.S. Environmental Protection Agency, has developed The Model Plan for Public Participation (<http://www.epa.gov/oeca/ej/main/nejacpub/html>). "The Core Values and Guiding Principles for the Practice of Public Participation" includes guidelines for ensuring early involvement of the public. We believe the following core values and guidelines were violated by LAWA in its public participation process and should be utilized in further engaging the public and preparing the final EIS/EIR.

- People should have a say in decisions about actions which affect their lives.
- Public participation includes the promise that the public's contribution will influence the decision.
- The public participation process communicates the interests and meets the process needs of all participants.
- The public participation process seeks out and facilitates the involvement of those potentially affected.
- The public participation process communicates to participants how their input was, or was not, utilized.
- The public participation process provides participants with the information they need to participate in a meaningful way.
- Encourage early and active community participation.
- Institutionalize meaningful public participation by acknowledging and formalizing the process.
- Create mechanisms and measurements to ensure the effectiveness of public participation. (NEJAC, The Model Plan for Public Participation, p. 13.)

As part of a federally mandated process, we believe LAWA's public participation process was sorely lacking. Specifically, LAWA failed to include early and meaningful participation of low-income and minority populations. For example, the EIS/EIR fails to list any specifics about the 126 community meetings discussed in the Environmental Justice section of the EIS/EIR, including: who was invited; who attended; what decision makers (including elected officials, LAWA Commissioners and high level staff) attended; what was the agenda; if input received at those meetings was incorporated into LAWA's Master Plan; how such input was assimilated and incorporated by LAWA staff; what languages were spoken at those meetings; what written materials was distributed; and what efforts were made to engage low-income populations. We request that this information be provided for the 126 meetings mentioned in the EIS/EIR and the Environmental Justice workshops, and that it be circulated in a supplemental EIS/EIR to allow for appropriate analysis of LAWA's environmental justice public outreach program.

Though LAWA's EIR does recognize that environmental justice issues exist, it does not adequately address them. As yet, for example, it is still unclear to the public what the goals are for LAWA's Environmental Justice Task Force, who is involved and what is the methodology to incorporate ideas of the many residents stand to only bear more and more of the operational burden with an expanded LAX. As a result, we believe that the public participation and environmental justice processes engaged by LAWA are deficient.

**Response:**

As described in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the Environmental Justice Task Force included representatives of public interest groups who have experience analyzing the impacts of transportation on minority and low-income communities, joined with LAWA staff and consultants. As further described in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the Environmental Justice Task Force was formed to initially focus on working with the affected communities to develop the LAWA Environmental Justice Program. The Task Force was charged with the goal of helping to ensure that the Master Plan for LAX is carried out equitably, protects human health and the environment, and promotes economic vitality for all the people of the Los Angeles Region.

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Also, please see Response to Comment PC00178-2 regarding noticing efforts made by LAWA in support of the environmental justice workshops. Finally, please see Response to Comment PC02063-1 regarding environmental justice-related mitigation and benefits.

**PC02221-8**

**Comment:**

III. LAWA Failed to Articulate Sufficient Methods to Offset or Mitigate Well-Defined Negative Impacts on Low-Income and Minority Populations

The California Environmental Quality Act requires public agencies to adopt feasible mitigation measures to reduce or eliminate otherwise significant adverse environmental impacts. Cal. Pub. Res. Code §§

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21002, 21081, subd. a. For each identified significant adverse environmental impact the EIR must identify specific mitigation measures. CEQA Guidelines § 15126.4. However, we believe that the environmental justice mitigation measures suggested by LAWA has not been fully developed and, instead, relies on the deferral of mitigation measures until after some undefined further work is completed by LAWA.

**Response:**

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. Many of these measures apply to minority and low-income communities, as well as other potentially effected communities. While a number of these mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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

**PC02221-9**

**Comment:**

LAWA's EIS/EIR specifically states increased LAX operations will disproportionately impact minority and low-income populations with respect to noise, air quality and health effects. (EIS/EIR, p. 4-395-396.) As the situation currently stands, "[M]inority and low-income residential communities are directly under the [LAX] primary arrival flight path. The primary impacts on minority and low-income communities from current airport operations are therefore mostly associated with aircraft noise and air emissions." (EIS/EIR, p. 4-411 (emphasis added).) A simple review of LAWA's EIS/EIR bears out this conclusion:

Noise

"[M]inority and low-income communities to the east bear the greatest burden of aircraft noise from LAX." (EIS/EIR, p. 4-412);

"Under the Master Plan build alternatives, parks within minority communities to the east of LAX would be newly exposed to high noise levels to a substantially greater extent than communities to the north and south of LAX." (EIS/EIR, p. 4-423)

"Impacts on public schools associated with aircraft noise exposure would fall on schools that are located predominately within minority and/or low-income communities." (EIS/EIR, p. 4-423);



"Only one library, located in the predominately minority community of Inglewood, would be significantly impacted by the build alternatives." (EIS/EIR, 4-423).

#### Air Quality

"After mitigation, emissions of NO<sub>2</sub> [nitrogen dioxide] and SO<sub>2</sub> [sulfur dioxide] would remain significant, and off-airport emissions of all criteria pollutants would remain significant." (EIS/EIR, p. 4-424);

"Under the build alternatives, higher ozone levels could result from increased NO<sub>x</sub> [nitrogen oxides] emissions associated with aircraft operations. . . . While O<sub>3</sub> [ozone] is a regionwide problem, minority and low-income populations may be more severely affected because they may be more susceptible to asthma and other chronic respiratory illnesses triggered by high O<sub>3</sub> levels. Children may be particularly susceptible to health effects of PM<sub>10</sub> [particulate matter], ozone and NO<sub>2</sub>. Minority communities with a high percentage of children may thus be more severely affected than other communities exposed to equivalent levels of pollutants, while children living in poverty who lack access to adequate health care may be especially at risk." (EIS/EIR, pp. 4-424-425 (emphasis added).)

#### Human Health

"Health risks associated with airport-related emissions, however may affect some residents, schools, hospitals and nursing homes in nearby areas with increased risks falling within an area running east-northeast over six miles. As noted above, because children are more sensitive to environmental hazards, greater health risks to children may exist in these areas." (EIS/EIR, p. 4-425)

"Cancer risks for all three build alternatives are estimated to exceed thresholds of significance in 2005 in a small area immediately east of the north runways. The area falls on portions of census tracts . . . which are considered minority/low-income tracts." (Id.)

However, LAWA's plan for environmental justice mitigation measures falls far short of solving these environmental problems. LAWA states that "environmental justice mitigation programs will be developed in conjunction with the affected communities based on response to this analysis and other public input. . . . FAA [Federal Aviation Administration] and LAWA will work with the affected communities to develop mitigation programs tailored to the needs of these communities prior to final project approval." (EIS/EIR, 4-401.) No timeline is suggested for FAA's and LAWA's work, nor does LAWA articulate a comprehensive plan for "working with affected communities" consistent with environmental justice principles.

#### Response:

Please see Response to Comment PC02221-8, and Topical Response TR-EJ-1 regarding air quality and air toxics impacts on minority and low-income communities, and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02221-10

#### Comment:

We believe LAWA's plan to develop environmental justice mitigation measures falls far short of legal expectations. In fact, LAWA's plan to outline environmental and social impact mitigation measures sometime in the future is dangerously close to relying upon deferred mitigation measures that is not permitted under CEQA. See, e.g., *King County Farm Bureau v. City of Hanford*, 221 Cal. App. 3d 692, 728 (1990). At minimum, LAWA may defer the development and implementation of mitigation measures only when LAWA commits to meet realistic performance standards. *Gentry v. City of Murrieta*, 36 Cal. App. 4th 1359, 1395-1396 (1995). Such performance standards to alleviate environmental justice, social and cultural impacts are nowhere in LAWA's analysis.

#### Response:

Please see Response to Comment PC02221-8 and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits. .

### 3. Comments and Responses

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#### PC02221-11

**Comment:**

We also believe that LAWA's proposed future mitigation plans also runs afoul of the NEPA mitigation requirements. As currently articulated, LAWA's plan to simply "consult with affected populations," fails to be adequate and effective because it does not provide a concrete solution to identified environmental problems. Because the mitigation measures have not yet been developed, it is impossible to gauge if the measure will decrease pollution, alter construction impacts, or provide compensation to affected populations. See 40 C.F.R. 1508.20.

**Response:**

Please see Response to Comment PC02221-8 and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02221-12

**Comment:**

As articulated above, we believe that LAWA's public participation process needs serious and immediate improvement, including at minimum more hearings on the Master Plan throughout Los Angeles County; a more transparent decision-making process regarding the three build alternatives; a comprehensive plan showing how the environmental justice workshops and Environmental Justice Task Force will affect LAWA's decision-making process; and more inclusiveness of low-income and minority populations in the decision-making process.

**Response:**

Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR addressed the degree to which the Master Plan alternatives would comply with federal and state regulations and policies pertaining to environmental justice, specifically Executive Order 12898, U.S. Department of Transportation Order 5610.0, California Public Resources Code Section 72000-72001, and California Environmental Protection Agency policy. The approach, methodology, analysis, and results of environmental justice presented in the Supplement to the Draft EIS/EIR are based on the general approach and methodology described in Section 4.4.3, Environmental Justice (subsection 4.4.3.2), of the Draft EIS/EIR, with exceptions regarding the noise analysis, the human health risk assessment, the off-airport traffic emissions, and the use of Year 2000 data in order to determine impacts to minority and low-income communities.

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Please also see Response to Comment PC02236-15 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR in the Spanish language. Additionally, please see Response to Comment PC00178-2 regarding community noticing efforts provided by LAWA in support of the environmental justice workshops. Finally, please see Response to Comment PC02063-1 regarding environmental-justice related mitigation and benefits.

#### PC02221-13

**Comment:**

We request that LAWA review specific mitigation measures to alleviate articulated negative environmental impacts on low-income and minority populations, including, but not limited to: closer analysis of steps that might be taken to mitigate impacts on local parks and schools, or at the very least, to offset the unmitigatable impacts with appropriate improvements that yield net gains in community facilities and benefits; re-defining the noise contours to ensure that all impacted residents are eligible for noise insulation; and providing health care to those affected by LAX air emissions, especially for children, elderly and other sensitive populations.

**Response:**

Please see Response to Comment PC02221-8 regarding mitigation measures to address environmental effects on minority and low income populations. See Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program, Topical Response TR-LU-5 regarding noise mitigation, and Topical Response TR-N-2 regarding single event noise and CNEL differences, in particular Subtopical Response TR-N-2.2. Regarding health care, the potential air emission effects of LAX operations or operations associated with the proposed LAX Master Plan cannot be specifically assessed based on current information and the absence of long-term studies. However, as presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), and Appendix F-A of this Final EIS/EIR, a mobile health clinic is proposed as part of the final Environmental Justice Program. Please see Section 4.26.3, Parks and Recreation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding potential impacts to parks.

**PC02221-14**

**Comment:**

We further request that LAWA be more specific in its work plan for their proposed environmental justice mitigation proposals. We request that LAWA include community groups with knowledge of this issue, including, for example, the well-organized and Inglewood-based community group, LAX Expansion No!, and Communities for a Better Environment, who work with low-income and minority communities under the flight path of LAX, neither of who were included in LAWA's previous 126 public meetings. Finally, we request that any future mitigation proposals developed to combat environmental justice impacts to low-income and minority populations be re-circulated in the form of a supplemental EIS/EIR for both procedural and substantive review by the public.

**Response:**

There are no Master Plan commitments related to environmental justice; however, LAWA has proposed programs that are intended to improve conditions in minority and low-income communities that have experienced disproportionately high and adverse effects from LAX operations. These programs and benefits are described in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. These programs will continue to be refined and developed with input through LAWA's ongoing Environmental Justice Program.

Section 2 in Appendix S-D, Supplemental Environmental Justice Technical Report, of the Supplement to the Draft EIS/EIR indicates that LAWA has made a concerted effort to engage communities in decisions regarding mitigation of current and future environmental impacts associated with past, present, and future actions at LAX. For example, a Memorandum of Understanding between the City of Los Angeles and the City of Inglewood began a new level of cooperation to pursue and implement measures to study and mitigate the possible environmental impacts on Inglewood of existing and potential future operations and improvements at LAX. Please refer to Topical Response TR-EJ-2 for additional information about the environmental justice benefits program.

**PC02221-15**

**Comment:**

IV. The EIS/EIR Fails to Review or Provide any Substantive Analysis Regarding Regional Alternatives

The only three alternatives proposed by LAWA are all based at LAX only. No discussion of other LAWA airports is included, and there is no discussion of other regional alternatives. LAWA explains that it focused entirely on the LAX expansion plan because "LAX is projected to serve a larger volume of passengers and cargo over the next 15 to 20 years. . . . the existing facilities at LAX cannot accommodate the existing demand and forecasted increase in the number of aircraft, cargo and passengers without significant delays and a very poor level of service. . . . The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) for the Los Angeles region." (EIS/EIR, p. 1-30.)

A. SCAG's 2001 Regional Transportation Plan Should Be Included in LAWA's Analysis

### **3. Comments and Responses**

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As part of the 2001 Regional Transportation Plan ("RTP"), SCAG analyzed nine different aviation alternatives for the service of the five county area in Southern California, including Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura Counties. These nine alternatives were to be analyzed for consideration in the 2001 RTP, submitted to the federal Department of Transportation for planning and federal funding purposes for the entire region.

In 1998, SCAG convened an Aviation Task Force to review the nine alternatives, which were narrowed to four alternatives in March of 2000. Each alternative considered passenger and cargo usage at each of the regional airports, including LAX, Ontario, Long Beach, Burbank, Palmdale, John Wayne and March AFB, as well as development of a new airport at El Toro AFB in Orange County. The alternatives considered different million annual passenger ("MAP") measures for each airport, and the possible usage of high-speed rail to relieve stress on the air travel system. SCAG's Aviation Task Force, and later, SCAG's Transportation and Communications Committee, carefully analyzed all the airport options for the entire region, and included a public comment process that lasted over many months. In the end, and following numerous public comments and debates among SCAG's staff and elected membership, SCAG voted in the spring of 2001 to implement "Alternative 8," an aviation alternative that capped LAX expansion at 78 MAP per year, rather than the 89 MAP sought by LAWA officials.

However, none of these developments are mentioned in LAWA's analysis in its EIS/EIR. None of the regional alternatives are discussed or analyzed in LAWA's EIS/EIR, and the final 2001 vote of SCAG is not included in LAWA's EIS/EIR, even though it could severely impact LAWA's potential federal funding. The complete lack of an in-depth regional analysis as part of LAWA's EIS/EIR is particularly puzzling as LAWA staff was on the Aviation Task Force that considered numerous alternatives over many months during 1998 through 2000.

We request that LAWA incorporate full review of regional alternatives and alternatives that maximize use of technologies and modes of transportation with less impact. Such alternatives should include a combination of transportation modes, including, but not limited to, use of other LAWA and regional airports; high-speed rail; light rail; carpooling and HOV lanes. LAWA must, for example, incorporate the SCAG findings for 2001 aviation planning for the region, including more limited LAX expansion, in a supplemental EIS/EIR. The 1998 data used by LAWA is out of date, in light of the 2001 results. We further request that the supplemental EIS/EIR be re-circulated for review by the public once these alternatives are analyzed.

#### **Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. As indicated in the Topical Response, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region. The environmental impacts of Alternative D were evaluated in a Supplement to the Draft EIS/EIR, which was circulated for public review and comment. A discussion of alternative technologies and transportation modes is provided in Chapter 3, Alternatives, of the Draft EIS/EIR. Please also see Topical Response TR-ST-5 regarding the rail/transit plan.

#### **PC02221-16**

#### **Comment:**

B. SCAG's "Southern California Aviation Industry Impact Analysis" Findings Must Be Incorporated Into LAWA's Economic and Alternatives Discussion

As part of SCAG's analysis of the various regional alternatives, SCAG commissioned an economic analysis of all alternatives to ensure that none of the alternatives would cause environmental harm to the region. The resulting independent report, "Southern California Aviation Industry Impact Analysis," was completed by CIC Research, Inc., on July 11, 2000.

The report specifically found, and in contradiction to LAWA's findings in Chapters 1 and 3 of the EIS/EIR, that no one alternative, and no one expansion plan for any of the regional airports, would have

a detrimental economic effect on the region. (Analysis, "Executive Summary," p. iii.) Rather, the report concluded that all of the alternatives would contribute different economic benefits to airports and communities throughout the region. This information, which would have been accessible to LAWA planners, is not mentioned anywhere in LAWA's discussion of alternatives or regional economic impacts of LAX expansion.

We request that the economic findings of the independent Analysis be incorporated into LAWA's discussion of economic impacts of the regional aviation alternatives, including LAWA's finding that the regional economy will suffer if LAX does not expand to double its cargo load and increase to accommodate 89 MAP. We further request that LAWA's Chapters 1 and 3 be revised to reflect the findings of the Analysis.

**Response:**

Please see Response to Comment AL00033-113 regarding changed circumstances in the region's system of airports since the referenced study was prepared and SCAG's 2001 Regional Transportation Plan was adopted. Economic impacts were addressed in Section 4.4.1, Employment/Socio-economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 5 of the Draft EIS/EIR and Technical Report S-3 of the Supplement to the Draft EIS/EIR.

**PC02221-17**

**Comment:**

C. A Regional Environmental Justice Analysis Must Be Completed

The EIS/EIR fails to completely analyze the regional environmental justice impacts due to LAX operations. The environmental justice chapter of the EIS/EIR goes into some detail about the impact of the proposed alternatives on the area immediately surrounding LAX. However, the EIS/EIR gives no analysis of what impact LAX operations have on communities located further east of the airport, directly under the flight path. These communities are predominately low-income and minority, and often must endure noise and air quality impacts of LAX operations, although not as directly as the populations directly adjacent to LAX. We request that impacts on the populations under the flight path and within 10 miles of LAX be analyzed and incorporated into a further supplemental EIS/EIR.

**Response:**

As stated on page 4-402, in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the study area for the analysis is defined as the area in which the collective environmental effects of the Master Plan alternatives would be likely to occur, extending beyond the areas adjacent to LAX to include those areas potentially affected by aircraft noise (defined by the future 65 dB CNEL noise contours) and aircraft or airport-related emissions, as well as airport-related traffic impacts, including congestion, noise and air pollution. Although specific analyses of environmental justice concerns within a 10-mile radius is outside of the scope of the LAX Master Plan EIS/EIR, see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as appropriately analyzed in the Southern California Association of Government (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Also note that LAWA Staff's new preferred alternative, Alternative D, limits future (2015) growth at LAX to levels similar to what would occur with existing facilities if the LAX Master Plan were not approved. Alternative D reduces growth at LAX compared to the other build alternatives, potentially shifting the burden of airport expansion to other regional airports, including airports in the Inland Empire. To the extent that other regional airports undertake expansion plans, these plans would be subject to environmental review and would address environmental justice issues pursuant to NEPA and/or CEQA as applicable. Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-3 regarding environmental justice and regional context.

### 3. Comments and Responses

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#### PC02221-18

##### Comment:

We also specifically request that LAWA update all of its EIS/EIR demographic analyses using 2000 Census Data that is now available, and include their findings in a supplemental or final EIS/EIR. The more recent census data is critical to understanding the impacts of the expansion, especially in this rapidly changing urban context. Such a consideration was contemplated by LAWA when the draft EIS/EIR was released last January, and we believe it should have been included. See EIS/EIR, p. 4-402, fn. 145.

##### Response:

The 2000 Census data was not available at the time the Draft EIS/EIR was being prepared. However, efforts were taken to review vendor data as reflected in footnote 145 on page 4-402. The demographic trends identified in the 2000 U.S. Census have since become available. See Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, which includes a presentation and evaluation of 2000 U.S. Census data. As stated in subsection 4.4.3.3, while there have been demographic changes in the area, the new demographic data does not show a material change in the findings presented in the Draft EIS/EIR.

#### PC02221-19

##### Comment:

V. The EIS/EIR Fails to Include Appropriate Environmental Health Studies that Are Currently Ongoing by LAWA, and Is Based Upon Incomplete and Insufficient Information

A. The Air Quality and Source Apportionment Study Must Be Completed and Its Findings Included in Supplemental EIS/EIR

In its air emission and human health analysis, LAWA articulates some possible air quality and health risks, then qualifies its findings by stating, "Due to the lack of available background data, the cumulative or synergistic health effects of TAP [toxic air pollutants] emissions associated with the build alternatives and other environmental hazards could not be quantitatively analyzed within the scope and timeframe of this EIS/EIR." (EIS/EIR, p. 4-426.) Essentially, LAWA argues that because of the LAX's proximity to other air pollutants, such as the 405 and 105 freeways, the Chevron El Segundo Refinery and two power generating station, it is impossible to determine with certainty what LAX's air quality impacts are to the surrounding community. (EIS/EIR, p. 4-424.)

However, LAWA fails to incorporate findings from its own Air Quality and Source Apportionment Study, which is currently underway and will provide significant information that LAWA claims is now unavailable. The study will shed light on the health impacts of various air emissions, as well as determine the contribution of various airport-related activities on selected air toxic and pollutant concentrations contrasted to other non-airport sources in the surrounding community. In spite of identifying the need for such a study, LAWA fails to explain why it did not include the study findings in its air quality and human health analysis in the EIS/EIR. Surely the study findings would have a direct impact on quantifying LAX air emissions, thus determining what TAPs are generated by LAX, what would be generated by increased operations, and how LAWA can mitigate or offset such dangerous air pollutants.

##### Response:

The LAX Ambient Air Quality and Source Apportionment Study (LAX AQSA) was never intended to be part of the LAX Master Plan documentation. LAWA agreed to support the study to the maximum extent possible, but stated several times that the study would not be tied to the Master Plan. Two important reasons were timing and methods of analysis. In addition, the events of September 11, 2001, have impacted the ability to allocate resources to the LAX AQSA.

LAWA still intends to support the LAX AQSA; however, due to the substantial loss of revenue by airports and airlines after 9/11, funding for the study will need to come from other entities. Currently, LAWA is working with the U.S. EPA in an attempt to secure funding for the Pilot Study portion of the

LAX AQSA. The U.S. EPA has conducted a peer review of the study work plan and protocols and is in the process of developing the peer review report. Since the timing and funding of the LAX AQSA is unknown at this time, the LAX Master Plan and AQSA remain separate studies.

If funded, the LAX AQSA Pilot Study will employ state-of-the-art methods to monitor air pollutant concentrations near a runway at LAX. These air monitoring methods may not comply with approved regulatory air monitoring protocols and therefore data obtained from this study may require additional analysis before it is considered acceptable by regulatory agencies. Thus, relying on the LAX AQSA to describe air quality impacts at LAX would be subject to substantial debate. Therefore, a more traditional health risk assessment approach was used in the LAX Master Plan Draft EIS/EIR and Supplement to the Draft EIS/EIR.

Please refer to Section 6.7, Cumulative Risk, of 14a, Human Health Technical Report of the Draft EIS/EIR for a discussion of cumulative risks associated with LAX operations compared to risks associated with other sources to determine the impact of LAX operations on cumulative risk for people living in the South Coast Air Basin. Additional information on non-cancer cumulative risk is provided in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR.

#### PC02221-20

**Comment:**

We do not include a more detailed analysis of the air quality section of the EIS/EIR here, partly because organizations such as the Coalition for Clean Air are providing detailed comments on this issue on behalf of the affected communities. However, at minimum, we request that the Air Quality and Source Apportionment Study be completed, and its findings be incorporated into a supplemental EIS/EIR and re-circulated to the public for review.

**Response:**

Comment noted. Please see Topical Response TR-AQ-2 regarding the source apportionment study.

#### PC02221-21

**Comment:**

B. A Study of the Human Health Impacts of Jet Fuel Must Be Completed and its Findings Included in a Supplemental EIS/EIR

In addition to the Source Apportionment Study, we believe LAWA should specifically study the human health impacts of jet fuel in the EIS/EIR. A more detailed analysis of the use of jet fuel is essential to workers at LAX, as well as local residents and the public at large.

As a human health issue, studies have shown that prolonged exposure to jet fuel can also cause injury to pulmonary and major immune systems, and may also cause skin irritation and cognitive difficulties. (See "Proceedings of the First International Conference on Environmental Health and Safety of Jet Fuel," April 1, 1998.) These impacts must be appropriately analyzed and included in LAWA's human health analysis.

**Response:**

Jet fuel was considered in the health risk assessment for the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Emissions from tank farms, during fueling, and during aircraft operation were accounted for in the emissions inventory. Emissions were estimated for components of jet fuel, including criteria pollutants and toxic air pollutants identified as components of jet fuel by EPA and Cal/EPA. For individual workers, exposures to jet fuel would not be expected to change significantly in the future, except as a result of emissions improvements in fuel handling equipment. Worker exposure at individual gates as aircraft are serviced will continue under both No Project and build alternatives. Finally, the issue of worker exposure to jet fuel is subject to occupational regulations. Workers receive training in fuel handling and hazards, and efforts are made under these regulations to reduce all hazards, including those related to direct exposure. The Draft EIS/EIR and Supplement to the Draft EIS/EIR in Section 4.24, Human Health and Safety, evaluated available toxicological information regarding adverse health effects of jet fuel, such as information provided in the Agency for Toxic

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Substances and Disease Registry Toxicological Profile for Jet Fuel (ATSDR, 1997). In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR evaluated human health impacts associated with exposure to toxic air pollutants identified as components of jet fuel. Also, please see Response to Comment PC00045-4 regarding odors.

#### **PC02221-22**

**Comment:**

Because of the volatility of jet fuel, the jet fuel distribution system, which is currently underground at LAX, should be analyzed with respect to possible fire and explosion capabilities. Also, because of the heightened awareness of the dangers of jet fuel following September 11, a pilot crew might now be more likely to jettison jet fuel if threatened by terrorists, thereby causing a health risk to the public. As a result, the human health impacts of exposure jettisoned jet fuel must also be evaluated, especially in light of the densely populated area surrounding LAX. Now, more than ever, such studies are necessary and essential to help explain flying risks to the public, as well as provide information about how to stay safe when exposed to jet fuel.

**Response:**

As discussed on page 4-963 in Section 4.23, Hazardous Materials, of the Draft EIS/EIR, most of the jet fuel is delivered to LAX through underground pipelines from refineries located in the vicinity of LAX. These pipelines are subject to pipeline safety requirements contained within the Pipeline Safety Act as enforced by the California State Fire Marshall. These requirements include design specifications, as well as provisions for construction, operation and maintenance, and release reporting. As discussed on page 4-768 in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR, under Alternative B, construction of an off-site fuel farm at either the Scattergood Electric Generating Station or the oil refinery located south of the airport would occur. With development of either of these sites, existing fuel transmission lines would need to be extended from the current terminus at LAX to the fuel farm, and fuel transmission lines would need to be provided between the oil refinery site or the Scattergood site and LAX. The proposed alignment for these pipelines is in the existing right-of-way of Vista del Mar. An underground concrete "utilidor" would contain the piping from the fuel farm site to LAX. The utilidor box would be designed to contain any spillage from the transmission lines, and a leak detection system with periodical double block and bleed closure valves would create individual emergency fuel shutoff points that would segmentize the main line. The pipeline would be constructed in accordance with all applicable regulations and permit requirements. Thus, the risk of upset associated with the fuel transmission lines would be less than significant. The act of jettisoning fuel from an aircraft in flight is only rarely performed during extreme emergencies where the ability of the aircraft to maintain flight altitude is at risk. The FAA does offer guidance to commercial aircraft operators for jettisoning fuel during emergency situations regarding the safety of the persons on board the aircraft. In the event it would occur, fuel would be jettisoned at an altitude sufficient to ensure that all fuel is vaporized before it could reach the ground. Normally, fuel dumping, if necessary, would take place well off shore and in accordance with FAA regulations in the Airman's Information Manual, FAA, paragraph 6-24. In addition, the various airlines have their own procedures for jettisoning of fuel. For aircraft emergencies at LAX, depending upon the nature of the emergency, aircraft would typically jettison fuel over the Pacific Ocean. Contrary to some opinions, jettisoning of fuel by an aircraft is a very rare event even during emergency situations. Pilots of aircraft do not regularly jettison fuel because it immediately reduces the ability of an aircraft to reach a specific destination. Further, the cost of the fuel is a significant factor to the aircraft operator. As mentioned above, the need to jettison fuel in-flight occurs when the aircraft can no longer maintain sufficient altitude for safe flight.

#### **PC02221-23**

**Comment:**

We request that the jet fuel studies be completed, and findings incorporated into a supplemental EIS/EIR and re-circulated to the public for review.

**Response:**

Please see Response to Comment PC02221-22 above regarding the issue of jet fuel.



**PC02221-24**

**Comment:**

VI. Relocation of Residences and Minority Owned Businesses Must Be Fully Addressed

LAWA has inexplicably failed to provide full information about what local residents and businesses might be impacted by expanded LAX operations. As a result, it is not possible to determine if environmental justice or civil rights issues are implicated by the Master Plan.

**Response:**

Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR, provided demographic information concerning the minority and low-income composition of the census tracts within which residential properties are proposed for acquisition. For Alternatives A, B and C, this census tract, tract 2780, and its demographic characteristics are described on pages 4-427 and 4-428 of the Draft EIS/EIR. Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR provided updated demographic information based on the 2000 U.S. Census and identified changes in the locations and concentrations of minority and low-income populations within the environmental justice study area. The demographic characteristics by census tract throughout the study area based on the 2000 U.S. Census are presented in Table S3, on page 7 of Appendix S-D of the Supplement to the Draft EIS/EIR. As indicated on page 4-318, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, the new demographic data for the study area would not materially change the impact analysis contained in the Draft EIS/EIR. Also note, as stated on page 4-333 that under Alternative D, no residential acquisition is proposed.

Public information on the demographics of business ownership and employment is limited. As a result, and based on issues related to privacy rights and the difficulty of completing a survey within the study area, this information was not included in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. However, the potential for relocation effects on minority businesses or residents is identified on pages 4-428, 4-430, and 4-432 of the Draft EIS/EIR and on pages 4-336, 4-337, and 4-339 of the Supplement to the Draft EIS/EIR. As stated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, relocation would be undertaken in compliance with the Uniform Relocation Act and pursuant to a LAWA Relocation Plan that would include special provisions to assist minority owned businesses or residents to the extent necessary. Although relocation impacts are less than significant, to the extent that there could be disproportionate effects on minority businesses or residents, they would be addressed through LAWA's Relocation Plan and the Environmental Justice Program described in subsection 4.4.3.7 of this Final EIS/EIR, including Mitigation Measure MM-RBR-2 and the job related provisions for disadvantaged business enterprises described under the environmental justice benefit "Job Outreach Center." As demonstrated above, the lack of greater specificity on demographics has not compromised the environmental justice analyses or the adequacy of LAWA's Environmental Justice Program, Mitigation Measures, or Master Plan Commitments that help address and offset potential disproportionate effects on minority and/or low-income populations.

**PC02221-25**

**Comment:**

With respect to the 172 residents who would be relocated under all of LAWA's alternatives, "The minority and/or low-income status of the individual occupants of these dwelling units has not been ascertained." (EIS/EIR, pp. 4-427-428.) In addition, LAWA fails to provide information about potential impacts on minority owned businesses surrounding LAX because "data is not currently available regarding the number of minority owned businesses or minority employees that might be affected" by proposed land acquisition by LAWA. (EIS/EIR, p. 4-428.)

**Response:**

Please note that LAWA Staff's new preferred alternative, Alternative D, does not propose residential acquisition and has the least acquisition of the proposed Master Plan build alternatives.

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Public information on the ethnicity of business owners, employees, and individual residents is limited. As a result, and based on issues related to privacy rights and the difficulty of completing a survey within the study area, this information was not included in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. However, the potential for relocation effects on minority businesses or residents is identified on pages 4-428, 4-430, and 4-432 of the Draft EIS/EIR and on pages 4-336, 4-337, and 4-339 of the Supplement to the Draft EIS/EIR. As stated in Section 4.4.3, Environmental Justice of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, relocation would be undertaken in compliance with the Uniform Relocation Act and pursuant to a LAWA Relocation Plan that would include special provisions to assist minority owned businesses or residents to the extent necessary. To the extent that there could be a disproportionate effect on minority businesses or residents, the effect would be addressed through these provisions contained within LAWA's Relocation Plan and through the Environmental Justice Program described in subsection 4.4.3.7 of the Final EIS/EIR, including Mitigation Measure MM-RBR-2 and the job related provisions for disadvantaged business enterprises described under the environmental justice benefit "Job Outreach Center." As demonstrated by the provisions outlined above, the lack of greater specificity on demographics has not compromised the environmental justice analyses or the adequacy of LAWA's Environmental Justice Program, Mitigation Measures, or Master Plan commitments that address and offset potential disproportionate effects.

#### PC02221-26

**Comment:**

We request that LAWA provide full information about the demographics of the residents and businesses projected to be impacted and relocated because of expanded LAX operations.

**Response:**

Please see Response to Comment PC02221-24 above.

#### PC02221-27

**Comment:**

VII. Traffic Management Plans Must Be Appropriately Addressed

We believe the EIS/EIR fails to properly address the traffic impacts of increased traffic near the airport, and especially increased trips generated on the 405 freeway. The numbers utilized by the EIS/EIR are based upon 1996 baseline numbers, and traffic has, if anything, become more problematic in the area over the past five years. We request that LAWA consider further mitigation proposals for the traffic problems identified in the EIS/EIR, as well as those identified in other comments (especially those submitted by the County of Los Angeles).

One possible mitigation plan includes the implementation of the federal Commuter Choice program at LAX. Changes in the 1998 Federal Tax Code makes Commuter Choice incentive strategies universally available as potential Transportation Control Measures to meet Clean Air Act requirements in areas that fail to meet the National Ambient Air Quality Standards to protect public health. As documented in the DEIR, "The City of Los Angeles is included in the South Coast Air Basin, which has been designated as a non-attainment area for certain pollutants that are regulated under the [Clean Air Act]."66 As a result, we believe the Commuter Choice incentive program is uniquely suited for implementation at the Project site, to both improve air quality and relieve some of the parking congestion projected to occur at the Project site.

The 1998 Federal Transportation Equity Act for the 21st Century (TEA-21) gives new incentives to reward employees and employers who help reduce traffic and pollution problems. The Commuter Choice provisions in TEA-21, Section 9010, modify the Internal Revenue Code and enable employers to offer employees options for qualified transportation fringe benefits. There are three principal Commuter Choice options: (1) Employees can purchase up to \$65 dollars per month in transit benefits using pre-tax income (an amount that increases to \$100 in 2002) which slashes the effective cost of transit. (2) Employers can offer tax-free subsidies for their employees' transit costs, with the same limits. And (3) employers can now offer cash in lieu of parking -- "cashing-out" old, inflexible parking subsidies.

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Utilizing Commuter Choice would be a win-win proposition for all involved -employers get a tax break, employees get an additional pre-tax benefit, and the region benefits with cleaner air. In correspondence with staff of the Senate Environment and Public Works Committee in 1999, the EPA Office of Mobile Sources estimated that a national commuter choice program assuming a 5-10% employee participation rate would generate:

- A reduction in commute vehicle miles traveled ("VMT") of 1.6 to 3.2%
- Reductions in VMT of 10,000,000,000 to 20,000,000,000 miles
- Emission Reductions of:
  - HC: 27,000-54,000 short tons
  - CO: 240,000-480,000 short tons
  - NOx: 16,800-33,600 short tons
  - CO2 1,180,000- 2,360,000 metric tons

In other areas, Commuter Choice programs have been shown to unite the diverse interests of environmentalists, business, labor, and transit and highway advocates. Most realize that Commuter Choice is good for business and for communities. Commuter Choice is a voluntary incentive that boosts travel options and supports more efficient use of the roads and transit we already have. It can provide quick relief to traffic-strained communities and will expand market opportunities for new forms of access to suburban jobs. Low- and moderate-income workers benefit particularly, since commuting costs represent a larger relative burden on them, and they tend to be more reliant on ride-sharing and transit.

The Alliance for Clean Air and Transportation, a new national group representing a diverse array of sectors, including the road builders, automobile industry, environmentalist and health groups, the American Association of State Highway and Transportation Officials, Highway User Federation, American Automobile Association, the National Association of Regional Councils, the United States Department of Transportation, and the Environmental Protection Agency, in February 2000 adopted a consensus goal of making Commuter Choice benefit programs a standard part of the American worker benefit program over the next five years.

We believe implementing Commuter Choice at the LAX would relieve concern regarding employee parking, provide additional worker benefits, and help improve air quality in an already overburdened area.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Topical Response TR-GEN-1 regarding the baseline years used in the analysis, and Topical Response TR-ST-4, in particular Subtopical Response TR-ST-4.3 regarding impacts to I-405. When the final implementation plan is prepared, all feasible methods of minimizing construction traffic and its related emissions will be explored in addition to those outlined in the Draft EIS/EIR and Supplement to the Draft EIS/EIR. This may possibly include the Commuter Choice program the commentor refers to.

**PC02221-28**

**Comment:**

We request that LAX address this possible mitigation proposal and incorporated their findings into a supplemental EIS/EIR, which should be re-circulated to the public for review.

**Response:**

Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR providing a comprehensive analysis of Alternative D as well as certain new information pertaining to the evaluation of other alternatives, and was circulated for public review and comment. Air Quality Mitigation Measure MM-AQ-1 provides for carpool programs, rideshare programs, and other programs consistent with the Commuter Choice program described in Comment PC02221-27 above.

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#### **PC02221-29**

**Comment:**

VIII. Request for Notification

Pursuant to California Public Resources Code Section 21092(b)(3), Environmental Defense requests that LAWA please mail any and all public notices or information concerning the proposed project to Jerilyn Lopez Mendoza at the following address (effective October 1):

Environmental Defense  
Environmental Justice Project Office  
3250 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90010  
Phone: 213-386-5501  
Fax: 213-386-5577

**Response:**

Comment noted.

#### **PC02221-30**

**Comment:**

IX. Conclusion

As a result of these deficiencies, we believe that the EIS/EIR is inadequate. We request that the deficiencies described in these comments be addressed in a supplemental EIS/EIR, and that the supplemental EIS/EIR be re-circulated to the public for review and comment.

**Response:**

As indicated above in Response to Comment PC02221-28, a Supplement to the Draft EIS/EIR was completed and circulated for public review.

**PC02222**

**Ong, Jerry**

**Gateway to L.A., Inc.**

**9/24/2001**

#### **PC02222-1**

**Comment:**

As LAX's immediate "neighbor" to the east (Gateway's border is Sepulveda Boulevard, adjacent to the Airport), we have reviewed the LAX Master Plan Draft EIR/EIS document, and respectfully provide the following observations and comments as they pertain to property interests in the Gateway BID area. These comments relate to the "preferred alternative", which is Alternative C.

**Response:**

Comment noted. Please see Responses to Comments below.

#### **PC02222-2**

**Comment:**

1. The Gateway to L.A. BID has long-contemplated the introduction of more synergistic land uses that better complement Gateway's commercial properties, along Gateway's 98th Street border.

Along the south side of 98th Street, hotels, office buildings and parking structures are the predominant land use. However, along the north side of 98th Street (owned by Los Angeles World Airports) surface parking lots are the predominant existing land use.

Gateway's goal is to create an attractive, pedestrian-friendly corridor, with complementary retail-type amenities along 98th Street, so that 98th Street is not such a "back door" to the BID, and to ensure that 98th Street does not become a primary "cargo front door" to the Airport. To this end, Gateway has recently undertaken, at significant expense to the BID, a market research study to identify additional and alternative uses to enhance the BID's attractiveness to retailers, restaurateurs and entertainment venue providers. The study is evaluating potential sites, including along 98th Street, on which to locate new retail, restaurant and entertainment venues.

The future land uses proposed on the north side of 98th Street under the LAX Master Plan by LAWA, will bring jet aircraft and cargo-related uses/operations much closer to Gateway's properties. The proposed future land uses reflected in the Draft EIR/EIS, along Gateway's northern border, include:

- "PCV" - Proposed Commercial Vehicle Holding Area
- "PA" - Proposed Ancillary Facility
- "PSP" - Proposed Short-Term Public Parking
- "PEP" - Proposed Employee Parking
- "PC" - Proposed Cargo Buildings
- Proposed Aircraft Taxiways (where aircraft will taxi close to some of Gateway's properties)

These new uses proposed by LAWA raise land use compatibility issues, where the proposed aircraft and cargo uses have little relation to the commercial uses within the Gateway BID.

**Response:**

Compatibility of proposed uses under the LAX Master Plan for Alternatives A, B, and C with uses along the south side of 98th Street was described in Section 4.2, Land Use (subsection 4.2.6), Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns (subsection 4.4.4.6), and Section 4.21, Design, Art and Architecture Application/Aesthetics (subsection 4.21.6), of the Draft EIS/EIR. As concluded in these sections the proposed uses are similar to and compatible with existing commercial and industrial uses along the "Century Corridor" (bounded by 96th Street, Aviation Boulevard, and Sepulveda Boulevard, and Century Boulevard) many of which are airport-dependent. In addition, Cargo Guidelines and a landscape buffer would be provided to enhance current visual conditions and ensure compatibility with uses along 98th Street. Compatibility of the proposed uses under Alternative D with existing uses along the "Century Corridor" was also described in Section 4.2, Land Use (subsection 4.2.6), Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns (subsection 4.4.4.6), and Section 4.21, Design, Art and Architecture Application/Aesthetics (subsection 4.21.6), of the Supplement to the Draft EIS/EIR. As concluded in the analysis of Alternative D, proposed uses would be similar to and compatible with existing commercial and industrial uses along the Century Corridor and would also adhere to LAWA's Cargo Guidelines and provide a landscape buffer. Under Alternative D, compared to the other build alternatives, fewer properties would be acquired along 98th Street. In addition, the APM proposed under Alternative D has the potential to be incorporated into Gateway's future plans for development along 98th Street. It should be noted that the proposed future development is in the preliminary development stages; however LAWA continues to meet with Gateway to obtain their comments and address their concerns.

**PC02222-3**

**Comment:**

Gateway would encourage LAWA, prior to the preparation of the Final EIR/EIS document, to study more synergistic land uses across the street from Gateway's northern border. Gateway would welcome and encourage the Airport to study an alternative land use mix that includes some retail and commercial frontage, at least on the ground floor level, along the northern side of 98th Street. For example, the development of new, multi-level parking structures on the north side of 98th Street, which parking structures could serve the public, while providing ground level retail opportunities which front onto 98th Street, would create a visual and noise buffer from the aircraft and cargo operations immediately to the north, as well as create more land use compatibility with Gateway's bordering office, hotel and restaurant land uses.

### **3. Comments and Responses**

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**Response:**

The suggested alternative land use mix is noted; however, the subject alternative would not avoid or reduce any significant impacts identified in the Draft EIS/EIR or the Supplement to the Draft EIS/EIR. As described therein, no unavoidable significant impacts related to land use, visual resources, or noise for uses along 98th Street are expected to occur from the currently proposed alternatives.

**PC02222-4**

**Comment:**

Retail or commercial amenities along LAWA's side of 98th Street would also create additional revenue sources for LAWA, provide sales tax dollars to the City of Los Angeles, thus creating fiscal benefits, as well.

**Response:**

Comment noted.

**PC02222-5**

**Comment:**

Further, for some of the existing businesses being displaced in Westchester under the preferred alternative, this might provide retail or commercial site opportunities in the area to replace their previous business locations.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. Also please note that after the publication and review of the Draft EIS/EIR, a new alternative - Alternative D-Enhanced Safety and Security Plan - was added to the range of options currently being considered for the LAX Master Plan. Alternative D is the LAWA staff-preferred alternative and would have substantially less/fewer impacts than any of the other build alternatives, including Alternative C, which was previously the preferred alternative. Alternative D proposes substantially less property acquisition than the other build alternatives, including, by comparison the proposed acquisition of only 38 business instead of the 239 to 330 businesses proposed to be acquired under the other three build alternatives. As such, the need for, and impacts of, business relocation have been substantially reduced with the addition of Alternative D.

**PC02222-6**

**Comment:**

As part of the market research study now underway commissioned by Gateway, Gateway seeks the opportunity to synchronize its planning efforts with LAWA. Gateway believes that given the opportunity to collaboratively plan the land uses along its 98th Street/northern border, will result in solutions that may eliminate land use impacts from the LAX Master Plan, while bringing benefits to both LAWA and Gateway.

**Response:**

Comment noted. Please see Responses to Comments PC02222-3 through PC02222-5.

**PC02222-7**

**Comment:**

Finally, Gateway would suggest that LAWA's development of the north side of 98th Street include widening of 98th Street to accommodate traffic circulation, as well as to create landscaping setback areas on both sides of 98th Street.

**Response:**

Sufficient setback areas would be provided to allow adequate landscaping on both sides of 98th Street.

**PC02222-8**

**Comment:**

2. As it exists today, Airport Boulevard is a significant north-south transportation corridor serving businesses in the Gateway BID. Airport Boulevard is also a heavily-used traffic corridor for vehicles going to and from the LAX. Airport Boulevard spills out onto Century Boulevard, and accommodates thousands of daily vehicle trips as quantified in the traffic study of the Draft EIR/EIS.

Gateway BID properties along Airport Boulevard include the Renaissance Hotel, the Four Points Sheraton Hotel, the Embassy Suites Hotel, the Marriott Hotel and the 9841 Airport Boulevard office building.

The Draft EIR/EIS "preferred alternative" shows that Airport Boulevard, as we know it today, will cease to exist near the existing Renaissance, Four Points Sheraton, Embassy Suites, Marriott and 9841 Airport Boulevard properties. It appears that Airport Boulevard will be cul-de-sac'd to allow for the closure of the street, and the elimination of the Renaissance Hotel property.

The closure of Airport Boulevard poses significant changes in both land use and traffic circulation patterns.

We ask that the Final EIR/EIS more fully clarify traffic circulation in light of the closure of Airport Boulevard as a through-street, i.e.:

- Where will the present traffic go?
- What north-side transportation corridor(s) will absorb the traffic? - i.e.,
- Will Sepulveda Boulevard, Vicksburg Avenue, Avion Drive, Bellanca Avenue, Aviation Boulevard, and/or La Cienega Boulevard absorb the traffic, and if so, how much traffic?
- Will the proposed Ring Road absorb existing Airport Boulevard traffic, and if so, how much?
- As an alternative to closing or cul-de-sac'ing Airport Boulevard as a through-street, was under-grounding of Airport Boulevard, starting at 96th Street, evaluated in the Draft EIR/EIS? If not, we would ask that the feasibility of under-grounding Airport Boulevard be addressed in the Final EIR/EIS document.

**Response:**

The methodology used to analyze the impacts of the LAX Master Plan and the numerous proposed changes to the transportation system is described in Topical Response TR-ST-2. Airport Boulevard would not be closed in Alternative D. Because, under Alternative C, the closure of Airport Boulevard between Century Boulevard and Arbor Vitae Street would be combined with many other land use and network changes, it is not possible to isolate the impacts of the closure by itself. Tunneling Airport Boulevard was not analyzed in detail, because it would be cost-prohibitive, particularly in light of the fact that all of the land uses between 96th Street and Arbor Vitae, which currently rely on Airport Boulevard for access, would not exist in the alternatives. Therefore, the vehicular demand for that segment of roadway would be much less than today. In that case, Airport Boulevard would act as a through street only. However, there should be adequate through-capacity with Sepulveda, Aviation, and La Cienega.

**PC02222-9**

**Comment:**

We also ask that the Final EIR/EIS clarify the impacts from displacing the Renaissance Hotel property - i.e., are there plans by LAWA to relocate the hotel elsewhere, and if so, where?

**Response:**

The Renaissance Hotel property was shown as Master Plan Area C, Parcel 31 on Figure 3-8, Alternative A Proposed Property Acquisition Areas, Figure 3-12, Alternative B Proposed Property Acquisition Areas, and Figure 3-16, Alternative C Proposed Property Acquisition Areas, in Chapter 3, Alternatives, of the Draft EIS/EIR. This parcel is proposed for acquisition under each of these alternatives. This property is targeted for relocation to Westchester Southside, as indicated in Table A-3, Parcel Detail of Acquisition Areas Alternative A, Table B-3, Summary Statistics of Acquisition Areas

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Alternative B, and Table C-3, Summary Statistics of Acquisition Areas Alternative C, in Appendix P to Chapter V of the Master Plan, Preliminary Property Acquisition and Relocation Plan.

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. Alternative D would not involve the acquisition of the Renaissance Hotel (see Figure S3-14, 2015 Alternative D Proposed Property Acquisition Areas, in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR and Table 2.7-2, Alternative D - Parcel Detail of Acquisition Areas, in Chapter 2.7 of the Master Plan Addendum).

#### **PC02222-10**

##### **Comment:**

3. The proposed closure of Airport Boulevard pursuant to the Draft EIR/EIS could create a land-locked "island" for Gateway properties such as the Four Points Sheraton, the Embassy Suites Hotel, the western side of the Marriott and the eastern side of the 9841 Airport Boulevard office building.

The cul-de-sac'ing of Airport Boulevard in front of these properties could make them less accessible, and less visible, to potential guests, tenants, visitors and vendors, which in turn could impact the properties' market competitiveness.

Further, the closure of Airport Boulevard, and LAWA's proposed land uses, will eliminate one of Gateway's finest hotel properties, the Renaissance Hotel.

The closure of Airport Boulevard under the Draft EIR/EIS "preferred alternative" poses land use challenges that Gateway would like to see more fully analyzed in the Final EIR/EIS.

##### **Response:**

While the closure of Airport Boulevard at Arbor Vitae Street would occur under Alternatives A, B, and C as analyzed in the Draft EIS/EIR, these properties would still retain access and be highly visible from Century Boulevard. In addition, surrounding land uses on Airport Boulevard would remain similar to the existing airport-related uses (such as parking) and therefore would not be expected to have a substantial effect on marketability to potential guests. However, under LAWA Staff's new preferred Alternative D, no closure of Airport Boulevard would occur.

Please see Response to Comment PC02222-9, regarding the acquisition and relocation of the Renaissance Hotel.

#### **PC02222-11**

##### **Comment:**

Synergistic and compatible land uses at the "mouth" of the proposed cul-de-sac on Airport Boulevard could create both a visual and noise buffer from the Airport's operations to the north, as well as land use opportunities which could help compensate the Gateway BID and mitigate the impacts from the loss of this thorough-fare. Gateway would like to see the Final EIR/EIS document more fully evaluate and respond to the above issue.

##### **Response:**

Comment noted. Please see Responses to Comments PC02222-3 through PC02222-5.

#### **PC02222-12**

##### **Comment:**

Gateway would also like the opportunity to participate with LAWA in planning solutions related to the potential closure of Airport Boulevard that will help mitigate land use impacts.



**Response:**

Comment noted. LAWA will ensure commentor is on all notification lists.

**PC02222-13**

**Comment:**

4. The intersection of La Cienega and Century is Gateway's eastern-most "portal" leading to Century Boulevard and Gateway's properties. Properties near this intersection include the Holiday Inn, Quality Inn, ARCO, McDonalds, Arden's 5200 Century office building, KB Airport Center office building, and the Westin Hotel, among others.

Under the "preferred alternative" of the Draft EIR/EIS, and due to the anticipated increase in passenger and cargo activity at LAX, certain area intersections will suffer serious degradation. One of the most impacted intersections is La Cienega and Century. This intersection will be at a failing level of service during both morning and afternoon/evening rush hours in terms of surface traffic i.e., traffic gridlock.

We believe that more analysis is warranted in the EIR/EIS to address mitigations that can bring the Century/La Cienega intersection to more acceptable, free-flowing levels.

**Response:**

While unmitigated, the intersection of Airport Boulevard and Century Boulevard will function at LOS E or better in 2015 for all peak hours and all alternatives, which means that the demand is expected to be within the maximum capacity of the intersection. Improvements for this intersection have been identified, but may not be implementable due to right-of-way constraints. Estimates of the impacts of the Green Line extension and other transit improvements are conservatively high in the Draft EIS/EIR in order to avoid under-estimating potential impacts. LAWA and LADOT will make every effort to achieve greater transit usage. This will help to improve operations at the La Cienega/Century intersection as well as other intersections in the area.

**PC02222-14**

**Comment:**

Otherwise, this will create a need under the California Environmental Quality Act (CEQA) for a "Statement of Overriding Considerations" in connection with not only the proposed LAX Master Plan, but with proposed development activity that property owners in the Gateway BID may contemplate in the future.

**Response:**

The commentor is correct that approval of the LAX Master Plan would require a statement of overriding considerations for significant unavoidable adverse impacts.

**PC02222-15**

**Comment:**

Further, with the proposed elimination of Airport Boulevard north of Century as a through-street, it is essential to Gateway that La Cienega Boulevard, as Gateway's other primary north-south transportation corridor, not be even more burdened with vehicular traffic.

Previously, at presentations by LAWA to Gateway, there was discussion about a possible above-ground People Mover/monorail system serving the Airport that might traverse 98th Street in the Gateway BID area, to reduce the amount of vehicular trips in the area and create more free-flowing intersections. However, we saw no discussion in the Draft EIR/EIS of an off-site People Mover system along or near 98th Street that would bring passengers and visitors into the Airport from the east, as a way to mitigate vehicular traffic impacts.

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LAWA has proposed several significant transportation-related mitigation measures as part of the LAX Master Plan, including the proposed Ring Road, the LAX Expressway, an internal on-Airport People Mover system, and the extension of light rail (the GreenLine) to the Airport.

We respectfully ask that the same level of creativity be applied to mitigating the Century/La Cienega intersection to bring the intersection to acceptable levels of surface, and ask LAWA for further analysis in the Final EIR/EIS to address the mitigation of the Century/La Cienega intersection.

**Response:**

Due to the cost of a further extension of the people mover system beyond (i.e. east of) the Central Terminal Area, and the relatively low ridership expected on such an extension, a people mover extension to the east is not considered feasible in Alternatives A, B, and C. However, in the Enhanced Safety and Security Plan, known as Alternative D, a people mover system to the east is included and analyzed. That analysis is included in the Supplement to the Draft EIS/EIR. Please see Response to Comment PC02222-13 for information regarding proposed mitigation measures.

**PC02222-16**

**Comment:**

5. Over the next few years, due to the expected increase in passenger and cargo-related traffic going to and from the Airport, the anticipated degradation of the La Cienega/Century intersection, and the proposed closure of Airport Boulevard under the preferred alternative in the Draft EIR/EIS, traffic flow in the Gateway BID area could become seriously impaired.

Because of that, Gateway is concerned about safety issues, and response time in terms of emergency vehicles getting into and out of the Gateway area.

Gateway's daytime and nighttime population is significant, due to the presence of numerous high-rise office buildings and approximately 7,200 hotel rooms. In an emergency situation that necessitates the need for a fire department response, police response, ambulance response or hazardous materials response, Gateway is concerned that the emergency vehicles be able to respond and access their properties in a timely fashion.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed emergency access in Section 4.26.1, Fire Protection. As shown on Figure 4.26.1-1 of the Draft EIS/EIR, Fire Station 95 and Fire Station 51 are located in the immediate vicinity of Gateway's properties and west of La Cienega Boulevard/Century Boulevard intersection. Station 95 would be relocated under Alternatives A, B, and C, and Station 51 would be relocated under Alternatives A and B. Under LAWA staff's new preferred Alternative D, these stations would not be relocated and Station 51 would be expanded.

Off-airport traffic impacts were addressed in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Master Plan Commitment ST-19, as described in Section 4.3.2 of the Supplement to the Draft EIS/EIR, addressed off-airport street closures. Specifically, Master Plan Commitment ST-19 ensures that existing roadways would remain open until they are no longer needed unless a detour route is available. As indicated on page 4-740 of the Supplement to the Draft EIS/EIR, under Alternatives B and C, the number of deficient intersections operating at LOS E or F (at 31 of the 61 intersections analyzed) would be less than the number of deficient intersections (34) under the adjusted environmental baseline (2015). Under Alternative A, one additional intersection (35) would be deficient compared to the adjusted environmental baseline (2015). Under Alternative D, 50 of the 85 intersections analyzed would operate at LOS E or F. This is the same number of deficient intersections identified for the adjusted environmental baseline (2015). Under all of the Master Plan alternatives the La Cienega/Century intersection is identified as impacted. Intersections operating at LOS E or F would increase traffic congestion in areas off the airport but are not expected to significantly impair emergency response. With mitigation of almost all of the project-related cumulative traffic impacts that would occur, as more fully described in Section 4.3.2.8 of the Supplement to the Draft EIS/EIR, development of the Master Plan alternatives would serve, in some cases, to improve regional traffic flow compared to conditions that would exist if the Master Plan were not developed. Furthermore, the continued use of emergency vehicle sirens, alternate response routes during peak periods or congested conditions, and multiple station responses when necessary would be expected to facilitate

adequate emergency access and response, similar to current conditions. In addition, as further discussed on page 4-741 of the Supplement to the Draft EIS/EIR, implementation of Master Plan Commitments FP-1, PS-1, PS-2, LU-1, C-1 and ST-9 through ST-22, the mitigation measures identified in Section 4.3, Surface Transportation, of the Supplement to the Draft EIS/EIR, and project-by-project plan review to enforce code requirements, the impacts to fire protection under Alternatives A, B, C, and D would be less than significant. These commitments and mitigation measures address such relevant fire protection concerns as LAFD facility siting requirements, roadway design, emergency access, coordinating with fire department staff during construction and demolition activities, and off-airport traffic congestion. More specifically, regarding response times, Master Plan Commitments PS-1 and PS-2 will ensure that the size and locations for expanded, relocated, or future stations would support facility needs and FAR requirements anticipated with implementation of the LAX Master Plan. As the LAFD has maintained adequate emergency response times with past increases in activities at LAX, it is expected that their ongoing evaluation and adjustments in staffing and facilities combined with roadway improvements and facility expansion associated with the proposed LAX Master Plan will ensure continued maintenance of adequate emergency response times.

Also, please see Response to Comment PC01210-4 regarding adequacy of existing LAFD services and proposed improvements that would occur under the Master Plan alternatives.

#### PC02222-17

**Comment:**

Further, in the event of a catastrophic incident at LAX, where emergency vehicles must utilize the roadways around Gateway to respond, it will be important that the emergency vehicles are able to respond in an expeditious manner.

If area intersections and roadways are anticipated to be congested with additional vehicular traffic in the coming years, Gateway is concerned that these traffic impacts be mitigated so that emergency vehicle response time is adequate.

As there was little discussion in the Draft EIR/EIS related to life-safety response issues in light of additional traffic, Gateway asks that the Final EIR/EIS document more fully address how life-safety response to emergency situations in the areas adjacent to LAX will be handled and mitigated.

**Response:**

Please see Response to Comment PC02222-16 regarding emergency access and off-airport response times.

#### PC02222-18

**Comment:**

6. It is important to the Gateway BID that traffic solutions precede the majority of anticipated passenger and cargo growth at LAX, to insure that Century Boulevard, Airport Boulevard, Aviation Boulevard, Bellanca, 98th Street, 102nd Street, La Cienega Boulevard, Sepulveda Boulevard, Vicksburg Avenue, Avion Drive, and other roadways serving the Gateway BID are not significantly impacted.

Gateway notes the following:

- LAX is operating at 68 million annual passengers today (in 2001)
- The Draft EIR/EIS "preferred alternative" assumes growth to 89 million annual passengers over the next several years
- The anticipated passenger growth is therefore 21 million more passengers than today (in 2001)
- Cargo is anticipated to increase to 4.2 million tons annually, which will result in more truck/cargo trips traversing the Gateway area

Without transportation mitigation measures in place before the onslaught of additional passengers and cargo, significant congestion could be experienced on roadways in the Gateway area. Gateway's businesses and their tenants, guests, visitors and vendors could experience significant delays accessing Gateway properties without appropriate surface transportation improvements to accommodate the expected increase in passenger and cargo growth.

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**Response:**

The intent is get the transportation improvements in place as soon as possible. Therefore, most major transportation improvements for Alternatives A, B, and C would be in place in Phase I, including the majority of the Ring Road. The LAX Expressway would be started in Phase I, but may not be completed until Phase II. The Green Line extension would be completed after 2010. The Supplement to the Draft EIS/EIR includes construction phasing information for Alternative D. Note that Alternative D does not include the LAX Expressway or Ring Road.

**PC02222-19**

**Comment:**

While traffic mitigation measures are identified in the Draft EIR/EIS (such as the LAX Expressway, Ring Road, on-Airport People Mover, LAX Expressway and extension of Green Line light rail to the Airport), the EIR lacks details in explaining:

- The cost of the traffic mitigations, and

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02222-20**

**Comment:**

- The source of funds to pay for these traffic mitigations

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02222-21**

**Comment:**

- The phasing/scheduling of the traffic mitigations

Gateway asks that LAWA's final environmental document identify the cost of the surface transportation mitigation measures, the funds to pay for the traffic mitigations, and clarify as to whether the traffic mitigation measures will precede significant new growth in passenger and cargo operations.

**Response:**

Please see Response to Comment AL00008-6 regarding funding. Also, the intent is get the transportation improvements in place as soon as possible. Therefore, most major transportation improvements for Alternatives A, B, and C would be in place in Phase I, including the majority of the Ring Road. The LAX Expressway would be started in Phase I, but may not be completed until Phase II. The Green Line extension would be completed after 2010. The Supplement to the Draft EIS/EIR includes construction phasing information for Alternative D. Note that Alternative D does not include the LAX Expressway or Ring Road.

**PC02222-22**

**Comment:**

7. Sepulveda Boulevard is one of the primary points of ingress and egress to many of Gateway's more westerly properties. Along Sepulveda Boulevard, Gateway properties include the 9800 Sepulveda office building, as well as the newly remodeled Radisson Hotel.

Per the Draft EIR/EIS, the Sepulveda Boulevard tunnel, and areas adjacent to the Sepulveda tunnel (traversed by many Gateway employees, visitors, hotel guests and vendors), will undergo significant

construction, and therefore construction-related closures and delays, under the preferred alternative in the Draft EIR/EIS.

Gateway assumes that this construction along Sepulveda Boulevard could last several years.

Construction-related delays and lane closures could seriously undermine access to and the viability of some of Gateway's properties over an extended period of time. Yet, there is little discussion in the Draft EIR/EIS of the potential impacts from construction necessary for the proposed Ring Road, to properties within Gateway's borders along or near Sepulveda Boulevard.

We would request that the Final EIR/EIS more fully address potential impacts from Sepulveda Boulevard, Sepulveda Tunnel and Ring Road construction issues, as construction-related delays and lane closures could seriously undermine access to, and the viability of, the 9800 Sepulveda building and the Radisson Hotel, as well as other Gateway properties near Sepulveda.

Additionally, we would ask for more detail in the Final EIR/EIS concerning the anticipated construction schedule and the number of years anticipated for such construction.

**Response:**

Subsections 4.3.1.6.2 and 4.3.2.6.2 of the Supplement to the Draft EIS/EIR and Section 7 of the Technical Reports S-2a, On-Airport Surface Transportation Technical Report, and S-2b, Off-Airport Surface Transportation Technical Report, and Topical Response TR-ST-3 address the concern raised in this comment. Also, the Draft EIS/EIR and the Supplement to the Draft EIS/EIR are program level environmental documents intended to analyze the impacts of a Master Plan. It is acknowledged that further documentation may be required to address certain environmental issues in a more specific manner, as necessary and appropriate. However, it is anticipated that necessary access would be maintained at all times to adjacent properties, although the access may, at times, be interim and temporary.

**PC02222-23**

**Comment:**

8. Due to the proximity to LAX, and the take-off and landings of aircraft, Gateway properties experience significant noise levels approximately 18 hours per day. For many of the high-rise office buildings and hotels, people on floors above the 3rd or 4th floor level experience very perceptible levels of noise from aircraft, which noise sometimes impairs business activity, and (for the hotel guests) sleep.

Further, truck activity (related to LAX air cargo) on Century Boulevard and nearby roadways, creates noise at perceptible levels on the lower floors of many of Gateway's properties.

Now, due to the anticipated growth in passenger and cargo activity, as projected in the Draft EIR/EIS, noise levels due to aircraft and cargo/trucking related activity may increase significantly over present levels.

To the extent that an increase in noise levels could impact Gateway properties and their operations, this could be meaningful in terms of maintaining Gateway properties' competitiveness for attracting and retaining office tenants, hotel guests, and others.

Office tenants of Gateway's office properties must work in a quiet, conducive-to-business atmosphere, so an increase in noise impacts to the Gateway BID area could be meaningful in terms of attracting and retaining office tenants.

Hotel guests in Gateway's hotel properties, with approximately 7,200 guest rooms, require a quiet environment to accommodate guests' sleep, so an increase in noise impacts to the Gateway BID area could be meaningful in attracting and retaining hotel guests.

**Response:**

As shown in Figures 4.2-5 of the Draft EIS/EIR and Figure S1 of Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR, the Gateway properties have historically been exposed to high noise levels within the 65 and 70 CNEL. As shown on Figure S4.2-3

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of the Supplement to the Draft EIS/EIR, the Gateway properties are exposed to high single event noise levels (defined by the 94 dBA SEL noise contour) under 1996 baseline and Year 2000 conditions. As listed in Tables S4.1-3, S4.1-4, and S4.1-5 in Section 4.1, Noise of the Supplement to the Draft EIS/EIR, peak hour roadway noise under 1996 baseline conditions for the LAX Sheraton Hotel (site RD7) is 50.1 dBA Leq, daily roadway noise is 47.3 dBA 24-Hour Leq, and combined daily aircraft and roadway noise is 70.2 dBA 24-hour Leq. Generally, aircraft noise is much higher than roadway noise at receptor sites.

As presented in Section 4.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR a significant noise increase would occur to noise-sensitive uses newly exposed to the 65 CNEL noise contour, that experience an increase of 1.5 CNEL within the 65 CNEL, or residential uses newly exposed to the 94 dBA SEL. As shown on figures presented in Section 4.2.6 of the Supplement to the Draft EIS/EIR and the Supplemental Land Use Technical Report, under all of the build alternatives Gateway properties would experience significant noise increases compared to 1996 baseline and Year 2000 conditions. As shown on figures presented in Section 4.2.6 of the Supplement to the Draft EIS/EIR and Supplemental Land Use Technical Report, under all of the build alternatives compared to 1996 and Year 2000 conditions, some Gateway properties would be newly exposed to significant single event noise levels. However, as described in Topical Response TR-LU-5 these uses are not considered noise sensitive. As presented in Section 4.1.4.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR a significant roadway noise impact would occur if a noise sensitive receptor experiences an increase of 5 dBA Leq(h) when compared to existing conditions, and for new highway facilities proposed as part of the project, if a noise sensitive receptor experiences an hourly Leq of 67 dBA or greater when compared to existing conditions. As concluded in Section 4.1.6.2 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, noise level increase from roadway noise was not considered to be significant on the LAX Sheraton Hotel. See also Response to Comment PC02222-24, below.

Regarding attracting and retaining hotel guests, the majority of office and hotel tenants choose Gateway properties due to the proximity of these properties to the airport. In addition, since these properties have historically been exposed to aircraft noise, most of these buildings include sound insulation measures or have been constructed to achieve acceptable interior noise levels of 45 CNEL.

#### PC02222-24

##### Comment:

Many of Gateway's properties will require insulation to mitigate the noise impacts that will come with additional aircraft and cargo activity.

##### Response:

The Gateway properties include a mix of hotels, office buildings, parking, and other retail uses. As described in Topical Response TR-LU-5, these uses are not considered noise-sensitive uses that would be impacted by aircraft noise. Furthermore these uses have historically been exposed to high noise levels and as a result these uses provide noise reduction measures to achieve acceptable interior noise levels of 45 CNEL. Therefore, no mitigation is proposed. Regarding the impact of additional aircraft and cargo activity noise, please see Topical Responses TR-N-6 (Subtopical Response TR-N-6.2) and TR-N-5 (Subtopical Response TR-N-5.4). Project design features proposed under Alternative C, to reduce noise impacts from ground-level cargo activity on Gateway properties include landscape buffers between airport uses and Gateway properties south of Century Boulevard, east of Sepulveda Boulevard, north of 96th Street, and east of Aviation Boulevard. See also Response to Comment PC02222-23 regarding noise increases on Gateway properties.

Under Alternative D, the area proposed for air cargo would be reduced compared to Alternative C and would be located south of Century Boulevard rather than to the north and east of Gateway properties, as proposed under Alternative C. As stated in subsection 4.1.6.5.3 of the Supplement to the Draft EIS/EIR, under Alternative D, a severe noise impact from the proposed Automated People Mover (APM) was identified for two Gateway property hotels (the Sheraton Hotel and Four Points Sheraton), located along the APM route. As concluded in subsection 4.1.8.4 of the Supplement to the Draft EIS/EIR, the incorporation of mitigation measure MM-N-12 would reduce this impact to less than significant levels.

#### PC02222-25

**Comment:**

Gateway is concerned that the Draft EIR/EIS may have inadvertently over-stated the current noise level (called "existing conditions") at and around the Airport, which would result in future projected noise level increases that appear to not be so significant.

Gateway requests that the Final EIR/EIS provides further analysis to:

- More accurately quantify noise impacts under the preferred alternative

**Response:**

The environmental baseline used for CEQA comparisons is Year 1996. Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR provide a comparison of the impacts of future conditions to the Year 2000 noise conditions. The Year 2000 contours extend further to the east than those of 1996, but are narrower north and south of the airport. Additionally, please see Topical Response TR-GEN-1 regarding baseline issues and TR-N-6, in particular Subtopical Response TR-N-6.2, regarding relationship between traffic levels and noise levels.

#### PC02222-26

**Comment:**

- Identify the appropriate measures that will mitigate the noise impacts to properties in the Gateway district, and
- Identify source(s) of funds to pay for mitigations such as increased insulation, to mitigate the noise impacts to Gateway properties

**Response:**

As described in Response to Comment PC02222-24, no significant noise impacts were identified for Gateway properties, with the exception of unshielded noise from the APM. Mitigation measure MM-N-12 would reduce this impact to acceptable levels. This mitigation measure would be funded by LAWA.

#### PC02222-27

**Comment:**

9. The Sheraton Gateway Hotel at 6101 W. Century Boulevard, and Arden's Skyview Center office building at 6033 W. Century Boulevard, are dependent upon surface parking lots located along the north side of 98th Street, as their buildings have little-to-no on-site parking. Employees, hotel guests, tenants and vendors of both properties are accommodated by the use of the existing surface parking lots on 98th Street, across the street and to the north of the Sheraton and Skyview buildings.

Under the "preferred alternative" in the Draft EIR/EIS, it is not clear as to whether the Sheraton and Skyview buildings would lose the surface parking lot areas located on the north side of 98th Street near their buildings.

As both of these properties are dependent upon the availability of parking on the present lots along the north side of 98th Street, the elimination of the parking areas for use by Sheraton's and Arden's employees, guests and tenants would significantly impact the financial viability of both properties.

We request that the Final EIR/EIS provide clarity on this point, and urge LAWA to preserve parking along 98th Street for continued use by these properties.

**Response:**

It is anticipated that, under Alternative C, parking would be available to the Sheraton and Arden's Skyview Center in the parking garage to be located on the north side of 98th Street.

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#### PC02222-28

**Comment:**

10. Intersections in the Gateway area presently experience heavy traffic, especially during morning rush hour, noon/Airport rush hour, and early evening rush hour. During certain holiday and vacation times, Gateway intersections are congested throughout the day and evening.

The Draft EIR/EIS traffic chapter and related traffic Appendices gauge the "existing conditions", as well as project "future conditions" related to intersection congestion in the Gateway BID area and surrounding areas.

However, in examining the intersection counts in the Appendices to the Draft EIR/EIS, some of these intersection counts date back to 1994, 1995, 1996. These do not reflect "existing conditions", as the EIR was released in January 2001. It is hard to accurately quantify the incremental increase in projected traffic under "future conditions" because the intersection counts do not appear to correspond to an appropriate baseline year.

We would ask that the Final EIR/EIS include more current intersection counts, that more accurately reflect existing conditions.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.2, regarding the definition of baseline scenarios and incorporation of local/regional plans and programs.

#### PC02222-29

**Comment:**

11. Many Gateway employees, tenants, visitors, hotel guests and vendors access the Gateway properties from the south. Many vehicles that are headed to LAX, including passenger cars and cargo trucks, are approaching LAX from south of the Airport. There are a tremendous number of vehicles traveling from the south, headed north on the 405, with an ultimate destination to LAX, the Gateway BID area, or adjacent areas west of the 405 Freeway.

However, the Draft EIR/EIS contains little analysis of future traffic growth south of LAX, and correspondingly, proposes virtually no traffic-related mitigations south of LAX to relieve traffic congestion. There is no discussion of any meaningful mitigation measures for the 405 Freeway south of the LAX area, or along El Segundo Boulevard, Rosecrans Boulevard, or any more southerly transportation corridors.

Without proper mitigations related to the roadway system south of LAX, and as passenger and cargo operations grow, it is possible that a significant increase in vehicular traffic congestion will occur. This could result in Century Boulevard, Sepulveda Boulevard and La Cienega Boulevard in the Gateway BID area, becoming disproportionately burdened with significantly increased vehicular activity, as primary points of ingress and egress related to LAX.

We would request that the Final EIR/EIS more fully study how traffic approaching LAX from the south will be mitigated, so that Gateway's transportation corridors do not become disproportionately burdened.

**Response:**

Please see Response to Comment PC02220-9 regarding mitigation.



#### PC02222-30

**Comment:**

12. The northeast corner of Century and Aviation is presently home to the Travelodge Hotel, Denny's restaurant, and Texaco gas station.

However, the Draft EIR/EIS "preferred alternative" reflects that the existing Travelodge, Denny's and Texaco will be replaced to accommodate future cargo related operations.

**Response:**

The Travelodge Hotel, Denny's restaurant, and Texaco gas station were identified as MP Areas D6, D8, and D7 on Figure 3-16 of the Draft EIS/EIR for Alternative C and are also shown on Figure S3-14 of the Supplement to the Draft EIS/EIR for Alternative D. Under Alternative C these areas would be acquired for a landscaped buffer and airport service pavement, as shown on Figure 3-15 of the Draft EIS/EIR. Under Alternative D these areas would be acquired for roadway improvements associated with the GTC, as shown on Figure S3-8 of the Supplement to the Draft EIS/EIR. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed land acquisition for each of the alternatives in Chapter 3, Alternatives, and Section 4.2, Land Use (subsection 4.2.6). Compatibility with adjacent land uses was analyzed in Section 4.2.6 of the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding acquisition impacts to the community of Westchester. As was described in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA's programs for the acquisition of businesses would conform to governing federal and State requirements for the payment of just compensation for the purchase of any needed property and applicable relocation assistance and payments will be provided to assist the relocation of any business displaced.

#### PC02222-31

**Comment:**

The immediate frontage along Century Boulevard, where the Travelodge, Denny's and Texaco properties are presently located, will apparently become a greenway or berm to separate the future cargo-related land uses from Century Boulevard. We say "apparently" because it is difficult to interpret the Alternative C exhibit map legend, due to its small size, and color-coding that is ambiguous.

Per the Draft EIR/EIS, directly behind the apparent berm (to the north) will be a paved area where aircraft can taxi or park. Further, to the east will be an air cargo building.

It is important to Gateway that cargo operations and/or parked aircraft not be visible from Century Boulevard, which is a commercial corridor trying to retain its market share and viability. Likewise, it is important to Gateway that noise volumes emanating from air cargo and jet engine activity not disrupt remaining nearby Gateway properties, such as Taco Bell, Quality Inn, Holiday Inn, McDonalds and ARCO.

With regard to the Century and Aviation area, where Travelodge, Denny's and Texaco operate today, Gateway would like clarification in the Final EIR/EIS of:

- The proposed land use changes
- The set-back length and the height of the landscaping berm
- Proposed mitigations to alleviate the visual impacts from new cargo activity being introduced
- Proposed mitigations to attenuate the noise impacts from jet engines in the new cargo area, near Gateway properties and businesses

**Response:**

As was shown on Figure 3-15 of the Draft EIS/EIR, the Travelodge, Denny's, and Texaco properties, located at the northeast corner of Century Boulevard and Aviation Boulevard, would be acquired and developed as open space/landscape buffers to shield views of the cargo building, taxiway/aircraft aprons, and employee parking north of Century Boulevard and east of Aviation Boulevard. As illustrated, the cargo facility would front La Cienega Boulevard, with aircraft parking and equipment staging provided immediately west of the building and employee parking located to the south (adjacent

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to the remaining commercial uses at the northwest corner of Century and La Cienega Boulevards). Design of the new facility would adhere to the LAX Air Cargo Facilities Design Guidelines, as discussed in the Draft EIS/EIR, Section 4.21, Design, Art and Architecture Application/Aesthetics, and therefore would be required to provide a minimum 50-foot wide landscaped area along Century Boulevard. However, the proposed landscape buffer along Century Boulevard, south of the cargo facility's aircraft parking area, would be approximately 250 feet wide. Additionally, the cargo building and employee parking lot would be buffered from Century Boulevard and the existing commercial uses to remain by a landscaped setback ranging from approximately 73 to 80 feet wide. In accordance with the Cargo Guidelines, the edge treatment along Century Boulevard would also include a one-foot high by three-foot wide turf berm, with trees planted along either side of the berm. Trees would be placed a minimum of 30 feet apart at a minimum ratio of one tree per 1,000 square feet of landscaped area. With application of the Cargo Guidelines and provision of the landscaped buffer area described above, views from Century Boulevard of parked aircraft and cargo operations would be screened. Regarding the legibility of Figure 3-15, larger versions of the plan were presented at the public workshop and public hearing and are on file with the City Planning Department and LAWA.

Under Alternative D, the aforementioned area would be developed as a Ground Transportation Center (GTC), as illustrated in Figure S3-8 in Chapter 3, Alternatives, and described in detail in Section 4.21, Design, Art and Architecture Application/Aesthetics, of the Supplement to the Draft EIS/EIR. The GTC would be surrounded by landscaped open space that would serve as a buffer for adjacent off-site uses and roadways. Edge and landscape treatments would be provided in compliance with the LAX Street Frontage and Landscape Development Plan, which permits a minimum 15-foot landscaped setback along secondary highways (with variation according to property utilization characteristics). With observance of applicable design guidelines and plan provisions for open space/landscape buffers, the proposed structures would be adequately screened from view from Century Boulevard. Regarding the potential for noise from air cargo and jet engine activities to disrupt commercial uses in the vicinity of Century Boulevard/Aviation Boulevard and Century Boulevard/La Cienega Boulevard (the location of Taco Bell, Quality Inn, Holiday Inn, McDonalds, and Arco) no noise mitigation actions are planned. As shown in the table below, the noise levels computed for the respective properties are anticipated to be similar under Alternative C and Alternative D when compared to 1996 Baseline, Year 2000 and No Action/No Project conditions. This reduction would largely be the result of: 1) the phase-out of older and noisier (FAR Part 36 Stage 2) aircraft from the operating mix of scheduled carriers and 2) shifting of runway use patterns to heavier aircraft using the north complex.

**Table 1**

**Grid Point Assessment CNEL Comparison of Alternative C 2015 to No Action/No Project Alternative, 1996 Environmental Baseline and Year 2000**

<b>Grid Cell ID</b>	<b>Alt C 2015</b>	<b>No Action/No Project Alternative</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73.3	73	+3
L05 <sup>2</sup>	67.7	67.5	+2
	<b>Alt C 2015</b>	<b>1996 Environmental Baseline</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73.3	76	-2.7
L05 <sup>2</sup>	67.7	66.9	+8
	<b>Alt C 2015</b>	<b>Year 2000</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73.3	80.1	-6.8
L05 <sup>2</sup>	67.7	66.3	+1.4

- <sup>1</sup> Century Boulevard/Aviation Boulevard  
<sup>2</sup> Century Boulevard/La Cienega Boulevard

**Table 2**  
**Grid Point Assessment CNEL Comparison of Alternative D 2015 to**  
**No Action/No Project Alternative, 1996 Environmental Baseline and Year 2000**

<b>Grid Cell ID</b>	<b>Alt D 2015</b>	<b>No Action/No Project Alternative</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73	73	+0
L05 <sup>2</sup>	67.3	67.5	-2
	<b>Alt D 2015</b>	<b>1996 Environmental Baseline</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73	76	-3
L05 <sup>2</sup>	67.3	66.9	+4
	<b>Alt D 2015</b>	<b>Year 2000</b>	<b>Amount Change</b>
K05 <sup>1</sup>	73	80.1	-7.1
L05 <sup>2</sup>	67.3	66.3	+1.0

<sup>1</sup> Century Boulevard/Aviation Boulevard  
<sup>2</sup> Century Boulevard/La Cienega Boulevard

The FAA approach presumes that mitigation actions are intended to reduce the impacts of proposed project actions on the significantly impacted noise-sensitive populations (for federal evaluations, within 65 CNEL, or if exposed to increases of 1.5 CNEL within the 65 or greater CNEL). Commercial uses are considered compatible below 75 CNEL. As summarized above and presented in the Draft EIS/EIR, Appendix D, Aircraft Noise Technical Report, Tables A5-2 and A5-3, and Appendix S-C1, Supplemental Aircraft Noise Technical Report, Table S13 of the Supplement to the Draft EIS/EIR increases are shown for both grid cell sites in Alternative C compared to the No Action/No Project Alternative and slightly reduced for Grid Cell ID K05 compared to 1996 Baseline conditions. Whereas, Alternative D, shows a slight reduction in Grid Cell L05. Where an increase in the CNEL levels is projected, it would be less than 75 CNEL and therefore these properties are considered to be compatible. As a result, there are no mitigation efforts planned in the area for non-residential or non-noise sensitive uses. Additional future alternatives are identified in Tables A5-2 and A5-3 located in Appendix D, Aircraft Noise Technical Report of the Draft EIS/EIR and in Table S-13 of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR. For more information regarding mitigation please see Section 7, Noise Mitigation in Appendix D of the Draft EIS/EIR and Section 3.1.6, Alternative D Mitigation, Section 6.1.3, Mitigation of Awakenings and Section 6.2.3, Mitigation of Single Event Effects on Schools of Appendix S-C1, Supplemental Aircraft Noise Technical Report, of the Supplement to the Draft EIS/EIR and Topical Response TR-N-4. During the INM process air cargo operations are included in the noise model. Additional cargo traffic taxiing into the Century Cargo complex area would not be distinguishable due to the arrival and departure traffic on the south runway complex, as well as, vehicular traffic on Century Boulevard. For more information on the noise modeling process and noise increases please see Topical Response TR-N-1 and Topical Response TR-N-6.

LAWA has been meeting regularly with Gateway to LA to obtain their comments and address their concerns about the proposed Alternatives, including the new Alternative D.

**PC02222-32**

**Comment:**

13. The southeast corner of Century and Aviation is presently home to a Union 76/Circle K gas station, and light industrial buildings. Just to the east along Century Boulevard is a Thrifty Car Rental business.

However, the Draft EIR/EIS "preferred alternative" reflects that the existing gas station, light industrial buildings and the Thrifty Car Rental business will be replaced to accommodate future Airport Employee Parking. It is not known whether the proposed parking will be in the form of surface parking lots, or structured parking.

Because of the small size of the Alternative C map, it is difficult to know whether the frontage of the proposed Airport Employee parking area will be set back with berms and landscaping. It is important to

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Gateway that a large surface parking lot serving Airport employees not be visible from Century Boulevard, as Century Boulevard is a commercial corridor trying to retain its market share and viability.

With regard to the Century and Aviation area, where Union 76/Circle K gas station, light industrial users, and Thrifty Rental Car operates today, Gateway would like clarification in the Final EIR/EIS of:

- The proposed land use changes - i.e., will the proposed "Airport Employee Parking" be in the form of a large surface parking lot, a parking structure, or a multiple parking structures?
- The set-back length and the height of the landscaping berm
- Proposed mitigations to alleviate the visual impacts from a parking use serving LAX employees

**Response:**

Under Alternative C, the proposed parking on the southeast corner of Century and Aviation Boulevards would be surface parking. Sufficient landscaping would be provided along Century Boulevard to shield the employee parking from Century Boulevard. The exact specifications of the set-back/landscaping areas are beyond the scope of this program-level EIS/EIR; however, those details would be developed prior to implementation.

**PC02222-33**

**Comment:**

14. The Westin Hotel property in the Gateway district is located on the south side of Century Boulevard, between Aviation and La Cienega.

Under the proposed Master Plan preferred alternative, new LAX Employee Parking would border the Westin on the west side. From a review of the EIR/EIS, it is unclear if the parking will be a large surface parking lot, a parking structure, or a series of parking structures.

Gateway requests that the Final EIR/EIS clarify the nature of the proposed LAX Employee Parking adjacent to the Westin Hotel, as well as appropriate mitigations to visually screen the proposed parking from the Westin. Gateway would suggest that the landscaping include rows of mature trees to adequately screen the parking area from the Westin Hotel.

**Response:**

Please see Response to Comment PC02222-32 regarding the surface parking lot. It is currently unknown which airport employees would use that parking lot. That would be determined during final design and project implementation.

**PC02222-34**

**Comment:**

15. Presently, Aviation Boulevard is an above-ground surface street, which accommodates a significant amount of traffic into and out of the Gateway area. The LRW building in the Gateway district is located on Century Boulevard just west of Aviation Boulevard.

Under the preferred alternative in the Draft EIR/EIS, Aviation Boulevard, just north of 98th Street, will be under-grounded resulting in vehicles on Aviation traveling into a below-ground tunnel. Gateway seeks clarification in the Final EIR/EIS as to:

- Where will the Aviation Boulevard tunnel end and begin?
- How will the Aviation Boulevard tunnel affect traffic circulation?
- Did LAWA study the impact of an Aviation Boulevard tunnel on surface traffic in light of Southern Pacific Railroad's train operations? Southern Pacific Railroad (SPRR) trains run immediately parallel to Aviation Boulevard. When the trains reach the area just north of Gateway's boundaries, the trains presently cause long delays at surface intersections. When this happens, drivers often re-route to other Gateway streets. We would request that the Final EIR/EIS address the impact on circulation of the

proposed Aviation Boulevard tunnel in light of the SPRR train-related delays (at intersections to the immediate north of Century and Aviation).

**Response:**

The exact point that Aviation Boulevard would begin to tunnel will be determined in the design phase of the facility. However it is anticipated that Aviation Boulevard would begin descending about 400 feet north of Century Boulevard. From that point to north of Arbor Vitae Street, Aviation would have retaining walls on both sides. Access to those land uses that are not acquired on the west side of Aviation, north of Century would be maintained via an internal access road that would likely share a comment access point on Aviation Boulevard. Therefore, there is little impact on circulation anticipated.

Under Alternative C, the Southern Pacific Railroad would be abandoned and its right-of-way acquired.

**PC02222-35**

**Comment:**

- How will the Aviation Boulevard tunnel affect nearby land uses?

**Response:**

Please see Response to Comment PC02222-34 regarding the effect of the Aviation Boulevard tunnel on traffic circulation. As shown on Figure 3-15 of the Draft EIS/EIR, the two tunnel locations would be surrounded by airport related uses; therefore, the Airport Boulevard tunnel would not have an effect on nearby land uses. Please see Section 4.3.2.6 regarding traffic impacts, Section 4.20.6 regarding construction impacts, Section 4.4.2.6 regarding acquisition impacts on businesses, and Section 4.2.6 regarding land use compatibility in the Draft EIS/EIR. Under LAWA Staff's new preferred alternative, Alternative D, no tunnel under Aviation Boulevard is proposed.

**PC02222-36**

**Comment:**

Gateway requests that the Final EIR/EIS address and clarify the above issues, as well as describe proposed measures to mitigate traffic and land use impacts from the under-grounding of Aviation Boulevard.

**Response:**

Please see Response to Comment PC02222-34 regarding the Aviation Boulevard tunnel.

**PC02222-37**

**Comment:**

16. The Gateway district is home to three gas stations:  
- Texaco, at the northeast corner of Century and Aviation  
- Union 76, at the southeast corner of Century and Aviation  
- ARCO, at the northwest corner of Century and La Cienega

Under the preferred alternative in the Draft EIR/EIS, two out of three gas stations in the Gateway district - Texaco and Union 76, on opposite corners of Century and Aviation - will be eliminated. This will leave the Gateway BID area with only one gas station - Arco, at the corner of Century and La Cienega -- the most congested intersection in the area.

There are no gas stations from La Cienega to Sepulveda along the parallel corridor of Imperial Highway. While there is a Shell gas station on Airport Boulevard near Arbor Vitae, it will be difficult to access, since Alternative C proposes to cul-de-sac and dead-end Airport Boulevard at 98th Street. Further, with the proposed Arbor Vitae interchange and proposed Ring Road, the continuing existence of the Shell gas station on Airport Boulevard is questionable.

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Gateway is "home" to several thousand employees who work in the office buildings, hotels and other establishments. Many of them drive cars to and from work, and sometimes need to re-fuel in the area. Gateway is also "home" to approximately 7,000 hotel guests nightly, as well as daytime visitors attending functions at the hotels, many of who drive to and from the hotels.

LAX will be host to a projected 89 million annual passengers, and will continue to be a workplace for thousands of LAX employees, many of who drive cars to and from LAX.

Further, there are numerous car rental operations in the area adjacent to LAX, as well as numerous freight forwarding and cargo facilities with truck fleets.

With the elimination of gas stations, Gateway questions where will all these drivers go to re-fuel their vehicles?

Thousands of rental cars are returned every day in the area, and many of these rental car drivers re-fuel just before they return the vehicle. With the proposed elimination of two out of three existing gas stations in the Gateway district, we are concerned about the possible impacts of cars driving around and around, looking for a gas station, adding to the existing congestion in the Gateway district.

Gateway would ask that the Final EIR/EIS document address this issue and how the loss of the existing gas stations will be mitigated.

Lastly, one of Gateway's members who owns the Texaco station operation at the northeast corner of Century and Aviation specifically requests that the present Texaco gas station operation and land use be retained, and not be converted to accommodate future LAWA cargo related operations (or setback area in connection therewith). This Gateway member has informed us that Gateway employees as well as LAX visitors rely on the ability to re-fuel their vehicles at this gas station, and the loss of this particular land use under the Preferred Alternative would represent the loss of a vital amenity and service to the Gateway community.

#### **Response:**

The Texaco and Union 76 stations were identified as MP Areas D7 and E1, respectively, on Figure 3-16 of the Draft EIS/EIR. Under Alternative C, these areas are proposed for acquisition under to provide for air facilities and improvements. As shown on Figure S3-14 of the Supplement to the Draft EIS/EIR, under LAWA Staff's new preferred Alternative D, these gas stations are also proposed for acquisition. In addition to the ARCO station referenced by the commentor, with implementation of Alternative C, approximately 12 other gas stations would remain within a 1 mile radius of Century Boulevard and the I-405 Freeway, and under Alternative D, approximately 13 gas stations would remain to serve employees and visitors. As was discussed in Section 4.4.2 of the Supplement to the Draft EIS/EIR, under Master Plan Commitment RBR-1, Residential and Business Relocation Program, and mitigation measure MM-RBR-2, LAWA would provide relocation assistance for affected businesses in compliance with the Uniform Relocation Act. As stated in Master Plan Commitment RBR-1 business assistance services would include a business relocation assistance program to determine the needs and location preference of each business. If there is a strong market for gas stations in the area, and the acquired businesses desired to relocate close by, LAWA would work to serve those needs and preferences through their business relocation assistance program. In addition, under mitigation measure MM-RBR-2 LAWA would assist businesses in the Gateway district in locating suitable sites along Century Boulevard that are proposed for land recycling under the City of Inglewood General Plan.

It is anticipated that the relocation of these gas stations would be accommodated by the local market and although a certain level of convenience may be temporarily or incrementally reduced, the loss of these two gas stations, in light of the other stations in the area, is not expected to create significant traffic congestion and other related impacts within the Gateway district due to drivers trying to find gas stations to fuel their vehicles. Furthermore, to the extent that demand for gas stations in the Gateway district becomes underserved, there would be opportunities for new gas stations to locate in the area to meet this demand.

PC02223

Campbell, M.E.S.,  
M.P.P., Todd

Coalition for Clean Air

9/24/2001

PC02223-1

**Comment:**

Introduction

On January 18, 2001, Los Angeles World Airport ("LAWA") and the Federal Aviation Administration ("FAA") released a Draft LAX Master Plan ("Master Plan") and Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") that are meant to describe and analyze their plans for expansion of Los Angeles International Airport ("LAX") over the next fifteen years. The Master Plan and EIS/EIR, which comprise approximately 12,000 pages, including appendices and some supporting technical documents, were released in compliance with requirements of the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"), and they demonstrate that the FAA and LAWA have created a plan for massive expansion of LAX at a cost of many millions of dollars.

Pursuant to applicable provisions of CEQA and NEPA, interested parties are permitted to comment on the Master Plan and EIS/EIR.<sup>1</sup> The Coalition for Clean Air Inc. ("Coalition") is a California non-profit corporation, with a membership of over 1,000 individuals and affiliated state and local citizen groups. The majority of the individual members of the Coalition live and work in the South Coast Air Basin. The Coalition is the only California-wide organization devoted entirely to air quality issues, and has actively participated in proceedings related to the local, state and federal regulatory activities affecting air quality in the region. Members of the Coalition breathe the excessively polluted air of the South Coast Air Basin and have a direct interest in the outcome of the proposed massive expansion of LAX. The Coalition therefore is an interested party and as such has reviewed and analyzed the Master Plan and EIS/EIR. The Coalition hereby submits its comments to the Master Plan and EIS/EIR.

In performing its review and analysis, the Coalition has reviewed and made use of research materials that have examined environmental impacts caused by airport operations in general and materials that study the health effects associated with human exposures to chemical compounds typically used at airport facilities. The Coalition staff has also made use of reports performed by qualified experts in the areas of human health risk assessment, air emissions regulation and planning, aircraft noise assessment and mitigation, and environmental justice. These experts were retained by the Cities of Inglewood and El Segundo, some of which were retained directly at the request of Coalition for Clean Air staff, and copies of their written reports have been included with the formal set of comments from each city as exhibits.

In brief, the Coalition respectfully submits that neither the Master Plan nor the EIS/EIR satisfy the requirements of either CEQA or NEPA. As such, the Coalition respectfully suggests that both the Master Plan and EIS/EIR are insufficient and, at a minimum, must be substantially revised.

The insufficiencies, all of which are addressed in detail below, may be summarized as follows:

POLICY DISCUSSION

A. THE DRAFT EIS/EIR FAILS TO SATISFY PROVISIONS OF LAW REQUIRING LAWA TO ADEQUATELY CONSIDER ALTERNATIVES TO EXPANSION AT LAX

1. LAWA's Consideration of Alternatives to Expansion at LAX does not conform to CEQA
2. LAWA's Consideration of Alternatives to Expansion at LAX does not conform to NEPA

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

1. The LAX Master Plan Fails To Conform To The Air Quality Maintenance Plan

### **3. Comments and Responses**

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2. The LAX Master Plan Fails To Conform To SCAG's 2001 Regional Transportation Plan

C. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES ENVIRONMENTAL IMPACTS

D. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT ADEQUATELY ADDRESS THE IMPACT OF TOXIC AIR POLLUTANTS

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

2. LAWA Failed To Properly Study Toxic Air Emissions

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

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

E. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES HUMAN HEALTH RISKS

1. LAWA's Study does not Adequately Factor Time as a Variable

2. The Draft EIS/EIR Fails to Adequately Delineate Health Risks

3. The Draft EIS/EIR Fails to Consider Health Risks on a Regional Basis

4. LAWA Failed to Conduct a Sensitivity Analysis of Its Human Health Risk Assessment

F. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ASSESSES AIR EMISSIONS

1. The Draft EIS/EIR Does Not Adequately Assess The Impact Of Air Emissions Mitigation Measures Upon The Surrounding Environment

2. LAWA'S Comparison To The No Action/No Project Alternative Is Flawed

3. LAWA Has An Opportunity To Establish A New Baseline That Is Compliant With CEQA

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

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

H. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES TRAFFIC IMPACTS

1. The Draft EIS/EIR Ignored Cumulative Impacts Of The LAX Master Plan By Not Analyzing The Traffic Impacts In The Surrounding Residential Communities

2. LAWA Did Not Fully Assess Traffic Mitigation In The Draft EIS/EIR

3. The Draft EIS/EIR's Traffic Congestion Relief Congestion Package Is Inadequate

4. The Study Of The Effects Of The Proposed LAX Expressway Is Inadequate

5. LAWA'S Baseline For Traffic Is Questionable

I. THE LAX MASTER PLAN FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT CONFORM TO LOCAL TRAFFIC PLANS



J. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES NOISE INCREASES

1. The Draft EIS/EIR Uses An Improper Baseline For Noise Analysis
2. LAWA's Noise Exposure Contours Are Understated
3. LAWA'S Assertions Regarding Nighttime "Over-Ocean Operation" Are Incorrect

K. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES THE HEALTH EFFECTS OF AIRCRAFT NOISE

1. The Draft EIS/EIR Should Consider The Health Effects Of Aircraft Noise
2. The Draft EIS/EIR Needs to Address Aircraft Noise Interference With Classroom Activities and Sleep

1 CEQA Guidelines § 15086(a)(4).

**Response:**

Please see Responses to Comments PC02223-2 through PC02223-49 below.

**PC02223-2**

**Comment:**

POLICY DISCUSSION

The Coalition for Clean Air firmly believes that Southern California's future aviation demand must be met by a regional solution that will share in both the substantial burdens of and mitigation needed to reduce the significant environmental impacts associated with modern day airport operations.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02223-3**

**Comment:**

Well before LAWA and the FAA proposed this massive expansion of LAX's facilities, LAX was already identified as the second largest emissions source for smog-forming gases in the Los Angeles area. As Table 1 below demonstrates, only the emissions from Chevron USA surpass the level of smog-forming emissions generated at LAX. In the future, LAX is likely to surpass all emissions sources for smog-forming chemicals in the South Coast Air Basin, especially if the facility expands as proposed under the Draft Master Plan and Draft EIS/EIR, as future regulatory action for aircraft emissions standards is restricted by international law.

Table 1. Top 10 Industrial Sources of Smog-Forming Gases in the Los Angeles Area, 1993 [see original for actual graph]

**Response:**

Please see Response to Comment AL00043-6 regarding LAX as a source of air pollution. Because LAX represents a complex aggregation of multiple stationary, on-road mobile, and off-road mobile sources owned and operated by many public- and private-sector entities spread over a fairly large area, it would be misleading to compare the total on-site emissions at LAX to those of any single facility or any single category of sources as in the table referenced by the commentator.

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#### PC02223-4

**Comment:**

Although the Coalition is not opposed to a limited expansion scenario of the LAX facilities to help meet future aviation demand, none of the three "build" alternatives presented in the Draft Master Plan and Draft EIS/EIR should be considered limited, nor do they adequately mitigate the substantial environmental impacts that will be brought upon the residential and business communities surrounding LAX and under its established flight paths. If any of the three "build" alternatives are pursued by LAWA as described under the Draft EIS/EIR, the result is likely to be a significant increase in air toxics, fine particles, smog-forming chemicals, noise, and other human health hazards.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, air quality in Section 4.6, Air Quality, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-2 regarding toxic air pollutants, Topical Response TR-AQ-3 regarding air pollution increase, and Topical Response TR-HRA-3 regarding human health impacts. In addition, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02223-5

**Comment:**

And since these impacts will fall most heavily on the low-income and minority communities surrounding LAX, they would seem to constitute a clear case of environmental injustice.

**Response:**

Environmental justice was addressed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits.

#### PC02223-6

**Comment:**

The Coalition hopes that LAWA and the FAA will carefully consider the comments provided below and reconsider its current expansion plans for LAX. The Coalition urges LAWA staff to consider an alternative that requires limited expansion of LAX and the expansion or creation of other regional airports capable of providing international service and cargo handling.

**Response:**

Comment noted. Please see Response to Comment below. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02223-7

##### Comment:

The Coalition asks that LAWA staff increase its commitment to mitigate the significant environmental impacts that certainly would occur with any expansion of LAX facilities. Mitigation measures should focus on the significant reduction of air toxics, global warming emissions and other harmful air pollutants. Mitigation measures should also substantially reduce noise impacts to affected communities. Finally, mitigation measures should also aim to protect water and soil quality.

##### Response:

Comment noted. Proposed measures to mitigation significant air quality, noise, and water quality impacts were identified in Section 4.6, Air Quality, Section 4.1, Noise, and Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Master Plan commitments are proposed to ensure that no significant impacts related to contamination of soils occur, as was described in Section 4.23, Hazardous Materials, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. These Master Plan commitments and mitigation measures provided the basis for the corresponding Master Plan commitments and mitigation measures presented in this Final EIS/EIR.

#### PC02223-8

##### Comment:

A. THE DRAFT EIS/EIR FAILS TO SATISFY PROVISIONS OF LAW REQUIRING LAWA TO ADEQUATELY CONSIDER ALTERNATIVES TO EXPANSION AT LAX

##### 1. LAWA's Consideration of Alternatives Does Not Conform To CEQA

The LAX Master Plan and Draft EIS/EIR fail to conform to CEQA because they do not properly consider alternatives to expansion at LAX. Proposals that entail expansion at other airports instead of LAX should have been analyzed and considered. Instead of considering only three "build" alternatives, each of which called for massive expansion of LAX (in comparison to a flawed No Action/No Project Alternative), LAWA and the FAA should have considered alternatives that included expansion and/or construction at El Toro Marine Corps Air Station, John Wayne Airport, Ontario Airport, Palmdale Airport and March Air Force Base.<sup>2</sup>

In discussing alternative locations for a project, the CEQA Guidelines state, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."<sup>3</sup> The CEQA Guidelines further state:

"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternative shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project."<sup>4</sup>

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

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

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"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)."<sup>5</sup>

Considering these feasibility factors in connection with expansion at LAX illustrates why the LAX Master Plan is not consistent with CEQA. LAX is located in the midst of a heavily populated residential area. The area is not well suited for the airport operations that currently exist, let alone massive expansion. LAX is economically viable, but expansion of LAX offers little, if any, additional economic benefit regionally when compared to other expansion scenarios considered by the planning body for Southern California, the Southern California Association of Governments ("SCAG").<sup>6</sup> The LAX Master Plan contemplates massive construction at LAX because, as it stands today, the infrastructure at LAX is not sufficient to handle the expanded operations in the plan. In reality, however, this places LAX in a similar position to that of every other airport in the area. If LAX is to expand, massive construction will have to take place. The LAX Master Plan is simply not consistent with other plans, in particular SCAG's 2001 Regional Transportation Plan ("RTP") (see below for further discussion) and the 1999 and 2001 Air Quality Management Plan (AQMP). Lastly, the LAX Master Plan virtually ignores the regional approach to airport expansion, by failing to fully analyze any alternative that does not call for massive expansion at LAX. Given the fact that LAWA owns several of the other airports in Southern California, this failure is inexplicable. The feasibility of expansion of other airports in the region meets or exceeds the feasibility of expansion of LAX, when considering the factors mandated by CEQA.

2 Other potential regional airports that LAWA and the FAA could have considered as alternatives are Civet, Daggatt, Darts, Fillmore, Gorman, Hector, Long Beach, Oceanside, Paradise, Pomona, Palm Springs, Riff, San Marcus, Los Alamitos, Twenty-Nine Palms, and Ventura.

3 CEQA Guidelines § 15126.6(f)(2).

4 CEQA Guidelines § 15126.6(a),(f).

5 CEQA Guidelines § 15126.6.

6 "Southern California Aviation Industry Impact Analysis," CIC Research, Inc., July 11, 2000, p. v.

#### **Response:**

The content of this comment is essentially the same as comments AL00017-13 through AL00017-15; please see Response to Comment AL00017-13 regarding the range of alternatives analyzed, Response to Comment AL00017-14 regarding economic benefits, and Response to Comment AL00017-15 regarding the regional approach and Alternative D.

#### **PC02223-9**

#### **Comment:**

2. LAWA's Consideration of Alternatives Does Not Conform To NEPA

LAWA failed to comply with NEPA by only examining in depth alternatives that involve expansion of LAX. NEPA has twin aims. First, it places upon an agency the obligation to consider every significant aspect of the environmental impact of a proposed action. Second, it ensures the agency will inform the public that it has indeed considered environmental concerns in its decision making process.<sup>7</sup> An Environmental Impact Statement must discuss reasonable alternatives to the project.<sup>8</sup> Consideration of alternatives is at the heart of the environmental impact statement.<sup>9</sup>

NEPA requires that a Federal agency - to the fullest extent possible - consider alternatives to its actions that would reduce environmental damage.<sup>10</sup> Considerations of administrative difficulty, delay or economic cost will not suffice to strip the procedural requirements of NEPA of their fundamental importance.<sup>11</sup>

### 3. Comments and Responses

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The Environmental Impact Statement need not consider an infinite range of alternatives, only reasonable or feasible ones.<sup>12</sup> However, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate.<sup>13</sup> An agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action, and sufficient to permit a reasoned choice."<sup>14</sup> The Draft EIS/EIR fails to meet these requirements.

The FAA's Airport Environmental Handbook requires detailed examination of possible alternatives where airport expansion will significantly affect the surrounding environment:

"When section 509(b)(5) of the 1982 Airport Act is applicable, the FAA shall authorize no project under the Airport Improvement Program involving airport location, a major runway extension, or runway location found to have a significant adverse effect unless the agency shall render a finding in writing, followed by a full and complete review, that no feasible and prudent alternative to the project exists and that all possible steps have been taken to minimize such adverse effect."<sup>15</sup>

Section 4(f) of the DOT Act requires a finding that "no feasible and prudent alternative" exists.<sup>16</sup> The FAA's Airport Handbook also states "To comply with section 4(f), it is necessary to show that a rejected alternative to a proposed action presents unique problems or that the costs or community disruption it entails reaches extraordinary magnitudes."<sup>17</sup>

A reasonable alternative to massive expansion of LAX is a regional solution that looks to meeting increased airport demand by expanding other airports in Southern California. The Draft EIS/EIR does not establish that such an alternative to massive expansion at LAX presents "unique problems," or that the costs or community disruption associated with such an alternative reach "extraordinary magnitudes." On the contrary, the alternatives are dismissed without any such consideration.

As discussed above, the Draft EIS/EIR does not adequately consider alternatives that will reduce the environmental impact upon the community surrounding LAX. Nor does the Draft EIS/EIR consider a "regional" approach that would include substantial expansion at other airports in the region instead of LAX. The Draft EIS/EIR therefore fails to conform to the requirements of NEPA regarding alternatives to the project as presented.

7 Baltimore Gas and Electric Co. v. NRDC, 462 U.S. 87 (1983).

8 42 U.S.C. §4332(2)(C)(iii); Alaska Wilderness Recreation v. Morrison, 67 F.3d 723, 729 (9th Cir. 1995).

9 40 C.F.R. § 1502.14.

10 Calvert Cliffs' Coordinated Committee v. Atomic Energy Commission, 449 F.2d 1109, 1114 (D.C. Cir. 1971). cert. denied, 404 U.S. 942 (1972).

11 Id. at p. 1115.

12 40 C.F.R. § 1502.14(a)-(c).

13 Alaska Wilderness Recreation v. Morrison, supra, 67 F.3d at p. 729.

14 Id.

15 FAA Airport Environmental Handbook, Chapter 8., p. 2.

16 Id.

17 Id.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR in compliance with NEPA and Topical Response TR-RC-1 regarding the role of the LAX Master Plan in a regional approach to meeting demand. It should be noted that, subsequent to publication of the Draft EIS/EIR, Alternative D was added to provide a

### 3. Comments and Responses

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build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP). Alternative D will make the airport safer and more secure, convenient, and efficient, and will have the fewest negative impacts to the local communities and the region.

#### PC02223-10

##### Comment:

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

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

"Section 176(c) of the Clean Air Act Amendments of 1977 states in part that no Federal agency shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to a State Implementation Plan after it has been approved or promulgated under section 110 of that Act. It is FAA's responsibility to assure that Federal airport actions conform to state Plans for controlling area wide air pollution impacts."<sup>18</sup>

In addition, the Airport Environmental Handbook states that the 1982 Airport Act requires that Airport Improvement Program applications for projects involving airport location, runway location, or a major runway extension shall not be approved unless the governor of the state in which the project is located certifies that there is a "reasonable assurance" that the project will be located, designed, constructed, and operated in compliance with applicable air and water quality standards<sup>19</sup>. Finally, the FAA's Airport Environmental Handbook states that all airport development must conform to local plans:

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

(a) The project is reasonably consistent with existing plans of public agencies for development of the area (section 509(b)(1)(A));

(b) Fair consideration has been given to the interest of communities in or near the project location (section 509(b)(4)); ...

(d) Appropriate air and water quality certificates have been or will be obtained for projects involving airport location, runway location, or a major runway extension (section 509(b)(7))."<sup>20</sup>

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

First, the LAX Master Plan fails to conform to the relevant Air Quality Management Plan. Mr. David Calkins, an expert in air emissions planning and compliance issues, reviewed the LAX Master Plan and Draft EIS/EIR. In his report, Mr. Calkins states, "Review of Chapter 4.6 found several inconsistencies in LAWA's reference to the conformity and SIP planning process."<sup>21</sup>

Second, Mr. Calkins has found that the Draft EIS/EIR fails to conform to the Regional Transportation Plan ("RTP") in at least eight different ways. In addition to the Federal law requirements discussed above, under CEQA an EIR must discuss any inconsistencies between the proposed project and applicable general plans and regional plans.<sup>22</sup> The Draft EIS/EIR fails to meet these requirements.

<sup>18</sup> Airport Environmental Handbook, Chapter 5, p. 12.

<sup>19</sup> Id., Chapter 5 p. 14.

<sup>20</sup> Id., Chapter 9, p. 3.

21 Calkins Phase I Report, p. 11.

22 CEQA Guidelines § 15125 (d).

**Response:**

Please see Responses to Comments AL00017-19 through AL00017-27.

**PC02223-11**

**Comment:**

1. The LAX Master Plan Fails To Conform To The Air Quality Management Plan

The LAX Master Plan does not conform to the local air pollution reduction plan. Southern California is designated a non-attainment area under the 1990 Clean Air Act. Therefore all major projects must be constructed with assurance to the Federal Government that the project fits into the current air pollution reduction plan, known as the Air Quality Management Plan ("AQMP").<sup>23</sup> Mr. Calkins has determined that the LAX Master Plan Draft EIS/EIR fails to conform to the relevant AQMP in regards to the following:

1. Emission Inventory - the 2001 AQMP, currently in development, will require changes to the Draft EIS/EIR's emission inventory.
2. Mitigation Measures - LAWA's failure to commit to specific mitigation measures in the Draft EIS/EIR inhibits development of the 2001 AQMP.
3. Baseline Issues - use of the "adjusted" environmental baseline for off-airport traffic impacts does not allow comparison of the Draft EIS/EIR alternatives with current conditions, but actually compares the alternatives to a future condition.
4. Aircraft Mix - the Draft EIS/EIR assumes an aircraft mix of mostly jumbo airliners, in conflict with the adopted 2001 RTP calculations, which will cause differences in projected emissions between the Draft EIS/EIR and the AQMP.
5. Stationary Source Emissions - LAWA's alternatives do not take into account the increase in nearby, off-airport stationary source emissions, despite LAWA's assertions to the contrary; thus, it cannot conform to the regional plan.
6. Ground Support Equipment - LAWA failed to follow the California Air Resources Board's (CARB) latest off-road emission model when concluding that emissions for future Ground Support Equipment would be zero.<sup>24</sup>

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

23 Calkins Phase II Report, pp. 11-12.

24 Id., pp. 13-14.

**Response:**

The content of this comment is essentially the same as Comment AL00017-19; please see Response to Comment AL00017-19.

**PC02223-12**

**Comment:**

2. The LAX Master Plan Fails To Conform To SCAG's 2001 Regional Transportation Plan

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

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

1. Projected Passenger Load - the LAX Master Plan Draft EIS/EIR projects LAX handling over 92 million annual passengers ("MAP") in 2015; the RTP limits LAX to handling what is considered to be its current physical capacity of 78 MAP.
2. Different Model Years - The Draft EIS/EIR models years 2005 and 2015, but the RTP models 2025 as its model year.
3. Market Incentives - There are significant differences between the two plans in choice of market incentives, which causes potential conflicts between the two plans.
4. Aircraft and Passenger Characteristics - These differ in regards to projected aircraft types and passenger growth during the relevant periods.
5. Cargo Handling Projections - The Draft EIS/EIR projects much larger cargo handling for LAX than that planned for in the RTP.
6. High Speed Rail Projections - The Draft EIS/EIR rejects this project as too speculative, but the RTP bases projections on passenger and cargo demand in part upon the inclusion of this transportation mode.

**Response:**

The content of this comment is essentially the same as comments in comment letter AL00017; please see Responses to Comments AL00017-20 and AL00017-22 through AL00017-26.

**PC02223-13**

**Comment:**

7. Funding Projections - The RTP does not include the Ring Road, 105 Freeway extension, or 405 Freeway Connector Projects in its funding projections. The Draft EIS/EIR plans for funding for all of these projects, presumably from Federal Highway funds.<sup>25</sup>

25 Id., pp. 9-10.

**Response:**

This comment is similar to comment AL00017-26. Please see Response to Comment AL00017-26.

**PC02223-14**

**Comment:**

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

**Response:**

Comment noted. Please see Responses to Comments AL00017-20 through AL00017-26 regarding the issues of concern. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated



for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR provides a comprehensive analysis of Alternative D and was circulated for public review and comment. Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region. Please see also Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan.

#### PC02223-15

##### Comment:

C. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES ENVIRONMENTAL IMPACTS

CEQA Guidelines section 15125(a) states "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time of notice of preparation is published ...The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." Under CEQA the impacts of the project must be measured against the real conditions on the ground.<sup>26</sup>

The Draft EIS/EIR fails to utilize a proper baseline. LAWA utilized three different baselines when examining the environmental effects of its Master Plan for LAX. LAWA's "environmental baseline" reflects the conditions in 1996. LAWA's "adjusted environmental baseline" reflects the current use of LAX, with the addition of future road projects and certain land uses. LAWA's "No Action/No Project" Alternative reflects the future road projects and certain land uses, and projects future airport use. LAWA has failed to create a sufficient baseline from which to analyze its alternatives. LAWA's "No Action/No Project" Alternative reflects future conditions. This is inconsistent with CEQA and incorrectly minimizes the environmental effects of the other alternatives. LAWA should develop a proper baseline from which to evaluate its alternatives.

<sup>26</sup> Save Our Peninsula Committee v. Monterey County Board of Supervisors (2001) 87 Cal.App.4th 99,121.

##### Response:

Please see Topical Response TR-GEN-1 regarding baseline issues.

#### PC02223-16

##### Comment:

D. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT DOES NOT ADEQUATELY ADDRESS THE IMPACT OF TOXIC AIR POLLUTANTS

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

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

CEQA requires that an EIR include a description of the environment in and around the project at the time of the Notice of Preparation.<sup>27</sup> Such a description, or baseline, serves as the basis for the EIR's analysis of the environmental impacts of a project. CEQA also requires that detailed analysis of the potential environmental impacts from each of the projects contained in the aviation alternatives not be deferred to subsequent environmental documents.<sup>28</sup> The Draft EIS/EIR does not contain an adequate basis from which to determine the current impact to human health of air toxics emitted by LAX. "The HHRA did not evaluate impacts of toxic air pollutants associated with current airport operations."<sup>29</sup> As noted by Mr. Calkins, this oversight means that LAWA does not provide a sufficient baseline from which

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to draw later conclusions. Without a baseline, LAWA cannot adequately assess the environmental effects of its plans to expand LAX.

27 CEQA Guidelines § 15125(a).

28 Public Resources Code § 21100; Stanislaus Natural Heritage Project v. County of Stanislaus (1996) 48 Cal.App.4th 182.

29 Calkins Phase I Report, p. 8.

**Response:**

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In accordance with CEQA guidelines the Draft EIS/EIR uses the date of July 1997, the date on which the Notice of Preparation (NOP) was published, as the baseline for its environmental analysis. The environmental baseline used in the Human Health Risk Assessment of the Draft EIS/EIR reflects historical airport activity for the full year 1996 and the physical facilities of the airport as they existed in 1997. For a discussion of baseline conditions associated with LAX operations please refer to Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR, Section 3.3, Emissions Estimates for TAPs, of Technical Report 14a and Attachment F of that Technical Report, which is the Air Quality Modeling Protocol for Toxic Air Pollutants, LAX Master Plan EIS/EIR (Attachment F). The use of an earlier rather than later baseline date generally results in a more conservative environmental analysis. This conservatism is due to the steadily increasing number of passengers and cargo that use LAX, and the correspondingly greater levels of traffic and congestion-related air pollution. By using earlier years for baseline environmental conditions, impacts associated with future activity levels are measured against lower levels of airport activity and therefore incremental impacts are greater.

Data representative of more current airport operations (Year 2000) were available for the Supplement to the Draft EIS/EIR and air toxic-related risks were estimated under Year 2000 conditions as a basis for comparison to air toxic-related risks estimated using the 1996 baseline presented in the Draft EIS/EIR. Due to the decrease in air travel following terrorist actions in September 2001, the data for 2001 was not representative of typical or expected conditions, and, therefore, were not used.

**PC02223-17**

**Comment:**

2. LAWA Failed To Properly Study Toxic Air Emissions

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

**Response:**

Please see Topical Response TR-AQ-2 regarding the LAX Ambient Air Quality and Source Apportionment Study. In addition, please also see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR and TR-HRA-4 concerning human health mitigation strategies.

#### PC02223-18

**Comment:**

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

The Health Risk Assessment in the Draft EIS/EIR should be extended to consider a longer time period. There do not appear to be any tables or data in the Draft EIS/EIR on cancer and non-cancer health risks for any year after 2015. However, the operation of the expanded airport during those latter years may well have continuing impacts on the residents of the surrounding communities. Health impacts are often seen in the resident population over a much longer time span than the 15-20 years assessed in the Draft EIS/EIR tables. Other major planning assessments, such as the RTP (2025) and the AQMP (2030), examine impacts of their action over a much longer time frame.<sup>30</sup> The Health Risk Assessment in the Draft EIS/EIR should be extended to conform to this model.

<sup>30</sup> Calkins Phase II Report at p. 22.

**Response:**

The content of this comment is identical to comment AL00017-30; please refer to Response to Comment AL00017-30.

#### PC02223-19

**Comment:**

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

It is unclear in the Draft EIS/EIR what LAWA's criteria is for determining net change in chronic and acute hazard indices for air pollutants. LAWA does not include the criteria pollutants in this analysis, and this is a critical, indeed fatal, omission. The results of the Source Apportionment study, which was only recently initiated, would have provided valuable input to assessing criteria air pollutant (NAAQS) levels as well as various toxic air pollutant impacts on health, if it had been available to the LAWA at the time of preparation of the Draft EIS/EIR.

**Response:**

Regarding criteria for determining the net change in chronic and acute hazard indices, please refer to Response to Comment AL00017-31. The Draft EIS/EIR and Supplement to the Draft EIS/EIR address criteria pollutants in Section 4.6, Air Quality, separate from the analysis of TAPs in Section 4.24.1, Human Health Risk Assessment. Regarding potential impacts of interaction between TAPs and criteria pollutants, please refer to Response to Comment AF00001-38. Please refer to Topical Response TR-HRA-1, regarding the use of the Source Apportionment study to assess criteria pollutants and toxic air pollutants.

#### PC02223-20

**Comment:**

The Draft EIS/EIR also appears to ignore the incremental cancer and non-cancer risks to people who do not "receive a certain hazard level criterion."<sup>31</sup> These issues must be addressed and resolved in the Draft EIS/EIR.

<sup>31</sup> Id.

**Response:**

The content of this comment is identical to comment AL00017-32; please refer to Response to Comment AL00017-32.

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#### PC02223-21

**Comment:**

E. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES HUMAN HEALTH RISKS

1. LAWA'S Study Does Not Adequately Factor Time as a Variable

LAWA analyzes environmental health impacts for two years - 2005 and 2015; however, the environmental health impacts will occur over time. Accordingly, LAWA's analysis inaccurately minimizes certain risks and fails to consider numerous cumulative impacts.

Further, as noted by Dr. Hattis, "2005 does not represent even the peak year for construction-related impacts."<sup>32</sup> In fact, emissions of particulate matter in year 2004 are expected to be more than twice those in 2005 (approximately 44,000 lbs/day versus 19,000 lbs/day). For a proper analysis, LAWA should "analyze and express impacts in terms of both peak-year and integrated bottom-line measures of effect over a reasonably foreseeable extended time over which the facilities will be built and operated."<sup>33</sup>

<sup>32</sup> Hattis Report at p.4.

<sup>33</sup> Id.

**Response:**

The content of this comment is identical to comment AL00017-33; please see Response to Comment AL00017-33.

#### PC02223-22

**Comment:**

2. The Draft EIS/EIR Fails to Adequately Delineate Health Risks

The increased health risks associated with the LAX Master Plan should be set forth with more clarity and specificity in the Draft EIS/EIR. Impacts are expressed primarily in terms of "significance" of effects for the most exposed individual, or, when considering certain carcinogenic effects, in terms of the areas or numbers of people exposed to concentrations expected to exceed a 1/100,000 lifetime incremental cancer risk criterion or an unusual criterion for non-cancer effects of a hazard index of 5.<sup>34</sup> However, the usual criterion used in many impact assessments under other environmental statutes, including Superfund, is a hazard index of 1.<sup>35</sup> Dr. Hattis notes:

"These ways of expressing health impact results are of some relevance because they help the audience judge the fairness of the burden of extra risk imposed for residents of the areas most affected by the project options. However, exclusive definition of impacts in terms of the area or number of people who receive an increment of risk or (for non-carcinogenic agents) exposure to pollutants from LAX-related sources alone that is deemed to exceed a single bright line of 'significance' ignores the incremental cancer and non-cancer risks to people who do not happen to be moved across such a criterion level. Further, these ways of summarizing impacts can not, by themselves, give decision-makers and the public a sufficient description of the overall health impacts to arrive at a reasoned judgment of whether the mix of economic, human health, and environmental impacts of the proposed "build" option is more desirable overall than the comparable impacts of other options. The current analysis of economic activity describes projected aggregate changes in jobs and overall economic activity for the City of Los Angeles, Los Angeles County, and the whole Southern California area. To be comparable with these aggregate economic impacts, aggregate measures of health impacts must be created and the current artificial limitation of the study area for quantifying air pollution impacts must be transcended."<sup>36</sup>

<sup>34</sup> Hattis Report at p. 4.

<sup>35</sup> Id.

36 Hattis Report pp. 4-5.

**Response:**

The content of this comment is essentially the same as comment AL00017-34; please see Response to Comment AL00017-34.

**PC02223-23**

**Comment:**

Decision-makers and the public should be informed of the differences among options for the calculation of overall cases of cancer that are expected to arise over the lifetimes of the individuals exposed over particular periods of construction and operation of the proposed facilities. This should be done for the entire geographic area of the South Coast Air Basin that receives incremental changes in exposures.<sup>37</sup> Human health impacts can and should be expressed in aggregate incremental cancer cases, aggregate incremental deaths, aggregate incremental hospitalizations and aggregate incremental asthma effects for the entire Los Angeles basin associated with the LAX Master Plan.<sup>38</sup> These calculations are certainly feasible and would inform the decision makers and the public of the true human health effects of the project. Until this is done, the document is deficient in addressing this topic.

3. The Draft EIS/EIR Fails to Consider Health Risks on a Regional Basis

The Draft EIS/EIR's human health risk assessment should study risks created by the Master Plan in the entire Southern California region, not simply in those areas immediately surrounding LAX. Failure to so conceals the public health advantages of health risks from expanding other airports instead of LAX. As Dr. Hattis notes:

"Were the analysis expanded to include some options shifting additional air service to outlying airports (as recommended above), continued use of the more localized health impact analysis method would cause analysts to miss important benefits that would accrue from placing emissions downwind rather than upwind of the major population centers of the Los Angeles area."<sup>39</sup>

Restricting the environmental impact analyses to the immediate LAX area and the options considered only to expansion of LAX prevents considering the relative burdens of LAX expansion on minority and lower-income communities versus expansion of air service at other airports. The City of Inglewood appears to be substantially included in the existing boundaries of the air dispersion modeling study, but it is important to have impacts broken down by various political jurisdictions covering the most affected communities.<sup>40</sup> LAWA's current approach on this risk assessment fails to fully capture all relevant data.

37 Id., p. 5.

38 Id., p. 5.

39 Id., p. 5.

40 Id., pp 5-6.

**Response:**

The content of this comment is essentially the same as comment AL00017-35; please see Response to Comment AL00017-35.

**PC02223-24**

**Comment:**

4. LAWA Failed to Conduct a Sensitivity Analysis of Its Human Health Risk Assessment

LAWA failed to conduct a sensitivity analysis of the methodology of its health risk assessment. This failure means that the health risk assessment does not attempt to assess and communicate

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uncertainties in a quantitative way. Whether through sensitivity analysis, or use of a more sophisticated model, such analysis can be and is used to inform interested parties of the uncertainties in key results.<sup>41</sup> One aspect of the modeling that needs such analysis is the assumed behavior responses of airlines to increasing delays as the intensity of usage of airport facilities increases.<sup>42</sup> This variable affects "capacity" calculations, emissions estimates and economic results. LAWA should perform such sensitivity analysis to investigate its methods and conclusions.

41 Id., p. 6.

42 Id.

**Response:**

The content of this comment is essentially the same as comment AL00017-36; please see Response to Comment AL00017-36.

**PC02223-25**

**Comment:**

F. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ASSESSES AIR EMISSIONS

1. The Draft EIS/EIR Does Not Adequately Assess The Impact Of Air Emissions Mitigation Measures Upon The Surrounding Environment

The Draft EIS/EIR does not adequately assess proposed mitigation measures for increased air emissions caused by the LAX Master Plan. Federal law requires that an Environmental Impact Statement include a detailed statement concerning adverse environmental effects of the project that cannot be avoided.<sup>43</sup> This requirement includes a duty to discuss measures to mitigate adverse environmental impacts.<sup>44</sup> While a complete mitigation plan is not required, "omission of a reasonably complete discussion of possible mitigation measures would undermine the action-forcing goals of the National Environmental Policy Act."<sup>45</sup> Absent such discussion, neither the proponents nor the opponents of a project can properly evaluate the adverse effects that will occur.<sup>46</sup> Federal regulations require that the sponsoring agency discuss possible mitigation measures in defining the scope of the EIS, in discussing the consequences of and alternatives to the proposed action, and in explaining its ultimate decision.<sup>47</sup>

The Draft EIS/EIR does not adequately assess the impact of air emissions mitigation measures upon the surrounding environment. As stated by Mr. Calkins, "While the document conducts a fairly extensive effort to identify potential measures, the specific impacts of implementing such measures upon the surrounding county do not appear adequate."<sup>48</sup> Mr. Calkins notes that although LAWA examined the effect of mitigation measures on seventeen intersections, all of these intersections were located west of the 405 Freeway. Further investigation is needed on this topic, in particular upon the efficacy of the mitigation measures for reducing impacts in affected areas, like the City of Inglewood. Mr. Calkins further states:

"Furthermore, emission reductions from the select measures are somewhat questionable. At a minimum, LAWA should provide some analysis of the impacts of the mitigation measures and roadway reconfigurations upon the City of Inglewood."<sup>49</sup>

This analysis is needed for decision makers and the public to be fully informed. Without it, the Draft EIS/EIR fails as an informational document and therefore does not conform to CEQA.

43 42 U.S.C. § 4332(2)(C)(ii).

44 40 C.F.R. § 1502.16(h); Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 351-352; 109 S.Ct. 1835, 1846-47, 104 L.Ed. 351 (1989).

45 Id.

46 Id.

47 40 C.F.R. §§ 1508.25(b), 1502.14(f), 1502.16(h), 1505.2(c).

48 Calkins Phase I Report p.9.

49 Calkins Phase I Report p. 9.

**Response:**

The Draft EIS/EIR identified the most severely impacted intersections associated with LAX traffic. The Air Quality impact analysis calculated the ambient air quality at those intersections and found that without mitigation, the carbon monoxide (CO) standards would be met for all alternatives considered. Other intersections in Inglewood, El Segundo, Culver City and elsewhere would have lower impacts than the 17 intersections modeled in the Draft EIS/EIR. The implementation of mitigation measures to reduce automobile emissions would simply reduce the magnitude of these already non-significant impacts.

Please note that the local CO intersection analysis was updated in the Supplement to the Draft EIS/EIR to include the latest available, approved emission factor model (EMFAC2002) and additional intersections. Please see Topical Response TR-ST-2, regarding the traffic analysis. Again, all intersections, before implementation of any mitigation measures, were below the CO standards for all alternatives. Please see Section 4.6.2.3, Air Dispersion Modeling, and Section 2.2.4 of Appendix S-E, of the Supplement to the Draft EIS/EIR for additional information on the updated CO intersection analysis. The Supplement to the Draft EIS/EIR also addressed the regional off-airport, on-road emission inventory analyses which included the entire South Coast Air Basin.

Please see Response to Comment AL00017-37.

**PC02223-26**

**Comment:**

LAWA should expand the scope of its study of the air quality impacts of the LAX Master Plan. The Draft EIS/EIR focuses its discussion of air quality impacts upon the "immediate areas" surrounding LAX.<sup>50</sup> These areas lie almost exclusively within the City of Los Angeles. The impacts of the Master Plan upon air quality for the areas bordering upon those "immediate areas," are not well documented. This constitutes a major deficiency of the Report.<sup>51</sup> Among other problems, the growth-inducing aspects of LAX expansion are not identified for specific communities in the surrounding area, due to the broad nature of the socio-economic impact analysis of the Draft EIS/EIR.<sup>52</sup> CEQA requires analysis of economic effects that cause physical changes to the environment. This analysis must be sufficient to trace the chain of causation from the economic effect to the physical change.<sup>53</sup> This analysis has not been undertaken in the Draft EIS/EIR.

50 Calkins Phase II Report at 14.

51 Calkins Phase II Report at 15-17, 19.

52 Id., p. 16.

53 CEQA Guidelines § 15131(a).

**Response:**

Please see Response to Comment AR00003-47 regarding regional air quality impacts and the potential effects of growth in the LAX area.

**PC02223-27**

**Comment:**

2. LAWAS Comparison To The No Action/No Project Alternative Is Flawed

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The comparison in the Draft EIS/EIR of the No Action/No Project Alternative and the three "build" alternatives is seriously flawed. The comparison fully assigns future growth impacts, including non-Master Plan expansions and growth of LAX, to the No Action/No Project alternative. In addition, the build alternatives take credit for mitigation measures and the construction of five major arterials to ease traffic, which have no identified funding in the 2001 RTP.54

LAWA's approach underestimates the environmental impacts of the project. If LAWA is incorrect about the extent of growth that would occur in and around LAX absent the Master Plan, or if it is incorrect regarding its ability to conduct the currently unfunded mitigation, then the impacts of the LAX Master Plan will be much larger than LAWA currently represents. These issues must be addressed and corrected before the Draft EIS/EIR can be considered.

Finally, the analysis for the No Action/No Project Alternative is highly questionable in that it highlights improvements that are only in the planning stages for the three "build" alternatives but significantly downplays the improvements that may occur at LAX under the No Action/No Project Alternative. For example, LAWA has pursued numerous improvements at LAX since 1997, including taxiway improvements, the incorporation of SCAQMD's Rule 1194, construction of new cargo building space and additions to onsite and offsite parking facilities. Nevertheless, in defining the No Project Alternative, the Draft EIR/EIS assumes that "only minor improvements" would be made. The Draft EIS/EIR thereby underestimates the improvements that would likely occur at LAX without the Master Plan and appears biased toward the three "build" alternatives.

54 Calkins Phase II Report, p. 18.

**Response:**

This comment is similar to comment AL00017-39; please see Response to Comment AL00017-39.

**PC02223-28**

**Comment:**

However, nowhere is the bias towards the three "build" alternatives more evident than in the emissions comparisons of each alternative. The No Action/No Project Alternative is indicated to have more significant health and safety impacts than any of the three "build" alternatives. Such a finding is very surprising given that aircraft emissions account for 97% of total overall emissions and the No Action/No Project Alternative is estimated to have 1.8% less total annual aircraft operations versus Alternative C and 17.3% less total operations than Alternative A and B. The Coalition believes that these questionable results were partially achieved by the Draft EIS/EIR's use of outdated or partially current baselines to determine traffic, air quality, aircraft noise, biology, earth and water resources. The use of a baseline based on five-year-old data at the time of the Draft EIS/EIR's release is clearly inappropriate and should be rejected.

**Response:**

A number of variables are important for understanding results of the health risk assessment. However, one variable, the amount of time that aircraft taxi and idle, is a key factor in the health risk results. Most emissions from aircraft occur during taxi to and from runways and during idling of engines at gates and in queue on taxiways. Although the total operations under the No Action/No Project Alternative would be less than under the build alternatives, the taxi/idle times would be substantially greater, because the current facility is unable to operate as efficiently as anticipated for any of the build alternatives. As a result, the No Action/No Project Alternative would have greater emissions from aircraft engines than would the build alternatives. Since aircraft account for the great majority of total emissions, greater emissions from aircraft under the No Action/No Project Alternative are predicted to result in greater risks and hazards. This finding is illustrated in Tables S4.24.1-5 and S4.24.1-6 in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. These tables provide a summary of incremental cancer risks and non-cancer health hazards associated with the No Action/No Project Alternative and all four build alternatives compared to 1996 baseline conditions and updated Year 2000 conditions. As indicated in Table S4.24.1-6, the impacts of the No Action/No Project Alternative would be greater than those of the build alternatives even when a more current baseline is used. The relationship of the baselines for traffic, aircraft noise, biology, earth, and water resources to human health risk, asserted by the commentator, is unclear. Please also see Topical Response TR-GEN-1 regarding the environmental baseline.



**PC02223-29**

**Comment:**

3. LAWA Has An Opportunity To Establish A New Baseline That Is Compliant With CEQA

CEQA requires that the "baseline" be defined by conditions extant at the time the Notice of Preparation is released. The baseline provided in the Draft EIS/EIR, however, was already five years old at the time of the Draft EIS/EIR's release. Thus, the Draft EIS/EIR fails to comply with the intent of CEQA to facilitate an understanding of changes in the environment associated with the proposed project. LAWA and the FAA have a unique opportunity, however, to establish a new baseline that is up-to-date and accurate for air quality emissions, traffic, aircraft noise and other factors generated by LAX due to the national disaster. By comparing data collected during the week of September 10, 2001 against other comparative weeks before and after the September 11th disaster, LAWA would be able to provide the public with valuable data concerning traffic, air, noise and other impacts currently generated at LAX.

**Response:**

Please see Response to Comment AL00022-12 and Topical Response TR-GEN-1 regarding baseline issues.

**PC02223-30**

**Comment:**

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

Research on Southern California has demonstrated that the region has significant inequities in exposure of minority neighborhoods to toxic facilities, airborne pollution, and other hazardous materials. Some have worried that certain expansion scenarios will disproportionately affect minority groups, further worsening the current environmental imbalance. Using two measures, one measure evaluating total regional pollution burden faced by Caucasian and minority populations and the other calculating a "person-impacts" estimate in airport zones, researchers found that the enormous expansion proposed by the Draft LAX Master Plan and Draft Environmental Impact Statement/Environmental Impact Report would pose additional burdens for minority populations in Southern California already being exposed to a disproportionate level of noise and air pollution.<sup>55</sup> The report goes on to suggest that a regional approach to meeting the Southern California's future aviation demands would be a more equitable approach and could translate into fewer emissions overall.

<sup>55</sup> Pastor, Jr., Manuel, and Jim Sadd. November 2000. "Environmental Justice and the Expansion of Los Angeles International Airport.." UC Santa Cruz and Occidental College. p.2.

**Response:**

The analyses contained in Section 4.4.3, Environmental Justice, and Appendix F of the Draft EIS/EIR and Section 4.4.3, Environmental Justice, and Appendix S-D of the Supplement to the Draft EIS/EIR provided comprehensive information pursuant to NEPA and CEQA requirements, consistent with Executive Order 12898 and DOT Order 5610.2. Noise and air quality mitigation measures are provided in Section 4.4.3, Environmental Justice, on page 4-338 and 4-339. In addition, please see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-EJ-2 regarding environmental justice-related mitigation and benefits. Please also see Section 4.24.1, Human Health Risk Assessment (CEQA), of the Supplement to the Draft EIS/EIR regarding health risks for all the proposed alternatives for LAX.

**PC02223-31**

**Comment:**

Despite LAWA's own acknowledgement in the Draft LAX EIS/EIR that the projected future emissions for all build alternatives would increase LAX aviation activity and would have a disproportionate impact on

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minority and low-income communities east of LAX,<sup>56</sup> no commitments in the Master Plan or the EIS/EIR are proposed to remedy or mitigate the projected increase in noise and air pollution that will intensify an already acute problem of environmental justice.<sup>57</sup> The preferred alternative, Alternative C, proposes to increase cargo volume by 120% or 2,275,236 tons by 2015 which could translate into: an increase in cargo aircraft size and frequency of cargo flights around the clock, the development of residential areas surrounding the airport for distribution centers or warehouses, and an increase of at least 56,881 heavy-duty trucks per year. There is also some evidence that aircraft and truck frequency projections made by LAWA may be overly optimistic, making real world air and noise impacts of preferred Alternative C much worse than the EIS/EIR would have the reader believe. Based on Coalition staff's experience with distribution centers that rely on diesel-powered heavy-duty vehicles, we believe such an increase would have a significant impact on the public health. The Coalition for Clean Air finds LAWA's decision not to condition the expansion of LAX with plans to incorporate best available control technologies that have the potential to significantly reduce air and noise impacts in the area to be wholly unacceptable. The Coalition for Clean Air strongly encourages LAWA to revise the Master Plan to include meaningful mitigation measures that will improve the quality of life for residential communities surrounding the LAX facility.

56 Draft EIS/EIR p.4-395.

57 Id., p.4-405.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. As presented in these sections and in Chapter 5, Environmental Action Program, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, extensive mitigation measures were provided to address air and noise impacts. Many of these measures address impacts on minority and low-income communities, along with other communities in proximity to LAX.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated with consideration of benefit provided relative to cost, whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. While all recommendations were considered as possible additional components of the Environmental Justice Program, there was a practical limit to the number of benefits that could be selected to help off-set disproportionately high and adverse environmental effects on minority and low-income communities. Furthermore, while LAWA will investigate and pursue environmental justice benefits as feasible and allowable by law, implementation of any programs or measures is dependent upon LAWA's ability to utilize airport revenue funding, or other state or federal funding sources for such implementation. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

#### PC02223-32

**Comment:**

The Master Plan and EIS/EIR Unfairly Burdens the Minority and Lower-Income Communities Surrounding LAX in Violation Federal and California Law

Federal law requires that each federal agency "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."<sup>58</sup> Environmental Justice is also a requirement of California law.<sup>59</sup> Under California law Environmental Justice means "the fair treatment of all people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies."<sup>60</sup> The California Environmental Protection Agency is charged with the responsibility to "Promote enforcement of all health and environmental statutes within its jurisdiction in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state."<sup>61</sup> These requirements imposed on LAWA the responsibility to consider the impacts of LAX expansion on lower income and minority communities.

58 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (EO 12898, February 11, 1994).

59 Cal. Pub. Res. Code § 72000-72001.

60 Cal. Pub. Res. Code § 72001.

61 Cal. Pub. Res. Code § 72000(b).

**Response:**

Environmental justice was addressed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-EJ-1 regarding environmental justice with regards to health risk and cumulative health risk as it applies to minority and low-income populations and Topical Response TR-EJ-2 for a description of the Environmental Justice Program and Benefits.

#### PC02223-33

**Comment:**

Several of the communities surrounding LAX, and in particular to the east of LAX, contain predominantly minority populations and lower income populations. The Draft EIS/EIR contains a demographic analysis of the communities surrounding LAX that will be impacted by the LAX Master Plan. LAWA analyzed seventy census tracts, comprising parts of the City of Los Angeles, El Segundo, Inglewood, Hawthorne, and unincorporated areas of Los Angeles County.<sup>62</sup> Fifty-four of the seventy census tracts within the study area are considered to be predominantly minority. A tract is so defined when more than fifty percent of the population is minority.<sup>63</sup>

Similarly, thirty-three of the seventy census tracts within the Impact Study Area are considered to be low-income. Low-income is defined as having more than 15% of the resident population below the poverty level.<sup>64</sup> Thirty-two of the thirty-three census tracts identified as low-income are predominantly minority.<sup>65</sup> LAWA's analysis shows that the distribution of minority and non-minority populations may cause differential impacts between these two groups:

"This data reveals a readily discernible pattern of minority and low-income communities in the areas surrounding LAX. While the areas to the north and south of LAX are predominantly non-minority, the area east of I-405 with the study area is predominantly minority. Furthermore, within these areas east of I-405 minority populations are heavily concentrated: 39 of the 70 minority census tracts with the study area have minority percentages greater than 90 percent. The uneven distribution of minorities

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throughout the study area, as evidenced by the data showing that most census tracts have less than 20 percent or greater than 90 percent minorities, increases the potential for differential impacts on minorities and non-minorities."66

62 Draft EIS/EIR, Appendix F, Environmental Justice Technical Report pp. 5-6.

63 Id. at p.10.

64 Id.

65 Id., p.15.

66 Id.

**Response:**

The content of this comment is identical to comment PC02223-31; please refer to Response to Comment PC02223-31.

**PC02223-34**

**Comment:**

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

"[M]inority and low-income residential communities within the study area are currently concentrated east of LAX, separated from the airport by predominantly commercial and industrial airport-related land uses and the I-405 freeway. In contrast, residential areas of El Segundo and Playa Del Rey/Westchester, to the immediate north and south of the airport, do not have high concentrations of minority and low-income populations. LAX has always had an east-west runway configuration to take advantage of the prevailing wind pattern and to maximize efficient use of airspace. The combination of the long-standing runway orientation and more recent changes in the demographic patterns in the area around LAX means that minority and low-income residential communities are directly under the primary arrival flight path. The primary impacts on minority and low-income communities from current airport operations are therefore mostly associated with aircraft noise and air emissions. While residential areas of El Segundo and Playa Del Rey/Westchester directly adjacent to the airport are also exposed to high levels of side-line noise, the areas of exposure are much smaller in comparison to the noise-impacted residential communities to the east." 67

67 Id., p.16.

**Response:**

Comment noted.

**PC02223-35**

**Comment:**

Hawthorne, Inglewood, and Lennox are some of the most predominantly minority communities located east of LAX which receive a disproportionate share of the impacts of LAX.

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

**Response:**

All LAX Master Plan alternatives were selected in accordance with the requirements identified in the California Environmental Quality Act (CEQA) regulations, and the National Environmental Policy Act

(NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a detailed discussion of the alternative selection process. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

Please see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Alternative D was added to the Supplement to the Draft EIS/EIR as a build alternative designed to serve a level of future (2015) activity comparable to the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX, and instead, shifting the accommodation of future aviation demand to other airports in the region.

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

#### PC02223-36

##### Comment:

LAWA admits that its Master Plan for expansion of LAX imposes a disproportionate burden of noise impacts upon persons of color and/or low income, and that it does not know if the Plan also imposes a disproportionate burden of toxic air emissions on those same groups.<sup>68</sup> As discussed in the report of Dale Hattis, Ph.D, if LAWA had chosen to seriously consider alternatives that do not include massive expansion at LAX, LAWA would have been able to consider alternatives that would reduce the human health risk overall and spread the environmental burden more equitably among the general population of Southern California.<sup>69</sup> Dr. Hattis observes:

"The framing of the options for analysis in the current draft is exclusively focused on engineering changes. Future "demand" for air services is estimated from a single set of assumptions about future population and economic growth in Southern California, and future national average costs of air travel in revenue per seat-mile, and then "build" options are designed to meet this projected "demand" either in full or in part. There is no apparent recognition or analysis of the possibility that at least some of the growth in "demand" for air services could be shifted to outlying airports downwind of major population concentrations (or out of the South Coast Air Basin entirely, in the case of connecting flights) by changes in economic pricing—such as airport user fees. Such economic measures might not completely avoid the need to expand capacity at LAX, but they seem worthy of explicit consideration at least as supplements to the existing engineering options..."<sup>70</sup>

For these reasons, LAWA should have considered alternatives to massive expansion of LAX. Dr. Hattis notes three specific reasons why such an analysis of alternatives should take place: (1) User fees, in addition to re-directing demand, could be used for mitigation measures; (2) This approach would allow LAWA to slow growth at LAX, which would allow expansion at a much slower pace, which in turn will reduce congestion and, therefore, the significant impacts on the environment from construction; and (3) without such fees the real beneficiaries could be the airlines rather than the flying public.<sup>71</sup> LAWA should immediately and seriously consider other alternatives and analyze them to the same degree that it analyzed Alternatives A, B, and C in its current Master Plan. Anything less fails to adequately address Environmental Justice, as required by law.

<sup>68</sup> LAX Master Plan Draft EIS/EIR, Chapter 4.4.3 Environmental Justice, p. 4-395.

<sup>69</sup> Hattis Report at p.3.

<sup>70</sup> Id., p.3.

<sup>71</sup> Id., p.3.

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**Response:**

Please see Response to Comment PC02223-35, regarding alternatives and a regional approach to meeting demand, Topical Response TR-EJ-3 regarding environmental justice and regional context, and TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02223-37**

**Comment:**

H. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES TRAFFIC IMPACTS

1. The Draft EIS/EIR Ignored Cumulative Impacts Of The LAX Master Plan By Not Analyzing The Traffic Impacts In The Surrounding Residential Communities

LAWA improperly ignored the cumulative impacts of the LAX Master Plan by failing to analyze the impacts of the plan upon the traffic in the surrounding residential communities. Under both Federal and California law the cumulative impacts of the LAX Master Plan must be analyzed in the Draft EIS/EIR. The FAA's own Airport Environmental Handbook states:

"CEQ 1508.7 states that 'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."<sup>72</sup>

In addition, CEQA requires that the cumulative impacts of the project be considered and analyzed in the environmental impact report.<sup>73</sup> This was not done with respect to the impacts of the Master Plan on surface traffic in all affected areas.

<sup>72</sup> FAA's Airport Environmental Handbook, Chapter 3, p. 5.

<sup>73</sup> CEQA Guidelines § 15130.

**Response:**

Please see Response to Comment AR00003-21 regarding cumulative impacts.

**PC02223-38**

**Comment:**

The traffic analysis contained in the Draft EIS/EIR does not review all necessary surrounding areas. Traffic Engineer Paul Cook reviewed the traffic analysis contained in the Draft EIS/EIR. Mr. Cook states that the Draft EIS/EIR lacks analysis on communities surrounding LAX, and that this is a deficiency of the report.<sup>74</sup> This deficiency must be remedied before there can be any further work on the LAX Master Plan. Without such analysis the Draft EIS/EIR fails to consider all of the cumulative impacts of the Master Plan, which is a fatal error under NEPA and CEQA.

2. Traffic Mitigation is Not Sufficiently Analyzed in The Draft EIS/EIR

The Draft EIS/EIR fails to properly discuss the specific impacts of implementing potential mitigation measures upon the surrounding residential communities.<sup>75</sup> Mr. Cook notes:

"While most of the City of Inglewood is within the Land Use Study Area as shown in the attached Figure 4.2-1, the analysis on the impacts of the project on intersections and roadway segments east of the 405 are minimal."<sup>76</sup>

Analysis of additional intersections and roadway segments east of the 405 freeway is appropriate and necessary to determine the need for additional mitigation measures other than those already included in

the Draft EIS/EIR. Id. LAWA must conduct this additional analysis immediately and make the results available for public review as part of the EIS/EIR analysis and process.

3. The Draft EIS/EIR's Traffic Relief Congestion Package is Inadequate

The Draft EIS/EIR contains a "congestion relief package". This package is inadequate and should be expanded.<sup>77</sup> On preliminary review, it appears that the South Bay Cities are excluded from this relief package.<sup>78</sup>

74 Cook Report p.5.

75 Id., p.6.

76 Id.

77 Cook Report pp. 6-7.

78 Id.

**Response:**

This comment is similar to AL00017-41. Please refer to Response to Comment AL00017-41.

**PC02223-39**

**Comment:**

The source of the funding for these roadway improvements is uncertain.<sup>79</sup> LAWA must include the South Bay Cities in its "congestion relief package," and should take necessary steps to ensure funding of this aspect of the Plan. Identification of a certain source for the funding of these roadway improvements must be included in the Draft EIS/EIR.

79 Id.

**Response:**

Please see Response to Comment AL00008-6 regarding funding. The congestion relief package addressed the facilities significantly impacted by the proposed project, as discussed in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR.

**PC02223-40**

**Comment:**

4. The Study of the Effects of the Proposed LAX Expressway is Inadequate

LAWA's review of the impact of its "LAX Expressway" must be expanded because it fails to consider impacts of this project on the surrounding communities.<sup>80</sup> "An EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, ...."<sup>81</sup> Pursuant to CEQA, the Draft EIS/EIR must consider all significant environmental effects of the LAX Expressway. The Draft EIS/EIR must also take into account traffic impacts to the surrounding communities, in particular intersections and roadway links east of I-405 that have not been so analyzed.<sup>82</sup> Failure to analyze and comment on these vital traffic/transportation links renders the EIS/EIR inadequate.

80 Cook Report p.7.

81 CEQA Guidelines §15121.

82 Cook Report, p.9.

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**Response:**

The content of this comment is essentially the same as Comment AL00017-43; please see Response to Comment AL00017-43.

**PC02223-41**

**Comment:**

5. LAWA'S Baseline For Traffic Is Insufficient

The baseline that LAWA used to evaluate "levels of service" in the Draft EIS/EIR is dubious:

"Two baseline scenarios were used to determine the effect of the proposed Master Plan improvements on off-airport roadways. First, the environmental baseline is the surface condition existing in 1996. Second, the adjusted environmental baseline uses the current airport use, but assumes future roadways and land uses. Two issues are raised when using this approach:

1. It does not provide for a comparison of project alternatives with existing conditions. CEQA requires that the existing condition of an EIR be established at the time the Notice of Preparation (NOP) is issued. The use of so-called existing condition for the years 2005 and 2015 does not meet this requirement.

2. It minimizes the extent of change on area roads between the existing conditions and the future conditions associated with the project. It is clear that not all future roadway adverse conditions will be a result of the LAX Master Plan. However, comparing the project to a future condition seems to limit the evaluation of cumulative effects and the project's contribution to their mitigation.<sup>83</sup>

In addition, the Draft EIS/EIR modeled future conditions for 2005 and 2015, but the current SCAG RTP uses 2025 as its horizon year. The 2025 horizon year is more appropriate because "the project will take as least 16 years to complete...[so a] discussion of a longer planning horizon would be appropriate."<sup>84</sup> Finally, the validity of LAWA's model depends on certain improvements being in place, but there is no guarantee that these improvements will be made in a timely manner.<sup>85</sup>

Inasmuch as a proper baseline is necessary for a proper analysis, without such, the EIS/EIR is inadequate.

<sup>83</sup> Id., pp. 7-8.

<sup>84</sup> Cook Report, p. 8.

<sup>85</sup> Id.

**Response:**

The content of this comment is similar to comment AL00017; please see Responses to Comments AL00017-44 through AL00017-46.

**PC02223-42**

**Comment:**

I. THE LAX MASTER PLAN IS INSUFFICIENT BECAUSE IT DOES NOT CONFORM TO LOCAL TRAFFIC PLANS

The LAX Master Plan must conform to area-wide transportation plans. There are substantial differences, however, between the Draft EIS/EIR and the RTP recently adopted by SCAG. The Draft EIS/EIR refers to the 1998 SCAG RTP and its data; however, more current information is available and should be utilized. In addition, the RTP projects 78 million annual passengers ("MAP") at LAX, not the 86 MAP projected in the Draft EIS/EIR preferred Alternative "C." Failure to conform could lead to potential funding sanctions and other Federal restrictions that could affect the cities and communities surrounding LAX.<sup>86</sup> These conformance problems jeopardize many aspects of the LAX Master Plan, including important mitigation measures.



86 Cook Report at p.9.

**Response:**

This comment is similar to comment AL00017-47. Please see Response to Comment AL00017-47.

**PC02223-43**

**Comment:**

J. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY MEASURES NOISE INCREASES

LAX's existing operations, without expansion, are a significant source of noise pollution for the surrounding residential and business communities in the area. Residents, employees, students and children in the areas surrounding LAX's operations suffer daily from the barrage of aircraft overflights, cargo ground operations, airport-vehicular traffic and ICE ground support equipment. Community members living in the areas surrounding areas of LAX have long complained about the airport's noisy operations. In testifying at workshops on noise issues in the City of Los Angeles, members of the public were unanimous in their desire for relief from the aircraft noise burden that is increasingly disrupting their lives.<sup>87</sup>

Members of the public have reported that they suffer from severe sleep disruption, and the inability to carry on conversations in their homes and to enjoy their homes due to the intensity and constant noise from aircraft operations at LAX. Others reported that it is unpleasant to use bike paths along the beach due to the noise from aircraft.<sup>88</sup> Finally, the City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City.<sup>89</sup>

<sup>87</sup> See Los Angeles City Planning Department Staff report to the Planning Commission, prepared for the 11/12/98 Planning Commission hearing.

<sup>88</sup> Id.

<sup>89</sup> City of Los Angeles Noise Element, 2-11.

**Response:**

Comment noted. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakening in homes in the sections referenced above, with supporting technical data and analyses provided in Appendix S-C and Technical Report S-1. In addition, please Topical Response TR-N-1 regarding the noise modeling approach, Topical Response TR-N-3 regarding aircraft flight procedures, Topical Response TR-N-5 regarding nighttime aircraft operations, Topical Response TR-N-6 regarding the noise increase, and Topical Response TR-LU-4 regarding outdoor noise levels.

**PC02223-44**

**Comment:**

1. The Draft EIS/EIR Uses An Improper Baseline For Noise Analysis

The baseline used to analyze noise impacts in the Draft EIS/EIR is inappropriate. LAWA's baseline for its analysis of noise issues is 1996. However, as discussed in the Report of John C. Freytag ("Freytag Report"), the 1996 baseline year occurred mid-way through the phase out of Stage 2 aircraft, which is now complete. According to Mr. Freytag, "the current noise exposure at LAX is below the 1996 baseline."<sup>90</sup> Since LAWA uses the higher baseline, it improperly minimizes the noise increases to be caused by the LAX Master Plan. LAWA easily could have utilized more recent information, and it must do so to bring the EIS/EIR into conformance with law.

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90 Freytag Report at p.2.

**Response:**

Please see Response to Comment AL00017-48.

**PC02223-45**

**Comment:**

2. LAWA's Noise Exposure Contours Are Understated

The noise exposure contours in the Draft EIS/EIR fail to capture and convey the true parameters of the noise increase that will occur under the LAX Master Plan. LAWA utilizes "simplified line drawings" for its flight tracks meant to demonstrate current conditions and future alternatives. This was most likely done in an effort to simplify modeling efforts; however, it also understates the resulting CNEL contour.<sup>91</sup> LAWA should break down each of its flight tracks, as discussed in the Freytag Report, in order to obtain an accurate depiction of the CNEL contours that will be created under each alternative. Failure to do so will lead to inaccurate modeling; decision makers and the general public will be deprived of their right to know the full extent of the environmental impact of the LAX Master Plan.

91 Id., p.3

**Response:**

For more information, please see Topical Response TR-N-1 regarding the noise modeling approach, particularly TR-N-1.4 regarding simplified line drawing flight tracks vs. track dispersion.

**PC02223-46**

**Comment:**

3. LAWA'S Assertions Regarding Nighttime "Over-Ocean Operation" Are Incorrect

LAWA's discussion in the Draft EIS/EIR concerning nighttime operations at LAX raises questions and does not provide answers. The Master Plan Chapter II is entitled "Existing Conditions Working Paper" and it is dated April 19, 1996. Section 2.2.3 is entitled "Noise Abatement Operating Procedures." It states, "Over-Ocean operation procedures shall be in effect between the hours of 24:00 and 06:30 a.m. Over-ocean operations consist of departures on Runway 24L and arrivals on Runway 7L."<sup>92</sup> However, this analysis ignores the fact that these operation rules, which are already in effect, are suspended frequently due to weather constraints. Therefore, to the extent that this condition was utilized in connection with noise or emissions calculations or modeling, the accuracy and validity of such calculations must be considered carefully.

92 II-2.30.

**Response:**

The content of this comment is essentially the same as comment AL00017-51; please see Response to Comment AL00017-51.

**PC02223-47**

**Comment:**

K. THE DRAFT EIS/EIR FAILS TO SATISFY APPLICABLE LAW BECAUSE IT IMPROPERLY ANALYZES THE HEALTH EFFECTS OF AIRCRAFT NOISE

1. The Draft EIS/EIR Must Consider The Health Effects Of Aircraft Noise

The Draft EIS/EIR must fully consider all of the adverse health effects of aircraft noise. LAWA admits that its LAX Master Plan will create increased noise impacts upon the residential communities of Inglewood and Westchester. The Coalition also believes that the communities of Hawthorne and

Lennox and portions of Los Angeles east of LAX may also be greatly impacted. "Under Alternative C, which does not add a new runway, a decrease in noise exposure would occur in the City of El Segundo and the community of Del Aire with increases in portions of the community of Westchester and the City of Inglewood."<sup>93</sup>

There is strong scientific evidence of the adverse health effects of noise pollution on humans. Studies have shown clear health effects on animals, and these studies indicate the certainty of such effects on humans as well.

"A study sponsored by the EPA, constituting one of the most notable studies of animal noise exposure, examined cardiovascular effects of noise on monkeys. This research demonstrated that monkeys subjected to industrial noise at levels between 85 to 90 dBA for several months developed significant elevations of systolic and diastolic blood pressure. It is particularly notable that these changes persisted long after exposure ceased, demonstrating that noise has a chronic effect on blood pressure."<sup>94</sup>

LAWA admits that such studies exist and that noise can cause negative health effects, but fails to consider such reports or provide meaningful mitigation to minimize or prevent potential noise impacts created by LAX expansion. Instead, LAWA simply concludes that such studies are controversial and, therefore, that no in-depth analysis is required.

"Some studies suggest that there are indicators that high noise levels, particularly from aircraft, may have a detrimental effect on the cardiovascular system, mortality rates, birth defects, achievement scores, psychiatric admissions, sleep disturbance, and overall psychological well being; others show no conclusive evidence of these effects. However, the results of such studies continue to be controversial and are not accepted by the general scientific community at this time."<sup>95</sup>

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

"Although there is consensus that noise has some health effects, there is no agreement as to the degree of the effects or the level at which they become significant. The scientific community and regulatory agencies have not developed numerical thresholds beyond which the health effects of noise are considered to be significant."<sup>96</sup>

In other words, LAWA takes the position that the absence of a specific threshold absolves it from having to address this issue in any meaningful way in the Draft EIS/EIR. Instead, LAWA focused on overall noise exposure caused by its expansion plan. "Since it is not possible to quantify noise health impacts for a population, such as the people who live in the vicinity of an airport, this analysis focused by necessity on quantifying overall noise exposure."<sup>97</sup>

LAWA's admitted inability to fully analyze the Health Effects of Aircraft Noise itself renders the planned expansion in violation of existing law. LAWA improperly fails to consider the admitted potentially significant adverse health effects of noise. "Significant and unavoidable impacts associated with aircraft noise are expected to occur. Such noise exposure is considered to pose a potential significant and unavoidable impact relative to health effects of noise, to the extent there is such a relationship between the two."<sup>98</sup>

"The U.S. Environmental Protection Agency (USEPA) has taken the following position: 'Research implicates noise as one of several factors producing stress-related health effects such as heart disease, high blood pressure and stroke, ulcers and other digestive disorders. The relationship between noise and these effects has not yet been quantified.'"<sup>99</sup>

No Master Plan commitments for the health effects of noise are proposed."<sup>100</sup> LAWA must fully examine the health effects of aircraft noise in order to fulfill the requirements of NEPA and CEQA.

<sup>93</sup> Draft EIS/EIR Section 4.24.2, p. 4-1040.

<sup>94</sup> Fred M. Svinth, Illingworth & Rodkin, Inc. "The Effects of LAX Aircraft Noise on Local Communities," January 2001, p. 9.

<sup>95</sup> Draft EIS/EIR Section 4.24.2, p. 4-1041.

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96 Draft EIS/EIR Section 4.24.2, p. 4-1046.

97 Draft EIS/EIR Section 4.24.2, p. 4-1039.

98 Draft EIS/EIR Section 4.24.2, p. 4-1050.

99 Draft EIS/EIR Technical Report 14b. Health Effects of Noise Technical Report.

100 Draft EIS/EIR Section 4.24.2, p. 4-1046.

**Response:**

The content of this comment is essentially the same as comment AL00017-52; please see Response to Comment AL00017-52.

**PC02223-48**

**Comment:**

2. The Draft EIS/EIR Inadequately Considers Aircraft Noise Interference With Classroom Activities and Sleep

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

"Interference with classroom activities and learning from aircraft noise has been the subject of much recent research. Several studies have been performed, including studies at LAX, London's Heathrow Airport, and Munich International Airport. These studies indicate that a relationship between aircraft-related noise and learning effects does exist, but that additional research is required to clarify how close that relationship is and at what noise levels the relationship appears. The relationship has been particularly difficult to document due to the confounding factors of background noise, school quality, and socioeconomic status. Additional research is being performed to try to account for these factors."101

Similarly, LAWA admits but dismisses summarily the very real problem of sleep disturbance caused by aircraft noise. LAWA states:

"Generally, laboratory studies have shown considerably more disturbance than field studies, perhaps due to the subject's lack of familiarity with the location and experience. Sleep disturbance studies have also involved the collection of cumulative data from subjects.... A review of existing studies and literature indicates that additional research is required to clarify the relationships between aircraft-related noise and sleep disturbance."102

LAWA tries to minimize the sleep disturbance caused by aircraft operations at LAX. LAWA states, "LAX undertakes a different operational procedure for takeoffs and landings between midnight and 6:30 a.m. These 'over-ocean' procedures route both arrivals and departures over Santa Monica Bay, directing aircraft noise away from residential areas to the east of LAX during nighttime hours."103

However, due to constraints caused repeatedly by weather conditions, residential communities of Del Aire, El Segundo, Hawthorne, Inglewood, Lennox, Morningside Park, Playa Del Rey, Westchester and other nearby communities are subjected to late night overflights. The Draft EIS/EIR fails to adequately analyze these issues.

101 Draft EIS/EIR Section 4.24.2, p. 4-1043.

102 Draft EIS/EIR Section 4.24.2, p. 4-1044.

103 Draft EIS/EIR Section 4.24.2, p. 4-1045.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. In addition, please see Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02223-49**

**Comment:**

CONCLUSION

The comments on the Draft LAX Master Plan and Draft EIS/EIR presented in this letter are the result of careful review by staff of the Coalition for Clean Air and expert consultants in the areas of human health risk assessment, air emissions and planning, aircraft noise impacts, traffic engineering and environmental justice. As discussed above, serious issues exist with regard to these two documents that must be addressed by LAWA and the FAA prior to any further action.

The Coalition for Clean Air and its members look forward to having the comments presented in this letter responded to in detail, with adequate time to review prior to any action by LAWA and/or the FAA.

**Response:**

Comment noted. In accordance with the provisions of NEPA and CEQA, FAA and LAWA have prepared written responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. These responses are provided herein as part of this Final EIS/EIR. The Final EIS/EIR has been made available for public review at FAA and LAWA and through distribution to public libraries throughout the area, and is available electronically at [www.laxmasterplan.org](http://www.laxmasterplan.org). Responses to individual comments included in this comment letter are provided above.

**PC02224**

**Bulpitt, Ken**

**None Provided**

**9/21/2001**

**PC02224-1**

**Comment:**

The LAX Master Plan fails to adequately deal with several important safety, health, environmental, and community issues pertinent to a large scale expansion of LAX, while the EIS/EIR similarly fails to identify and provide solutions for these critical elements. I outline below my legitimate concerns as they relate to the proposed LAX expansion:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02224-2**

**Comment:**

Safety:

1. Airport Security: In the wake of the recent terrorist attacks involving hijacked passenger aircraft from major metropolitan airports, attention is finally being paid to the inadequacy of airport security screening for passengers and baggage. Current staff and technology at LAX cannot assure air safety. Doubling the number of passengers and packages transiting the LAX facility will guarantee future breaches of security and potential disaster.

The Master Plan fails to address this critical issue. Larger airports requiring mass security procedures will slow travel to a crawl. In addition, large facilities with huge numbers of people will themselves become targets of terrorism.

### **3. Comments and Responses**

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**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC02226-03, and PC02131-5.

**PC02224-3**

**Comment:**

2. Air Congestion: Already the FAA has approved requests from LAX to lower the altitude of the downwind and approach airspace pattern and reduced the minimum separation distances between aircraft. These changes were requested to increase the number of aircraft per unit air space, thereby increasing the number of landings per unit time. Although aircraft collisions are uncommon, doubling air traffic to and from LAX will greatly increase the risk of air collisions over heavily populated areas.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02224-4**

**Comment:**

3. Taxiway Congestion: LAX unfortunately ranks as one of the top airports for near misses involving taxiing aircraft. Increasing the number of take-offs and landings per unit time will lead to further unacceptable increases in this risk. Reconfiguration of the runways and taxiways cannot overcome the danger of doubling aircraft traffic. Since the LAX complex is surrounded by heavily populated areas to the North, East, and South, and an environmentally protected area to the West, the acreage of LAX is fixed. Doubling aircraft and support vehicles for those aircraft in a confined space is a dangerous approach to solving the regional needs of Los Angeles, Ontario, and Orange counties.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety, including a discussion regarding airfield modification proposed under the build alternatives to reduce the risk of runway incursions.

**PC02224-5**

**Comment:**

4. Increased Helicopter and Small Aircraft Traffic: A topic not addressed in a meaningful manner is the safety issue tied to the concomitant increase in helicopter and small commuter aircraft. Already helicopters fly low over houses along narrow air corridors along Sepulveda Blvd. During overcast and foggy days, helicopters frequently violate FAA rules for altitude over inhabited structures. A near doubling of such aircraft will greatly increase the risk of collisions over heavily populated areas.

**Response:**

As described in 14 CFR Part 91.119 regarding minimum safe altitudes, no person, except when necessary for takeoff or landing, may operate an aircraft below the following altitudes: Anywhere. An altitude allowing, if a power unit fails, an emergency landing without undue hazard to person or property on the surface. Over congested areas. Over any congested area of a city, town, or settlement, or over any open air assembly of persons, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft. Over other than congested areas. An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure. Helicopters. Helicopters may be operated at less than the minimums prescribed in paragraph (b) or (c) of this section if the operation is conducted without hazard to persons or property on the surface. In addition, each person operating a helicopter shall comply with any routes or altitudes specifically prescribed for helicopters by the Administrator. Also, please see Topical Response TR-SAF-1 regarding aviation safety.

#### PC02224-6

**Comment:**

5. Ground Traffic: Increased car and truck traffic on surface streets turned into expressways for the benefit of LAX travelers, will put pedestrians including many children in danger whenever they cross major streets such as Sepulveda Blvd.

**Response:**

It is not anticipated that the project would exacerbate any issues with pedestrian crosswalks on area arterial streets such as Sepulveda Boulevard. Further, such crosswalks are under the jurisdiction of local and state transportation agencies. These agencies should be contacted regarding any existing issues with crosswalks.

#### PC02224-7

**Comment:**

Health:

1. Airborne Toxins: Little analysis has occurred to understand the health risks from airborne toxins originating from aviation fuel. Aviation fuel is an impure substance contaminated by multiple organic solvents including benzene, toluene, formaldehyde, etc. (known carcinogens). Furthermore, combustion of jet fuel by jet engines is inefficient and incomplete, leading to the release of heated airborne solvents and particulates which readily drift with the wind.

The prevailing winds of Westchester have a steady onshore flow (one of the reasons the site was selected for an airport in the first place) carrying these carcinogenic combustion products into the heavily populated areas of Inglewood and South Los Angeles. The health risk of current exposure is unknown. The risk of increasing aircraft emissions further must be addressed before permitting expansion.

**Response:**

The content of this comment is essentially the same as comments PC02221-21 and PC00045-4; please see Responses to Comments PC02221-21 regarding jet exhaust and PC00045-4 regarding odors. In addition, please refer to Topical Response TR-AQ-1 regarding deposition studies for airports, including aircraft fuel combustion and deposition.

Please note that while benzene is classified as a known human carcinogen, and formaldehyde as a probably human carcinogen, no substantive evidence exists that suggests that toluene causes cancer in humans or experimental animals.

#### PC02224-8

**Comment:**

2. Noise Pollution: Measurement of average noise levels (frequently cited in analyses pertaining to this form of pollution) are meaningless. Aircraft take-offs and engine braking (reverse thrust used to slow landing airplanes) generate enormous noise which exposes tens of thousands of local residents to known and unknown health hazards. The area affected extends miles from the LAX boundary, and in addition, incoming aircraft affect residents in Inglewood and South Los Angeles.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. The CNEL metric used in the assessment of noise takes into consideration loudness and duration of exposure.

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#### PC02224-9

**Comment:**

Local noise abatement programs consist of providing double-paned windows and insulation to homeowners in the immediate vicinity of the airport complex. This works well for a small select group . . . provided they never leave their homes. One of the major attractions of Los Angeles is the year-round user friendly weather. LAX expansion threatens to create hermits out of many Westchester families (children in particular).

The only public park in Westchester (located at Manchester and Lincoln) is currently so noisy that outdoor activities there are by necessity limited to short periods of time.

**Response:**

Please see Topical Response TR-LU-3 for a description of the residential soundproofing program. See also Topical Response TR-LU-4 for a discussion of outdoor noise levels, and Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels that would result from development of the build alternatives and mitigation measures that would reduce exposure of noise-sensitive uses to high noise levels. Existing and projected noise levels at park facilities were analyzed in Section 4.1, Noise; Section 4.2, Land Use; Section 4.8, Department of Transportation Act, Section 4(f); and Section 4.26.3, Parks; of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Based on the analysis provided therein, Westchester Recreation Center was not identified as significantly impacted either under 1996 baseline conditions or as a result of development of any of the Master Plan alternatives. Please also see Topical Response TR-N-4 regarding noise mitigation.

#### PC02224-10

**Comment:**

Stage 2 aircraft engines are not half as noisy as current engines, and therefore in no way can offset the increase in noise due to traffic. As a resident of Westchester, I have noticed no appreciable reduction...and in fact a steady increase in noise pollution from LAX.

**Response:**

Comment noted. Stage 2 aircraft engines are, on average, several decibels louder than similarly sized Stage 3 aircraft. For information regarding future noise increases, please see Topical Response TR-N-regarding noise increase and Subtopical Response TR-N-7.6. Please also see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester. Aircraft noise mitigation was described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise were provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

#### PC02224-11

**Comment:**

3. Sleep Deprivation: Among the goals of the proposed reconfiguration is enabling the 24 hour launching of cargo aircraft from both North and South runways. Heavily loaded wide-body aircraft requiring maximum thrust will generate unprecedented night-time noise pollution for miles to the sides of the LAX runways. Airports in other heavily populated areas of the country have demonstrated respect for the local communities by instituting curfews or night time flight restrictions for air flights...a benefit to the health of Westchester and El Segundo residents not viewed as important to past or present LAX policymakers.

**Response:**

Cargo aircraft have been able to operate from both the north and south runway complexes for many years. The development proposed by the alternatives would not change this capability. To institute



restrictions on nighttime operations would require approval of such measures by the FAA. To gain that approval, the benefits of the measure are required to outweigh its costs. The heavily loaded flights to Asia have an enormous economic benefit to the region, and they need to leave during the night hours to meet the most efficient window of time for delivery in Asian markets. The costs of stopping these operations would equal the economic benefit to the community derived from them, and the benefits from their cessation would not justify the action under Part 161 of the Federal Aviation Regulations. Also, please see Response to Comment PC02214-37 and Section 4.1, Noise, Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR for additional information regarding the effect of single events on nighttime awakenings. However, based on recent Court of Appeal ruling in the "Berkeley Jets" case at Oakland International Airport, additional sound insulation is recommended for areas exposed to single event Sound Exposure Levels (SEL) in excess of 94 decibels if a recommended restriction on easterly departures during the night hours fails the required tests under FAR Part 161. Mitigation Measure MM-LU-2 Incorporate Residential Dwelling Units Exposed to Single Event Awakenings Threshold into Aircraft Noise Mitigation Program was described in Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR.

#### PC02224-12

##### Comment:

Local Environmental Impact:

1. Street and Freeway Congestion: Although the Master Plan recognizes that the proposed LAX expansion will result in a great increase in surface car and truck traffic, the proposed solution of a ring road is simplistic, and does not address the impact beyond the immediate airport perimeter. Already the 405 freeway, the only major thoroughfare for the entire Westside of Los Angeles, and the major connector between the San Fernando Valley and the South Bay, is loaded to capacity. Grid-lock exists now. What will a near doubling of vehicular influx and efflux from LAX do to the ability of Los Angelinos to traverse their city?

##### Response:

The amount of traffic forecast for the project alternatives would not double the existing airport traffic, as shown in Tables 4.3.1-10 (Alternative A), 4.3.1-11 (Alternative B), and 4.3.1-12 (Alternative C) in the Draft EIS/EIR, Section 4.3.1. Further, the increase in airport-area traffic would be less with the projects than if nothing were done in the future (the No Action/No Project Alternative). An analysis of the regional freeways are included in the Congestion Management Program (CMP) results, included in Technical Report 3b, Off-Airport Ground Access Impacts and Mitigation Measures. Please note that Alternative D does not include the LAX Expressway or the Ring Road. Please also see Topical Responses TR-ST-2 regarding surface transportation analysis methodology and TR-ST-4 airport area traffic concerns.

#### PC02224-13

##### Comment:

2. Inappropriateness of a Mega-Airport to Southern California: Los Angeles, Ontario, and Orange Counties are horizontal communities, lacking true economic and cultural centers. Unlike cities such as New York, Chicago, and Boston, our populations are spread over large geographic areas. Directing the majority of available City funds into a single airport in this large region will establish the huge future liability for generations of Southern California residents of having to travel great distances at the expense of enormous amounts of time and lost productivity in order to travel. Smaller regional airports which are accountable to the local community is required.

##### Response:

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

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

#### PC02224-14

**Comment:**

3. Population Growth will Prevent Long Commutes to LAX: Los Angeles is steadily growing through the combined effects of immigration and birth. All areas will therefore have increased intra-regional traffic which will further slow influx and efflux from LAX. Given the option, potential air travelers from Orange County, Palmdale, Ontario, Venture would gladly utilize and support their local airports.

**Response:**

Comment noted. Please see Response to Comment PC02224-13.

#### PC02224-15

**Comment:**

4. Lack of Proof that Expansion is Essential to the Los Angeles Economy: The LAX commission has always functioned on the assumption that LAX expansion was necessary and economically beneficial. The events of September 11th, 2001 are likely to have long term repercussions on air travel. Cost of air flight will be higher and more difficult, and demand will remain low for decades. Up until September 11th, air travel was considered a right, not a luxury. Low airfares, and unprecedented availability of flights to anywhere at anytime created a false sense of need. Air travel is not a necessity for many business and personal uses. Many business functions can and will be replaced by technology which already exists.

Modernization of technology, and facilities does not necessitate expansion. The LAX policymakers have presented expansion as the only way to achieve modernization.

**Response:**

Please see Response to Comment PC02143-6 regarding periodic upturns and downturns in aviation activity as related to long-term aviation demand projections. As indicated therein, the aviation demand projections used for the Master Plan are still considered to be valid, even in light of the events of September 11, 2001 and the recent economic recession.

#### PC02224-16

**Comment:**

In summary, the LAX Master Plan is flawed, and does not address the needs or concerns of the Los Angeles community, and its neighbors.

**Response:**

Comment noted.

#### PC02225

**Teplitz, Pamela**

**None Provided**

**9/24/2001**

#### PC02225-1

**Comment:**

The current EIS/EIR uses flawed models to address the identified issues raised by the current LAX Master Plan. For example, the EIS/EIR:

1) uses 5-year-old environmental quality baselines;

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

**PC02225-2**

**Comment:**

2) has the appearance of advocacy rather than objectivity;

**Response:**

Comment noted.

**PC02225-3**

**Comment:**

3) provides no project alternative that addresses safety and modernization while producing less significant impacts;

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR.

**PC02225-4**

**Comment:**

4) concludes that the development of a regional alternative is unreasonable;

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02225-5**

**Comment:**

5) contains no review of the impact or feasibility of ground access improvements;

**Response:**

The impact and feasibility of proposed ground access improvements are included in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Sections 4.3.1, On-Airport Surface Transportation, and Section 4.3.2, Off-Airport Surface Transportation.

**PC02225-6**

**Comment:**

6) lacks a valid analysis of environmental justice issues;

**Response:**

Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR provide full analyses of environmental justice issues pursuant to NEPA and CEQA requirements, and consistent with Executive Order 12898 and DOT Order 5610.2. Also see Response to Comment AL00022-20.

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#### PC02225-7

**Comment:**

7) lacks any noise mitigation measures beyond soundproofing;

**Response:**

Please see Topical Response TR-LU-5 regarding noise mitigation measures presented in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, which also include mitigation measures that reduce noise levels through modification of airport operations.

#### PC02225-8

**Comment:**

8) does not address the impact of the expanded airport operating at 167.5% capacity as it is currently.

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

#### PC02225-9

**Comment:**

In the light of the recent airplane terrorist attacks on the east coast, it is more important than ever to avoid concentrating so much of Southern California's air traffic in one place. LAX's location could be a strategic target for a similar attack since it is surrounded by large population centers and business that include America's aerospace industry, oil and gasoline processing facilities, the Ports of Los Angeles and Long Beach, the Hyperion Water Treatment Plant, etc. The number of passengers and flights must be limited so that security screening procedures and personnel are never again operating beyond capacity.

This report must be rejected and the current plan rewritten to reposition LAX as one part of a regional solution that assures the Southern California area of safety, security, quality of life, and reasonable and responsible access to passenger and cargo transportation.

**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02226**

**Barry, William**

**None Provided**

**9/23/2001**

#### PC02226-1

**Comment:**

1. The recent events of September 11, 2001 in N.Y. and the FAA's security response has changed the factual setting in significant respects:

A. Traffic patterns will be completely re-routed due to the ban on parking at LAX inside the circle road, changing pollution/impact & traffic impacts.

**Response:**

The FAA ban on parking within the Central Terminal Area was only temporary. Cars are currently permitted to park in the CTA. Under Alternative D all parking and most vehicle trips, with the exception of Fly Away buses, would be moved out of the CTA.

**PC02226-2**

**Comment:**

B. The EIS/EIR needs to re-examine the security issues associated with concentrating this much commercial air traffic in one site, rather than a regional international airport elsewhere.

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02226-3**

**Comment:**

C. The EIS/EIR's analysis of security issues is deficient in that there is no discussion of the risks that are (now) obvious in airport operations. All of the threat assumptions in the EIS/EIR are manifestly open to question.

**Response:**

Comment noted. Then Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. Please also refer to Topical Response TR-SEC-1 regarding security issues. Finally, please see Appendix I of the LAX Master Plan Addendum for a comparative security analysis of Alternative D, Enhanced Safety and Security Plan, and the No Action/No Project Alternative.

**PC02226-4**

**Comment:**

D. The Master Plan does not address the current offsite parking arrangements.

**Response:**

Parking impacts were addressed in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02226-5**

**Comment:**

Therefore, the Master Plan and the EIS/EIR are deficient and fail to address threats and operational restrictions that are expected to be in place for an unknown period of time.

**Response:**

Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, includes a specific emphasis on safety and security provisions, including considerations that have come to the forefront relative to airport planning and operations following the terrorists attacks of September 11, 2001. The Supplement to the Draft EIS/EIR addressed the environmental impacts associated with Alternative D. As noted in the Supplement to the Draft EIS/EIR, the design of Alternatives A, B, and C can be refined to incorporate security provisions pursuant to federal requirements.

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**PC02227      Holm, Eleanor      None Provided      9/24/2001**

**PC02227-1**

**Comment:**

At the EIR hearing that was presented at the Furama Hotel in Westchester I asked the question: "How many public/private schools would be affected by the airport expansion and what were the noise and air pollution affects on these school children." The individuals assigned to help the public locate this information were unable to give a definitive answer.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. Regarding noise impacts on schools, see the summary provided in Section 4.27, Schools (subsection 4.27.9), and note that aircraft noise mitigation for schools would only apply to those significantly impacted schools without existing aviation easements as further described in Topical Response TR-LU-3. Please see Topical Responses TR-AQ-3 regarding air pollution, TR-HRA-2 regarding airport emissions and link with adverse health effects, TR-HRA-3 regarding human health risk, and TR-LU-1 regarding impacts on quality of life.

**PC02227-2**

**Comment:**

How do you plan to mitigate the added noise and air pollution which will affect the unknown number of schools being affected by the increase in the pollution from expansion?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed mitigation for noise impacts on schools in Section 4.1, Noise, and Section 4.2, Land Use. Impacts and mitigation measures associated with air quality were addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-3 regarding mitigation measures for noise impacts on schools, and TR-AQ-1 regarding increases in air pollution.

**PC02228      Reed, Mary Ann      None Provided      9/23/2001**

**PC02228-1**

**Comment:**

The Master Plan is unacceptable to the Westchester community.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02228-2**

**Comment:**

Long term planning is needed. Regional planning is the solution. The City of Los Angeles owns two airports - Ontario and Palmdale, which should be developed as opposed to LAX. Why should LAX bear the burden alone.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02228-3**

**Comment:**

Major Hahn was stranded in New York during the attack on our nation. LAX is a prime target. Now for security safety we must have regional airports!

**Response:**

Please refer to Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02229**

**Bowen, Debra**

**California State Senate**

**9/21/2001**

**PC02229-1**

**Comment:**

Four years ago, as a member of the state Assembly representing the 53rd District, I wrote to the Los Angeles Department of Airports (LAWA) to express my views on what it should include in its draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles International Airport (LAX) Master Plan. In those comments, I focused on the need to create regional alternatives to meet our region's air transportation needs in the 21st century. Given the impacts the proposed expansion at LAX will have on our air and water quality, transportation infrastructure, traffic, and much more, I implored the Department of Airports to use real-world baselines to measure these impacts on the residents and businesses in the areas around LAX.

Considering the time and money invested in producing the Draft EIR/EIS that was released for public comment in January, 2001, I was deeply disheartened to discover that Los Angeles World Airports (LAWA) failed to respond to most of the concerns I and many others expressed in 1997.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-GEN-1 regarding the environmental baseline.

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#### PC02229-2

**Comment:**

Among the most obvious gaps in the Draft EIR/EIS is the fact that it proposes to accommodate virtually all the projected need for passenger and cargo space in the region by expanding LAX, without recognizing the fact that development trends point to much larger population growth in the Central Valley and Inland Empire areas of California.

I feel as strongly today as I did in 1997 that, for the long-term health of our area and the people who live and work in the Los Angeles Basin, we need to do more than simply squeeze ever-growing numbers of passengers in and out of LAX. The California Environmental Quality Act (CEQA) demands that a reasonable range of feasible alternatives be presented - especially those that would avoid or lessen the impact of the project. Yet in an amazing display of indifference not only to the requirements of CEQA but the public's interest, the Draft EIR/EIS fails to present even one regional alternative.

This approach is especially disturbing considering that, over the last four years, the cities and counties in the five-county region have overwhelmingly supported a responsible, regional alternative to massive expansion at LAX that takes into account these projected growth trends. It was precisely this groundswell of support that led to the recent decision by many local governments represented on the Southern California Association of Governments' Regional Council to restrict growth at LAX and recommend the development of regional airports.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR. Regarding aviation demand and population growth, as discussed in Chapter 1, Regional Context, of the Draft EIS/EIR (subsection 1.2.1, Passenger Demand), and illustrated in Figure 1-2 of that chapter, existing and projected passenger demand do not correlate to projected population growth. On the contrary, the highest level of projected passenger demand in 2015 (greater than 80,001 passengers per square mile) is centered around LAX. In comparison, passenger demand in the Inland Empire is projected to be 4,000 to 20,000 passengers per square mile in 2015. Also please refer to Topical Responses TR-RC-1 regarding the role of the LAX Master Plan in a regional approach to meeting demand. Nevertheless, in response to public comments received on the three alternatives included in the Draft EIS/EIR, subsequent to the publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D, Enhanced Safety and Security Plan - is designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP), and shifts the accommodation of future aviation demand to other airports in the region.

#### PC02229-3

**Comment:**

Even more importantly, the Draft EIR/EIS appears to misrepresent the "No Project Alternative" required by CEQA. Approximately 97% of total overall emissions associated with the expansion proposal will come from airplanes flying some 20 million more people into LAX each year. Given the fact that there would be between 1.8% and 17.3% fewer aircraft operations in the "No Project Alternative," how is it possible for the "No Project Alternative" to have greater and more significant health and safety impacts?

**Response:**

Please see Response to Comment PC02223-28 regarding air emissions for the No Action/No Project Alternative compared to the build alternatives.

#### PC02229-4

**Comment:**

In addition to LAWA's failure to address the likely population growth patterns for the region, I'm alarmed at how this Draft EIR/EIS also fails to address the impact LAX expansion will have on traffic and the



local transportation infrastructure. The Draft EIR/EIS estimates that the number of vehicle trips to destinations other than LAX will go down, thus offsetting an increase in the number of vehicle trips to and from an expanded LAX. This not only defies common sense, but calls into question how seriously LAWA has actually considered the impact LAX expansion would have on communities already struggling to widen roads and intersections quickly enough to keep mounting traffic snarls on city streets from becoming unmanageable.

There's no reason to believe, as the Draft EIR/EIS maintains, that people who drive past the airport on Sepulveda, Lincoln, Aviation, Pershing, or Vista del Mar will change their driving patterns in the future if those roads remain the most direct routes to and from their destinations. In fact, one would expect that as the population grows, which it will continue to do, the number of drivers using these roads who aren't headed to and from LAX will only increase.

**Response:**

The analysis compares future conditions with the project to the adjusted environmental baseline conditions, which accounts for future non-airport traffic growth. The analysis does account for likely population growth patterns, as explained in the Draft EIS/EIR Section 4.3.2, Off-Airport Surface Transportation, and in Technical Report 3b, Off-Airport Ground Access Impacts and Mitigation Measures. Please also see Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02229-5**

**Comment:**

The Draft EIR/EIS also fails to resolve or even adequately address my concerns about air quality. The LAX expansion plan LAWA recommends shows that carbon monoxide will increase by as much as 400% and nitrogen dioxide by as much as 1,000%.

**Response:**

Please see Response to Comment PC02203-62 regarding increase in CO and NO<sub>2</sub>.

**PC02229-6**

**Comment:**

The proposed mitigation measures don't seem to address this issue effectively.

**Response:**

Please see Response to Comment PC01196-12 regarding air quality impacts and further mitigation measures. LAWA has established an extensive list of significance criteria (see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR) for both construction- and operation-related air quality impacts. The thresholds of significance were taken from local jurisdictions such as the SCAQMD as well as federal standards established by the U.S. EPA. These significance criteria have been used to determine the project's air quality significance.

**PC02229-7**

**Comment:**

In terms of water quality, the Draft EIR/EIS provides contradictory information in that it anticipates a successful reduction in pollution using a program that's already been shown to be inadequate when used at LAX previously.

**Response:**

In the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA stated that potential increases in pollutant loading will be addressed through implementation of Master Plan Commitment HWQ-1 and Mitigation Measure MM-HWQ-1. This mitigation measure would improve existing flood control infrastructure with water quality enhancements in addition to providing structural treatment control that will result in no net increase in pollutant loading. Also, please see Section 5.3 of Technical Report S-5 of

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the Supplement to the Draft EIS/EIR and Response to Comment SAL00015-302 regarding potential pollutant removal through implementation of structural BMPs.

#### **PC02229-8**

##### **Comment:**

One of the key issues I raised in my letter to LAWA during the 1997 scoping process was the choice of baselines for measuring environmental impacts. The purpose of CEQA is to facilitate an understanding of the changes in the environment that would take place as a result of a proposed project. That requires using a baseline that's appropriate to the current circumstances, as opposed to one that tells us how things looked five years ago, which is the baseline LAWA chose for its Draft EIR/EIS.

Among other problems, the passenger baseline LAWA uses is 58 million air passengers (MAP), when 68+ MAP are presently using the airport. This is yet another example of LAWA choosing to ignore the intent of CEQA in an effort to promote the goal of expanding LAX, regardless of the environmental impacts and the social costs of its proposed expansion plan.

##### **Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

#### **PC02229-9**

##### **Comment:**

Four-plus years of effort and millions of dollars have been spent in getting to this point. Ultimately, the price of doing not only what's lawful but also what's "right" will undoubtedly be much higher. Until LAWA provides the public with a fully developed, statistically supported statement of the potential impacts of the proposed LAX Master Plan, any effort to pursue further expansion at LAX is likely to become mired in court challenges, at a high cost not only to LAWA and the public, but also to the future economic growth of our region.

In view of the serious oversights and shortcomings of this Draft EIR/EIS, I would call on LAWA to begin anew and produce an EIR/EIS that accurately portrays the potential impact of the LAX Master Plan on the region as it exists today. The new EIR/EIS should respond to the strong support expressed by cities, counties, businesses and residents for a balanced, regional solution to meeting our air transportation needs that complies with both the spirit and letter of CEQA.

##### **Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR which provides a comprehensive analysis of Alternative D, was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR was that Alternative C would have the fewest negative impacts to the community and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the fewest negative impacts to the community and the region.

**PC02230**      **Lyoun, Ph.D., Joseph**      **California League of Conservation Voters Education Fund**      **9/24/2001**

**PC02230-1**

**Comment:**

Thank you for the opportunity to comment on the above-referenced project. The California League of Conservation Voters (CLCV) Education Fund opposes the approval of the Los Angeles International Airport (LAX) Master Plan Draft Environmental Impact Report and Statement (EIR/S).

The CLCV Education Fund is a non-profit public interest organization dedicated to enhancing and protecting the environment by strengthening the position of environmentalists within public debate and action. We work to include underrepresented voices in policy decisions that impact our urban environment.

**Response:**

Comment noted. Environmental justice was addressed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

**PC02230-2**

**Comment:**

We believe that the draft EIR/S for the LAX Master Plan should not be approved because significant new information has become available since the publication of this document. Most obvious among these developments has been the disastrous terrorist attacks on the World Trade Center and Pentagon on September 11, 2001. These attacks and the resulting declaration of "war" on terrorism by President George W. Bush have significantly altered the fundamental assumptions of the future needs, demands, and capabilities of LAX, which have been used to produce the draft EIR/S. The impacts have been immediate and dramatic. LAX, and perhaps the world, will never be the same. The draft EIR/S should be revised accordingly to address these significant new developments.

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02230-3**

**Comment:**

Significant new information has also been developed through the monitoring of toxic air contaminants by LAX World Airports. These data have important bearing upon the calculation of the public health and environmental impacts in the communities surrounding LAX. LAX World Airports should reassess these impacts on the basis of these new data. We incorporate by reference into our comments all currently available (even if not public) toxic air contaminant monitoring data collected by LAX World Airports.

**Response:**

Please see Topical Response TR-HRA-1 regarding the baseline used for the human health risk assessment included in Section 4.24.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Also please refer to the Section 4.24.1 of the Supplement to the Draft EIS/EIR for additional human health impact analyses associated with airport operations.

Data representative of more current airport operations (Year 2000) were available for the Supplement to the Draft EIS/EIR and air toxic-related risks and hazards were estimated under Year 2000 conditions as a basis for comparison to air toxic-related risks estimated using the 1996 baseline presented in the Draft EIS/EIR.

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#### **PC02230-4**

##### **Comment:**

Similarly, the California Air Resources Board has collected data about toxic air contaminant levels throughout the state. These data alter the consideration of cumulative health and environmental impacts considered in the draft EIR/S. The draft EIR/S should be revised to include the consideration of these new findings by the California Air Resources Board. We incorporate by reference into our comments all currently available (even if not public) toxic air contaminant monitoring data collected by the California Air Resources Board.

##### **Response:**

The Draft EIS/EIR evaluated the broader-scale, cumulative impacts of LAX emissions on air quality, both with and without implementation of the LAX Master Plan, using data collected for and analyzed in the MATES-II recently completed by the South Coast Air Quality Management District. The MATES-II used data from several of the California Air Resources Board (CARB) fixed long-term trend sites: Los Angeles, Burbank, Long Beach, Rubidoux, and Fontana. Based on review of the data and evaluation of the fixed long-term trend sites used by CARB and MATES-II, we believe that use of the MATES-II data incorporates applicable CARB TAC monitoring data. As described in Section 4.24.1.3 (page 4-619), affected Environment/Environmental Baseline, of the Supplement to the Draft EIS/EIR, additional information developed by USEPA pertaining to the understanding and analysis of the affected environment was used to evaluate cumulative non-cancer health effects in the Supplement to the Draft EIS/EIR in Section 4.24.1.7.

#### **PC02230-5**

##### **Comment:**

The April 2001 decisions by the Southern California Association of Governments (SCAG) to restrict LAX to a 78-million annual passenger limit and reject the planned San Diego Freeway exit at Arbor Vitae Street must also be considered significant new information. As a result of these decisions, SCAG will not allocate federal funding to LAX for transportation improvements as part of the tri-annual Regional Transportation Plan. Without these funds, LAX will not be able to develop ground transportation projects around the airport. This significant new information has not been considered in the draft EIR/S. We incorporate by reference into our comments the decision of SCAG to restrict LAX to a 78-million annual passenger limit and reject the planned Arbor Vitae Street exit.

##### **Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. A Supplement to the Draft EIS/EIR, which provides a comprehensive analysis of Alternative D, was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the fewest negative impacts to the community and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the fewest negative impacts to the community and the region.

#### **PC02230-6**

##### **Comment:**

In addition, the draft EIR/S fails to provide a clear and understandable description of the proposed project. Given the estimated 12,000 pages of the draft EIR/S, the document is too large and confusing for a reasonable person to understand the true environmental impacts of this project. CLCV Education Fund representatives have reviewed much of the draft EIR/S and attended the so-called "Environmental Justice" workshops offered by LAX World Airports. Even after these attempts to gain an understanding

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of the proposed project and the resulting environmental impacts, we have found it impossible to comprehend what this project actually entails and exactly how the environment will be effected. In short, we have found the draft EIR/S too long and too complicated to understand.

**Response:**

Comment noted. The EIS/EIR is carefully organized by topic, contains a clear description of the proposed project, provides an appropriate description of the environmental impacts, and includes sufficient detail to be understandable. Additional information is included in appendices and supporting documents.

**PC02230-7**

**Comment:**

In closing, we ask that we be provided a clear and responsive point-by-point reply to our comments. We also request timely notice of, and an opportunity to comment upon, any proposed agency decisions related to this project, including but not limited to the issuance of a final EIR/S. Please feel free to contact Dr. Joseph K. Lyu at (310) 234-1022, ext. 316, or [jlyou@ecovote.org](mailto:jlyou@ecovote.org) if you have any questions or need further information.

**Response:**

In accordance with the provisions of NEPA and CEQA, FAA and LAWA have prepared written responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. These responses are provided herein as part of this Final EIS/EIR. The Final EIS/EIR has been made available for public review at FAA and LAWA and through distribution to public libraries throughout the area, and is available electronically at [www.laxmasterplan.org](http://www.laxmasterplan.org). Responses to individual comments included in this comment letter are provided above.

**PC02231      Park, Noel                      Palisades Residents Association    9/24/2001  
of San Pedro**

**PC02231-1**

**Comment:**

The Palisades Residents Association of San Pedro represents approximately 1800 households in the southerly neighborhood of San Pedro known as the Palisades. This year, I have the honor to be the president of the Palisades Residents Association. In addition, I am the president of the San Pedro and Peninsula Homeowners Coalition, of which our Palisades Association is a member.

I have been asked to write the comment letter for the San Pedro and Peninsula Homeowners Coalition. The Palisades Residents Association is in absolute agreement with that letter, a copy of which is enclosed, and incorporated by reference into these comments.

For all of the reasons outlined in that letter, the Palisades Residents Association requests that you implement the "No Action/No Project" Alternative. Please create a regional plan for airport expansion, and do not visit any more negative impacts upon the citizens of the Los Angeles Basin.

**Response:**

Comment noted. Please see Responses to Comments below. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

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#### PC02231-2

**Comment:**

Our Coalition represents approximately 40,000 residents in San Pedro and eastern Rancho Palos Verdes. We are submitting this letter as a public comment on the Draft EIS/EIR. We strongly support the "No Action/No Project" Alternative, and are absolutely opposed to any of the other three alternatives.

**Response:**

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

#### PC02231-3

**Comment:**

Many of the neighborhoods which are represented by our Coalition are seriously impacted by aircraft noise from flights originating at LAX. It is no coincidence that the highest noise level recorded in your 1999 Palos Verdes Noise Study was recorded at South Shores Elementary School in San Pedro. Neighborhoods in southern San Pedro are routinely overflown by large jet aircraft originating from LAX. While the FAA has assured us that these aircraft are kept 2 miles offshore until they reach the area of Seal Beach, this is clearly not the case. Substantial numbers of jets fly directly over the homes in these neighborhoods.

**Response:**

Comment noted. The current flight paths take most of the jets offshore to the west 5 miles and then as they turn east they pass the Peninsula 3 miles to the south. However, certain flights that reach an altitude of 12,000 feet MSL may be redirected to the northeast and overfly the peninsula at altitudes greater than 12,000 feet primarily en route to the FAA's Seal Beach navigational aide (SLI) or other points east or north. The current routing of jet aircraft around the peninsula applies only to those aircraft being controlled by SoCal TRACON and not the LA ARTCC Center. The Ops center takes over aircraft as they approach 12,000 feet. On average, approximately 10 to 20 jets per day that depart from LAX to the west will cross either the PV Peninsula, San Pedro or the Harbor itself adjacent to San Pedro. There is also a significant amount of jet traffic from Long Beach airport that would be directly over San Pedro at much lower altitudes (3 to 5,000 feet and climbing). For more information on noise impacts on the South Bay, see Response to Comment PC00552-2.

#### PC02231-4

**Comment:**

We are not interested in debating what level of noise is acceptable. The current level is unacceptable. We fear and believe that, once this current master plan controversy is over, and the FAA, the LAWA, and the airlines no longer have an incentive to minimize complaints from Los Angeles neighborhoods, this noise will only increase. There is a great incentive for the airlines to cut the corner over our communities, thus saving time and fuel. If LAX is allowed to expand, particularly with the advertised shift from "commuter" aircraft to larger planes, we see the potential for massive noise increases in our neighborhoods.

**Response:**

Comment noted. There is a federal standard of noise compatibility located at 14 CFR Part 150 Table 1. A number of mitigation measures have been developed or are in the process of being developed to reduce the potential of early turns over the South Bay. Please see Topical Response TR-N-3 regarding aircraft flight procedures, in particular Subtopical Response TR-N-3.1. For information about the relationship between noise increases and larger aircraft meaning more noise please see Topical Response TR-N-6. For more information on noise impacts on the Southbay, see Response to Comment PC00552-2.

**PC02231-5****Comment:**

This is unacceptable. It should not be the function of our City government to implement projects which will degrade the quality of life in our neighborhoods. As we see the destruction wrought upon Playa Del Rey, Westchester, South Central Los Angeles, and the many other surrounding cities, we live in fear that we will be next.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding potential effects of the Master Plan alternatives on the community of Westchester.

**PC02231-6****Comment:**

We are deeply concerned about the local and regional impacts on traffic of these proposed expansion schemes. The 405 freeway is recognized as the most congested freeway in the United States. We see nothing in this plan which will relieve congestion on the 405. While some construction may be contemplated in the immediate local airport area, once north of Jefferson Blvd., or south of the 105 freeway, nothing changes. Furthermore, the huge Playa Vista development is under construction, which will greatly exacerbate the horrible traffic from LAX north to the 10 freeway. Please refer to the enclosed article from the September 2, 2001 Los Angeles Times, "As Summer Ends, Traffic Surge Begins", particularly "With traffic volumes and congestion at record levels, Southern California freeways operate near capacity more often, according to transportation experts. It takes only a few more cars to push an already overburdened freeway into gridlock." The traffic impacts of this plan are unacceptable.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02231-7****Comment:**

Much has been made of the benefits of the proposal to extend the Green Line light rail into the airport. This is fine, but we cannot see how it will bring about any noticeable reduction in traffic. Parking at the existing Green Line stations is so limited that there will effectively be no opportunity for any significant number of people to leave their cars at Green Line stations and ride to the airport. Where then is the massive benefit. We would like to see some numbers on projected Green Line ridership to the airport, and its effect on street and freeway traffic.

**Response:**

The ridership for the Green Line extension in the technical analysis for the LAX Airport Master plan was kept very conservative (5 percent or less). Please see Topical Response TR-ST-5 regarding the rail/transit plan. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

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#### **PC02231-8**

**Comment:**

The environmental justice issues presented by this plan have not been effectively addressed, in fact there is no way to do so. Clearly, the hideous noise impacts of this proposal fall disproportionately upon the lower income residents of Inglewood, South Central Los Angeles, and many other lower income communities. This is wrong!

**Response:**

The Environmental Justice Program outlined in Section 4.4.3, Environmental Justice, of this Final EIS/EIR recognizes the potential disproportionate effects that the Master Plan would have on minority and low-income populations and goes beyond basic mitigation proposals to address the unique needs of these communities. With input gathered through environmental justice workshops and an extensive public outreach effort, the Environmental Justice Program represents a full and good faith effort to identify all possible means for avoiding, reducing or off-setting the impacts of the Master Plan in a manner that addresses the needs and preferences of affected minority and/or low-income communities in accordance with NEPA and CEQA requirements. Regarding fairness, with the orientation of the runways at LAX, it is inevitable that increases in aircraft activity would have a greater burden on communities to the east of LAX than those to the north and south. It should be noted however, that LAWA Staff's new preferred alternative, Alternative D, has the least impacts of the Master Plan build alternatives and would limit operations at LAX to levels that would be similar to what would occur with existing facilities if the Master Plan were not approved. Please also see Section 4.1 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding noise impacts, with supporting data and analyses provided in Appendix D.

#### **PC02231-9**

**Comment:**

We have asked for a health risk assessment of the impacts of this project. We have not seen it. We fear that there are massive risks of cancer, respiratory, and other diseases to people exposed to the constant presence of jet exhaust. The air east of LAX reeks of unburned jet fuel. What is the health impact on the predominately lower income and minority residents of these communities? No one knows.

**Response:**

Please see Responses to Comments PC00599-5 and PC02221-21 regarding jet exhaust, Response to Comment PC00045-4 regarding odors, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

A complete human health risk assessment for the LAX Master Plan has been performed and was presented in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. Cancer risks were evaluated based on modeled emissions associated with proposed alternatives, and were calculated using conservative (protective) exposure assumptions. For example, when estimating exposure, residents were assumed to spend 70 years, 24 hours per day at the location of maximum impact. This approach is consistent with standard practice defined by regulatory agencies charged with protection of human health. A detailed discussion of the human health risk assessment process was provided in the Draft EIS/EIR in Section 4.24, Human Health and Safety, and Technical Report 14a, Human Health Risk Assessment, and current estimates of possible risks and hazards were presented in Section 4.24 of the Supplement to the Draft EIS/EIR.



#### PC02231-10

**Comment:**

We constantly hear reports of "runway incursions" and other near misses of catastrophic accidents at LAX. We believe that the reason for this is simple. LAX is too small. Please refer to the enclosed map of airport sizes. LAX has 3500 acres. Some examples of other airports handling similar, or less, numbers of operations are: Chicago O'Hare 6600 acres, Washington Dulles 10,200 acres, Denver International 33,920 acres, and Dallas/Forth Worth 17,500 acres. The Palmdale property owned by LAWA has 17,750 acres. Clearly, the city fathers of the 1950's knew what they were doing when they envisioned Palmdale! Crowding a huge number of operations into a tiny are creates congestion and high risk of collision. Even we can figure that out.

**Response:**

Please see Topical Response TR-SAF-1 regarding aviation safety, Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02231-11

**Comment:**

We are absolutely opposed to anything which would increase the potential number of operations at LAX. Therefore, the current Master Plan is unacceptable to us. We oppose any increase in the number or size of runways, taxiways or terminals. We specifically oppose the proposal to move runways farther apart.

**Response:**

Comment noted. The proposed relocation of the runways in the various development alternatives is to accommodate a new parallel taxiway that will enhance safety of aircraft operations at the airport by reducing runway incursions. Alternatives D and C do not increase the number of runways. All alternatives include lengthening of certain runways and the parallel taxiway to improve airfield operations to better accommodate existing and future aircraft fleet mixes, which, among other things, will result in reduced air quality impacts compared to the No Action/No Project Alternative. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02231-12

**Comment:**

We strongly support, and indeed insist upon, a regional solution to air traffic growth. Any increased capacity must be built elsewhere. These location may include, but are not limited to, Palmdale, March Air Force Base, Norton Air Force Base and Ontario. At the first three locations, the local communities are strongly in favor of local airport expansion.

**Response:**

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

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Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Please also see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### **PC02231-13**

**Comment:**

We must find effective ways to give Orange County incentives to do their fair share, whether at El Toro or John Wayne.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand for a discussion of the El Toro conversion, constraints at John Wayne Airport, and the Ontario Master Plan.

#### **PC02231-14**

**Comment:**

We believe that Commissioner Wong suggested a substantial surcharge on tickets for Orange County passengers. That would be a good start.

**Response:**

LAX is a public facility and is supported by grants from the FAA. It is illegal to charge different fees to users of the same facility and thus discriminate among users.

#### **PC02231-15**

**Comment:**

We believe that, as massive growth continues in the Santa Clarita - Valencia are, and points to the north and west, it will become easier to move hundreds of thousands of passengers from there, and the north San Fernando Valley, to Palmdale than it will be to move them to LAX.

**Response:**

Please see Topical Response TR-RC-5, regarding transferring LAX operations to Palmdale for a discussion of multi-airport markets, airline economics and passenger choice.

#### **PC02231-16**

**Comment:**

Likewise, it makes no sense to force residents of the Inland Empire to struggle through to already horribly congested 10, 60, and (worst of all) 91 freeway corridors to access air travel via LAX. This would be a regional planning catastrophe.

**Response:**

Comment noted.

#### **PC02231-17**

**Comment:**

As we said in a letter to Mayor Riordan, many months ago, "If we make our City the center of trade and commerce for the whole world, but in so doing render it unlivable, what will we have accomplished." Please, we beg you, do not implement this Master Plan, which would be a terrible step toward rendering our City unlivable. Instead, develop a regional plan which will send the additional air traffic to the regional airports where the resident actually want it.

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**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02232      Lansford, Ruth      Friends of Ballona Wetlands      9/24/2001**

**PC02232-1**

**Comment:**

I am writing on behalf of Friends of Ballona Wetlands as the grass roots organization dedicated to saving and restoring the Ballona Wetlands. Friends of Ballona Wetlands supports the acquisition of the West Bluff of the Ballona wetland ecosystem as mitigation for any loss of habit for the endangered Riverside Fairy Shrimp recently found at LAX. We are concerned about this bluff top site, which overlooks the wetlands. It would be ideal if the airport could buy the West Bluffs and use it as mitigation. It is my understanding that the United States Fish and Wildlife Service approved this mitigation plan.

The West Bluff has what is probably the very last vernal pool left in the City of Los Angeles. It is shown on the historical maps, and in recent photographs. It is also a critical component of the last large coastal wetland system left in Los Angeles County.

In writing this letter, please understand that I am not supporting the expansion of LAX. I am supporting the acquisition of the West Bluff in regards to the impacts of the current operations of LAX.

**Response:**

Comment noted. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. The West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the Riverside fairy shrimp cysts due to the significantly high cost associated with acquiring the properties for purposes of relocating the embedded cysts.

**PC02233      Davis, John      Sierra Club      9/22/2001**

**PC02233-1**

**Comment:**

As indicated in the attached article, our Executive Committee is on record as supporting the acquisition and preservation of the West Bluff of the Ballona wetlands. We have long supported preservation of this last and only natural bluff of Ballona for many reasons. It is critical habitat for several bird species including the California Horned Lark that needs its grassland habitat to survive in this ecosystem.

In addition, we want to see the vernal pool located on the bluff to be saved, and serve as an educational tool for school children and university students to learn how to restore such an area. It is one of the very last examples left in Los Angeles City and County.

To that end, we support the position of US Fish and Wildlife that acquisition of the West Bluff be made, to mitigate any loss of habitat at LAX for the endangered Riverside Fairy Shrimp. If such habitat is taken, then we support acquiring the bluff to mitigate for it.

**Response:**

Comment noted. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. The West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the Riverside fairy shrimp cysts due to the significantly high cost associated with acquiring the properties for purposes of relocating the embedded cysts.



**PC02236-3**

**Comment:**

II. CBE Requests an Extension of the Public Comment Period

CBE joins in the September 18, 2001 request of Environmental Defense, NRDC, Heal the Bay, and the Coalition for Clean Air to extend the public comment period on the EIR/EIS.

**Response:**

Comment noted. In response to the events of September 11, 2001, LAWA and the FAA extended the public comment period to November 9, 2001, for a total of 295 days.

**PC02236-4**

**Comment:**

III. The Environmental Justice Analysis is Fatally Flawed.

A. The Area Covered by the Environmental Justice Analysis Must be Expanded.

While the EIR/EIS Acknowledges that Health risks Associated with Airport emissions affect residents, schools, hospitals, and nursing homes within an area running "east-northeast over six miles (past the I-110 freeway)" the environmental just analysis fails to cover this entire area.

Thus, it is flawed and must be re-done to include this area.

**Response:**

Please see Response to Comments AL00017-190 and AL00017-194.

**PC02236-5**

**Comment:**

The 2000 Census data is now available and should be used instead of estimations.

**Response:**

The 2000 Census data was not available at the time the Draft EIS/EIR was being prepared. However, efforts were taken to review vendor data as reflected in footnote 145 on page 4-402. The demographic trends identified in the 2000 U.S. Census have since become available. See Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, which includes a presentation and evaluation of 2000 U.S. Census data. As stated in subsection 4.4.3.3, while there have been demographic changes in the area, the new demographic data does not show a material change in the findings presented in the Draft EIS/EIR.

**PC02236-6**

**Comment:**

1. Southeast Los Angeles Will be Impacted by Planes Approaching the Airport and by Increased Manufacturing and Truck Impacts Due to Increased Cargo Trips to LAX.

CBE is particularly concerned about the noise, air pollution, and transportation impacts on Southeast Los Angeles. Not only are these communities in the flight path, but they stand to be exposed to increased air pollution from increased truck traffic as a result of from manufacturing businesses receiving increased

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**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; air quality in Section 4.6, Air Quality; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. These issues were also addressed as they relate to environmental justice in Section 4.4.3, Environmental Justice of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

**PC02236-7**

**Comment:**

B. Studies on Background Health Risks From Cumulative Sources Must be Completed and Included in the Draft EIR/EIS

The EIR/EIS states that due to "the lack of available background data, the cumulative, synergistic health effects" of toxic air pollutants associated with the build alternatives and other environmental hazardous could not be quantitatively analyzed within the scope and timeframe of this EIR/EIS." (4-426). If the data does not exist, it is up to LAWA to do the research and compile the data. In fact, LAWA "has initiated a study to gather air quality data through a monitoring and source-apportionment program in minority and low-income communities in the vicinity of LAX. The results of this study are not anticipated to be available before 2002." p. 4-425. Thus, the Draft EIR-EIS should be redone to include this data and then re-circulated.

**Response:**

Section 4.24.1, Human Health Risk Assessment (CEQA), of the Supplement to the Draft EIS/EIR provided a detailed analysis of toxic air pollutants and health risk impacts on individuals residing and working near the LAX. Please see Topical Response TR-AQ-2 regarding source apportionment. Also see Topical Response TR-HRA-2 regarding data availability, applicable health studies, and the distinguished difference between the data that can be used to properly assess the project.

**PC02236-8**

**Comment:**

C. Environmental Justice Program Must Be Developed and Discussed in the Draft EIR/EIS

The EIR/EIS states that LAWA will be formulating an Environmental Justice Program. ES-29. While CBE encourages such a program, it should have been developed and discussed in the EIR/EIS to enable the public to review and comment on it. Similarly, the Executive Summary notes that "Once LAWA has committed to specific measures as part of its Environmental Justice Program, the FAA will make its final determination as to whether the master plan has a disproportionately high and adverse human health or environmental effect on minority or low-income populations[.]" Again, this determination must be made prior to approval of the EIR/EIS. The EIR/EIS must be redrafted to include the Environmental Justice Program and re-circulated.

**Response:**

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

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection

with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the Supplement to the Draft EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program and the findings that take into account this program are presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

#### PC02236-9

##### Comment:

1. The Master Plan Fails to Contain any Environmental Justice Commitments

LAWA's lack of commitment to environmental justice is demonstrated by the fact that the Master Plan Commitments contain no environmental justice commitments. (4-405). While the Draft EIR/EIS states that LAWA will explore appropriate formulation of specific Master Plan commitments related to environmental justice (4-405), CBE demands that such commitments be developed and circulated in a revised Draft EIR/EIS for public review. LAWA must identify and analyze mitigation measures in the CEQA document so that the public and governmental decision-makers can review and comment on the measures. *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296 (1988); see also *Gentry v. City of Murrietta* (1995) 36 Cal.App.4th 1359, 1396 (requiring applicant to comply with recommendations in report that had yet to be performed violated CEQA; *Quail Botanical Gardens Foundation, Inc. v. City Encinitas* (1994) 29 Cal.App.4th 1597, 1605, fn. 4. ("City cannot rely on post approval mitigation measures adopted during the subsequent design review process . . . there cannot be meaningful scrutiny of a [CEQA document] when the mitigation measures are not set forth at the time of project approval."))

##### Response:

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. Many of these measures apply to minority and low-income communities, as well as other potentially effected communities. While a number of these mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

As stated on page 4-337, in Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR, LAWA received a substantial number of recommendations for mitigation measures and other benefits relating to environmental justice concerns from environmental justice workshops, comments received on the Draft EIS/EIR, and subsequent community outreach. All recommendations were thoroughly evaluated against such criteria as whether the recommendation had a nexus or connection with the environmental effects of the proposed LAX Master Plan, or whether it would be feasible for the FAA and/or LAWA to fund and implement. Those recommendations that best met the criteria were instrumental in defining the Environmental Justice Program included in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of the Supplement to the Draft EIS/EIR. As further described in Topical Response TR-EJ-2, public input was also received in association with public circulation of the Supplement to the Draft EIS/EIR, through additional environmental justice workshops, public hearings, and comments on the EIS/EIR. Furthermore, environmental justice outreach was conducted more recently through meetings with local organizations, environmental groups, and civic, religious, and business leaders in adjacent communities. This additional input was considered and evaluated through

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a process similar to that undertaken prior to circulation of the Supplement to the Draft EIS/EIR. The final Environmental Justice Program is presented in Section 4.4.3, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, with supporting information provided in Appendix F-A, of this Final EIS/EIR.

#### PC02236-10

##### Comment:

2. Who is the Environmental Justice Task Force and What Have they Done?

The EIR/EIS discusses an Environmental Justice Task Force, but fails to identify its members. CBE requests that LAWA recirculate the Draft EIR/EIS that identifies the members of the EJ Task Force. What will the EJ Task Force do other than be a token group that tries to placate people with promises and rhetoric? There is no specific discussion of its activities.

##### Response:

As indicated in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the Environmental Justice Task Force includes representatives of public interest groups who have experience analyzing the impacts of transportation on minority and low-income communities, joined with LAWA staff and consultants. The Environmental Justice Task Force was formed to initially focus on working with the affected communities to develop the LAWA Environmental Justice Program. The Task Force was charged with the goal of helping to ensure that the Master Plan for LAX is carried out equitably, protects human health and the environment, and promotes economic vitality for all the people of the Los Angeles Region.

The Supplement to the Draft EIS/EIR provides updated information about activities and outreach efforts in support of environmental justice in Section 4.4.3, Environmental Justice, and Appendix S-D, Supplemental Environmental Justice Technical Report.

#### PC02236-11

##### Comment:

3. Environmental Values Must Take Priority over Economic Benefits.

The Draft EIR/EIS appears to justify significant adverse environmental impacts by "offsetting" economic benefits. (ES-30) No economic benefits justify disproportionate impacts. This language used in the Draft EIR/EIS is reminiscent of the tired "jobs vs. environment" debate. No one should have to choose between a job and an healthy and safe environment. Moreover, under CEQA "environmental values are to be assigned greater weight than the needs of economic growth . . . [CEQA] thus requires decision-makers to assign greater priorities to environmental than economic needs." San Francisco Ecology Center v. City and County of San Francisco (1st Dist. 1974) 48 Cal.App.3d 584, 590-91.

##### Response:

The text to which the commentor is referring pertains solely to the determination of whether or not the project would have a disproportionately high and adverse effect on minority or low income populations. Neither the Draft EIS/EIR nor the Supplement to the Draft EIS/EIR suggest that significant environmental impacts associated with the project are offset by economic impacts. If a project would result in significant effects which cannot be avoided or substantially lessened, the agency must prepare a written statement of overriding considerations. Economic, legal, social, technological, or other project benefits are all possible bases for a statement of overriding considerations. See Pub. Res. Code § 21081(b); 14 Cal. Code Regs § 15093(a). Accordingly, projects are regularly approved on the basis of policy considerations despite unmitigated environmental effects. See, e.g., San Francisco Ecology Ctr. v. City & County of San Francisco (1975) 48 Cal.App.3d 584, 596-97 (goals of making international airport more convenient, safe, efficient, and quiet were valid overriding considerations).



#### PC02236-12

**Comment:**

E. CBE Submits an Environmental Justice Study into the Administrative Record

CBE asked Manuel Pastor, Jr., and Jim Sadd prepare a study on the environmental justice impacts of the expansion of LAX. CBE hereby submits a copy of their study, Environmental Justice and the Expansion of the Los Angeles International Airport, Nov. 2000, into the administrative record. (Copy attached hereto as Exhibit A). CBE requests that LAWA provide a written response to the conclusions of the study.

**Response:**

Comment noted. See Responses to Comments provided below.

#### PC02236-13

**Comment:**

IV. Any Increase in Air Pollution must be Considered Significant and Mitigated

Given the existing air pollution and cancer risks in the South Coast Air Basin, any increase in pollution must be considered significant and must be mitigated fully. Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 717-18 (1990).

**Response:**

Please see Response to Comment PC01196-12 regarding air quality impacts and further mitigation measures. LAWA has established an extensive list of significance criteria (see Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR) for both construction- and operation-related air quality impacts. The thresholds of significance were taken from local jurisdictions such as the SCAQMD as well as federal standards established by the U.S. EPA. These significance criteria have been used to determine the project's air quality significance.

#### PC02236-14

**Comment:**

V. US EPA EJ NEPA Guidance

On September 30, 1997, the United States EPA issued its Interim Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses. The EPA NEPA Guidance Analyses provides an excellent blueprint for an agency to use to ensure that environmental justice concerns are adequately researched, considered, avoided, and mitigated. Specifically, Exhibit 3. Summary of Factors to Consider in Environmental Justice Analysis provides an excellent list of the demographic, geographic, economic, human health, and risk factors that should be used to consider environmental justice in the NEPA process. (pages 26- 30).

As discussed at page 41 of the EPA NEPA Guidance Analyses, an agency preparing an EIS

ha[s] to consider historical, current, and reasonably foreseeable future circumstances of minority/low-income communities to assess cumulative impacts of new action. . . . Potential cumulative impacts associated with additive/synergistic effects of pollutant loadings from new discharges and existing sources and reasonably foreseeable future sources could be significant[ .]"

In Chapter 5. Methods and Tools for Identifying and Assessing Disproportionately High and Adverse Effects, the EPA NEPA Guidance Analyses discusses various technical methods and tools that can be used to assess the adverse health, socioeconomic, and distributional impacts of a project. (50-58). CBE urges LAWA to follow the EPA NEPA Guidance.

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#### Response:

Although the environmental justice analysis follows the relevant guidance for the FAA outlined in "Department of Transportation Order 5610.2 - Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," EPA guidance on environmental justice and other guidance was consulted and used in addressing the issue. The approach taken is comprehensive and generally consistent with collective federal and state guidance and evolving professional standards for addressing environmental justice.

As provided for in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR, the analyses address historical, current and reasonably foreseeable future circumstances. Also, potential cumulative and synergistic effects of pollutant loadings on minority and low-income populations were addressed in Section 4.4.3, Environmental Justice (pages 4-426, 4-430, and 4-433), of the Draft EIS/EIR, and Section 4.4.3, Environmental Justice, of the Supplement to the Draft EIS/EIR (pages 4-335 and 4-336). However, quantification of cumulative or synergistic health effects of air pollutant emissions was not undertaken, due to a lack of available background data and information and the need for long-term studies well outside the scope of a CEQA or NEPA document. These potential effects are identified in the Preliminary Findings presented in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and all feasible mitigation measures are proposed in subsection 4.4.3.7, Environmental Justice Program, of this Final EIS/EIR. Furthermore, offsetting benefits are also proposed as part of the program based on community input. Additionally, LAWA has coordinated with the EPA and others and taken steps to advance a long-term study of the health effects on toxic air contaminants. Also see Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities and Topical Response TR-AQ-2 regarding toxic air pollutants.

#### PC02236-15

#### Comment:

VI. The Entire EIR/EIS, including all Technical Reports Must be Translated into Spanish

The EIR/EIS acknowledges that 30 percent of the people most affected by the Project speak Spanish at home. While a summary of the EIR/EIS has apparently been translated into Spanish, CBE believes that the entire EIR/EIS must be translated into Spanish. Similarly, all public notices should be published in Spanish, in Spanish newspapers, and all public hearings required under CEQA must be simultaneously translated into English and Spanish. See e.g., *El Pueblo para el Aire y Agua Limpio v. Kings County*, Civ. No. 366045 (Kings Super. Ct. 1991).

Because an EIR is first and foremost a public information document, it should "facilitate both public input and the decisionmaking process." *Russian Hill Improvement Assoc. v. Board of Permit Appeals*, 44 Cal.App.3d 158, 168 (1975). The CEQA Guidelines § 15201 state that "[p]ublic participation is an essential part of the CEQA process." The courts have repeatedly affirmed the importance of public input in the CEQA process as a means to "test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom." *Sutter Sensible Planning, Inc. v. Board of Supervisors*, 122 Cal.App.3d 813, 822 (1981).

Federal agencies have implemented the public participation language of NEPA by fully embracing Spanish-speaking people in the environmental review and decision-making process. Federal agencies have translated EISs, wherever a substantial part of the population speaks Spanish. For example, the U.S. Department of Housing and Urban Development prepared draft EISs in both Spanish and English for housing projects to be built in Dorado and Bayamon, Puerto Rico. (45 Fed.Reg. 79583 (December 1, 1980)); 45 Fed.Reg. 80189 (December 3, 1980). A Spanish version of a Fishery Management Plan for the Shallow-Water Reef Fish Fishery of Puerto Rico was made available for public comment. (50 Fed.Reg. 19559 (May 9, 1985); see also *In re: EcoElectrica, L.P.*, 1997 PSD LEXIS 2 (1997), PSD Appeal Nos. 96-8 and 96-13, fn. 16 (citing the Executive Order, which states: "Each Federal agency may, whenever practicable and appropriate, translate crucial public documents, notices, and hearings relating to human health and the environment for limited English speaking populations.")

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When the language of the document excludes a substantial portion of the public from the CEQA review and comment process, the fundamental goal of the statute is defeated. In this case, substantial portions of the affected population which are Spanish-speaking have already been excluded from the public review and comment process, in violation of the underlying spirit of CEQA. CBE therefore requests that the entire EIR/EIS, and all CEQA documents, be translated into Spanish. Public proceedings must be conducted with simultaneous Spanish and English translation.

**Response:**

Comment noted. Production, publication, and distribution of the Draft EIS/EIR and Supplement to the Draft EIS/EIR was conducted in accordance with NEPA and CEQA requirements. Public notices were published in Spanish in Spanish newspapers, and all public hearings were simultaneously translated from English to Spanish. Additionally, each public hearing and workshop offered the service of a Spanish translator for those wishing to testify, and bilingual staff were available to answer questions. Furthermore, the Executive Summary of the Draft EIS/EIR and Supplement to the Draft EIS/EIR also was translated into Spanish and was available upon request. A Spanish-language overview of Chapter 4, Affected Environment, Consequences and Mitigation Measures, of the Draft EIS/EIR is provided in Section 1E of Appendix S-D of the Supplement to the Draft EIS/EIR.

As indicated in Section 4.4.3.7, Environmental Justice Program, of the Supplement to the Draft EIS/EIR, an environmental justice outreach program was developed by LAWA in accordance with Executive Order 12898 and enacted State of California legislation to ensure an effective dialogue with minority and low-income communities affected by LAX. Subsequent to the release of the Draft EIS/EIR, LAWA held a series of community workshops in the communities of Inglewood, Lennox, and South Los Angeles. The workshops were widely noticed to residents within a 10-mile radius of each meeting site through newspapers, posted notices, and door-to-door distribution. Approximately 1,500 letters of invitation to the workshops were also mailed to organizations and leaders in the affected communities.

The format of the workshops included a number of stations staffed by LAWA employees and/or technical consultants where graphic illustrations and/or written materials were provided to inform attendees about the concept of environmental justice and potential environmental impacts associated with the proposed LAX Master Plan alternatives. Materials were provided in both English and Spanish and Spanish translators (including bi-lingual LAWA staff), assisted at each workshop.

Please see Topical Response TR-PO-1 for additional information regarding the public hearing process, including the Environmental Justice Workshops.

**PC02236-16**

**Comment:**

VII. Alternatives Involving Regional Growth Must be Analyzed in the EIR/EIS

CBE supports a regional solution involving increased traffic at airports throughout the Southern California area. The EIR/EIS must re-consider such regional alternatives in light of the September 11, 2001 terrorist attacks and the resulting impacts on the air transportation business.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02236-17**

**Comment:**

VIII. Based on all of the Inadequacies in the DEIR, a Supplemental DEIR/EIS must be Prepared and Recirculated for Public Comment.

CBE respectfully requests that a supplemental DEIR/EIS be prepared and recirculated for public comment because the DEIR/EIS cannot form the basis of a final EIR/EIS. The opportunity for

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meaningful public review of significant new information is essential "to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom." Sutter Sensible Planning, Inc. v. Sutter County Board of Supervisors, 122 Cal.App.3d 813, 822 (1981); City of San Jose v. Great Oaks Water Co., 192 Cal.App.3d 1005, 1017 (1987). An agency cannot simply release a draft report "that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review." Mountain Lion Coalition v. California Fish and Game Commission, 214 Cal.App.3d 1043, 1052 (1989).

**Response:**

Comment noted. A Supplement to the Draft EIS/EIR was prepared and circulated for public review and comment.

**PC02236-18**

**Comment:**

IX. Request for Notification

Accordingly, pursuant to California Public Resources Code Section 21092(b)(3), CBE requests that you please mail any and all public notices or information concerning the proposed project to CBE at the following address:

Communities for a Better Environment  
Attn: Scott Kuhn  
5610 Pacific Blvd., Suite 203  
Huntington Park, CA 90255  
Fax: 323-588-7079

**Response:**

Comment noted.

<b>PC02237</b>	<b>Park, Noel</b>	<b>San Pedro and Peninsula Homeowners' Coalition</b>	<b>9/24/2001</b>
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The content of this comment letter is identical to the attachment to comment letter PC02231; please refer to Responses to Comments PC02231-2 through PC02231-17.

<b>PC02238</b>	<b>Park, Noel</b>	<b>None Provided</b>	<b>9/24/2001</b>
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**PC02238-1**

**Comment:**

Our family lives in the southerly neighborhood of San Pedro known as the Palisades. This year, I have the honor to be the president of the Palisades Residents Association. In addition, I am the president of the San Pedro and Peninsula Homeowners Coalition, of which our Palisades Association is a member.

I have been asked to write the comment letter for the San Pedro and Peninsula Homeowners Coalition. I am in absolute agreement with that letter, a copy of which is enclosed, and incorporated by reference into these comments.

For all of the reasons outlined in that letter, my family and I request that you implement the "No Action/No Project" Alternative. Please create a regional plan for airport expansion, and do not visit any more negative impacts upon the citizens of the Los Angeles Basin.

**Response:**

Comment noted. Please see Responses to Comment letter PC02231. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It

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

#### PC02238-2

The attachment included as part of this comment letter is identical to the attachment to comment letter PC02231; please refer to Responses to Comments PC02231-2 through PC02231-17.

**PC02239**      **Collins, Esq., Peggi**      **None Provided**      **9/24/2001**

#### PC02239-1

**Comment:**

My husband and I became involved in LAX activities when the flight pattern was altered three years ago, resulting in constant flights over our home. Not only was the noise unbearable -especially at night - but our patio became filthy with who knows what coming from the aircraft.

**Response:**

Comment noted. Please see Topical Response TR-N-3 regarding aircraft flight procedures and Topical Response TR-AQ-1 regarding air pollutant deposition.

#### PC02239-2

**Comment:**

When we learned about the Master Plan, we were flabbergasted. No matter how many studies you conduct, and no matter how many "experts" you engage, you will NEVER convince us that adding capacity to LAX will benefit anyone other than the airlines and the City of Los Angeles' coffers. We are not willing to bear that burden for either of them.

**Response:**

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

#### PC02239-3

**Comment:**

The New York metropolitan area is served by three international airports. Why do we have only one in Los Angeles - a sprawling metropolitan area many times the size of New York City. Why should the South Bay bear the burden for Orange and Riverside Counties?

**Response:**

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

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#### PC02239-4

**Comment:**

Given the events of September 11, 2001, it is imperative that passenger safety be the number one concern of LAWA and the FAA. The measures taken in the last two weeks are a good beginning, but it is imperative that the passenger and flight volume not be increased.

**Response:**

Comment noted. LAWA is addressed Alternative D, Enhanced Safety and Security Plan, as a proposed non-expansion improvement to LAX with additional security and safety improvements. Aviation forecasts used for the analyses presented in the Supplement to the Draft EIS/EIS take into account trends in air transportation after September 11, 2001, the general downturn in the economy that has occurred over the past several years, and the SARS incident in Asian Pacific countries. That revised forecast is provided in the LAX Master Plan Supplement and summarized in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. See also Response to Comments AL00051-93, AL01881-31, and PC02131-5.

#### PC02239-5

**Comment:**

LAX is already handling many, many more passengers and flights than it was designed for and it is time for a regional solution. Spend the money on upgrading the existing facilities at Ontario, Burbank and John Wayne, and convert El Toro to commercial use.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02240      Karlik, Sasha      None Provided      9/22/2001**

The content of this comment letter is identical to form letter PFQ; please refer to the response to form letter PFQ.

**PC02241      Kumada, Ted      None Provided      9/23/2001**

#### PC02241-1

**Comment:**

As a resident in the community of Playa del Rey, I am writing you this letter to request you for your acquisition of the West Bluff in the Ballona Wetland ecosystem as mitigation for the loss of the endangered Riverside Fairy Shrimp recently found at LAX. It is our understanding that the United States Fish and Wildlife Service has approved this mitigation.

The West Bluff has the very last vernal pool in the City of Los Angeles. It is shown on the historical maps, and in recent photographs. It is also a critical component of the last large coastal wetland system left in Los Angeles County.

Once again, together with the rest of residents in the community, I urge you to consider seriously your acquisition of the West Bluff in regards to the impact of the current operation of LAX.

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**Response:**

Comment noted. Please see Topical Response TR-ET-2 regarding the definition and evaluation of wetlands/vernal pools for further discussion of Riverside fairy shrimp mitigation. The West Bluff of the Ballona wetland ecosystem was eliminated for relocation of the Riverside fairy shrimp cysts due to the significantly high cost associated with acquiring the properties for purposes of relocating the embedded cysts.

**PC02242**

**Dubois, Karen**

**None Provided**

**9/20/2001**

**PC02242-1**

**Comment:**

To all those concerned, this is in response to the Los Angeles International Airport (LAX) draft-environmental impact statement and environmental impact report (draft-EIS/EIR).

Let me also state that I live adjacent to the north runway of LAX. To all those people who do not want it in their back-yard, well it is in my back-yard and I do oppose the master plan I do not need it in my side and my front yard as well. It is also over my head. The FAA does nothing to curve flights in the airspace above Playa Del Rey for early turns that are supposed to go over to the ocean.

**Response:**

Comment noted. Please see Topical Response TR-N-3 regarding aircraft flight procedures. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02242-2**

**Comment:**

When I purchased my condo here, the Office of Ruth Galanter showed me plans to put in a new golf course and a park where Westchester Parkway now is. Now I might have a runway. Well, no trust here when people tell you something.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Response to Comment PC00264-2 regarding expansion of parks and recreation areas.

**PC02242-3**

**Comment:**

It is absurd to bring the entire Los Angeles region into the already jam-packed LAX area. Is expansion in the best interest of the communities surrounding LAX? Is it in the best interests of those who must travel for long periods, lengthy hours on the San Diego Freeway? Is it in the best interest to increase air traffic, increase passengers, to where there are already record numbers of near misses? The answer is the same, no, no, no.

Any LAX extension would waste billions of dollars and would be only a short-term fix and affect more than 150,000 adults and children who live nearby to an increase in noise, traffic, and air pollution.

And for what? So that people in Orange County do not have to have it in their back-yard? So that the limited number of businessmen can profit? The answer to those two questions are yes, yes.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-SAF-1 regarding aviation safety, and Topical

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Response TR-RC-4 regarding Orange County air transportation demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; traffic impacts in Section 4.3, Surface Transportation; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

#### **PC02242-4**

**Comment:**

Now down to a major issue that will affect me most of all. I oppose the new entrance from Pershing Drive. I oppose using the Westchester Parkway as a ring road. We do not need more roadways. You could use existing roadways. Additional new terminals could be located at the east end of the airport, accessible from Aviation Blvd.. And guess what, you do not have to condemn existing homes and businesses. A new people mover can connect the new terminal to new concourses and all other terminals. Remote drop off points and baggage checkin makes more sense that to concentrate everything at LAX. We currently have a ring road, much smaller than the one proposed, but it already is a large source of smog, noise and congestion. The proposed ring road would simply be a larger source of more and more smog, noise and congestion. No ring road.

And what will it do for the people of Playa Del Rey, or even Marina Del Rey? We will all have to go east and then onto the San Diego freeway to go south.

**Response:**

Comment noted. This suggested concept of remote drop off points and baggage check-in is very similar to the new Enhanced Safety and Security Plan, Alternative D, which was analyzed in detail in the Supplement to the Draft EIS/EIR. In addition, the proposed Alternative D would not have a Ring Road nor a passenger entrance from Pershing Drive. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR.

#### **PC02242-5**

**Comment:**

Get real, there will always have to be people who live near an airport. I am doing my turn, now let the people from other areas do theirs. Trying to crowd tens of millions of people and huge volumes of cargo where they do not fit is not in the best interest of anyone. LAX is surrounded by heavily populated areas with 12 schools.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### **PC02242-6**

**Comment:**

With 25% of LAX passengers coming from neighboring counties, now is the time to remove some of the burden from an already overburdened LAX. You need to cap the annual passengers and make our present airport safer and find a regional solution.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered



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

**PC02242-7**

**Comment:**

Additional runways, entrances or a ring road is not the answer. The only thing I agree with is to make public transportation to the airport easier. Do not give our small community more smog, traffic and noise.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. Please note that Alternative D would not include a ring road. Alternatives C and D do not include the construction of additional runways, but do include lengthening and relocation of runways to accommodate a new parallel taxiway to reduce runway incursions and improve airfield operations. In addition, please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02243      Broussinos, Peter      None Provided**

**PC02243-1**

**Comment:**

I have reviewed the LAX Master Plan. As a homeowner who lives near LAX and is constantly subjected to LAX jet overflights, the proposed expansion gives me great concern. These concerns are in the areas of: (1) increased noise; (2) increased freeway and surface road traffic; and (3) increased air pollution.

I wish to make the following specific comments on the content of the master plan EIR:

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, air quality in Section 4.6, Air Quality, and traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Appendix D, Appendix G, and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Responses to Comments PC02243-2 through PC02243-9 below regarding specific comments.

**PC02243-2**

**Comment:**

1. The proposed expansion of LAX will likely generate far more than the 89 to 98 million passengers the airport claims. The current airport was projected to handle 40 million passengers per year and now serves 67 million. The history of LAX suggests that the Master Plan will result in volumes as high as

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120 million annual passengers and the EIR should, but does not, analyze the impacts associated with this much higher probable volume.

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

**PC02243-3**

**Comment:**

2. An environmental impact report is supposed to consider a reasonable range of alternatives to the project. However, the subject EIR never seriously considers a truly regional airport solution.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR, and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and shifts the accommodation of future aviation demand to other airports in the region.

**PC02243-4**

**Comment:**

Nor does the EIR consider any alternative that would result in fewer adverse impacts than LAWA's preferred plan, Alternative C.

**Response:**

This comment is similar to comment PC01094-4; please see Response to Comment PC01094-4.

**PC02243-5**

**Comment:**

3. LAWA states the plan represents an increase of only 44 takeoffs and landings per day. However, these projections are clearly held artificially low by favorable assumptions about fleet mix. These assumptions are not justified and the impacts resulting from additional takeoffs and landings must be analyzed. The EIR should accurately assess realistic numbers, not LAWA's artificial projections.

**Response:**

Please see Responses to Comments PC00599-7 and PC00593-1 for a discussion on fleet mix assumptions and the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) in evaluating different activity levels.

**PC02243-6**

**Comment:**

4. The San Diego Freeway ( I-405) currently averages 18-23 mph during peak hour. Due to regional growth, it will slow to 10-16 mph in twenty years. The LAX expansion will only make that worse. The dire potential impacts of the LAX expansion on the I-405 traffic situation are hardly examined in the EIR. This omission represents a substantial deficiency in the EIR, and, I believe, renders it nearly worthless.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport

area traffic concerns, and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### PC02243-7

**Comment:**

5. LAX is already the region's largest single source of smog-forming NO<sub>x</sub> emissions, based on all impartial scientific studies. The expansion plan will as much as triple the NO<sub>x</sub> emissions from the airport. Yet, LAWA plans to mitigate only about 30% of the new NO<sub>x</sub> emissions. This is incredibly insufficient, considering the deleterious health effects of these air pollutant. Additional mitigation measures should be included in the EIR.

**Response:**

The Supplement to the Draft EIS/EIR included a revised air quality mitigation measure with many components, that describes in greater detail those efforts being carried forward and their associated emission reductions. LAWA intends to adopt and implement all feasible mitigation measures. It is important to note the mitigation measures for some types and sources of pollutants are more readily available than others. There are very few available and feasible mitigation measures to reduce NO<sub>x</sub>. Those measures which are currently available are insufficient to mitigate the NO<sub>x</sub>-related impacts of the project to below a level of significance.

#### PC02243-8

**Comment:**

6. All three proposed LAX expansion scenarios propose to more than double cargo activity at LAX. That will double the truck traffic and diesel emissions LAX neighbors will have to breathe. Again, due to the severe negative health risks associated with these emissions, this issue should be addressed in the EIR and realistic mitigation measures should be analyzed and proposed. If no mitigation measures are available, the expansion plans should be abandoned.

**Response:**

Please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-HRA-4 regarding human health mitigation strategies. Please refer to Section 4.24.1, Human Health Risk Assessment (subsection 4.24.1.9, Level of Significance After Mitigation), of the Supplement to the Draft EIS/EIR for an analysis of the level of significance associated with the four build alternatives after mitigation measures are implemented.

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

#### PC02243-9

**Comment:**

7. Arterial roads such as Sepulveda Blvd. are already gridlocked at rush hour. The expansion of LAX will turn Sepulveda Blvd. into a parking lot.

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**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02244**

**Sochar, Karen**

**None Provided**

**9/24/2001**

**PC02244-1**

**Comment:**

I am strongly opposed to any expansion at LAX.

**Response:**

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

**PC02244-2**

**Comment:**

I live near the corner of 80th Street & Emerson Avenue and hear a lot of noise from aircraft both landing and departing. I feel my windows should have been double-paned as I am often awakened by the loud noise from LAX which was not the case when I purchased in Westchester back in 1988. Over the past several years, the amount of noise pollution alone has increased significantly.

**Response:**

Comment noted. The noise impact area which determines residential uses eligible for sound insulation under the ANMP is described in Subtopical Response TR-LU-3.4 and is based on the 1992 fourth quarter 65 CNEL noise contour. Noise sensitive-uses exposed to the 65 CNEL noise contour under the 1996 baseline were described in Section 4.2, Land Use (subsection 4.2.3), and shown on Figure 4.2-5 of the Draft EIS/EIR. Noise-sensitive uses exposed to the 65 CNEL noise contour under Year 2000 conditions are described in Section 4.2, Land Use (subsection 4.2.3), and shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. As shown on these respective figures under 1996 baseline and Year 2000 conditions, the area within the 65 CNEL noise contour has decreased compared to the ANMP contour, which continues to define the area of eligibility for sound insulation. Although this is a comment on existing noise levels and conditions, the general focus of the document, pursuant to NEPA and CEQA, was to evaluate the potential future environmental effects of the project and to provide feasible mitigation measures to address significant impacts. See Subtopical Response TR-LU-3.4 regarding how eligibility for soundproofing is determined and Subtopical Response TR-LU-3.13 for a description of how approval of the LAX Master Plan would affect the ANMP, which included incorporating residential dwelling units newly exposed to high single event noise levels into the ANMP. See also Topical Response TR-N-6, regarding existing high noise levels. An analysis of high single event noise levels that results in nighttime awakening was provided in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR and is summarized under Topical Response TR-N-2. For more information on noise impacts on Westchester, see TR-LU-2 regarding the potential effects of master plan alternatives on Westchester.

**PC02244-3**

**Comment:**

What this means to residents in the area is a whole lot more traffic and dirt that not only covers our vehicles nightly, but any and all outdoor patio furniture, toys and equipment as well as increased dust inside our homes which also affect our bodies - all are literally destroyed by the amount of airport soot, dirt, debris and/or air pollution.

This means constant cleaning that the LAX expansion plan does not incorporate for all Westchester residents. Who will pay for the additional cleaning bills I have in my home due to the increased dust? If my windows are left open overnight, my furniture must be dusted daily as there is a constant layer of dirt

on all my furniture. I cannot sit in my home without sneezing. Who will pay for cleaning my screens, windows, patio furniture, car, etc.??? Who will pay for replacement of my filthy umbrellas due to airport pollution?

**Response:**

Please see Topical Response TR-AQ-1 regarding air pollutant deposition.

**PC02244-4**

**Comment:**

Who will pay for my asthma medications that have also increased due to the airport's pollution??? And finally, who will give me a new lung when needed, and who will pay for this???

**Response:**

Please refer to Topical Responses TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-HRA-4 regarding human health mitigation strategies.

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02244-5**

**Comment:**

Currently, I am paying for this havoc. I am paying increased medical bills for my daughter and myself. I am forced to take increased doses of allergy medicines due to the increased pollution in Westchester. My family suffers when I suffer as I am constantly sneezing and have itchy, swollen eyes. My chest hurts if I do not take steroids now to deter the wheeze from the added pollution. I did not have these symptoms in 1988. However, I do now! I fear what catastrophic illnesses will occur for many Westchester residents that will be forced to breathe the polluted air if any further expansion occurs at LAX.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

**PC02244-6**

**Comment:**

In addition to the air and noise pollution, the increased traffic will make it very difficult to travel on Lincoln Boulevard to the North or South of the LAX area. More traffic will be routed along Sepulveda Boulevard which creates even more stress on our neighborhoods.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

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#### PC02244-7

**Comment:**

I am enclosing an article entitled "LAX EXPANSION RUINS WESTCHESTER" that was written by my eleven year old daughter. Children in this neighborhood deserve a voice in the LAX expansion plan as any expansion will affect their lives greatly and perhaps gravely. I hope that you will read her article and understand that NO LAX EXPANSION should occur now or in the future!

**Response:**

Comment noted. Please see Responses to Comments PC02244-8 through PC02244-13 below. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### PC02244-8

**Comment:**

LAX EXPANSION RUINS WESTCHESTER

When you look at the homes, restaurants and offices around the airport, you probably don't think about the people who live and work there. Many of these are places that the airport wants to tear down. People just like you, having their house torn down, with no place to live. Would you want your house torn down?

**Response:**

Comment noted. Please see Response to Comment PC00035-2 regarding residential acquisition; Response to Comment PC00013-5 regarding business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan; and Response to Comment AL00018-1 regarding commercial property acquisition within the Westchester Business District. As discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, sufficient comparable housing within a 10-mile radius of LAX would be available for the displaced households. Furthermore, implementation of the Proposed Relocation Plan would facilitate the relocation of affected residents to comparable housing near LAX, meet applicable federal requirements, and ensure that residential relocation impacts would not be significant. Please see Response to Comment AL00033-120 and Response to Comment PC01879-11 regarding mitigation of potential acquisition and relocation impacts. Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues, including affordable housing, and Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

#### PC02244-9

**Comment:**

The airport is just doing this for money. The airport has torn down lots of homes already. The airport tears down the homes and then doesn't use the land. People around Westchester are worried their house will be taken. Some people in Westchester have gotten notices that tell them their homes are in an area that is needed.

**Response:**

Comment noted. Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. As indicated in TR-RBR-1, Alternative D does not propose residential acquisition.

#### PC02244-10

**Comment:**

Every time a plane lands in the airport, the airport makes a certain amount of money. So the airport needs more land ...right? WRONG!!! The airport wants more land to make money, so they take down

the homes of many people in Westchester that surround the airport. These people are getting very upset.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed residential and business relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-RBR-1 regarding residential acquisition and relocation.

**PC02244-11**

**Comment:**

This expansion will not only make Westchester more populated, but more airplanes produce more pollution. Not only plane pollution, but car pollution too! Plus, with that, lots more noise!

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed population growth in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement), air quality in Section 4.6, Air Quality; traffic impacts in Section 4.3, Surface Transportation; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester, Topical Response TR-AQ-3 regarding air pollution increase, and TR-N-6 regarding noise increase.

**PC02244-12**

**Comment:**

There will be lots more traffic in and around Westchester.

**Response:**

The Master Plan would help to separate regional airport traffic from local traffic and satisfy future airport traffic demand while mitigating impacts to the surrounding street system. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02244-13**

**Comment:**

Money is made from the planes that land in the airport. This LAX expansion is not the way to expand Westchester, it is just telling more people "go live somewhere else!"

This expansion is the wrong thing to do!

**Response:**

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02245      No Author Identified,   None Provided**

**PC02245-1**

**Comment:**

NOW IS THE TIME for all good men and women to come to the aid of their country, their cities and their airports. More than ever, we must look at a Regional Airports solution for our growing air transportation.

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The devastating terrorists strikes illustrate the wisdom of not putting all our eggs in one basket. . . to borrow an old cliché. To funnel the major portion of air travel through LAX is not only foolhardy, but tempting to terrorists.

The environmental impact of an expanded LAX upon our city may now be overshadowed by the need to downsize for the safety of all of Southern California. The recent terrorists attack should be an ultimatum for the FAA to refocus upon a regional airport master plan.

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02246      Schivley, Gary      None Provided      9/21/2001**

**PC02246-1**

**Comment:**

1. I feel the traffic increase if the airport is allowed to expand will destroy the lifestyle in Westchester.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester. Also, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02246-2**

**Comment:**

A) The added pollution levels will be life threatening.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

**PC02246-3**

**Comment:**

B) - The noise levels unbearable

**Response:**

Eligible property owners may qualify for residential sound insulation under the Aircraft Noise Mitigation Program, as described in Topical Response TR-LU-3. Please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Please see Topical Response TR-N-4 regarding noise mitigation and Topical Response TR-N-6 regarding noise increase.

**PC02246-4**

**Comment:**

C) The added traffic flow to this area will already be heavier due to the Playa Project.



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**Response:** This comment is similar to comment PC00148-2. Please see Response to Comment PC00148-2.

**PC02246-5**

**Comment:** (2) The pollution levels are high already.

**Response:** Please see Response to Comment PC00045-3.

**PC02246-6**

**Comment:** (4) We have black soot deposited on our windows/sills/drapes & interior of our houses.

**Response:** Please see Topical Response TR-AQ-1 regarding deposition, soot and fuel dumping.

**PC02246-7**

**Comment:** This has made breathing difficult at times when the smell of Jet fuel is carried in the air.

**Response:** The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Topical Response TR-AQ-1 regarding air pollutant deposition. Please also see Response to Comment PC00045-4 regarding fumes.

**PC02246-8**

**Comment:** 3. I say No! to expansion

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

**PC02247      Shumake, Linda      None Provided      9/22/2001**

**PC02247-1**

**Comment:** TOO MUCH TRAFFIC AND AIR POLLUTION ALREADY.

**Response:** Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data

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and analyses are provided in Appendix G and Technical Reports 2, 3, and 4 of the Draft EIS/EIR and Appendix S-E and Technical Reports S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

#### PC02247-2

**Comment:**

TRAFFIC WAS SIGNIFICANTLY (AND CONTINUES TO BE SIGNIFICANTLY) REDUCED ON 405 FREEWAY AROUND LAX AREA SINCE AIR TRAFFIC SLOW-DOWN DUE TO TERRORIST ATTACK ON 9/11/01.

FLIGHTS ARE NOW REDUCED ACCORDING TO AIRLINES AND LAX OFFICIALS. IN FACT LAX IS ASKING FOR FINANCIAL RELIEF FROM GOV'T DUE TO LOWER REVENUES. LAX SHOULD USE THE MONEY THEY WERE GOING TO USE FOR EXPANSION ON SOLVING THEIR FINANCIAL WOES. REDUCED AIRLINE SCHEDULES MEANS NO NEED FOR EXPANSION.

**Response:**

Please see Response to Comment AL00051-93.

#### PC02247-3

**Comment:**

IT IS TIME ORANGE COUNTY DEALT WITH THEIR OWN AIRLINE PASSENGERS. L.A. RESIDENTS DO NOT WANT TO PAY FOR THE ORANGE CO. PEOPLE ANYMORE. THEY NEED TO SERVICE THEIR FAIR SHARE OF PASSENGERS AND ABSORB THEIR OWN TRAFFIC AND AIR POLLUTION CONSEQUENCES. EXPAND IN EL TORO IF WE NEED TO AT ALL.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

#### PC02248

**Reed, Emily Jane**

**None Provided**

**9/23/2001**

#### PC02248-1

**Comment:**

LAX should not expand - we need a regional approach to the air traffic problem. Palmdale, Ontario, (El Toro-needs to be built for Orange Country) should be developed to allow for a variety of landing areas.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02248-2****Comment:**

With the recent Terrorist threats to our air transportation system and airports -- it is important that we don't put all our eggs into one basket "LAX". There should be many other airports around Southern Calif.: Palmdale, Burbank, Ontario, El Toro, John Wayne to handle air traffic.

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02248-3****Comment:**

As seen this past week, LAX has a Big Problem for security, and the airport cannot handle the drop-off and pick up of passengers. We now have a terrible traffic problem in front of the airport and on the 105 & 405 Freeways.

**Response:**

Comment noted. Subsequent to the publication and public review of the Draft EIS/EIR, and the terrorists attacks of September 11, 2001, Alternative D-Enhanced Safety and Security was added to the range of alternatives currently being considered. Alternative D places a particular emphasis on safety and security improvements to existing airport facilities, and includes a new passenger pick-up and drop-off facility (i.e., the Ground Transportation Center) designed to avoid the types of problems encountered at the Central Terminal Area in the period following September 11th.

**PC02248-4****Comment:**

The quality of life has been effected here in Westchester: pollution, kerosene smell, noise pollution, & traffic problems.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment PC00045-4 regarding odors, Topical Response TR-LU-1 regarding impacts on quality of life, and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02248-5****Comment:**

The city needs to reconsider what our needs are now -- since the terrorist attacks. Airlines are laying off employees, canceling flights, and going bankrupt. We do not need to expand LAX.

**Response:**

As indicated on page 8 of Appendix S-B of the Supplement to the Draft EIS/EIR, after the terrorist attacks of September 11, 2001, LAX was one of the disproportionately affected airports in the U.S. LAX passenger traffic declined by 25 percent for the fourth quarter of 2001 compared to the same period in 2000. As shown in Figure S4 in Appendix S-B, LAX is showing gradual recovery; traffic was down 33 percent in September, improving to a decrease of 20 percent in December. During January and

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February 2002, passenger traffic was down only 17.5 percent, compared to the same two months in 2001. As the economy recovers, airline traffic can be expected to recover to historical growth trends. This is true for the nation and at LAX. As indicated above, LAX has shown recovery after the initial decline after September 11, 2001.

In addition, please see Topical Response TR-GEN-3 regarding actual versus projected activity levels and Topical Response TR-SEC-1 regarding additional security measures incorporated as part of Alternative D, the Enhanced Safety and Security Plan, in light of the terrorist attacks that occurred on September 11, 2001.

**PC02249      Fellner, Dorothy      None Provided      9/23/2001**

**PC02249-1**

**Comment:**

I feel that the airport expansion will be harmful for this neighborhood. Congestion on the streets now is unbearable. Pollution from all the cars and etc increase in plane traffic and noise will doom this area.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-6 regarding noise increase. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02249-2**

**Comment:**

There must be other areas that could be used for additional plane traffic. Another plan has to be found.

**Response:**

Comment noted. The development of other alternative locations for the airport was discussed in Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02250      Emmett, Maryle      None Provided      9/23/2001**

**PC02250-1**

**Comment:**

A regional approach has always made the most sense. Long term planning is needed in order to accommodate the needs of the population growth in the inland empire. Model cities are around us... Washington, D.C., New York, Denver... all realized that they needed to build a second airport to support their metropolitan cities.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of

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LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02250-2

**Comment:**

LAX has limited geographic area available to expand without seriously impacting the surrounding communities AND inconveniencing those driving a distance to reach LAX. Traffic and noise with the current 67 million annual passengers are much more of a problem than they were even 8 years ago when I moved to Westchester. Traffic has slowed on both the San Diego freeway and Sepulveda Boulevard, and engine noise both while on the ground and upon take-off are a daily, and nightly, issue of life for those of us who live in Westchester. An almost 50% increase in passengers to 97 MAP will create havoc. The suggested expressway and ring road would destroy our community.

**Response:**

Comment noted. The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, land use, including noise compatibility impacts, in Section 4.2, Land Use, traffic impacts in Section 4.3, Surface Transportation, and community disruption impacts in Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns, with supporting technical data and analyses provided in Appendices D and S-C and Technical Reports 1, 2, 3, S-1, and S-2. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-N-5 regarding nighttime aircraft operations. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway or the Ring Road.

#### PC02250-3

**Comment:**

And, just as LAX, designed for 40 million has 67 MAP now, it can be expected that LAX would be allowed to once again grow more than projected, at 50% over to 130MAP---roughly DOUBLE the current size!!!

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX.

#### PC02250-4

**Comment:**

But the most persuasive argument for NOT expanding LAX and FOR developing Palmdale and Ontario is the terrorist attack of September 11. To continue to build one major airport, namely LAX, puts the city at great risk. Better to have 2 or 3 large airports serving our metropolitan area.

**Response:**

Please see Response to Comment AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02250-5

**Comment:**

I urge you to act responsibly and support a regional approach and leave LAX at its current capacity.

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**Response:**

Chapter 1, Regional Context, of the Draft EIS/EIR, Section 2, Purpose and Need for the Proposed Action, of the Supplement to the Draft EIS/EIR, and Topical Response TR-RC-1 provide information regarding the LAX Master Plan role in the regional approach to meeting demand. As described in the Supplement to the Draft EIS/EIR, Alternative D, Enhanced Safety and Security Plan, was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02251      Waddell, Fern      None Provided      9/22/2001**

**PC02251-1**

**Comment:**

We were told by LAWA that traffic to LAX through our area is only a minimum amount.

When the airport was closed on 9-11 for several days, the traffic in our area, plus the 405 was reduced by at least 50%!

**Response:**

Comment noted.

**PC02251-2**

**Comment:**

Let's get the facts straight! And let's start telling the truth.

**Response:**

Comment noted.

**PC02252      Edie, Jay      None Provided      9/24/2001**

**PC02252-1**

**Comment:**

1. The recent terrorist attack on the WTC will likely reduce demand for air travel significantly. This will be amplified by the increased costs due to greater security, etc. Therefore, All plans for LAX expansion should be suspended pending further demand and security evaluations.

**Response:**

Comment noted. Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02252-2**

**Comment:**

2. There are three components of surface traffic to/from LAX that need to be addressed in better ways, even at the present traffic levels.

(a) Passengers - There is now and in all LAX expansion alternatives too great a concentration of surface traffic into the terminal areas. All private vehicles should be banned from LAX and the passenger parking structures eliminated. There should be no new parking structures at LAX. Remote parking with people movers/shuttles should be used.

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**Response:**

The impacts and mitigation measures for each alternative were summarized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Section 4.3.1, On-Airport Surface Transportation. See also Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02252-3**

**Comment:**

(b) Cargo - The principal regions which are destinations of most air cargo are remote from LAX. All cargo-only flights should be banned from LAX and relocated to Ontario and Orange County airports.

**Response:**

Neither the FAA nor LAWA have the authority to direct airlines to use one airport in favor of another airport. The Airline Deregulation Act of 1978, as amended, ended federal, state, and local governments role in determining the location for air service by airlines. Please also see Topical Response TR-ST-1 regarding cargo truck traffic for more information.

**PC02252-4**

**Comment:**

(c) LAX Employees - People who work at LAX constitute a major fraction of the surface traffic in/out of the LAX area. There should be much greater incentives to these people to use mass transit and people movers from remote locations. The ban on private vehicles from LAX should include those of people who work at LAX.

**Response:**

As described in Topical Response TR-ST-2 the impact and mitigation already accounts for some shift to rail and public transit mode for employees, but maintains a conservatively low estimate of the reduction in vehicle trips achieved by transit in order to avoid under-estimating the need for other mitigation measures. More information discussing specific regional transit systems is provided in Topical Response TR-ST-2. Private vehicles would not be banned from LAX. In Alternatives A, B, and C, full access would continue to be provided to the curbs for private vehicles. In Alternative D, private vehicles would be banned from the CTA, but would be accommodated in the Ground Transportation Center, the Intermodal Transportation Center, and public parking lots.

**PC02252-5**

**Comment:**

3. All small private aircraft and a great deal of short haul passenger traffic should be shifted to other regional airports. Landing/parking and other fees can be used to provide incentives.

**Response:**

Comment noted. The landing fees and terminal rentals at a given airport typically represent between 4 and 6 percent of an airline's cost to operate at that airport. Differential pricing between airports in a region would be a minor factor among the many that an airline would consider when deciding whether to provide service to a given airport. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02253**

**Parkhill, Marsha**

**None Provided**

**9/22/2001**

**PC02253-1**

**Comment:**

Westchester is a community that has been carved up by LAWA already.

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**Response:**

Comment noted.

**PC02253-2**

**Comment:**

To remove 57 homes devastates 57 families. To remove a block of the commercial area will decimate Westchester, cause a loss of jobs and force residents to shop and go elsewhere for services. Westchester is a gateway for travelers to Los Angeles. Do we want them to see a thriving commercial area or more car lots, traffic, wasted space?

**Response:**

Regarding residential acquisition, please see Topical Response TR-RBR-1, and note that Master Plan Commitment RBR-1 ensures that LAWA will implement a relocation plan for affected properties in compliance with the Uniform Relocation Act, state and local regulations, and FAA Advisory Circular 150/5100-17.

The Supplement to the Draft EIS/EIR provided additional discussion beyond that presented in the Draft EIS/EIR of potential acquisition effects on the Westchester Business District. As described in Section 4.2, Land Use (subsections 4.2.6.2 through 4.2.6.4), acquisition within the Westchester Business District would be about 16 acres or 31 percent of the district under Alternative A, about 11 acres or 21 percent under Alternative B, or approximately 13 acres or 26 percent of the district under Alternative C. Under Alternatives A, B, and C, relocation opportunities would be available for some uses nearby within Westchester Southside. Also, many of the uses being acquired are airport related and a number of the community related uses that would be acquired (a bank, an office supply store, a bar and beauty shop) would still remain available through similar businesses that are located in close proximity within the Westchester Business District.

Also, as described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, note that in contrast to the other build alternatives, Alternative D (LAWA Staff's new Preferred Alternative), does not include any acquisition within the Westchester Business District or residential acquisition. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02253-3**

**Comment:**

The Master Plan did not fully explore regional airports to spread out the air traffic. Why does everyone in the greater L.A. area need to come to LAX?

**Response:**

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



**PC02253-4**

**Comment:**

In view of the recent terrorist attacks, airlines are considering bankruptcy and fewer people can enter LAX. This may mean fewer, not more flights.

**Response:**

Comment noted. Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02254      Schneider, Dennis      None Provided      9/24/2001**

**PC02254-1**

**Comment:**

It is time for a radical change to the plans of the Master Plan and corresponding EIS/EIR.

**Response:**

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

**PC02254-2**

**Comment:**

The need for a regional solution distributing the passenger and cargo load to several Southern California areas is essential to the financial and safety well being of the area.

**Response:**

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

**PC02254-3**

**Comment:**

Aside from being more expensive to implement, the present plan doesn't implement redundancy or an ability to expand safely in the future.

**Response:**

Comment noted. Please see Response to Comment AL00022-59 regarding project phasing.

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#### PC02254-4

**Comment:**

It puts an undue burden on the LAX surrounding communities without an positive rewards.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental impacts both adverse and beneficial in Chapter 4, Affected Environment, Consequences, and Mitigation Measures.

#### PC02254-5

**Comment:**

This proposed LAX expansion (in any of the alternatives proposed) destroys the last vestages of community on the north side by removing even more of the Westchester-Playa del Rey community. It makes this area into a thoroughfare to LAX and destroys its viability as a community by removing its business base, eliminating schools and social gathering sites, and increasing traffic and pollution (noise and chemical) beyond tolerable levels.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; traffic impacts in Section 4.3, Surface Transportation; acquisition and relocation impacts in Section 4.4.2, Relocation of Residences and Businesses; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. Also note, as was described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District. Further, it does not include a ring road. Please see Topical Response TR-LU-2 regarding impacts to the Community of Westchester.

#### PC02254-6

**Comment:**

Safety, especially since the terrorist attack is a major issue. Closing the airfield to consumers by distributing all of the traffic and congestion into the neighborhoods is not an acceptable solution. Although a stop-gap measure, use of the parking lots as drop-off is a start, access to these points is not adequate from the freeway and should not rely on increased traffic into our community.

**Response:**

Comment noted. Please see Topical Response TR-SEC-1 regarding security issues, and also Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### PC02254-7

**Comment:**

Widening every major street around the airport into a super highway is not a solution. The presently planned "improvement" of Lincoln Blvd. to 7 lanes and Sepulveda to 8 lanes while also expanding the use of LaTijera and Airport Blvd. as a major entrance to the airport is unacceptable.

**Response:**

Comment noted.

**PC02254-8****Comment:**

There are numerous inconsistencies within the documentation on who is impacted and to what extent.

**Response:**

Comment noted.

**PC02254-9****Comment:**

- Aircraft Noise and Health Impacts:

One example is the noise contour and expected impacts. In 1999 LAX and the FAA presented a number of approximately 89,000 people inside of the 65 CNEL Noise contour to the Osage Neighbors Association whereas the EIS/EIR shows only half that amount for any of the alternatives. The increased number on size of aircraft will cause even greater problems for an area already burdened by the health impacts of excessive noise, sleep deprivation, and pollution.

**Response:**

Comment noted. The commentor may have misread that 89,000 people were in the 65 CNEL impact area at the Osage Neighbors Association meeting since the LAX quarterly reports for 1998 or 1999 all show a population impact area of less than 86,000 people. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Technical Reports 14a and 14c of the Draft EIS/EIR and Technical Reports S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-1, in particular Subtopical Response TR-N-1.1, regarding differences in measured noise and forecasted noise, Topical Response TR-N-6 regarding noise from larger aircraft, Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, and Response to Comment AL00017-250 regarding health impacts of excessive noise.

**PC02254-10****Comment:**

- Pollution:

The plan and back up statements show limited or no increase in chemical (land or air) pollution yet the EPA evaluations that were on their website differ dramatically. More ground traffic and aircraft flights overhead will only increase the problems.

**Response:**

Section 4.6, Air Quality, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the impacts of air pollution in and around the airport. In general, the predicted air pollution impacts of any of the LAX Master Plan build alternatives will be lower than the predicted impacts of the No Action/No Project Alternative. Also, please see Topical Response TR-AQ-3 regarding air pollution increase.

**PC02254-11****Comment:**

- Ground Traffic

Each of the plans call for a ring road and additional road expansions. The analysis of impact does not show how the automobiles and trucks will be handled outside of the local area. The substantial increase in auto and truck traffic on the 405 (San Diego) and 105 Freeways is not adequately addressed. The 405, for instance, is stop and go at various times of the day under present conditions without the major influx of cars.

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**Response:**

Please see Topical Response TR-ST-4, in particular Subtopical Response TR-ST-4.1 and Subtopical Response TR-ST-4.3, regarding airport area traffic concerns and analysis of congestion issues. It should be noted that Alternative D does not include the Ring Road or LAX Expressway.

**PC02254-12**

**Comment:**

Further, traffic analyses are based on the MP authorization date of 1996 which was inadequate and out of date.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs. A discussion of the conditions under an updated baseline condition is provided in the Supplement to the Draft EIS/EIR.

**PC02254-13**

**Comment:**

Traffic congestion around the airport areas without expansion leaves many streets at a standstill. Increasing the airport capacity and demand will only exacerbate the problem.

**Response:**

Comment noted.

**PC02254-14**

**Comment:**

- Social Impact and Financial Impact

The degradation of many communities in the area is imminent due to removal of the business base and division of the communities into smaller pockets separated by large super-highways. There will be dramatically reduced open space, parks, educational facilities, local gathering areas, and local businesses under the proposed plan.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed land acquisition for each of the alternatives in Chapter 3, Section 4.2, Land Use, and Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns. Please see Topical Response TR-LU-2 concerning impacts within the Community of Westchester. Also note, as was described in Section 4.2, Land Use (subsection 4.2.6.5) of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District. Further, it does not include a ring road. As described in Sections 4.26.3, Parks and Recreation, and 4.27, Schools, there would be no significant impacts, due to acquisition on parks or public schools under the proposed Master Plan alternatives. As was stated in Section 4.26.3, Parks and Recreation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, parkland would be increased under all of the alternatives. As was described in Section 4.27, Schools, of the Draft EIS/EIR, acquisition of the 98th Street school within Manchester Square would also occur under a separate program and independent of the LAX Master Plan. As described in Response to Comment PC00267-3 and Section 4.2.6 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the Westchester Neighborhood School (a private school) and CPR Training School would be acquired under all of the Master Plan alternatives. As was discussed in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA would provide relocation assistance for businesses acquired under the Master Plan, including the opportunity to relocate in proximity to LAX.

#### PC02254-15

**Comment:**

- Greater LA Impact

The increased noise and risk of accidents from the air traffic can not be minimized after one looks at the radar traces to see the magnitude of traffic in the area.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, 3, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-SAF-1 regarding aviation safety.

#### PC02254-16

**Comment:**

As the speed of traffic on the freeways reduces due to general congestion it will take even longer for people to get to LAX than presently experienced. SCAG estimates that without the LAX expansion in their latest Transportation Plan that the average commute speed on the freeway will be down in the teens in 2020. This means the "practical service radius" of one-hour commute to LAX will be dramatically reduced for the areas that are project to be the fastest growing. The Master Plan and EIS/EIR state that there are (and will be) substantial jobs related to LAX. This means, that since there is little affordable housing in the area, people will have to travel farther to work! This means more pollution and time wasted. Ultimately people will tire of freight delivery delays and long commutes-jobs will be lost, not gained.

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### PC02254-17

**Comment:**

- Impact on Future Growth of the Area

Right now there is some excess capacity in airports like Ontario and Palmdale. If too many funds are diverted to LAX the money to maintain and expand these other areas will dry up. The excess capacity that provides lead time for capacity expansion will be unavailable in the future so the impact will again be loss of jobs in the area if we do not act to improve infrastructure in the other, faster growing areas.

**Response:**

Comment noted. Please refer to Response to Comment PC02254-2. Also, please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02254-18

**Comment:**

I have kept these comments to brevity as the conditions have been changed dramatically by the Sept 11, 2001 terrorist attacks. A few general suggestions for future comment periods and document releases:

1. Publicize better in local communities via a mailer to the general areas impacted, not short lists.
2. Make CD versions readily available.

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3. Make the CD versions searchable and use hypertext to jump around to corresponding areas within the thousands of pages.
4. Provide for on-line input and also for inputs on CD.

**Response:**

Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

**PC02255      Wertheimer, Lewin      None Provided**

**PC02255-1**

**Comment:**

AS A LONG TIME (22 YRS.) RESIDENT OF VENICE I HAVE SEEN THE TRAFFIC AROUND LAX BECOME UNBEARABLE. EXPANSION OF AN ALREADY POORLY LOCATED INTERNATIONAL AIRPORT WILL ONLY MAKE MATTERS WORSE.

**Response:**

Comment noted.

**PC02255-2**

**Comment:**

WE NEED TO SPREAD OUR AIRPORT TRAFFIC OUT. LOOK AT CITIES LIKE N.Y. OR PARIS W/2 OR 3 MAJOR AIRPORTS SERVING THEM. LAX EXPANSION IS NOT THE SOLUTION.

**Response:**

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

**PC02256      Kriwanek, Myra      None Provided      9/18/2001**

**PC02256-1**

**Comment:**

SAFEGUARD OUR NATIONAL SECURITY BY DEVELOPING AIRPORTS REGIONALLY, DO NOT EXPAND LAX PAST CURRENT CAPACITY!

I would like to go on record at this time to add to the LAX EIR that a week ago on September 11, 2001, our nation was attacked by terrorists which resulted in the closure of the entire nation's airport system, including LAX, for the first time in history. The devastation in the following week is recorded & continues to be recorded in the news media, making a historical statement not to be denied. The hijacking of 4 commercial airlines ended with the destruction of the World Trade Center in NY, the destruction of a section of the Pentagon & the death of over 6,300 innocent people. The reality of the impact continues past the deadline of this EIR.

My comment is focused on one point:

FIND REGIONAL SOLUTIONS TO LAX GROWTH TO AVOID SHUTTING DOWN THE ONLY OVERCAPACITY METROPOLITAN AIRPORT IN THE AREA IN CASE OF A MAJOR CASTROPHE.

Safety is the issue. This nation holds the FAA accountable & LAWA is responsible if a major catastrophe occurs at LAX. To increase the capacity of LAX over the existing 67 million annual passengers & manage the volume of movement in & out of this concentrated metropolitan area would increase the security risk factor. LAX is experiencing this first hand now after the present terrorist attacks. LAX had to be closed down for 6 days which sent the airport in to a tailspin economically, loosing billions of dollars, & has yet to recover. Security policies were found inadequate & caused a complete emergency overhaul of the systems.

While, we, citizens of Los Angeles were fortunate enough not to have been harmed physically during the September 11th terrorist attacks, emotionally & economically we were devastated. It was phenomenal that LAX was able to ground 178 airplanes, bring over 2,300 flights per day to a halt & secure the airport according to FAA controls under existing conditions. What would it be like with a proposed 130 million annual passengers at LAX?! The aftermath of this catastrophe continues, & the national security measures have become a real issue to take into serious consideration at airports, & especially in this LAX EIR

For our national security & safety sake, I recommend a regional solution!

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02257**

**Allison, William**

**None Provided**

**9/22/2001**

**PC02257-1**

**Comment:**

I have lived in Westchester, near LAX since the early 1950's. I have seen the airport grow from a good neighbor, into a growing cancer that does not serve the community, nor the air passenger. I used to use the airport frequently, but the congestion has become horrible. Even as late as 1990 I could literally leave my home and be boarding a plane in as little as 15 minutes. Now, any time during the summer, the traffic congestion takes me an hour just to get to the terminal. The impossible lines inside typically take 2 hours to board the airplane. The airport has exceeded its useful size and must not be allowed to grow any further.

The plans and EIS do not make any calculation of the human cost of the airport inefficiencies. Multiply 80 million passengers by 2 to include drivers and visitors, then by 3 hours, and you get 480 million wasted hours per year. If time is worth \$15/hour, the wasted time is worth \$7.2 billion a year!

I have listed several comments below:

**Response:**

Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

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#### **PC02257-2**

##### **Comment:**

1. EIS includes several proposals as ameliorations to offset the projected impacts of the expansion plan. Some of these were supposed to have been implemented years ago as offsets to the already intolerable airport impacts. Now these are offered all over again as offsets to even more airport expansion. This is like a con artist who loses a court settlement, then steals more money to compensate his earlier victim. This should be disallowed from the current plan.

For years the LAX has not been paying its fair share of road improvements and highway expenses. Many years ago, the Westchester Business District suffered irreversible economic damage when the airport expanded by tearing out tens of thousands of homes. The Business District was further crippled by a heavy traffic impact tax to make them pay for street improvements needed to support the Airport traffic burden. This is unfair and not properly addressed by the Expansion Plan.

For example- extending the light rail system to LAX. This was part of the original construction plan of the light rail system, but was cancelled for some reason.

##### **Response:**

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester. Also note that the extension of light rail to LAX is included in the existing LAX Interim Plan and proposed Alternatives A, B, and C, and D as addressed in the Draft EIS/EIR and the Supplement to the Draft EIS/EIR and Topical Response TR-ST-5 regarding the rail/transit plan.

#### **PC02257-3**

##### **Comment:**

Thousands of homes were removed to provide a sound buffer zone around LAX. The Airport now proposes to cover the buffer zone with high density commercial developments of millions of square feet and many thousands of vehicle visits per day. This massive development should never be allowed immediately next to a premium residential neighborhood. The EIS significantly reduces the size of this huge hypothetical commercial development if LAX is expanded in order to reduce the apparent noise and traffic impacts of the LAX expansion. This EIS is a sham.

##### **Response:**

Comment noted. The LAX Northside project was approved by the City of Los Angeles in 1983. The environmental impacts of this development were evaluated in an EIR prepared by the City of Los Angeles and certified by the Los Angeles City Council. Please see Topical Response TR-LU-2 regarding the development of the LAX Northside property under the LAX Master Plan, including the measures that would be implemented to ensure compatibility with surrounding neighborhoods (e.g., setbacks, landscape buffers, and other controls). Please also see Topical Response TR-LU-1 regarding implementation of a Neighborhood Compatibility Program as part of the Master Plan.

#### **PC02257-4**

##### **Comment:**

2. Airplane noise over much of the Westchester business district is currently intolerable. The Airport U.S. Postal Office is subject to horrible noise. I often see people cringe and/or cover their ears as loud jets pass over these areas. This noise has become significantly worse since the North Runway was improved to handle jumbo jets. The noise was mostly a nuisance when only small jets were using the North Runway. Now it is the cause of actual physical pain and permanent hearing loss.



**Response:**

Comment noted. Please see Response to Comment AL00017-246 regarding the fact that existing and future noise levels at and around LAX are projected to be well below the OSHA and CalOSHA standards that serve to protect against hearing loss.

**PC02257-5**

**Comment:**

3. If the North Runway is moved further north, more homes and businesses will be seriously impacted by noise and vibration.

**Response:**

Regarding increases in noise overall for the community of Westchester, the number of dwelling units that would be exposed to 65 CNEL or greater noise levels in 2015 would decrease under all of the build alternatives when compared to the 1996 baseline or Year 2000 conditions. The greatest reduction in dwelling units exposed to 65 CNEL or greater noise levels would occur under Alternative D, LAWA Staff's preferred alternative, with 4,431 fewer units exposed compared to the 1996 baseline and 2,589 fewer units exposed compared to Year 2000 conditions. Similarly, new analysis of single event noise levels presented in Section 4.1, Noise (subsection 4.1.6), and Section 4.2, Land Use (subsection 4.2.6), of the Supplement to the Draft EIS/EIR shows that the number of residential units in Westchester exposed to 94 SEL or greater noise levels would be reduced in 2015 under all of the alternatives when compared to 1996 and Year 2000 conditions. The greatest reduction in 94 SEL exposure or nighttime awakenings would occur under Alternative D, 5,957 fewer units exposed compared to the 1996 baseline and 1,753 fewer units exposed compared to Year 2000 conditions. Also, see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-N-3 regarding noise-based vibration.

**PC02257-6**

**Comment:**

4. If the North Runway is enlarged to handle cargo and super-jumbo jets we can expect even more intense and intolerable impacts upon the community.

**Response:**

Comment noted. Please see Response to Comment PC002257-5 above.

**PC02257-7**

**Comment:**

5. In the past year or so, some jets at the airport have presented an unusual noise profile. The direction of the noise is clearly coming from LAX. This unusual noise seems most common late at night (between 10pm and 1am) and early morning (5am-8am). Whatever it is, it makes a very low frequency sound of high energy that shakes the ground like an earthquake and vibrates the walls and windows and rattles items inside my home. I am concerned about potential physical damage to my home. Since those are the hours most heavily used for cargo flights, I assume that they will become more frequent under the Airport Expansion Plan. Since I live about 4 miles from LAX, I assume that thousands of structures are impacted even more than my home. The plan does not make any allowances for physical damage to buildings and windows by normal day to day operations.

**Response:**

Please see Topical Response TR-N-8 regarding noise-based vibration. Topical Response TR-N-5, in particular Subtopical Response TR-N-5.3, regarding night run-up activity, and Topical Response TR-MP-1 regarding air cargo activity/demand.

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#### PC02257-8

**Comment:**

6. Air Safety - This plan makes no improvements to air safety even though it is already a major concern with pilots, air traffic controllers, and passengers. The proposal may or may not improve ground safety, but does nothing for air safety.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

#### PC02257-9

**Comment:**

7. Passenger conditions and convenience. Horrible lines and congestion at the terminals cause passengers to wait typically one to three hours just to board a plane. This is absurd and will get worse if traffic is further increased. The proposed design will create a peculiar arrangement that will increase the number of miles all passengers must travel to get to the airport terminal. The terminal access area will actually be smaller than it is now. This can be expected to cause increased traffic congestion. The airport loop road, which will be several miles long, will have many visitors driving around more than once, causing additional wasted miles of driving, additional air pollution, and wasted time.

8. Passengers commonly drive 40-60 miles to get to the airport. This plan intends to increase the number of long distance drives, which causes region wide traffic, air pollution, and congestion. Not to mention the human cost in wasted hours.

**Response:**

The access plan is designed to increase vehicle speeds in an effort to lower the travel time for air passengers. Some trips may increase their distance, but at greater speeds their trips will take less time, generally improving emissions. Please note that Alternative D does not include the LAX Expressway or the Ring Road. See also Topical Response TR-ST-2 regarding the Congestion Management Program, Section 4.6, Air Quality, of the Draft EIS/EIR regarding air quality impacts, and Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-AQ-3 regarding air pollution increase.

#### PC02257-10

**Comment:**

9. The construction phase of this project will cause severe impacts upon the surrounding community and on the airport operations for several years. Since the situation is already intolerable, what kind of horrible delays, congestion, noise and pollution will we be facing?

**Response:**

Construction associated with Alternatives A, B, and C is anticipated to last approximately 14 years, with the most intensive period estimated to occur during the 3rd and 4th years. The duration of construction activities associated with LAWA Staff's new preferred Alternative D is estimated to last approximately 10 years. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed construction impacts including those associated with off-airport surface transportation, noise, and air quality in Section 4.20, Construction Impacts. Master Plan Commitments and Mitigation Measures that addressed construction impacts were presented in Section 4.20.5 and 4.20.8, respectively, of the Supplement to the Draft EIS/EIR. Representative Master Plan Commitments that address construction traffic include establishing a ground transportation/construction coordination office to monitor traffic conditions and coordinate with affected agencies; designating construction truck routes and delivery hours; separating construction traffic; and designating haul routes away from sensitive receptors. The use of low-NOX construction equipment is proposed as a Master Plan Commitment to minimize ambient air quality impacts that may occur during construction. Expanding the ground transportation/construction coordination office to include representatives of other area development projects is a mitigation

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measure proposed to address construction traffic impacts. Mitigation measures to address construction noise include the use of noise control devices, such as equipment mufflers, enclosures, and barriers; staging construction away from noise-sensitive uses; and scheduling construction to avoid construction during sensitive times of the day. A mitigation measure is proposed to reduce construction-related air quality impacts through implementation of revised air quality mitigation programs that would promote the use of clean-fuel equipment and alternative-fuel vehicles and minimize construction haul trips. The level of significance of identified impacts after mitigation was stated in Section 4.20.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR presented existing traffic conditions and identified potential traffic impacts on local roads and intersections from construction activities as a result of truck traffic, construction employee traffic, and road closures. These construction impacts were identified as significant and unavoidable. Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR presented existing noise levels and Section 4.1.6.4 identified noise sensitive uses within 600 feet from all construction sites that would be significantly impacted by high noise levels. Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR presented existing air quality conditions and concluded that, after mitigation, temporary construction-related emissions would exceed air quality standards established for the South Coast Air Basin and would therefore be significant.

#### PC02257-11

**Comment:**

10. The airport plan makes the absurd assertion that they have absolutely no control over the operation of the airport, and therefore imply that any suggestions or complaints are really just a waste of time. Yet they proceed to present widely different plans for the future of the airport with large differences in the number of passengers, freight and private planes using the airport. They are clearly self contradictory.

**Response:**

Comment noted. Please see Responses to Comments PC02036-1 and PC02218-6 regarding the ability of the airport to control the number of operations. Activity levels of the Master Plan are based on what actions the airlines are assumed to take when the capacity limit of the alternative is reached. Please see Chapter V, Section 3.3.2, of the Draft LAX Master Plan and Section 3.3 of the LAX Master Plan Addendum for further discussion of the activity levels.

#### PC02257-12

**Comment:**

11. The recent reduction in airport activity caused by the terrorist attacks conclusively proves many of our assertions regarding noise and congestion and pollution caused by the airport and not by general public activity.

**Response:**

Comment noted.

**PC02258**

**Mills, Tobin**

**None Provided**

**9/24/2001**

#### PC02258-1

**Comment:**

Car traffic is some of the worst in the world. There is no showing that it can be mitigated.

**Response:**

Comment noted.

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**PC02258-2**

**Comment:**

No mention made of effect of ban on car traffic in Airport.

**Response:**

A ban on car traffic within the Central Terminal Area of the airport was presented as a component of Alternative D, Enhanced Safety and Security Plan, in the Supplement to the Draft EIS/EIR.

**PC02258-3**

**Comment:**

Question of security and safety having one major airport for Southern California.

**Response:**

Please see Response to Comments AL00051-93, PC01881-31, and PC02131-5.

**PC02259**

**Lucas-Mozelle,  
Angela**

**None Provided**

**9/20/2001**

**PC02259-1**

**Comment:**

Members of the Regent Circle Block in Inglewood, California are adamantly opposed to any expansions of the Los Angeles International Airport.

**Response:**

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

**PC02259-2**

**Comment:**

The planes are constantly flying overhead 24 hours per day.

At one time, the proposed flight hours were from 5:00 a.m. to 12:00 midnight. Planes continue to fly before and after those proposed times.

**Response:**

There is no curfew on operations at LAX. However, there are special flight procedures in effect between midnight and 6:30 a.m. These procedures are not mandatory, but are generally used by air traffic controllers when practicable. For more information on this topic, please see Topical Response TR-N-5 regarding nighttime aircraft operations and Topical Response TR-N-7 regarding noise abatement measures/enforcement. Nighttime single event noise impacts and mitigation were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Supplement to the Draft EIS/EIR, with supporting information in Appendix S-C and Technical Report S-1.

**PC02259-3**

**Comment:**

The flight path of these planes goes directly over the downtown area of the City of Inglewood. Any accident would be detrimental and devastating to the citizens of the city.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02259-4**

**Comment:**

Property values of the city have and will continue to plummet with the ongoing noise, pollution and other hazards to the city.

**Response:**

Please see Topical Response TR-ES-1 regarding impacts to residential property values.

**PC02259-5**

**Comment:**

The members of the block club have timed the plane flights at various times of the day and evening. There are times when planes are crossing over the same residential areas every 2 1/2-4 minutes for hours with no pause.

**Response:**

Comment noted. Aircraft noise mitigation is described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise are provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provides mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02259-6**

**Comment:**

Recent homes in this area surrounded by the Great Western Forum, Daniel Freeman Hospital and the downtown area have sold for more than \$350,000.00. The values cannot and will not be maintained with the continual airplane traffic.

**Response:**

Please see Topical Response TR-ES-1 regarding impacts to residential property values.

**PC02259-7**

**Comment:**

How are the citizens, especially the children, affected from the pollution from more than 150 planes per day passing overhead?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft

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EIS/EIR. The human health risk assessment evaluated the potential adverse health effects associated with toxic air pollutants released by airport activities for the selected alternatives. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-3 regarding air pollution increase.

#### **PC02259-8**

**Comment:**

With the recent aircraft accidents, there is a great possibility that the entire city would be decimated by an attack similar to those occurring in Washington, DC and New York.

**Response:**

Comment noted.

#### **PC02259-9**

**Comment:**

Have these paths been selected because of their proximity to the airport or because of their proximity to predominantly minority neighborhoods? What value has been placed on the lives, livelihood, education and well-being of the citizens of Inglewood.

**Response:**

Regarding flight paths and concerns about effects on the City of Inglewood see the discussions under the headings "Historic Background" on page 4-405 and 4-406 and "Existing Conditions" on page 4-411 of Section 4.4.3, Environmental Justice, of the Draft EIS/EIR. Also please see Topical Response TR-N-3 regarding aircraft flight procedures, Topical Response TR-LU-1 regarding impacts on quality of life, and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02259-10**

**Comment:**

The trains run parallel to this flight pattern. Not only are the residents inundated with the noise and pollution from the trains, but there is a significantly increased chance of an accident with an airplane and a train.

**Response:**

Comment noted. Under Alternatives A, B, and C, the Green Line extension would be in an underground tunnel from a point east of Sepulveda all the way down Imperial Highway and into the basement of the west terminal complex. As a result, the possibility of an accident between an aircraft and a train would be highly unlikely. Under Alternative D, the Green Line would not be extended, but instead an Intermodal Transportation Center would be constructed nearby to serve passengers of the Green Line. In addition, please see Topical Response TR-SAF-1 regarding aviation safety.

#### **PC02259-11**

**Comment:**

This particular area has two major hospitals serving the great population of this city and surrounding areas. There are several schools in the direct flight path of the planes. There is seemingly little value placed upon the education and lives of the future of these youth. Your reconsideration for alternate flight patterns would prove beneficial to the City of Inglewood and in the future prove to have been the best choice.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts to sensitive uses in Section 4.2, Land Use, impacts to schools in Section 4.27, Schools, and human health

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and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, 3, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-3 regarding aircraft flight procedure.

**PC02260      Seyfarth, Gordon      None Provided      9/22/2001**

The content of this comment letter is identical to form letter PFQ; please refer to the response to form letter PFQ.

**PC02261      Galanter, Ruth      City of Los Angeles      9/20/2001**

The content of this comment letter is identical to comment letter PC00106; please refer to the response to comment letter PC00106.

**PC02262      Haythorn, J. Denny      None Provided      9/21/2001**

**PC02262-1**

**Comment:**

Thank you for your reminder. I sent a comment earlier in the summer and another today.

**Response:**

Comment noted.

**PC02263      No Author Identified,      None Provided**

**PC02263-1**

**Comment:**

I am strongly opposed to all the currently proposed concepts and believe the Draft EIR/EIS dramatically understates the impact of the proposed expansion plans. The proposed concepts are not well thought out and will have devastating impact on all areas around the airport.

**Response:**

Comment noted.

**PC02263-2**

**Comment:**

LAWA and LAX officials have a long history of ignoring the surrounding communities and continuing to build and expand their facilities with or with out approved Master Plans. Many of the mitigation efforts called for in this round of expansion plans are the same mitigation offered for previous expansions, but have never been implemented.

**Response:**

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

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#### **PC02263-3**

**Comment:**

The EIR/EIS does not accurately describe the full impacts we can expect in the surrounding communities because, I believe, it is based on false or flawed assumptions. The baseline or "no-build" option assumes that the maximum capacity of LAX as currently configured is approximately 78 MAP. I believe this to be an exaggeration of the true capacity and thus all of the other assumptions based on this number are incorrect. The existing approved Master Plan under which LAX is operating was adopted in 1980, it identifies LAX capacity as 40 MAP and states clearly that any additional capacity will be taken up by other facilities and specifically mentions Ontario and Palmdale. During the late 80's when LAX wanted to expand we in the community were told that the maximum capacity at that time was approximately 67 MAP. Now the EIR/EIS uses the 78 MAP as the assumed maximum capacity, but I find little to no justification or analysis in the EIR/EIS to support this number as the true maximum capacity. I attended a community meeting with the FAA at El Segundo High School a couple of years ago when representatives of the community asked the FAA officials repeatedly what the actual maximum capacity was at LAX. To our dismay FAA officials are either unwilling or unable to answer that question. I believe that there is in fact a study now being done by the FAA as to what is the actual maximum capacity of LAX. According to a press release in April, by Air Traffic Controllers and Pilots, LAX is at or very near maximum "safe" capacity now.

**Response:**

The content of this comment is essentially the same as PC00381-3; please see Response to Comment PC00381-3.

#### **PC02263-4**

**Comment:**

I believe the true discussion around capacity should be based on maximum operations per hour or per day. Capacity has little to do with the actual numbers of people that go through the terminals but is much more closely linked to the total numbers of planes that take off and land each hour. In the Executive Summary of the Draft EIR/EIS on page ES-8 we are provided with a chart that shows "Summary of Activity Comparison of Alternatives". This chart shows that in the baseline year 1996 Design Day Operations was at 2,235. It shows that the Concept C plan raises that number to 2319 and increase of 84 operations per day per. It also shows that under the "no plan" the operations will be about 2279 per day. So Concept C (the preferred plan of LAWA staff) would provide only an additional 40 operations per day over the "no project" plan. At the current rate of growth (see Table i-3.3 LAX Annual Aircraft Operations Forecast) the planned facilities under Concept C will be obsolete by the year 2005, long before the project is ever complete.

**Response:**

Comment noted. Please see Response to Comment PC00381-4 regarding capacity determinants in the Master Plan alternatives.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security.

#### **PC02263-5**

**Comment:**

In a Memorandum dated 1/31/01 from LAWA Environmental Affairs to the LAX Community Round Table it states that LAX Operations for 1996 were 763,866 for the year, or an average of about 2093 per day. And for 2000 the average was about 2200 operations a day. In the Master Plan Executive Summary, page 39, Section 4.2 Airside System it states "the number of peak hour operations that the system can handle is currently being experienced on a daily basis". If this is indeed the case then, how will capacity



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at LAX be able to grow from its current 67 MAP to 78 MAP under the "No Project" Plan? If they are at capacity now then the EIR/EIS should be comparing current levels of operation to the varying concepts not the imaginary 78 MAP. How do they plan to increase the numbers of operations to over 2300 per day without increasing the numbers of runways? Some how all these numbers just don't seem to add up. In short I don't believe their numbers.

**Response:**

The content of this comment is identical to Comment PC00381-5. Please see Response to Comment PC00381-5 regarding the growth in MAP of the Master Plan alternatives.

**PC02263-6**

**Comment:**

The mitigation proposals are completely inadequate and may never be completed. The proposed mitigation concepts of the "ring road", the people mover, and Green Line service to the terminals were all included in the traffic mitigation plans for the Master Plan approved back in 1980. Now LAWA is proposing the same mitigation for this round of expansion.

**Response:**

The improvements identified are actually part of the project, not mitigation measures as the commentor implies. The mitigation packages identified in Section 4.3.1.9 and 4.3.2.9 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR would mitigate most of the significant impacts. The mitigated levels of service were shown in Sections 4.3.1.10 and 4.3.2.10 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

**PC02263-7**

**Comment:**

The Master Plan offers no funding source for the proposed interchange at Arbor Vitae and the 405 or for the proposed "LAX Expressway" or any of the other off-airport improvements. LAWA is not allowed to spend federal dollars for off-airport improvements and recently SCAG has withdrawn support for both the Arbor Vitae interchange and the LAX Expressway in their transportation plan. Without those projects all traffic around LAX will become grid locked. There is currently no mechanism to assure that the proposed mitigation will ever be completed, so all proposed mitigation should be fully funded and built prior to allowing any further expansion at LAX.

**Response:**

Please see Response to Comment AL00008-6 regarding funding and Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02263-8**

**Comment:**

The Master Plan Concepts are poorly planned and do not fully explore all options available. Other than the numbers of runways the three proposed concepts are virtually the same. None of the proposals offer an alternative that will have less of an impact on the surrounding communities.

**Response:**

This comment is similar to comment PC00381-8; please see Response to Comment PC00381-8.

**PC02263-9**

**Comment:**

I do not believe for an instant that the true maximum capacity of LAX will be limited to 89 MAP under concept C. LAWA has a history of drastically understating the capacity at all of its airports. This serves

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the purpose of not having to fully mitigate the negative impacts or providing adequate facilities such as parking, which are based on passenger counts.

**Response:**

Comment noted. Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX and legal limits on the ability to control activity levels at airports. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02263-10**

**Comment:**

None of the concepts propose the use of remote off-airport terminals as have been developed at other airports and as is preferred by the FAA. All of the concepts propose development of a new large Western Terminal which then requires access to one of the most remote spots at the LAX site by millions of passengers a year.

**Response:**

The content of this comment is similar to Comment PC00381-10. Please see Response to Comment PC00381-10.

**PC02263-11**

**Comment:**

All of the concepts create a redundant internal circulation system that requires passengers to access the terminals through long and short term parking facilities, car rental facilities and Green line services at the new western terminal, only to be shuttled back to the east through the proposed people mover.

**Response:**

The plans provide direct access to the parking facilities. No excessive circulation would be needed. The access plans were discussed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR in Chapter 3, Alternatives.

**PC02263-12**

**Comment:**

All of the concepts provide for all future cargo demands to be accommodated at LAX, when much of the cargo demand could be diverted to Ontario Airport which is more conveniently located near freeway and rail facilities.

**Response:**

Please see Response to Comment PC00381-12 regarding cargo diversion to Ontario

**PC02263-13**

**Comment:**

All of the concepts call for lengthened runways in order to accommodate only one proposed type of airplane, the Airbus 380A. It is foolish to lengthen the runways just to accommodate this one airplane.

**Response:**

The content of this comment is identical to the comment PC00381-13. Please see Response to Comment PC00381-13.

#### PC02263-14

**Comment:**

All concepts call for the creation of a large freeway type interchange to be built at the Sepulveda Bl/Westcheter Parkway intersection, destroying a major section of Downtown Westchester.

**Response:**

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### PC02263-15

**Comment:**

The commercial developments along Sepulveda are just finally starting to return after years of recover from the last expansion.

**Response:**

The Supplement to the Draft EIS/EIR provided additional discussion beyond that presented in the Draft EIS/EIR of potential acquisition effects on the Westchester Business District. As described in Section 4.2, Land Use (subsections 4.2.6.2 through 4.2.6.4), acquisition within the Westchester Business District would be about 16 acres or 31 percent of the District under Alternative A, about 11 acres or 21 percent under Alternative B, or approximately 13 acres or 26 percent of the District under Alternative C. Under Alternatives A through C, relocation opportunities would be available for some uses nearby within Westchester Southside. Also, many of the uses that would be acquired are airport related and a number of the community related uses that would be acquired (a bank, an office supply store, a bar and beauty shop) would still remain available through similar businesses that are located in close proximity within the Westchester Business District.

Also, as described in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any acquisition within the Westchester Business District. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### PC02263-16

**Comment:**

All concepts will have a "significant and unavoidable" noise impact on the population of at least 7000 and an additional 5000 who are already impacted would suffer additionally higher noise levels. LAWA has just recently started a soundproofing program for residence for mitigation for expansions that happened 20-30 years ago. Will it take an additional 20 years to "mitigate" the noise impacts from this expansion? Will it ever even happen?

**Response:**

The content of this comment is identical to comment PC00381-16; please refer to Response to Comment PC00381-6.

#### PC02263-17

**Comment:**

Parking allowances are inadequate as proposed in all concepts. The existing Master Plan adopted in 1980 required 750 parking spaces for each 1 million passengers or about 30,000 spaces for 40 MAP. This translates to about 1 parking spaces for every 1300 passengers at the airport. Currently there are approximately 42,000 parking spaces for the public and employees or about 1 parking space for every 1600 passengers according to Table 3 of Chapter 3 - Alternatives of the EIR/EIS. Under Concept C there will only be 54,000 spaces or 1 space for every 1650 passengers. So under this Master Plan, LAX would increase passenger capacity by 225% but only increase parking capacity by 180%. This is

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not quite so bad if you believe these numbers, but I'm not sure you can. If you look at Table II-6.2 in Chapter 2 of the Master Plan document, it shows that currently there are only about 21,000 public parking spaces. Table II-6.3 shows approx. 6700 employee parking spaces. This would mean there are currently only about 27,700 parking spaces, not even the number required to meet the 40 MAP. Table II-6.2 does say there are an additional 7,000 - 9,000 spaces at privately operated parking lots, but assuming the full 9,000 are available they are still short of the 42,000 identified in the EIR/EIS. Not only that, but the privately operated parking facilities could be removed from service at the owners discretion and should not be counted toward total "required" parking numbers.

**Response:**

Please see Response to Comment PC00381-17.

**PC02263-18**

**Comment:**

There are many more examples of poor planning and questionable numbers and assumptions, but I do not have millions of dollars to pay consultants, years of time to prepare, and 12,000 pages of paper to fill with fancy charts and graphs, in order to comment on all the flaws of these documents. The bottom line is that LAWA has a long history of broken promises, uncompleted mitigation plans for past expansions, and dishonest projections of future growth. They should not be allowed to continue with business as usual.

**Response:**

Comment noted. This comment is identical to PC00381-18. Please see Response to Comment PC00381-18.

**PC02263-19**

**Comment:**

There can be no doubt that some remodel or renovation of existing facilities within existing airport boundaries could provide some greater efficiencies and allow for some increased capacity, but LAWA should focus on truly long term regional solutions. Even if LAX is allowed to grow to its fullest extent under Concept C it will again be undersized and in need of expansion by the time the construction is finished in 2015. Then the people living in the surrounding communities will be faced again with more expansion and land acquisitions. This is already the third major expansion I have lived through, the first was back in the 70's when LADOA promised that "all future expansion" will occur in Palmdale, the second was during the 80's when again we were told 40 MAP is it, all future expansion will be accommodated at Palmdale and Ontario. Will my daughter be fighting the next expansion in 2020 and hearing LAWA promise that all future expansion will be at Palmdale? LAX can not continue to carry the air traffic burden for all of Southern California.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02264      No Author Identified, None Provided**

The content of this comment letter is identical to comment letter PC01975; please refer to the responses to comment letter PC01975.

**PC02265      Hyra, J.                      None Provided                      6/30/2001**

**PC02265-1**

**Comment:**

No to LAX expansion! A regional airport solution is the only way to handle the projected increase in passengers and freight in the coming years. The cities of Westchester, Playa del Rey, Inglewood, and El Segundo have suffered enough with LAX noise, pollution, and traffic. Other areas of Southern California have to do their fair share.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. In addition, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02266      Hyra, J.                      None Provided                      7/21/2001**

**PC02266-1**

**Comment:**

Regional airports are the only economical, fair, and logistic answer to the increase in freight and traffic throughout the Southern California area. No to LAX expansion!

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. In addition, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02267      Hyra, J.                      None Provided                      8/11/2001**

**PC02267-1**

**Comment:**

Our family opposes any incremental expansion of LAX. We say "yes" to regional airports.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. In addition, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02268      Hyra, J.                      None Provided                      8/18/2001**

**PC02268-1**

**Comment:**

Our family is afraid of the incremental expansion of LAX. We are also afraid that all the concern over airport safety is just another reason to expand. Our Southern California area needs regional airports, not just LAX.

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**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. In addition, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please also see Topical Response TR-SAF-1 regarding runway incursions at LAX. As indicated in Topical Response TR-SAF-1, the primary purpose for modifying the airfield under each of the Master Plan build alternatives is to develop a physical solution that will greatly reduce the risk of runway incursions.

**PC02269 Allison, Ty None Provided**

**PC02269-1**

**Comment:**

We live in Venice under the flight takeoff path for Santa Monica Airport. The increase in jet traffic from this very small airport is seriously damaging and polluting this community.

This is a unique airport.

It is a very small airport with dense residential neighborhoods running right to the edge of both the landing and takeoff paths.

Its proximity to LAX and high powered businesses and entertainment related businesses in Los Angeles has brought a significant increase in jet traffic and neighborhood that was never designed for this.

The rise in fractional jet traffic and easy to charter private jets has affected this neighborhood terribly.

The FAA negotiated with the airport for noise levels 17 years ago.

In the development of private jets that is an eternity.

The city of Santa Monica is not only incapable of creating a noise enforcement plan that will protect this community but tends to do little or nothing for fear of being sued.

The noise levels are incredible.

Not only is it way too high to begin with, but private jets continuously violate this level with little consequence.

It is time for you to get involved in this serious problem.

**Response:**

Comment noted.

**PC02270 Grino, Orlando None Provided 8/19/2001**

**PC02270-1**

**Comment:**

I am a resident of Westchester and worked for 35 years at LAX, I have seen many expansion and renovations and again an Airport Commission under a so called Master Plan calling for another radical EXPANSION.

**Response:**

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

**PC02270-2****Comment:**

Previous studies by the Airport commission conclude that because a grossly underestimated traffic, the Airport will require constants renovations and expansions to alleviated constant traffic increases.

**Response:**

Comment noted.

**PC02270-3****Comment:**

Amount many studies presented to the Airport Commission, one suggested solution but opposed by the Air Lines and Associated businesses, that is develop and improve existing infrastructure to other Airports near LAX (El Toro, Ontario, Long Beach, March AF) in order to absorb commuters, short & medium range flights. Of all possible solutions suggested the one with the least impact to the communities and the taxpayers seems to be move traffic OUT of LAX to others Airports

Consequently only domestic long range and Internationals flights will be allocated to LAX.

**Response:**

Comment noted. Neither the FAA nor LAWA have the authority to direct airlines to use one airport in favor of another airport. The Airline Deregulation Act of 1978, as amended, ended federal, state, and local governments role in determining the location for air service by airlines. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02270-4****Comment:**

I beg your support in a NO vote to STOP LAX Expansion

**Response:**

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

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**PC02271      Hill, Jr., Norman      None Provided      8/20/2001**

**PC02271-1**

**Comment:**

Comments: I would like to stress to the city, county, and state government the importance of relieving the already too crowded road ways and also, "Airways". LAX is overcrowded and should not be expanded any more for the sake of safety and for the freeway and transportation problems. Palmdale is a diamond in the rough. I am sure that the flights that have been proposed into Palmdale airport will be easily self sustaining and will relieve a necessary amount of traffic, both air and ground. I travel about three weeks a month, and I have to drive to Burbank or Ontario, (both an hour from Palmdale), in order to catch a flight to work. Any traffic removed from the LA basin and San Fernando Valley areas has got to be a necessity, not an option. I personally will use the Palmdale Air Terminal for at least two flights a week on an all year basis. Please make the right choice for the people of Los Angeles, continue to make regional reliever airports of good quality and safety and keep our commerce going strong. The Antelope Valley could use the traffic and the commerce generated by this new terminal.

**Response:**

Palmdale's remote location and limited local passenger market have made it difficult for airlines to maintain air service at the airport despite past subsidies by LAWA. Palmdale's only air service in the past consisted of commuter operations into LAX. About 19,000 passengers used the airport in 1997. In early 1998, the sole airline providing service at Palmdale ceased operations. Currently, Palmdale has no scheduled air service. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02272      Shapiro, Jan      None Provided**

**PC02272-1**

**Comment:**

THESE MANY MONTHS I HAVE WRITTEN, ATTENDED MEETINGS AND SPOKEN ABOUT THE ENORMOUS INCREASE IN NOISY AIRCRAFT ROARING OVER OUR HOMES - UNRELENTING, WITHOUT ESCAPE - BUT THE THE ISSUE ACTUALLY GOES BEYOND THAT. THE TOO FEW PLACES IN THE VALLEY THAT HAVE BEEN SET ASIDE FOR US AS SANCTUARIES DO NOT PROVIDE US WITH IT'S PROMISE - LAKE BALBOA - FOR WALKERS AND JOGGERS, FOR FISHERMEN AND PICNICERS AND CHILDREN - WOODLEY PARK - A HEAVEN FOR BIRDERS AND A MOST RECOGNIZED BIRD MIGRATION STOP OVER THAT HAS THE "SECOND LARGEST VARIETY OF BIRDS ON THIS CONTINENT" - HIKING PATHS THRU THE MOST BEAUTIFUL WOODED AREAS IN THE VALLEY - ALL WANTING. WANTING FOR SOME MEASURED OR RESTRAINED DEGREE OF QUIETNESS THAT WE NEED AND HAVE THE RIGHT TO. THE CITY HAS FINALLY PROVIDED THE VALLEY WITH LOVELY SPACES TO FUNCTION WITH NATURE. DO WE NOW HAVE THE RIGHT TO EXSPECT A MEASURED OR RESTRAINED DEGREE OF QUIET ALONG WITH IT? I BELIEVE WE DO.

"THE ENTIRE VALLEY," IS NOT NOISE SENSITIVE AS DECLARED BY THOSE WHO WOULD DISPARAGE OUR PERSUIT OF NOISE ABATEMENT. SOME AREAS ARE MORE SENSITIVE THAN OTHERS AND THEY DESERVE A NOISE SENSITIVE DESIGNATION. LOOK AT THE MAP!

NOT ONLY ARE JUST NOISY JETS AND HELICOPTERS THE NOISE MITIGATION ISSUE THAT WE ALL KNOW, BUT THE SHEER INCREASE IN THE NUMBER OF HELICOPTERS WHETHER THEY BE MEDIA OR TOUR (AND FIXED WING SIGHTSEEING FLITES NO LESS) HAS GONE FAR BEYOND THE BRINK OF EXCESS. WHAT WILL BE DONE TO REDUCE THIS EVER INCREASING IMPACT OF NOISE ON RESIDENTS?

I BELIEVE THIS STEERING COMMITTEE PART 150 SHOULD BE EXPLORING AND EVALUATING, EVEN MORE THAN THEY HAVE, ALL POSSIBLE NOISE MITIGATION RECCOMMENDATIONS (MEETING MONDAY JULY 16, 2001) WITH AN EYE AND A HEART TO RESTORING CONFIDENCE



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IN THIS VALLEY THAT THEY CARE ABOUT OUR QUALITY OF LIFE AND THAT EVERYBODY HAS BEEN GIVEN A FAIR AND PRINCIPLED AND UNCORRUPTED SHAKE. IT IS POSSIBLE.

**Response:**

Comment noted. Noise impacts are addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR.

**PC02273**

**Jones, Donald**

**None Provided**

**7/18/2001**

**PC02273-1**

**Comment:**

This is a copy of my EIR/EIS presentation made before the R.P.V. Council last night. I have asked them to include my comments in their letter to LAWA opposing the expansion. I also read in the Daily Breeze today LA Mayor James Hahn has requested an extension beyond the July 25 deadline for other communities to comment on the expansion and LAWA has immediately granted the extension and set forth other sites for public comment. I hope that this time a better community response will be the case. In the meantime we must continue pressuring the Mayor to honor his pre-election promise of no expansion at LAX while others are trying to get him to do otherwise.

Maybe there is some light at the end of the tunnel...if so I hope it is an Amtrak train carrying passengers from the Palmdale Airport to LA.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02273-2**

**Comment:**

We urge you to send a letter responding to the EIR/EIS proposed expansion of LAX citing objections and concerns this expansion will have effecting residents in Rancho Palos Verdes and surrounding communities.

**Response:**

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

**PC02273-3**

**Comment:**

We have been impacted with noisy turboprop aircraft the FAA had promised to mitigate in 1999 by routing them around the Peninsula. Yet so far this has not happened. After promising they reneged. They stated there was no additional room to route them around the Peninsula because the available airspace was being occupied by jet aircraft leaving LAX.

**Response:**

Please see Topical Response TR-N-3 regarding aircraft flight procedures and in particular TR-N-3.1.

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#### PC02273-4

**Comment:**

Expansion surely will bring more flights routed over the Peninsula at low altitudes. If the FAA truly does not have airspace available over the ocean routes leaving LAX where will they route them if LAX is allowed to expand?

**Response:**

Comment noted. The Master Plan alternatives are all considered constrained alternatives because none of them have sufficient runway capacity to meet the forecast demand. Alternative C would include 44 additional daily operations. The additional operations would consist of cargo operations scheduled during off peak hours. The number of hourly operations in Alternative C does not exceed the existing peak hour activity, therefore additional routes will not be needed to serve its activity.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security. Sufficient airspace is available to accommodate the forecast volume of operations.

#### PC02273-5

**Comment:**

The flights if LAX is allowed to expand concern us from a health, safety, and noise standpoint. We are not only concerned about increased passenger travel but also the large amount of cargo flights.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, and 4.2, Land Use, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, 3, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-MP-1 regarding air cargo activity and demand. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02273-6

**Comment:**

This last winter large Jumbo Jet 747's were routed over the Peninsula by the LAX tower controllers under certain so called "weather conditions." This set precedence since it had not been done before. With the LAX expansion plan will we have to tolerate more of this kind of late night noise from planes leaving LAX under various scenarios?

**Response:**

The commentor may be affected by easterly takeoffs circling back to the west on their departures to Asia. As a mitigation measure, LAWA will pursue Federal approval of a restriction to alleviate that situation by prohibiting takeoffs and landings to the east of the airport when over-ocean procedures are in effect between midnight and 6:30 a.m. During a recent 18 month period, 82 jets departed to the east when over-ocean procedures were in effect, an average of about one per week. As noted by the noise abatement procedures delineated in Topical Response TR-N-7, exceptions to the over-ocean procedures are available when weather or wind conditions require east traffic flow. Please see Topical Response TR-N-3 regarding aircraft flight procedures, in particular Subtopical Response TR-N-3.1 regarding flight routes relative to areas of the South Bay. Additionally, for east flow operations at night, please see Topical Response TR-N-5, in particular Subtopical Response TR-N-5.2.

**PC02273-7****Comment:**

We suggest a regional expansion solution is a better option. The points you might consider in your response to the LAX EIR/EIS are as follows:

**Response:**

Comment noted. Please see Responses to Comments PC02273-8 through PC02273-16 below. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02273-8****Comment:**

1. Regional Airport Expansion Needed; Aviation needs of the region can be better met if airport capacity is expanded by considering other airport sites.

**Response:**

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

**PC02273-9****Comment:**

2. Congestion; In 1997 LAX drew 7 MAP from outside its 60-minute access zone including many who lived closer to other airports in the Region. Dependence on LAX has increased traffic congestion.

**Response:**

Comment noted. Please see Response to Comment AL00043-3.

**PC02273-10****Comment:**

3. Dangerous Overcrowding; LAX is the world's third busiest airport, but its 3,500 acres makes it one of the smallest major international airports in size in this nation. Denver has 35,000 acres to handle less aviation.

**Response:**

The content of this comment is identical to the comment AL00043-4. Please see Response to Comment AL00043-4.

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#### PC02273-11

**Comment:**

4. Air Pollution;  
LAX is already the largest stationary source of air pollution in Los Angeles and its expansion would worsen air pollution. Under current LAX expansion plans the number of tons of Nitrogen oxide (NOx) emitted would increase from 5,943 tons in 1999 to an estimated 9,044 tons by 2025.

**Response:**

Comment noted. Please see Responses to Comments AL00043-6 and AL00043-7.

#### PC02273-12

**Comment:**

5. Noise;  
LAX expansion calls for lengthening a runway from 7,000 to 12,000 feet Eastward. This would push the current noise footprint from landing planes eastward into more communities. About 31,000 homes and 36 schools near LAX currently suffer from noise exceeding 65 decibel noise level at which the FAA has determined a substantial portion of the community will be adversely affected.

**Response:**

The content of this comment is essentially the same as comment AL00043-9; please refer to Response to Comment AL00043-9.

#### PC02273-13

**Comment:**

6. "Environmental Justice";  
Minority and low in-come communities already suffer adverse effects from heavy usage of LAX. According to LAX's own draft environmental impact report, "projected future increases in aviation activity at LAX would have a disproportionate impact on minority and low-income communities East of LAX under all the proposed building alternatives."

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental justice in Section 4.4.3, Environmental Justice, with supporting technical data and analyses provided in Appendix F of the Draft EIS/EIR and Appendix S-D of the Supplement to the Draft EIS/EIR.

#### PC02273-14

**Comment:**

7. Public Safety;  
LAX has been averaging 11 incursions (near misses) a year during the past three years, which is seven more than the number considered acceptable by the FAA. More flights at LAX would further endanger safety.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

#### PC02273-15

**Comment:**

8. A Federal Issue;

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LAX is not Federally owned nor operated, but several of the above excesses are in the FAA's jurisdiction and clear Congressional intent is involved.

**Response:**

Comment noted. The City of Los Angeles owns and operates LAX. The FAA's role in this process is to ensure the safe and efficient use of navigable airspace in the United States.

**PC02273-16**

**Comment:**

9. Carriers; Carriers will continue to force themselves into LAX in spite of Inter-governmental consequences until they must accept Regional airport expansion.

**Response:**

Since passage of the federal Airline Deregulation Act of 1978, the airlines make the decision about which airports they will serve. As a general rule, airlines will choose to serve the airports near the highest concentrations of conveniently located customers. Within this general framework, however, airlines must make strategic decisions about air service to maximize their investments and gain competitive advantages. For instance, in regions with multiple airports, airlines tend to concentrate their air service at a single, well-located primary airport for reasons of economic efficiency. Concentrating service at a dominant airport also facilitates connecting service, which can significantly increase an airline's market and allow even greater frequencies to more destinations. The airlines will provide service where passenger demand and adequate airport facilities exist. Please see Topical Response TR-RC-2 regarding the role of deregulation in aviation planning for a discussion of airline response to market demand, deregulation, and airport pricing models, and Topical Response TR-RC-5 regarding the role of airline economics in shifting operations to regional airports.

**PC02273-17**

**Comment:**

Portions of my comments were borrowed from a letter I received from Los Angeles County Supervisor Don Knabe and I present them tonight with his permission.

In conclusion we hope your letter to LAWA regarding this proposed expansion will express the City of Rancho Palos Verdes and its residents, views, concerns and questions.

**Response:**

Comment noted.

**PC02274**

**Kimura, Mark**

**None Provided**

**6/28/2001**

**PC02274-1**

**Comment:**

I am writing to express my vehement objection to the proposed expansion of LAX onto Pershing Drive.

**Response:**

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

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#### PC02274-2

**Comment:**

As you know, Playa Del Rey is a small and quiet community except for the noise emanating from LAX. The noise levels reaching our community from LAX are already so overwhelming that you cannot carry on a normal conversation if you are outside and there is a plane taking off. Fortunately, the airports soundproofing program has alleviated this problem while inside. The expansion of the airport only promises to make this worse.

**Response:**

Please see Topical Response TR-LU-4 for a discussion of outdoor noise levels, Topical Response TR-LU-5 regarding thresholds used to identify significant noise levels that would result from development of the build alternatives and mitigation measures that would reduce exposure of noise-sensitive uses to high noise levels. Also, see Topical Response TR-LU-3 for a description of the residential soundproofing program and how this program would be revised under the LAX Master Plan. Regarding noise levels increasing in Playa Del Rey, as shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S4.2-2 of the Supplement to the Draft EIS/EIR, noise levels continue to decrease over time over the Playa del Rey area. However, as shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR, under 1996 baseline conditions some areas of Playa del Rey are exposed to significant high single event noise levels (shown as the 94 dBA SEL) that are currently outside the residential sound insulation or ANMP boundary (defined as the 1992 fourth quarter 65 CNEL noise contour). Under the LAX Master Plan, the ANMP boundary would be revised to include those areas exposed to the 94 dBA SEL and outside the current ANMP boundary. For more information on noise impacts on Playa del Rey, see Response to Comment PC00499-1.

#### PC02274-3

**Comment:**

In addition the expansion onto Pershing Drive will surely increase the traffic through Playa Del Rey and figures to reduce the entry points to the neighborhood which are already few. In conjunction with the construction of Playa Vista, I can only imagine the congestion nightmares.

**Response:**

The plan is designed to restrict access to Pershing Drive for only residents of Playa Del Rey. This restriction is intended to keep non-residential traffic off of the local streets. See also Response to Comment PC01086-4 regarding the future Pershing Drive access to the west.

#### PC02274-4

**Comment:**

I hope that you will join me and the entire community in opposing these plans and preserve Playa Del Rey's current, if imperfect, way of life.

**Response:**

Comment noted.

#### PC02275

**Stumpell, Kent**

**None Provided**

**8/7/2001**

#### PC02275-1

**Comment:**

I strongly object to the findings of the LAX Masterplan EIR for the following reasons:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02275-2**

**Comment:**

The plan fails to adequately examine alternatives for regional travel. The scenarios proposed by LAWA do not adequately consider alternative travel modes for meeting regional high speed travel needs. Much like Southern California's over-dependence on private automobiles for local travel, providing only one travel choice for high-speed regional travel - commercial airlines - gives travelers no options, creates severe environmental impacts, has inherent safety challenges and leaves the region vulnerable to problems caused by service disruptions.

The EIR's determination that alternate modes of transportation, including high speed rail, are not considered feasible or practical and were thus rejected from consideration is based on insufficient study of the impacts, benefits and trade-offs that should be addressed.

The plan fails to compare the environmental impacts of expanded air traffic to those of other high-speed travel alternatives, such as high-speed rail. The expansion of air traffic operations at LAX cannot be fairly considered without a much more thorough examination of all options for meeting our long-term, regional high-speed travel needs. The role of various forms of rail transportation must be compared and considered for their ability to support regional travel needs. Rail has a much different set of land use and environmental impacts, quite possibly with far less impact than aviation.

While non-regional long-distance travel - over 500 miles or so - may be best served by aviation, high-speed rail has the ability, amply demonstrated in other countries, to provide transport to many California and Southwestern cities that is sufficiently rapid and possibly more convenient than air travel.

Advantages of high-speed rail (HSR) over aviation for regional rapid transit include:

- Rail access is decentralized so that multiple stations, rather than one very large airport, provide dispersed places for passengers to access the carrier. This reduces the need and concentration of ground traffic for rail stations compared to airports.

- The land use impact of rail consumes far less area than a large central airport. The "footprint" of impacted land surrounding a major airport is far in excess of that for rail, even considering the entire track length adjacent to urban areas.

- Energy consumed, per passenger, for HSR is less than for air travel.

- High speed rail is powered by electricity, which has no air emissions at the train and can be generated from a variety of energy sources. Aviation is totally dependent on a single, pollution-prone, non-renewable energy source: jet fuel.

- High speed rail has fewer safety challenges when compared to aviation. Due to the severe safety concerns of being airborne, air travel must always incorporate elaborate safety precautions and procedures. These include: time-consuming boarding protocols, safety instruction for passengers, limitations on baggage, restrictions on in-flight passenger movement and activities, multiple backups of key equipment, extremely costly air control systems and expensive insurance costs.

By contrast, rail operations allow much faster multiple-entrance boarding, the ability to carry more luggage, freedom of passengers to move within the entire train at all times, and much simpler control and safety equipment. When a loss of propulsion does not imply imminent disaster, as it does for aviation, comparative safety is enhanced.

NONE of the above advantages are evaluated in the EIR for their comparative benefits over aviation in meeting our regional transportation needs.

The Master Plan briefly examines high-speed rail in Ch. 1 section 4.3.4, noting several significant benefits, which it ultimately dismisses. It finds that travel to several regional cities could be served by HSR competitively to air travel. Indeed, five cities, San Francisco, Sacramento, Oakland, San Jose and Las Vegas alone currently comprise over 31% of the domestic air traffic volume at LAX, or approx. 15

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MAP. According to the California High Speed Rail Authority, HSR is expected to be competitive with air travel for these markets. Travel cost for HSR is predicted to be 40% that of air travel. And travel time is expected to take one hour between LA and San Diego, and two and a half hours between LA and SF, door to door.

In considering the viability of high speed rail, the EIR observes that its development is many years off and then goes on to say that aviation is the fastest growing mode of travel. This is an inadequate basis for rejecting the many benefits of HSR.

When planning for long-term transportation needs, we cannot simply acquiesce to trends. Merely because a mode of travel is growing fast does not mean that this will result in a desirable outcome for our society. The many negative impacts associated with aviation travel require that we aggressively explore alternatives for high-speed regional travel. When all the negative impacts associated with aviation are factored in, there could be clear advantages to alternatives. The final EIR must fully explore these in order to provide the information needed to make a sound decision.

**Response:**

Please see Response to Comment PC01460-6.

**PC02275-3**

**Comment:**

The EIR does not consider the benefits of reducing operations at LAX from existing levels.

LAX already places an inordinate burden on communities surrounding it. The EIR must examine alternatives that are designed to mitigate the already-excessive negative impacts of LAX operations, not just options that will only worsen existing impacts. The benefits and value that could result from implementing alternatives to expansion must be fully analyzed. Improvements in quality of life, increased property values, improvements in mobility, enhanced value of commercial areas and outdoor resources, plus public health improvements are too valuable to ignore.

**Response:**

This comment is identical to comment PC01460-2; please see Response to Comment PC01460-2.

**PC02275-4**

**Comment:**

The EIR fails to adequately assess the impact that ground traffic expansion plans, required to support air traffic expansion, would have on surrounding communities.

For years, the communities surrounding LAX have experienced severe traffic congestion largely due to airport-related ground traffic. Arterials that could comfortably handle regional travel patterns are overwhelmed by traffic bound for LAX. Numerous intersections are already at level of service E and F during peak hours. It will not be possible to accommodate the substantial addition of ground traffic caused by LAX expansion without road improvement on a scale that would bring severe degradation to already-impacted streetscapes.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-2 regarding surface transportation analysis methodology.



**PC02275-5**

**Comment:**

Additional ground traffic created by the proposed expansion would create substantial negative impacts on surrounding communities, including:

- Road widening projects that would necessitate the loss of sidewalk space and the removal of street trees and landscaped medians.
- Degradation of the vitality of several commercial/retail districts located on key arterials.
- Negatively impact the viability of existing businesses.
- Discourage the establishment of needed new businesses.
- Degradation of retail areas would force residents, employees and visitors to drive outside of the community for many of their needs, further aggravating traffic congestion.

The EIR fails to adequately consider these impacts.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed effects on businesses due to acquisition in Section 4.4.2, Relocation of Residences and Businesses; impacts on visual quality in Section 4.21, Design, Art, and Architecture Application/Aesthetics; effects on land use and community serving uses in Section 4.2, Land Use, and Section 4.4.4, Community Disruption and Alteration of Surface Transportation Patterns; and traffic impacts in Section 4.3, Surface Transportation. Also see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02275-6**

**Comment:**

The EIR fails to adequately assess the full cost of degraded property values. Prevailing property values in Westchester, El Segundo, Inglewood and other communities surrounding LAX are already closely related to the degree that they are impacted by airport operations. Basically, the closer real estate is to the airport, a flight path or a congested road, the less value that property enjoys compared to similar parcels that are impacted less. Additional flights and ground traffic would directly result in further loss of property value. The cumulative losses would be huge. Homeowners and businesses have invested in the area based on existing conditions, not anticipating an expanded airport. To fairly compensate them for losses directly related to airport expansion would require the acquisition of property on a scale that is unheard of and clearly uneconomical when compared to shifting air traffic growth to outlying airports. The EIR does not address these issues.

**Response:**

This comment is essentially the same as Comment PC01460-5; please see Response to Comment PC01460-5. Also see Topical Response TR-ES-1 regarding the impacts on residential property values

**PC02276**

**Sauer, Paul**

**None Provided**

**8/18/2001**

**PC02276-1**

**Comment:**

I would like to ask you to hold on your pledge to withdraw the proposed LAX Master (Expansion) Plan in favor of development of other airports. That was one of the main reasons we voted for you. Please do not disappoint us.

**Response:**

Please see Response to Comment PC00578-1 regarding the development of Alternative D, Enhanced Safety and Security Plan, which was developed at the direction of Mayor James Hahn.

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#### **PC02276-2**

**Comment:**

We have lived in Westchester for over a decade. Over the years we have seen more and more traffic in our neighborhood, heard more and more noise and have inhaled more and more polluted air from both the bigger airplanes and from more the cars coming to and from the airport.

**Response:**

Comment noted.

#### **PC02276-3**

**Comment:**

We have had a more than a fair share of auto emissions, emissions from idling planes and jet fuel emissions. Now, more than in the past, the increased ground and air traffic will result in increased emissions of all five EPA classified major air pollutants, chemicals affecting respiratory system and causing cancer.

Our neighbors next to us lived in their home for more than 40 years. The husband died from cancer ten years ago, his wife Ivy followed him just last year. Our neighbor across the street, also living his whole life in the same place, died of cancer 4 years ago...

We are not blaming anybody for their death, we are not suing anybody, we are just a little scared what will happen to our children that have been growing in this neighborhood, playing in the backyards, swimming in our pool, eating the fruit from our trees.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-1 regarding air pollutant deposition, Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02276-4**

**Comment:**

We need long term planning and we need a regional solution, not the Master Plan for LAX. But, first of all, we need somebody who will listen and defend us, common people living in this area.

**Response:**

Chapter 1, Regional Context, of the Draft EIS/EIR, Chapter 2, Purpose and Need for the Proposed Action, of the Supplement to the Draft EIS/EIR, and Topical Response TR-RC-1 provide discussion regarding the role of the LAX Master Plan in meeting regional demand. Please note that the city of Los Angeles can make decisions to further develop only LAX, Ontario International, Van Nuys Airport, and Palmdale Regional Airport. The city has no authority to make decisions to further develop other area airports it does not own or operate.

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**PC02277      Keary, Thomas      None Provided      7/5/2001**

**PC02277-1**

**Comment:**

"Draft Master Plan": "NO LAX"

Is flawed due to constricted site, selection "LAX" only. The master plan does not include mitigation for dense population planning especially! Development parallel to Lincoln Hwy #1 & percent high density construction & further heavy traffic would be forced on to Manchester & 83rd Street.

**Response:**

Protecting neighborhoods is one of the four principles guiding the development of the Ground Access Plan. The Neighborhood Protection program is summarized in Topical Response TR-ST-2 (subsection 7.3.4) which addresses surface transportation analysis methodology.

**PC02277-2**

**Comment:**

Draft EIS/EIR

"Unsafe" primarily due Air Navigation Equipment is inadequate "virtually obsolete" to handle increase in type of aircraft being developed, when new "NAV AIDS developed"? They will not work well & is a very unsafe environment for passengers as well as property owners.

**Response:**

Navigational aids at LAX are subject to the requirements and inspection of the FAA and the ongoing effective operation of that equipment both today and in the future, for any of the alternatives, will be maintained.

**PC02278      Wood, Linda      None Provided      7/19/2001**

The content of this comment letter is identical to comment letter PC01678; please refer to the responses to comment letter PC01678.

**PC02279      Berghammer, Arich      West Hollywood Chamber of Commerce      7/24/2001**

The content of this comment letter is identical to comment letter PC01861; please refer to the responses to comment letter PC01861.

**PC02280      Bobrow, Warren      None Provided      6/10/2001**

**PC02280-1**

**Comment:**

I am writing this in response to the draft environmental impact statement/ environmental impact report (EIR/EIS) regarding the expansion of Los Angeles International Airport (LAX). I believe that the needs of the airlines and not those of the people in Los Angeles drive the entire project. The report is based on many rosy and faulty assumptions that will lead to more noise and traffic in the local area than the EIR/EIS admits to. Finally, the plans outlined do nothing to address the regional travel issues in

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Southern California. Rather, it represents a band-aid approach. In sum, I strongly urge you to reject the LAX expansion plans outright and choose the No Action/No Project Alternative.

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02280-2**

**Comment:**

In reading the EIS/EIR one thing becomes clear: LAWA and the FAA are more concerned about airlines profits than the quality of life of people in Los Angeles. Just because the airlines want to fly more into LAX does not mean that they have the right to. The airlines' legitimate desire and ability to make a profit must be balanced with the rights of the people who live in the LAX area. We have a free-market economy of supply and demand. If LAX demand exceeds the projected supply then the airlines can make their money at the under utilized airports in the region, such as Ontario and Palmdale. The citizens of Los Angeles should not have to sacrifice their quality of life to expand LAX when the airlines have existing alternatives. If LAWA and the FAA were truly concerned about the citizens of Los Angeles (note that all of the supporters of the expansion plan listed on the LAWA only includes groups that will profit from the plan and not any citizen groups) they would have supported!

! the No Action/No Project Alternative that tells the airlines that LAX is "full" and the airlines will have to change their schedules (e.g., more flights in/out of Ontario, Long Beach, Palmdale, SFO, etc.). Table 1-10 in the report shows that the percentage of airport use will go down in LA County, but rise in Orange and Riverside counties. Doesn't it make sense (for the City and the airlines) to increase capacity where the demand is rather than at LAX?

**Response:**

Please see Response to Comment PC00298-2 regarding airline market demand and deregulation.

**PC02280-3**

**Comment:**

The report seems to think that if LAX doesn't expand that the Southern California economy will wilt away. This is clearly preposterous. However, after this assumption is accepted, then it is easy for the FAA and LAWA to insist that the airlines have the right to use LAX to meet their needs, then the expansion plan becomes a fait accompli. All LAWA has done in this document is provide a set of false choices as to how the people living near LAX have to take their medicine.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR was that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmentally Superior alternative and would have the least negative impacts to the communities and the region.

**PC02280-4****Comment:**

Of these false choices the report suggests that Alternative C is the best one. However, it is based on the overly optimistic projection that only 5% more aircraft will be needed to service 40% more passengers. One example of how this assumption is clearly absurd when one considers how many 737 aircraft are used by Southwest and Shuttle by United. Their business models (quick turnarounds, standard maintenance, etc.) rest on being able to use an entire fleet these (or similar) aircraft. I doubt that they will replace so many aircraft with larger ones in such a short period of time to handle more passengers with the same number of planes. The reality is that they will fly more of the same sized planes if given the gate space, hence increasing the number of takeoffs and landings. Basic algebra and economics tells you that the percentage of new generation planes designed for transcontinental flight will not be enough to offset the increase in passengers LAWA wants to fit into!

the airport. A more than 5% increase will be required.

**Response:**

The content of this comment is identical to comment PC00298-4. Please see Response to Comment PC00298-4.

**PC02280-5****Comment:**

Even if we take LAWA's recommendation, the EIR/EIS says, "However, by 2015, the lowest total exposure levels would be achieved by the No Action/No Project Alternative followed by either Alternative A or C." So, even by LAWA's estimates, even the "best" alternative will have negative effects on the surrounding areas. Imagine the negative effects if the projections of the number of flights are wrong! It is not as if the airport will be contracted to fit the noise and pollution estimates. Once the expansion is built those in the LAX area will have to live with the consequences. Why do these need to have their quality of life compromised so the airlines can make more money?

**Response:**

Please see Response to Comment PC00298-8.

**PC02280-6****Comment:**

Also, many of the supposed noise reductions are based on the phasing out of noisier jets, What's the point of making planes quieter if LAWA wants to add flights and more noise?

**Response:**

The content of this comment is identical to comment PC00298-6; please see Response to Comment PC00298-6.

**PC02280-7****Comment:**

It is important to consider that LAX does not need these changes to improve safety. Rather, the EIR/EIS states, "... these [current] conditions do not create an unsafe environment. " Additionally, the FAA resources allocated to improved air traffic control systems will improve the efficiency of the airport without the proposed changes. These improved efficiencies will also reduce the pollution generated at the airport (unlike Alternative C, which the report says will lead to significant emissions of CO, VOC, NOx,SO2 and PM10 in 2015.).

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**Response:**

Please see Response to Comment PC00298-7.

**PC02280-8**

**Comment:**

I would also like to respond to two of the issues presented by those who support the expansion:

**Response:**

Please see Responses to Comments PC02280-9 and PC02280-10 below.

**PC02280-9**

**Comment:**

1. The region needs to expand the airport to maintain the economy. If passenger traffic is spread among the region's airports there will be no effect on the economy. In fact, given more choices people may find it more convenient to come to Southern California. Spreading more traffic to Ontario, Palmdale and Riverside airports will help those regions develop... that's why they want their airports to expand rather than LAX. The unions and construction companies will get their jobs no matter where airport construction occurs.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02280-10**

**Comment:**

2. The Green Line extension and other highway improvements will mitigate the increased traffic near LAX. When you consider this argument think about how much traffic on the Harbor Freeway has improved since the introduction of the Blue Line and carpool lanes. While the number of Blue Lines riders is significant it is only a drop in the bucket compared the number of people who drive so the traffic is just as bad. There's no possible way that the extension of the Green Line and/or building the airport ring will handle the additional number of LAX users proposed in the EIS/EIR. The report claims a traffic reduction based on the expansion alternatives and traffic mitigation efforts unrelated to the expansion. Why not just implement the non-expansion related improvements (e.g., expand the Green Line, reduce Century Boulevard closures, etc.) to help reduce pollution and noise in the LAX area?

**Response:**

This comment is identical to comment PC01540-10. Please see Response to Comment PC01540-10.

**PC02280-11**

**Comment:**

In sum, I strongly recommend that the proposed LAX plans be rejected in favor the No Action/No Project Alternative. Doing so will protect the quality of life in Los Angeles without having a significant impact on the economy. So doing will also force the FAA and the airlines to consider regional solutions to Southern California's transportation needs.

The voters of the LAX area are depending on you to stand up to the federal government and the airlines. We need you to protect our quality of life.

**Response:**

Comment noted. It should be noted Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02281      Frelinger, Amy      None Provided      7/26/2001**

The content of this comment letter is identical to comment letter PC01786; please refer to the responses to comment letter PC01786.

**PC02282      Garbanati, James      None Provided      9/21/2001**

The content of this comment letter is identical to comment letter PC02179; please refer to the response to comment letter PC02179.

**PC02283      McGindley, B.      None Provided      6/9/2001**

**PC02283-1**

**Comment:**

1. I have been a resident of Playa del Rey and Westchester for 34 yrs.
2. I have already lost one house to the airport and do not intend to lose another.
3. I feel the airport has lied to us the entire time I have lived in the area.
4. My perception is that this entire plan is fueled by GREED with absolutely no regard for people of this neighborhood or the environment
5. If the commissioners are so damned smart they should know that you cant put 5 lbs into a 3lb bag.
6. And finally, my sympathy goes out to the families of those who are going to lose their lives if this insane plan succeeds.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. Please note that LAX is not run as a for-profit organization. It is a public service and the

### 3. Comments and Responses

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fees collected are used to pay for the maintenance and upkeep. As required by Federal law, any funds generated at the airport must be expended at the airport.

**PC02284 Galanter, Ruth City of Los Angeles**

**PC02284-1**

**Comment:**

(overall)  
Alternatives under study

The Alternatives Under Study in this EIR are all Alternatives for expanding airport capacity at one single geographic location: LAX.

No Alternative is studied for

1. modernizing current facilities, without expanding MAP capacity
2. simultaneous expansion of the three LAWA-owned facilities (Palmdale, Ontario and LAX)
3. airport capacity expansion on a Regional level, including facilities expansion at Burbank, Long Beach, Orange County and Ontario<sup>1</sup>

The public should be given environmental impact information on these three additional scenarios, including full disclosure and side by side comparison to LAWA's Alternatives A, B, C for

1. noise impacts
2. aircraft safety (on ground and in air)
3. air quality (including complete statistics and figures)
4. off-area surface transportation (including regional freeway grid impacts)
5. other EIR sections and items of concern

The magnitude of these omissions truly renders the current draft EIR invalid. A subsequent draft EIR should be required, including opportunity for public comments and hearings. The public must be given opportunity to comment on a complete analysis of a truly regional alternative, prior to the release of any final form of this EIR.

<sup>1</sup> Prepared in conjunction with officials from these locations

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to growth of Ontario International and Palmdale Regional airports. It should be noted that, subsequent to publication of the Draft EIS/EIR, Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative (consistent with the policy framework of the SCAG 2001 RTP). Table ES-3 of the Supplement to the Draft EIS/EIR provided a comprehensive summary of the potential impacts associated with Alternative D, in a side-by-side comparison with Alternatives A, B, and C.

**PC02284-2**

**Comment:**

(overall)

Authority and Accountability

Our government was designed by Thomas Jefferson et al with a system of checks and balances to protect the interests of all. How has LAX and LAWA managed to slip through untamed?



### 3. Comments and Responses

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LAWA is an arm of LA City<sup>2</sup>, yet apparently not within the full domain of City Council<sup>3</sup> LAWA is the publisher of the Master Plan, yet they declare they can't control when airlines schedule flights <sup>4</sup>

The FAA and air traffic controllers should be monitoring how many flights can safely use the airport, yet it sure looks like the airlines dictate capacity.

Who really defines LAX capacity? The airlines? If the airlines are in charge of capacity, then this entire Master Plan process is a farce because the airlines are not recipients of the public process!

The interim Master Plan is for some 40 MAP<sup>5</sup>, yet LAX has gone ahead and expanded without a Plan to a capacity of more than 64 MAP.<sup>6</sup> Who has the authority to hold this monster to the 98 MAP cited in this Plan?

<sup>2</sup> "LAWA is a self-supporting branch of the City of Los Angeles" - LAWA's website at [www.lawa.org](http://www.lawa.org)

<sup>3</sup> per Council Member Ruth Galanter's recorded statement, LAX hearings, Furama Hotel 6/9/01

<sup>4</sup> EIR page 1-14: "... the airlines, and not government, make the decision about which airports they will serve." EIR page 3-3: "Federal law ... limits the City of Los Angeles' authority to place restrictions on aircraft activity at LAX."

<sup>5</sup> Certain speakers at the LAX hearings at the Furama Hotel, 6/9/01, cited figures in the 40 MAP range. I have not seen this figure.

<sup>6</sup> 1999 statistic from [www.laxmasterplan.org](http://www.laxmasterplan.org) Alternatives Under Study

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, the ability to mitigate the impacts of growth in airport activity, and legal limits on the ability to control activity levels at airports.

**PC02284-3**

**Comment:**

Many of the mitigations proposed by LAWA in this Master Plan are apparently the same ideas that were put forth in the past Master Plan, which were never implemented.<sup>7</sup> Who has enforcement authority to make sure the promised environmental mitigations are truly implemented?

<sup>7</sup> per community members who spoke at the LAX hearings at the Furama Hotel, 6/9/01, and who were around for the last round of LAX expansion discussions.

**Response:**

Comment noted. Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the opportunities to alleviate impacts associated with past or present airport activities at LAX.

**PC02284-4**

**Comment:**

In any business contract, there are stated legal ramifications if the parties default. The injured party has a course of action, a remedy.

What are the consequences if LAX goes overboard? And who has authority to enforce them?

Authority, accountability and consequences should be defined in the Master Plan. This EIR was written for an expansion to 98MAP. Any expansion beyond this volume would produce even more severe environmental impacts on the citizenry than the already severe ones outlined in this EIR document. Enforceable legal consequences for excesses are our only way of containing the environmental impact on our lives.

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Without enforceable legal consequences, this EIR is a farce, because the true environmental impact of LAWA's unconstrained expansion on the citizens will be far, far in excess of that stated here.

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, the ability to mitigate the impacts of growth in airport activity, and legal limits on the ability to control activity levels at airports.

**PC02284-5**

**Comment:**

EIR Air Pollution  
Air Pollution statistics omitted

LAX is currently the greatest polluter in the greater LA area. It comes as no surprise that the EIR section on Air Pollution has omitted all statistics; it contains no hard data.

I am no expert at EIR's. This seems strange to me, yet government officials who know the EIR requirements have commented that this data is required for a complete EIR filing.

LAWA should be required to present, in format that allows comparison between scenarios: Baseline pollution figures, No Project Alternative, pollution figures for Alternatives A,B,C, and the Regional Expansion scenario that needs to be added.<sup>8</sup> These should be given for at least the SCAQMD monitored pollutants, gasses and particulates. In light of our current global situation, I think that statistics should be presented regarding Greenhouse gasses<sup>9</sup> as well.

The air pollution statistics for Alternatives A, B, C must include the full impact of pollutants from these Alternatives. That means the air pollution figures from these single site expansion alternatives should include pollutants from all the individual passenger automobiles<sup>10</sup> of this tremendous additional volume of passengers, idling in LOS-F traffic on freeways across the entire greater LA basin freeway grid.<sup>11</sup>

Under the LAWA single-site location Alternatives<sup>12</sup>, passengers and freight trucks (in fact, all freeway travelers) will spend substantial amounts of time stuck in traffic on the freeways to cross the entire city to gain access to a single airport site. Regional expansion of other area airports would have these passengers and trucks making shorter trips, or even using local mass transit (example: Burbank), which can only result in less air pollution and fuel consumption!

Given that LAX is such a major polluter, this missing data represents a significant and substantial omission from this EIR. LAWA has failed to present an accurate description of the true environmental impact on this City.

<sup>8</sup> see separate Public Comment form

<sup>9</sup> carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), non methane volatile organic compounds (NMVOCs) and sulphur dioxide (SO<sub>2</sub>)

<sup>10</sup> LAWA offers little in the way of real public transportation solutions, see separate Public Comment form)

<sup>11</sup> see separate Public Comment form on LOS-F freeways and 2015 traffic speed projections.

<sup>12</sup> Alternatives A, B, C

**Response:**

Please see Response to Comment PC01186-4 regarding LAX as a source of air pollution and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. It should be noted that some greenhouse gases (e.g., CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) are not directly regulated by EPA, CARB, or SCAQMD, so there is no basis to establish whether a change in emissions of such gases is significant. EPA has reported that aircraft emissions in the U.S. contribute between 10 and 15 percent of total national transportation-related greenhouse gas emissions, on a carbon-equivalent basis. The impacts of CO,

NOx, VOC, and SO2 are discussed in Section 4.6 of both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. The Supplement to the Draft EIS/EIR provided an enhanced discussion of air quality impacts in Section 4.6, Appendix S-E, and Technical Report S-4.

#### PC02284-6

##### Comment:

EIR Section 4.4.4.4  
Community Disruption

FALSE: "implementation of the Master Plan alternatives would not disrupt...any existing communities"<sup>13</sup>

The authors of EIR Section 4.4.4.7.2 under "Cumulative Impacts" conveniently misread the CEQA threshold quoted at Section 4.4.4.1.

The CEQA threshold speaks of build alternatives that would "physically divide or substantially disrupt an established community."<sup>14</sup>

The proposed Sepulveda /Westchester Parkway intersection (whether a "diamond" or an "urban" intersection) takes out several blocks of "downtown Westchester", the heart of our business community. These properties have been in limbo over the looming threat of this project for so long that the SUBSTANTIAL DISRUPTION to businesses and property values is already occurring, even before the bulldozers roll!

The proposed Ring Road near Arbor Vitae and Aviation takes out many long established residences, and reduces the property value of many, many more. It takes out a Library, a community center that has been standing for well over 30 years. This is SUBSTANTIAL DISRUPTION of our community.

<sup>13</sup> EIR section 4.4.4.7.1, page 4-443

<sup>14</sup> EIR section 4.4.4.4.1, emphasis added

##### Response:

The commentor misquotes the conclusion presented under Section 4.4.4.7.1, page 4-443 of the Draft EIS/EIR that states the following for the No Action/No Project Alternative (i.e., no Master Plan): No sizeable airport-related surface transportation improvements would occur under the No Action/No Project Alternative. As a result, cumulative impacts associated with community disruption would be less than significant. The conclusions presented under Section 4.4.7.2 of the Draft EIS/EIR were based on an analysis of potential community disruption or division due to transportation facilities and acquisition proposed under the Master Plan. This is consistent with the threshold presented in Section 4.4.4.4.1 of the Draft EIS/EIR, which stated, in part, that a significant community disruption impact would occur if a build alternative would physically divide or substantially disrupt an established community, particularly if access to community services and facilities, recreational areas, residences, or businesses is significantly compromised. Potential disruption to existing and planned land uses and circulation was addressed in Section 4.4.4.6.2 of the Draft EIS/EIR and this impact was concluded to be less than significant since the pattern of acquisition would not divide or substantially disrupt existing land uses or planned development. Acquisition would occur along the edges of the Westchester Community and no transportation facilities would divide the Community, existing circulation patterns would be maintained or improved, and local streets would be re-routed in areas where acquisition is proposed. Chapter 3 of the Draft EIS/EIR specifically identified property acquisition proposed for each build alternative in the vicinity of Sepulveda Boulevard/Westchester Parkway as parcel numbers within MP Area A. A listing of these parcels by area is included in Appendix P of the Master Plan. This listing includes a summary of light industrial, office, retail, and residential uses that would be acquired by area under each build alternative. The greatest acquisition within Area A would be under Alternative A, which includes 131 businesses and 84 residential units. Businesses acquired within the vicinity of Sepulveda Boulevard/Westchester Parkway would be relocated to Westchester Southside and a Relocation Program would provide assistance for residential units acquired as described in the Draft EIS/EIR, Section 4.4.2, Relocation of Residences or Business. The effect of acquisition on the Westchester business community and the provision of comparable services that would be provided under Westchester Southside are described under Topical Response TR-LU-2. While acquisition of these businesses and residents would

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temporarily disrupt the community, it is expected that overall improvements and upgrades to the airport and Westchester Southside would improve, rather than reduce, property values in the Westchester Community. For further discussion of residential property values refer to Topical Response TR-ES-1. Properties proposed for acquisition in the vicinity of Arbor Vitae Street and Aviation Boulevard were identified in Chapter 3 of the Draft EIS/EIR within MP Areas C and D. Additional property along Arbor Vitae Street that would be acquired for the LAX Expressway is identified in Appendix K of the Draft EIS/EIR. No residential properties were identified within Master Plan Areas C and D; however some residential parcels along Arbor Vitae Street could be acquired for development of the LAX Expressway. Regarding the community center, similar community-serving meeting areas would also be provided within Westchester Southside. Library services to the Westchester community would not be disrupted. As described in Section 4.26.4 of the Draft EIS/EIR, under the 1998 Library Bond Program, which is independent from the LAX Master Plan, the Los Angeles Public Library's Westchester Branch and Loyola Village Branch libraries would be consolidated. This would involve the permanent closure of Westchester Branch Library and the expansion of the Loyola Village Branch Library to create the new combined Westchester-Loyola Village Library. The Loyola Village Branch Library would be closed during construction; however the Westchester Branch would remain open to serve the Westchester Community. As described in Section 4.26.2 of the Supplement to the Draft EIS/EIR, construction of the new Westchester-Loyola Village Library is ahead of schedule with an estimated completion date of March 2003. Finally, please note that Alternative D, the Enhanced Safety and Security Plan, has been added as a build alternative and does not increase the capacity of LAX and also does not call for construction of a ring road.

#### PC02284-7

##### Comment:

The Ring Road offramps at Emerson would SUBSTANTIALLY DISRUPT long established low traffic residential neighborhoods there.

##### Response:

The Draft EIS/EIR, Section 4.3.2.6.2 and Appendix K addressed surface transportation impacts associated with the ring road and LAX Expressway. Please also see Topical Response TR-ST-2, particularly Subtopical Responses TR-ST-2.20 and TR-ST-2.21 regarding surface transportation impacts on local streets. Access to the ring road under the Alternatives A, B, and C would not be provided from Emerson Avenue but rather would connect the LAX Expressway at Arbor Vitae Street to the airport terminal areas. As stated on page 4-296 of the Draft EIS/EIR, impacts to arterial streets and local streets - particularly to the north - would be minimized by shifting much of the north airport demand to the new LAX Expressway. Therefore, no substantial disruption to residential neighborhoods along Emerson Avenue, as a result of increased traffic from the ring road offramps is expected to occur. Although the ring road would not have any ramp access to Emerson under Alternatives A, B, and C, a traffic mitigation measure was proposed that would add an off-ramp from the Ring Road for westbound traffic onto northbound Emerson only. This is the only ring road access considered to or from Emerson. This ramp was added as a mitigation measure under Alternatives A, B, and C to provide the local residents living along Emerson with easier access when driving home from I-405. It is not expected that there would be any "cut through" traffic on Emerson due to the ramp, since this route would only benefit local inbound traffic approaching from I-405. Finally, please note that Alternative D, the Enhanced Safety and Security Plan, does not include construction of a ring road.

#### PC02284-8

##### Comment:

The proposed land uses of LAX Northside would SUBSTANTIALLY DISRUPT many residential pockets, placing hotel volume and light industrial next to homes, churches and schools.

The EIR makes blatantly false statements about the severe Community Disruption impact this project will have on Westchester!

##### Response:

Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, addressed the compatibility of LAX Northside and Westchester Southside with adjacent residential uses. As shown on

Figure 4.2-4 of the Draft EIS/EIR, development on Lots 1, 2, 3, 11, and 12A would occur closest to residential uses. As stated on page 4-90 through 4-93 of the Draft EIS/EIR, the ordinance that approves the development of LAX Northside (Ordinance 159,526) includes [Q] conditions that limit building height, require building setbacks from the property line and landscaped buffer setbacks along the property line, and restricts certain uses within these lots. Additionally, the [Q] conditions limit traffic generation from LAX Northside to 7,000 outbound trips during the PM peak hour and prohibit vehicular driveway ingress and egress from certain streets. The [Q] conditions associated with Ordinance No. 159,526 are included the Draft EIS/EIR, Technical Report 1, Land Use Technical Report. As stated in Section 4.2.5 of the Supplement to the Draft EIS/EIR, Master Plan Commitment LU-1 provides for the incorporation of [Q] conditions into the Westchester Southside Project to maintain the same level of environmental protection that would be provided under the [Q] conditions adopted as part of Ordinance 159,526. As shown in Table 4.2-15 of the Draft EIS/EIR, under Westchester Southside, development would occur on Lots 1, 4, 7, 9, 10, 15, 16, 17, 19, 20, and 22. Lots 2, 3, 5, 6, 8, 13, 14, 18, and 21 would provide open space, recreation, and landscape buffer areas along the northern edge of Westchester Southside and adjacent to the Westchester community. As shown on Table 4.2-16 of the Draft EIS/EIR, traffic generation associated with Westchester Southside would be limited to 3,060 outbound trips during the PM peak hour. Under LAWA Staff's new preferred Alternative D, LAX Northside would be developed as approved and would also include a vehicle trip cap that would reduce traffic generation to the same level of daily vehicle trips that would have resulted from the development of Westchester Southside. See also Response to Comment PC00261-2 and Topical Response TR-LU-2 regarding compatibility of LAX Northside/Westchester Southside with residential uses to the north.

As described in this response and Responses to Comment PC02284-6, the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Sections 4.2.6, 4.4.2 and 4.4.4 fully disclosed impacts associated with LAX Northside/Westchester Southside, acquisition, and community disruption, respectfully. In addition, Appendix K of the Draft EIS/EIR fully discloses impacts associated with the ring road and LAX Expressway that are proposed under Alternatives A, B, and C. See also Response to Comment PC02284-7 regarding the effects of the ring road offramps on residential neighborhoods and Topical Response TR-ST-7 regarding LAX Northside/Westchester Southside traffic.

#### **PC02284-9**

##### **Comment:**

EIR page 4-93  
Coordinate with Community Plan

A Committee is currently at work, under the direction of members of the LA City Council, to update the Westchester-Playa del Rey Community Plan (a component of the LA General Frameworks).

Part of the Ordinance 159,526 [Q] conditions for the LAX Northside development is "uniformity of development".

The LAX Northside / "Westchester Southside" portion of the LAX Master Plan should be placed on hold, pending the completion of the Westchester Community Plan. Other planned development projects in the area have already been placed into this "on hold" status, pending the completion of the Community Plan.

Upon completion of the Community Plan, the plans for LAX Northside development should be reviewed to assure that they are in alignment with the updated Community Plan, before proceeding.

Only by waiting for the outcome of the updated Community Plan and by adhering to its terms, can LAX Northside / "Westchester Southside" truly meet the "uniformity of development" requirement of Ordinance 159,526 [Q] conditions.

##### **Response:**

As described in Table S4.2-1 in the Supplement to the Draft EIS/EIR, the Westchester - Playa del Rey Community Plan is being revised as part of a Citywide Community Plan Update Program (CPU) and a draft Plan is scheduled for public release in mid-May 2003 with final Plan approval anticipated in the fall of 2003. Since publication of the Supplement to the Draft EIS/EIR, a draft Plan was available for public review in conjunction with an open house (held on June 19, 2003) and public hearing (held on June 26,

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2003). A second public hearing on certain key Plan subareas was held on November 13, 2003, and the Los Angeles City Planning Commission recommended approval of the CPU to the City Council's Planning and Land Use Management Committee. At the time of this writing, Final Plan approval is anticipated to occur in spring of 2004. LAWA has and continues to work with other City agencies. LAWA staff has provided input to the City of Los Angeles Planning Department in an effort to support consistency between the LAX Master Plan and the Westchester - Playa del Rey Community Plan and they are continuing to monitor the progress of the Westchester - Playa del Rey Community Plan Update to help support consistency with the proposed LAX Master Plan, LAX Plan, and LAX Zone/LAX Specific Plan. Appropriate uniformity of development is expected to be upheld through this process. Furthermore, Master Plan Commitment LU-1, as described in Section 4.2, Land Use (subsection 4.2.5) of the Supplement to the Draft EIS/EIR provides, in part, that the final conditions for the LAX Northside/Westchester Southside project will ensure that the level of environmental protection afforded by the full set of existing LAX Northside project [Q] conditions is maintained or increased with approval of the LAX Master Plan.

#### PC02284-10

##### Comment:

Tech Report 3b - Attachment B  
Geographic Distribution of Trips

EIR Technical Report 3b gives the reader no confidence that it has accurately predicted the future traffic situations around LAX and throughout the greater LA Basin. Technical Report 3b's Section 2.3 describes "Regional Socio-Economic Assumptions" yet these descriptions are so vague that the reader cannot determine what really went into LAWA's calculations. The restatement of assumptions at EIR section 4.3.2 (page 4-279 and following) does nothing to clarify.<sup>15</sup>

For example: Employees.

Where does the forecast think that future additional LAX employees are going to live<sup>16</sup>: have these employees been included in the additional load calculations for local surface streets, or in calculations for the long haul on freeways?

If the employees have been included in local surface street calculations, specifically what housing units does LAWA think these families will use (a housing unit supply issue)? If the employees have been included in local surface street calculations, does LAWA plan on paying them enough to afford the housing prices in areas immediately surrounding LAX (an economic issue)?

If the employees have been included in long haul freeway calculations, have their automobile emissions been included<sup>17</sup> in air pollution statistics for Alternatives A, B, C (an air pollution issue)? If the employees have been included for the freeway long haul, how far down the greater LA Basin freeway system will these additional employees impact the flow (a traffic issue)?<sup>18</sup>

Lastly, who are these employees? Are they only additional LAWA employees, or do the surface transportation figures include additions to the staff of American Airlines, Federal Express, Budget Rent-A-Car, sessioniers and taxi companies?

LAWA's careless assumption making has totally missed the mark in forecasting what real traffic in the greater LA Basin will be like if Alternatives A, B, or C are built.

We will have a traffic nightmare because of this Master Plan.

<sup>15</sup> Is this intentional subterfuge, or mere goofball oversight? The former is appalling and the latter terrifying.

<sup>16</sup> All I can find on this matter is EIR page 4-279 paragraph 3: "future employee distributions were modified based on changes in population." That conveniently tells the reader nothing.

<sup>17</sup> We know the answer to this one: No. LAWA has totally omitted any statistics on additional air pollution. See separate Public Comment form.

18 Maps at Tech Report 3b stop well short of the end of the bold and heavy color coded lines. The maps do not disclose the full extent of the traffic impact.

**Response:**

The forecast of future employee trips to and from the airport was taken into account in determining the respective traffic impacts on streets, highways and freeways. For additional details, please see the geographic distribution of airport trips discussed in Topical Response TR-ST-2.

Trips generated by LAX, including employees, were distributed within the off-airport model following the same analysis procedures and regional transportation computer models that are used in the SCAG and Los Angeles Citywide framework models. The determination of specific housing units for employees was not part of these program level, Draft EIS/EIR and Supplement to the Draft EIS/EIR documents. The specific methodology for assigning employee trips is discussed in Topical Response TR-ST-2. In addition, this Topical Response also provides supplemental information defining the study area and identification of the facilities analyzed.

Employee growth was forecasted and included in trip generation and traffic analyses in both the on-airport and off-airport analyses, both applying well-proven transportation models. These forecasts of airport employee growth are considered to be conservative so as not to underestimate traffic impacts. The total airport employee workforce, including airlines, concessionaire, cargo, airfield ground services, LAWA, security, police and all other types of employees located on the airport have been accounted for in the calculations. The resulting traffic forecasts and impacts were presented in Section 4.3, Surface Transportation, of both the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. On-Airport forecast and traffic impacts are presented in Section 2.4, Key Input Assumptions, and Chapter 4, Forecasts and Impacts, of Technical Report 3a, On-Airport Ground Transportation Report. Off-Airport traffic impacts are presented in Technical Reports 3b, Off-Airport Ground Transportation Report, and S-2b, Supplemental Off-Airport Surface Transportation Technical Report, with supplemental information provided in Topical Response TR-ST-2.

Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02284-11**

**Comment:**

EIR Tech Report 3b -Table 2.2 page 2-10  
LAX Northside Excessive Density

LAWA clearly plans to defy the Ordinance 159,526 [Q] conditions for vehicle trips.

Ordinance 159,526 [Q] conditions restrict the LAX Northside (aka "Westchester Southside") development to 6,340 inbound and 7,000 outbound vehicle trips per day.

Yet, Table 2.2 (item 135) reveals that LAX Northside is projected to have 1,625 retail employees<sup>19</sup> and 13,672 non-retail employees<sup>20</sup> for a total of 15,297 employees.

These headcounts don't even take into account hotel guests, office visitors, delivery trucks, restaurant customers, etc.

How are all these people going to come and go daily, within the [Q] condition vehicle trip cap of 6,340 inbound and 7,000 outbound vehicle trips per day?

The answer is, LAWA has no intention whatsoever of adhering to the Ordinance 159,526 [Q] conditions. LAWA plans to jam a massive development in the slender strip of land adjoining long standing low traffic volume residential neighborhoods.

The LAX Northside development is totally out of line with the adjoining community.

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19 945 + 550 + 130

20 5,200 + 2,072 + 6,380

**Response:**

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

**PC02284-12**

**Comment:**

EIR Surface Transportation  
Metro Green Line

The LAX EIR makes a big deal about direct freeway access to airport terminal areas,<sup>21</sup> yet completely neglects direct access by mass transit systems.

Why, in all the "surface transportation" reports<sup>22</sup> is no mention made of the Metro Green Line<sup>23</sup>? Why does the Aviation-105 station remain the closest rail or light rail connection to LAX?

Most major airports connect with their city's Metro equivalent: Chicago O'Hare, Boston, Philadelphia, Atlanta Hartsfield, Washington D.C. National, even Burbank! LA City Hall has a Metro Station. Why not LAX?

All surface transportation mitigations presented in this EIR are based upon a continued reliance on the individual passenger automobile. This is an approach our society cannot sustain and will soon have to abandon. The makeup of surface transportation in the LA area will be changing, within the expected "lifetime" of this Master Plan.

The Metro Green Line should be extended into LAX, to let off passengers directly at one of the Peoplemover stations. Alternatively, the Peoplemover could be extended out to the Aviation-105 Green Line station, as the system at Paris' Orly airport does.

Mass transit systems must be incorporated into any true modernization plan for this airport.

<sup>21</sup> EIR section 4.3.2.6.2

<sup>22</sup> reference EIR section 4.3.2.6.2

<sup>23</sup> the only mention I find is at the Alternatives Under Study at [www.laxmasterplan.org](http://www.laxmasterplan.org) which is a public relations narrative not an official planning document.

**Response:**

Comment noted. The extension of the Metro Green Line to LAX was proposed as part of the transportation system for Master plan Alternatives A, B, and C. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02284-13**

**Comment:**

(overall)  
Modernization versus Expansion

"I don't know how someone can look at the report that came out and say that we don't need to upgrade this airport ..."

-- John Aroggia, Airport Commission president, to LA Times<sup>24</sup>

Much ado has been made in the press about the antiquated state of LAX and the need for modernization. I agree that we need to modernize this facility.



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However: The LAX Master Plan before us is not a plan for modernization; it is a plan for profiteering, for market share, and for annihilation of other regional airports under development.

It is a plan for sheer volume expansion; "upgrade" or "modernization" plays a very distant second!

Its focus is on the profit to be derived by taking airport volume to 98 MAP and blasting out any competition for international flights.

Here are a few quotes from The Purpose and Objectives of the Proposed Project<sup>25</sup>:

- sustain and advance the economic growth and vitality ...
- ensure that new investments ... are efficient and cost-effective
- Maximizing the return on existing infrastructure capital
- sustain and advance the ...regional economy

It should be noted that profit and economic concerns are the focus of every single line of this Purpose and Objectives section, whereas the word "safety" never appears. And the only mention of "efficiency" is in conjunction with "investments".

Any idea of upgrading or modernizing the airport facilities is totally eclipsed by the greed for profit and power that drafted this Master Plan.

I believe that LAX facilities should be modernized. The terminals and mass transit access, perhaps the runways, most certainly the security systems, should be brought up to year 2001 standards. However, I see no reason whatsoever that any additional infrastructure should be built at this single-site location to increase airport volume.

The LAX site is already saturated. It is severely constrained by traffic and accessibility issues, by neighborhood noise and pollution issues, by land use issues<sup>26</sup>.

Increased demand for air services will be coming from the outlying areas of the Southern California geography.<sup>27</sup> There are airfields in those areas that in some cases are even EAGER to take on LAX's excess demand<sup>28</sup>. I see no reason that LAX should be positioned to supply air services for these areas.

The only conceivable reason is so that LAWA officials can increase their "empire", increase the profit their "self-sufficient" department generates, and have more revenues at their disposal. Profit and Power.

Give us a reasonable plan. Give us a workable plan for modernizing (not expanding) LAX, and expanding (not squelching) other area airports!

<sup>24</sup> LA Times "No. 1 in Airfield Close Calls, LAX Finds Solutions Elusive", 6/24/01

<sup>25</sup> EIR page 2-1, section 2.1

<sup>26</sup> see separate Public Comments forms on each of these issues.

<sup>27</sup> See separate Public Comment form on this issue.

<sup>28</sup> per recorded testimony of their representatives, Furama Hotel hearings, 6/9/91

#### Response:

Comment noted. Subsequent to publication of the Draft EIS/EIR, newly elected Mayor James Hahn directed the Los Angeles Board of Airport Directors to develop a new LAX Master Plan alternative that, consistent with public comment calling for a regional approach alternative, would be designed to accommodate passenger and cargo activity levels at LAX that would approximate those of the No Action/No Project Alternative, have fewer environmental impacts than the No Action/No Project Alternative and, in light of the events of September 11, 2001, would be designed to enhance airport safety and security. This new alternative - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and,

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instead, shifts the accommodation of future aviation demand to other airports in the region. Although the conclusion of the Draft EIS/EIR was that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

#### PC02284-14

##### Comment:

Tech Report 3b - section 2.3  
Planned Development Projects

The Socio-Economic Assumptions and associated Table 2.2 are appalling. The Assumptions do not give the traffic forecasting computer nearly the daily vehicle trip volume that we will experience!

Table 2.2 lists statistics for various Planned Development Projects in the LAX area. Yet the figures it uses are substantially understated. I have sampled these figures based on my knowledge of some local projects and find Table 2.2 grossly erroneous!

For example, Loyola Marymount University (lines 102,103 and 105) has been granted certification for a student capacity of 7,800 students<sup>29</sup>. That means LMU has the potential for an expansion of 3,300 students<sup>30</sup>. Vehicle trip calculations should include these additional planned students, plus anticipated additional faculty, administration and support services<sup>31</sup>. But Table 2.2 lists "population" at 1346 32 with non-retail employees of 230.<sup>33</sup> This is ridiculously wrong!

The Assumptions are outlined at Tech Report 3b, section 2.3 with such vagueness and brevity that I seriously question the figures that were fed to the computer model. Table 2.2 lists residential projects by "population," yet retail and non-retail are listed by "employees." How did LAWA translate "employees" into vehicle trips per day? A supermarket (line 116) is listed at 94 employees. Did the computer model get fed "94 vehicle trips per day"? An appalling proposition when you consider the HUNDREDS of daily vehicle trips a supermarket generates.

This is not a lone example. Schools and childcare centers (lines 90, 01) are listed at 4 and 9 employees. What about daily traffic of parents picking up and dropping off? Home Depot (line 98) is listed at 420 employees. Are the thousands of customers factored in? Gas stations (lines 89, 95) are listed at 4 employees. Did these go into the computer model at 4 vehicle trips per day? These are only samples -the entire Table is like this!

The Playa Vista sales office says their Phase II (line 114) includes 560,000 square foot of retail. By what formula do you derive only 1120 employees? Are customer trips included?

The Assumptions at Tech Report 3b, Section 2.3 give no indication of how office square footage is converted to vehicle trips per day. The Playa Vista Phase II project is listed at 15,620 non-retail employees. Phase I and II plans 5.2 million square feet of office uses. Playa Vista Phase II also includes a 750 room hotel and up to 640,000 square feet of community serving (Phase I and II combined). Is the LAX EIR correct with respect to this project? The formulas for evaluating this have been concealed from the public.

Playa Vista Phase II appears in line 114 with 0 SFDU (single family dwelling units). YIKES! They hope to put in 2,576! This Table 2.2 lists this project with residential population at 19,678, yet the LA Times recently gave the figure 28,000!<sup>34</sup> According to Playa Vista management, industry standard<sup>35</sup> would assume 2.2 persons per "dwelling unit"; Table 2.2 uses a factor of 2 for most projects listed.

Overall, Tech Report 3b appears to seriously understate the number of vehicle trips per day for each and every project listed! Any surface transportation mitigation plans made based upon these outlandishly low figures will fall far short of the magnitude required!

<sup>29</sup> I am not sure if this represents just full-time undergraduates. If it does, then certified capacity may be far greater, when one takes into account part-time undergrads and graduate students.

30 Their enrollment at the current time is projected to be 4500 full time undergrads, per my 7/18/01 telephone conversation with Mr. Fissinger of the Admissions Office.

31 The University should be contacted so that proper faculty figures can be reflected, because I believe LMU has a higher than typical ratio of faculty to students.

32 450 + 270 + 626

33 180 + 50

34 LA Times, Monday July 16, 2001, "Playa Vista's Public Role"

35 Institute of Transportation Engineers

**Response:**

The traffic generation methodology did account for all trips expected to be generated by each land use. The detailed methodology is contained in the LAX Ground Access Model Calibration and Validation Report, dated September 30, 1998. This document is available in the Administrative Record for the project. Also, please see Subtopical Response TR-ST-2.4 regarding model calibration and validation.

**PC02284-15**

**Comment:**

EIR Technical Report 14c  
Safety Statistics concealed

Technical Report 14c contains a purportedly complete listing of aircraft incidents at LAX.

Yet, in the public testimony at the LAX hearing at the Furama Hotel on June 9, 2001, a representative of the air traffic controllers indicated that there had been 24 recent incidents "not deemed runway incursions"<sup>36</sup>.

These incidents are not included in the incident and accident reports at Technical Report 14c section 2.2.1

"Not deemed runway incursions" sounds like a legal technical phrase, but as it was explained in the verbal testimony: each of these incidents was a potential aircraft accident on the ground.

And LAWA proposes to increase airport capacity to bring still more planes into this melee?

I cannot see where drastically increasing the number of moving objects in a limited space area can do anything but increase the number of incidents.

The volume of LAX is already at maximum capacity for the resources (land space) available.

The LAX Master Plan is totally out of line with area resources!

36 To verify this, check court reporter's transcript. This man was one of the first few speakers of the day.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety. The incident and accident data for LAX presented in Section 4.24.3, Safety, and Technical Report 14c of the Draft EIS/EIR do not include data for the Year 2000. Section 4.24.3, Safety, and Technical Report S-9b of the Supplement to the Draft EIS/EIR include identification of the number of incidents and accidents, as defined by the National Transportation Safety Board, at LAX through the Year 2000.

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#### PC02284-16

**Comment:**

EIR Technical Report 14c  
Safety in the air

Technical Report 14c omits entirely, any evaluation of safety in the skies. Rumor around the city has it that pilots already regard LAX as one of the most hazardous places to fly into.

I lived in Orange County during the Cerritos air disaster. Safety in the airspace above our heads is definitely an environmental concern (hopefully not an "impact"! ) to those who live and work beneath and beside the flight zones.

Full disclosure of aircraft safety statistics must be given, for both the in-air approachways and on the runways.

The EIR should reveal the standards to be measured up to for air safety, just as it does for any other EIR issue under analysis.<sup>37</sup>

The EIR should reveal: What are safe aircraft spacing parameters in approach to runways? How does Baseline and No Project Alternative volume load measure up to these parameters? Where will proposed (increased) flight volumes under Alternatives A, B, C place us with regards to these parameters?

If we had this information, I believe it would be plainly clear that planes today approach LAX at very close to the maximum safe frequency. I'll bet these statistics would prove that adding more aircraft volume to the air approachway for one single-location airport is unthinkable.

The only realistic alternative is landing the increased air traffic volume at multiple airport sites throughout the region.

LAX is already a Cerritos air disaster in the making. This Master Plan is beyond the capacity of area resources.<sup>38</sup>

<sup>37</sup> For example, the EIR section on Noise gives the CNEL 65 dB standard, describes the procedure, etc.

<sup>38</sup> in this case, "resources" equals basic air and ground space!

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety. It should be noted that, unlike the use of 65 CNEL as a standard to assess noise impacts of airport operations, there are no set standards to determine significant impacts for air safety. As described in Topical Response TR-SAF-1, the National Airspace System provides a comprehensive network of facilities, equipment, personnel, and procedures dedicated to providing the highest level of safety to persons and property in the air and on the ground. Aircraft operating into and out of LAX, both now and with implementation of any of the proposed alternatives, would be subject to the ongoing operation of the National Airspace System.

#### PC02284-17

**Comment:**

(overall)

Security

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Since the Sept. 11, 2001 terrorism incident, several articles have appeared in the media alluding to safety recommendations that were made and never implemented.

"Two commissions, one formed after the terror attack on Pan Am 103 over Lockerbie, Scotland, and one after the crash of TWA 800 off Long Island, New York, made a series of recommendations to improve airline security. Several suggestions never were followed."<sup>39</sup>

"'Serious vulnerabilities in our aviation security system exist and must be adequately addressed,' the GAO warned in April 2000."<sup>40</sup>

6000+ people died when the FAA had in their hands airline security suggestions that could have saved them.

The security recommendations of these commissions were undoubtedly well considered. They were not folly. It is unconscionable to cast them aside without implementation.

I'll bet the recommendations not implemented were cast aside due to expense -

LAWA should not be investing in a massive expansion of passenger and freight volume when they aren't taking care of what they've got! LAWA should invest in airport security facilities to assure the safety and security of the existing passenger volume, and the safety and security of our citizens on the ground.

Implement all the suggestions of the Pan Am 103 commission, the TWA 800 commission and correct the GAO findings; only then are you ready to discuss the possibility of volume expansion.

39 "Security tightened at U.S. airports" September 12, 2001, Associated Press [www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/](http://www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/)

40 "Security tightened at U.S. airports" September 12, 2001, Associated Press [www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/](http://www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/)

**Response:**

Comment noted. It is important to recognize the responsibilities of the various agencies in dealing with security. Security of aircraft is the responsibility of the Transportation Security Administration (TSA) which was formed subsequent to the cited incidents including the September 11, 2001 attacks. All alternatives, including the No Action/No Project Alternative would be able to respond to the requirements of the TSA as they are presently identified. Alternative D is a non-expansion alternative which would require major expansion of other regional airports. Alternative D also responds to airport security by creating "level one" screening at perimeter locations and "level two" screening (TSA requirements) at the most populated area(s) of critical infrastructure. See Appendix S-9 of the Supplement to the Draft EIS/EIR for further discussion.

**PC02285**

**Poyourow, Joanne**

**None Provided**

**5/29/2001**

**PC02285-1**

**Comment:**

I was given your contact information by Barbara Berg of Westchester. She said that she had spoken with you about the things I had found in the LAX Master Plan and that you were interested in reviewing my findings. It is my understanding that you can have people research the points more completely than I am able to.

I have been formatting my comments to fit the Public Comments forms found on the LAX Master Plan website. I am sending you those points that I am somewhat settled with; I continue to work on more issues.

I am sending a Word file because my comments have footnotes that give the references for my information sources. If you cannot read Word, please let me know and I can get it to you in another format.

### **3. Comments and Responses**

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The sequence of issues within the Word document is random. I drafted this presuming that each subsection would go on a separate Public Comments form. Thus colating them is irrelevant.

I am also sending this information to Denny Schneider because Barbara indicated that I should. It is my understanding that he can use some of these findings in publicity against the LAX Master Plan.

Please do all you can to stop the LAX Master Plan. It's not that I'm against expansion - rather, that I'm against THIS plan. It is a bad plan; it contains ill considered, conflicting, and possibly even corrupt proposals.

Thank you for your work in stopping the LAX Master Plan.

**Response:**

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

**PC02285-2**

**Comment:**

Subsection 4.3.1.6.1 - Evidence of statistical tampering

The EIR's preparer was obviously instructed to distort statistics in order to derive LAWA's desired results. Section 4.3.1.6.1 is clear evidence of this manipulation.

**Response:**

Comment noted. Please see Responses to Comments PC02285-3 and PC02285-4 below.

**PC02285-3**

**Comment:**

In many areas of the EIR the point is made that No Action/No Project Alternative is the true "baseline", since 1996 is now outdated.

**Response:**

Although the No Action/No Project Alternative provides a benchmark for comparison of the four build alternatives, in accordance with the State CEQA Guidelines, conclusions regarding the significance of impacts for all the build alternatives are based on the 1996 baseline or, for certain environmental disciplines, the adjusted environmental baseline. Please also see Topical Response TR-GEN-1 regarding baseline issues.

**PC02285-4**

**Comment:**

Yet in Section 4.3.1.6.1 the EIR admits that the P-6 parking garage (which already exists) is included only in the 2005 and 2015 scenarios<sup>1</sup>. It is not included in the No Action/No Project Alternative!

By consciously deleting P-6 from the No Action/No Project Alternative scenario, Alternatives A, B & C falsely appear to offer additional parking spaces. In fact, for 2005, Alternatives A, B & C each offer LESS parking spaces than if I drove to LAX today to park my car!<sup>2</sup>

Add to this, LAWA's assertion that parking demand will remain the same under Alternatives A, B & C as it will under No Action/No Project Alternative<sup>3</sup>. The statistics given for forecasted vehicle trips indicate 5,668 to 7,621 additional vehicle trips per hour<sup>4</sup>. I guess none of these cars will be stopping??

<sup>1</sup> First paragraph of EIR Section 4.3.1.6.1 Page 4-253

2 Table 4.3.1-7 at EIR page 4-260 "Planned Capacity" under the No Action/No Project Alternative should be 686 spaces higher for the P-6 garage. Therefore NA/NPA capacity would be 36,298 (=35,612 + 686). This is higher than planned capacity shown for any of the Alts A, B, C for 2005. Alt A is essentially the same as the present day for 2015. Parking today is higher than Alt B for 2015.

3 Table 4.3.1-7 "Daily Demand (Spaces)" is essentially the same for Alternatives A, B & C as it is for No Action/No Project Alternative.

4 EIR Table 4.3.1-4 "1996" columns, inbound plus outbound, compared to each of Tables 4.3.1-10, 4.3.1-11, and 4.3.1-12 "2015" columns, inbound plus outbound

**Response:**

Please see Response to Comment PC00248-3.

**PC02285-5**

**Comment:**

What other figures has LAWA slyly distorted in the EIR they bought?

Findings such as the tampering of parking statistics cast doubt and question upon ALL statistics contained in the EIR. The credibility of this EIR is seriously shaken. All statistics in this EIR should be reviewed by independent auditors prior to being taken as fact!

**Response:**

Comment noted. The EIS/EIR was prepared by a large number of independent consultants and experts. While there is no reason to question the overall accuracy of the statistics in the report, the public review period required under NEPA and CEQA affords agencies, interested parties, and the general public the opportunity to review, and question if desired, the assumptions, calculations, and conclusions of the analyses. In the case of the LAX Master Plan, a 295-day review period was provided for the Draft EIS/EIR and a 120-day review period was provided for the Supplement to the Draft EIS/EIR.

**PC02285-6**

**Comment:**

When LAWA's EIR alleges that there will be little to no impact (or positive impact) from their Alternatives A, B & C, we cannot believe them!

**Response:**

Comment noted.

**PC02285-7**

**Comment:**

Tables 4.3.1-4, 4.3.1-10, 4.3.1-11, 4.3.1-12  
Issue: Freeways at LOS-F

	Additional vehicles PER HOUR Over the traffic we are currently experiencing		
	Alt. A	Alt. B	Alt. C
Airport Peak	7,621	7,150	5,668
P.M. Peak	6,451	6,403	6,095

This is in addition to other massive increases looming in the area!5

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The greater Los Angeles infrastructure cannot support this influx of traffic.

The EIR admits that the I-405 and the I-105 were already at LOS E-F in 1996 6. The LAX Master Plan would add 5,668 to 7,621 ADDITIONAL VEHICLES PER HOUR to these already overburdened roadways.

The EIR conspicuously fails to reveal how many of these 5,668 to 7,621 ADDITIONAL VEHICLES PER HOUR will be driving on the I-405 between I-101 and SR-90. This stretch of freeway never seems to flow well, at any hour of day, any day of the week. The EIR fails to give breakdowns, to reveal how many of these additional vehicles will be using the I-105 east of Hawthorne Blvd, versus using the I-405 south of Imperial Hwy. The EIR simply marks these LOS E-F freeway stretches "more airport with project"7

The EIR takes the approach that because LAWA proposes the LAX Expressway, Alts A, B & C will improve the current traffic issues. In saying this, they are only looking at the immediate geographical vicinity of the airport8. They avoid considering the burden this Plan will place on the total freeway system.

The LAX Master Plan will "significantly impact" transportation corridors up the I-405 beyond the I-10 through the Sepulveda Pass. It will "significantly impact" I-405 flow (or lack thereof) through the South Bay curve, and I-105 through Hawthorne and beyond. In short, the LAX Master Plan will create massive gridlock throughout the greater LA basin.

No thanks!

5 Developments like Playa Vista, etc. are mentioned in other sections of the EIR (Sec 4.17.1.7.1 on Natural Resources for example) but are suspiciously absent from the discussions of surface transportation!

6 EIR Figure 4.3.2-2

7 EIR Figure 4.3.2-4

8 EIR Section 4.3.2 page 4-299, paragraph 1, even goes so far as to say that increased traffic congestion on the I-405 north of the LAX Expressway "should not be construed as adverse impacts created by the project" ! They slickly try to avoid taking responsibility for the fact that their proposal is way out of line with the area's overall resources!

**Response:**

This comment is similar to comment PC00249-1. Please see Response to Comment PC00249-1.

**PC02285-8**

**Comment:**

Subsection: Figure 1-3  
Issue: Exaggerated 60-Minute Accessibility Figures

The 60-minute accessibility statistics used in the EIR are grossly exaggerated. The Airport Travel Time Zones shown on Figure 1-3 are laughable. LAWA has overstated its 60-minute geographic territory, and thus has overstated its projected passenger load, in order to distort the reader's impression of demand for LAX air services.

LAWA simply wants to monopolize Los Angeles air transportation, and they have produced misleading figures to get us to approve their facilities expansion, to "sustain and advance"9 their market share.

Section 1.2.1.2 makes a big point of "market accessibility," the idea that a passenger has to be able to get to an airport to use it.

LAWA claims that 44 MAP10 are within the 60-minute access zone of LAX.11 These 44 MAP won't get to LAX in 60 minutes; some won't even get there in 2 hours!



9 The Purpose and Objectives of the Proposed Project, EIR section 2.1, third bullet point

10 EIR section 1.2.2.1, page 1-17 paragraph 2

11 LAWA is careful not to reveal the exact boundaries of this supposed 60-minute access zone, giving us only a fuzzy map without street name identifications (Figure 1-3). So I compared their Fig 1-3 to my Thomas Guide and then applied the results to Yahoo on Maps/Mapquest.com

**Response:**

Comment noted. Please see Response to Comment PC00250-1.

**PC02285-9**

**Comment:**

In Section 4.3.2.6.1 the EIR makes a dramatic issue about future traffic: "In 2020 . . . a 12-mile trip will take 60 minutes." Given LAWA's own assertion about future traffic speeds, and the LOS-F freeways that already exist<sup>12</sup>, those 44 MAP will quickly find other travel options and will avoid LAX. They will choose other airports.

Analysing 4 geographic points from what Fig 1-3 claims is LAX's 60-minute accessibility zone:

Northernmost - 405 fwy near Roscoe Blvd. Van Nuys. From here a passenger would travel approximately 23 miles to LAX. At 12 miles per 60 minutes<sup>13</sup>, this would mean just under 2 hours to get to LAX. <sup>14</sup>

Northeast - near the intersection of the 605 and the 10 fwys, El Monte. From here a passenger would travel approximately 30.2 miles to LAX. At 12 miles per 60 minutes, this would mean about 2 and a half hours to get to LAX.<sup>15</sup>

East - intersection of 5 fwy and 91 fwy, Fullerton. From here a passenger would travel approximately 29.3 miles to LAX. At 12 miles per 60 minutes, this would mean about 2 and a half hours to get to LAX.<sup>16</sup>

Southeast - intersection of 405 fwy and 605 fwy, Long Beach. From here a passenger would travel approximately 22.2 miles to LAX. At 12 miles per 60 minutes, this would mean about 2 hours to get to LAX.<sup>17</sup>

LAWA derives its incredible demand statistics by usurping the geographic territory already served by other local airports. For some geographic pockets, consumers already have a choice between two or even three other local airports, yet LAWA still includes these people in the count for LAX.<sup>18</sup>

LAWA has similarly distorted the 60-minute accessibility zones portrayed for other airports. From personal experience: I used to live at the intersection of 405 fwy, 55 fwy and 73 fwy in Orange County. We regularly used Ontario for certain air routes. It took us less than an hour to get there. Yet the location of my former residence is far outside the odd zone shown for Ontario.

Thus LAX will not draw passengers from nearly the geographic territory they claim they will. Traffic congestion will send these people to other airports. The demand figures for future LAX air travel services are grossly exaggerated in the LAX Master Plan, in order to support this project to preserve LAWA's monopoly.

LAX does not require facilities expansion of the magnitude that LAWA would have us believe.

<sup>12</sup> by their own acknowledgement at Figure 4.3.2-2

<sup>13</sup> EIR Section 4.3.2.6.1

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14 On Yahoo Maps, starting point 15800 Roscoe Blvd. Van Nuys. Arriving point 5300 century blvd, LA. I did not use Arbor Vitae because Mapquest.com does not acknowledge random points on the fwy and this is not yet an offramp.

15 On Yahoo Maps, starting point 12200 Garvey, El Monte. Arriving point 5300 century blvd. LA.

16 On Yahoo Maps, starting point 1200 Magnolia, Fullerton. Arriving point 5300 century blvd, LA.

17 On Yahoo Maps, starting point 1900 Studebaker Rd, Long Beach. Arriving point 5300 century blvd, LA.

18 Reference Figure 1-3.

**Response:**

This comment is similar to comment PC00250-2. Please see Response to Comment PC00250-2.

**PC02285-10**

**Comment:**

Subsections 4.1.9.1 versus 4.1.7.2  
Issue: Conflicting opinions!

The EIR states, regarding Level of Significance After Mitigation: "Although Master Plan Commitment N-I and Mitigation Measures MM-N1 through MM-N3 would reduce aircraft noise impacts, the residual impact would not be less than significant. As such, a significant and unavoidable impact from aircraft noise is expected.19"

The EIR states, regarding Cumulative Impacts:  
"The cumulative effects of noise from aircraft, construction and roadway noise are not expected to be significant.20"

The EIR authors have scrambled the facts so completely that they cannot themselves derive a consistent opinion on this Plan!

This EIR is not to be trusted!!

19 EIR section 4.1.9.1 Level of Significance After Mitigation: Aircraft Noise. Emphasis added

20 EIR section 4.1.7.2 Cumulative Impacts: Alternatives A, B, C. Emphasis added.

**Response:**

The content of this comment is similar to comment PC00251-1; please see Response to Comment PC00251-1.

**PC02285-11**

**Comment:**

Subsection 2.8  
Title: Funding

LAWA plans to spend state and local public funds<sup>21</sup> for roadway "improvements" that

1. yield "significant impact" to off-airport surface transportation<sup>22</sup> in all three Alternatives under study, and
2. add "more airport traffic with project" to already LOS E&F stretches of I-405 and I-105 <sup>23</sup>

In the interest of LAWA profit margins and market share, the taxpayer will receive "significant impact" to both his everyday transportation and his tax burden.

### 3. Comments and Responses

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LAWA has a bad plan, and they don't want to pay for it themselves. LAWA's plan is out of line with the area's overall resources. And they want to use our federal and state highway funds to clean up their mess.

They want to add the LAX Expressway to mitigate traffic impact to one small section of the I-405. They have no plans for mitigation over the rest of the I-405, nor the I-105, both of which they admit will be significantly impacted by traffic resulting from all three of their Alternatives. In fact, they openly scoff at the unmitigated impact in the text of their EIR.<sup>24</sup>

LAWA wants to use our public funds so that they can claim that they have improved traffic in the L.A. area. The reality is, their Plan will bring greater gridlock to the length of our freeway systems.

Our public funds would better be spent elsewhere. Such as, in bettering other local airports where consumer demand will only be increasing as gridlock in the LA basin increases.

The taxpayers and citizens get to pay more money to WORSEN our traffic situation. No thanks!

21 EIR Section 2.8

22 EIR Section 4.3.2 page 4-299, page 4-306, and page 4-317

23 I-405 north of SR-90, I-405 south of El Segundo Blvd. I-105 east of Imperial Hwy. All per EIR Figure 4.3.2-4 as compared with Figure 4.3.2-2

24 EIR Section 4.3.2 page 4-299, paragraph 1, "These I-405 traffic increases . . . should not be construed as adverse impacts created by the project. They are inevitable positive responses that occur whenever an effective regional improvement is provided." !

**Response:**

Please see Response to Comment AL00008-6 regarding funding and Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02285-12**

**Comment:**

Subsection 4.3.2, page 4-296  
Issue: Vehicles "cutting through" north surface streets

FALSE: " . . .impacts to arterial and local streets - particularly to the north - would be minimized by shifting much of the north airport demand to the new LAX expressway. This reduction in the number of LAX vehicles 'cutting through' the north surface streets is apparent . . ." <sup>25</sup>

How stupid do the Master Plan authors think the Southern California public is?

The EIR (all Alternatives) depicts drivers as preferring to drive several miles out of their way rather than cutting through Westchester on Sepulveda. The Master Plan would have vehicles taking the LAX Expressway, paralleling I-405 east and around the La Tierra curve, down to Arbor Vitae, before turning back west toward the airport, a distance of perhaps \_\_ additional miles. Preposterous!

Computers may crank number charts, but people are not that stupid! Take a basic map of the area, draw a straight line from I-405 in Culver City, to LAX, and there is Sepulveda through Westchester. People will take the straight-line shortcut, en masse.<sup>26</sup> Sepulveda will continue to be a major cut-through to access LAX. But with the addition of Alternatives A, B & C, our residential neighborhood will become a cut-through for even MORE volume in taxis, limos, autos, etc.

The LAX Expressway will not eliminate the Sepulveda north cut-through issues. The impacts on the local community are intollerable.

25 EIR Section 43.2 page 4-296. second paragraph

### 3. Comments and Responses

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26 even YahooMaps at Mapquest.com shows this route, Instead of recommending that drivers uses Century.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, Topical Response TR-ST-6 regarding neighborhood traffic impacts and Topical Response TR-ST-7, Westchester Southside Traffic, regarding a brief history of LAX Northside/Westchester Southside, its role in the Master Plan, and the impact/benefits of the proposed airport alternatives. Please note that Alternative D does not include the LAX Expressway or the Ring Road.

**PC02285-13**

**Comment:**

Subsection 4.1.3.1.1 and Figure 4.2-9 27  
Issue: Baseline Aircraft Noise Exposure understated

The noise impact circles drawn on figure 4.2-9. are inaccurate. The area truly affected by LAX noise levels is significantly understated.

27 It is interesting that the maps depicting the 65 CNEL contours are not provided in section 4.1 Noise; only a text description of these contours (4.1.2.1.1, bottom of page 4-29) is provided. One must go to section 4.2 Land Use to find the 65 dB contour maps. They have hidden the maps, just like they want to hide the future impact!

**Response:**

The content of this comment is similar to comment PC00253-1; please see Response to Comment PC00253-1.

**PC02285-14**

**Comment:**

I live about half way between Grid point HO7 and HO8 on Figure 4.1-1. The 1996 65dB circle as drawn on figure 4.2-9 would seem to exclude my residence. Yet at current airport activity levels, most days I can hear aircraft over the sound of my appliances<sup>28</sup>. Particularly when the weather is under Santa Ana wind conditions, on Monday mornings, Friday afternoons, and during certain hours of day.

28 According to the "Noise Levels in Decibels" chart at [www.temple.edu](http://www.temple.edu), if I can hear an aircraft over the sound of my vacuum cleaner, dishwasher or garbage disposal, then it is in excess of 65dB.

**Response:**

The content of this comment is similar to comment PC00253-2; please see Response to Comment PC00253-2.

**PC02285-15**

**Comment:**

I am thrilled that the EIR preparers utilized the latest INM computer projection system, but has anyone checked actual noise levels? Has anyone checked real LAX airport noise on a day with onshore winds? Santa Ana conditions? How about at 5-9 a.m. on a Monday? Any weekday morning without marine layer? Before a holiday weekend? Any Friday afternoon, anytime after noon? What about the sound of an aircraft that is called off, does not land, and accelerates over the residences to climb back to

altitude?29 30 These are not rare spikes in the sound pattern; their sum total, and the fact that one flows into the next, create a constant barrage of airport noise.

29 Who selected the "average day" to create the models? What was the weather like on the days the data was accumulated? What proportion of flights actually adhered to noise abatement procedures? What proportion of flights were called off? Were any statistics accumulated from east flow?

30 These observations are from spring 2001, and thus include "federally mandated phase out of older, noiser Stage 2 jets."

**Response:**

Please see Response to Comment PC00253-3 regarding accuracy of the INM.

**PC02285-16**

**Comment:**

EIR Section 4.1.3.1.1 states that "LAX operates in west flow 95-98 percent of the time." I wonder who sat and counted planes, under what perfect weather conditions, to derive this incredible figure. By my personal observation, LAX operates in east flow quite often, a situation that gives rise to extraordinary noise patterns that cannot possibly be reflected in the circles of impact included in the EIR.

**Response:**

Records of activity at LAX are maintained by an automated radar tracking system that records the runway used by each flight. Historically, these records have indicated use of the westerly runways 95-98 percent since data was first retained. The records are not maintained by days, but by numbers of operations - the airport is rarely operated all day long in east flow, but rather may operate for an hour or two on many days. Please see Response to Comment PC00253-4 regarding data sources and assumptions.

**PC02285-17**

**Comment:**

LAX is one of the biggest airports in the world. Was the INM computer system created to handle this? Or was this system designed for a more "average" airport. Also, computers calculate based upon data. Has anyone audited the statistics that LAX fed them to achieve these results? We already know what LAX does with statistics!<sup>31</sup>

I believe the INM computer is grossly understating the number of acres and number of people significantly impacted by LAX's DNL. And if 1996 noise impact circles on figure 4.2-9 are so grossly inaccurate, then we cannot possibly trust the projected 2005 and 2015 impact circles as drawn.

<sup>31</sup> Reference my finding of intentional distortion of parking garage statistics in the EIR.

**Response:**

The content of this comment is identical to comment PC00253-5; please see Response to Comment PC00253-5.

**PC02285-18**

**Comment:**

This plan is NOT designed "in an environmentally sound manner that is compatible with surrounding land uses. "<sup>32</sup> The LAX Master Plan is out of line with the surrounding community.

<sup>32</sup> The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

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**Response:**

Comment noted. Please refer to Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding compatibility issues.

**PC02285-19**

**Comment:**

Subsections 4.1.9.1  
Title: Aircraft Noise Key Conclusions

The EIR states:

"Although Master Plan Commitment N-I and Mitigation Measures MM-N1 through MM-N3 would reduce aircraft noise impacts, the residual impact would not be less than significant. As such, a significant and unavoidable impact from aircraft noise is expected.<sup>33</sup>"

The EIR states:

"Alternatives A and C are roughly equivalent to the No Action/No Project Alternative"<sup>34</sup> Based upon their statements about environmental baseline, I don't believe it.

The EIR states:

"Alternative B . . . would expose considerably more total people to 65 CNEL ..." <sup>35</sup>

<sup>33</sup> EIR section 4.1.9.1 Level of Significance After Mitigation: Aircraft Noise.

<sup>34</sup> EIR section 4.1, page 4-11, paragraph 4

<sup>35</sup> EIR section 4.1, page 4-11, paragraph 5

**Response:**

The content of this comment is identical to comment PC00254-1; please refer to Response to Comment PC00254-1.

**PC02285-20**

**Comment:**

These impacts are unacceptable.

This plan is NOT designed "in an environmentally sound manner that is compatible with surrounding land uses."<sup>36</sup>

The Master Plan is out of line with the surrounding community.

<sup>36</sup> The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

**Response:**

Comment noted. Please refer to Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding compatibility issues.

**PC02285-21**

**Comment:**

Subsection: Appendix K, section 5.15  
Issue: Significant impact on the Centinela Adobe

The EIR admits that impacts to the Adobe could be "Adverse" under two Alternatives under study.<sup>37</sup>

The EIR admits that the single viaduct alternative "could result in indirect impacts on the Centinela Adobe . . . due to vibration and potential structural damage."<sup>38</sup> The EIR contradicts itself in Table 5.15-1 by saying that the single viaduct would not have adverse effect on the Adobe, a statement that is in direct conflict with the implications of section 5.15.1.3.

The EIR states: "Adverse impacts to . . . the Centinela Adobe . . . would be reduced and possibly mitigated with the implementation of the mitigation measures "<sup>39</sup>

Adverse impacts of the LAX Master Plan's LAX Expressway on the Centinela Adobe would be substantial, even severe. This is intolerable; the Centinela Adobe is a treasured historical resource, not just to the city of Los Angeles, but in the eyes of California history.

37 under LAX Master Plan EIR Alternatives A and C. reference footnote 1 to Table 5.15-1 (Appendix K)

38 quoted from Appendix K, section 5.15.1.2, paragraph 2, which is incorporated into section 5.15.1.3 by reference: "as with Alternative 2, this alternative [alternative 3 - single viaduct] also involves the use of heavy machinery and equipment to erect the elevated viaducts and associated ramps and overpasses." This heavy machinery and equipment is admitted to cause potential damage by vibration under sec 5.15.1.2 for Alternative 2, yet this fact is slyly not restated under sec 5.14.1.3 for Alternative 3.

39 EIR Appendix K, section 5.15.4, paragraph 1, page 108

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02285-22**

**Comment:**

The EIR would have us believe that "placing [the HOV lane] . . . out of view of both resources' primary elevations"<sup>40</sup>, a visual mitigation, would be sufficient to mitigate impact on the Adobe. Yet the EIR admits that vibration is an issue to the Adobe. Vibration will come not just from construction equipment, but from automobile volume during useage! <sup>41</sup> "Out of view" will hardly solve the impact of vibration on the structural integrity of this historic Adobe.

40 Appendix K section 5.15.4, bullet point 1, page 108

41 The EIR gives no indication that they have even considered this point

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02285-23**

**Comment:**

The EIR implies under Mitigation Measures that relocating the Centinela Adobe is an option under consideration!<sup>42</sup> I believe that the Missions at Santa Barbara and San Juan Capistrano have experience with rebuilding adobe structures. This is not a simple process, must be undertaken by archeological masons skilled in the specific time period<sup>43</sup>, and of course destroys much historical detail despite the level of care taken. This is not just a matter of popping the structure onto an airport luggage transport tram!

42 Appendix K Section 5.15.4, bullet point 2, page 108

43 perhaps LAWA has some of these specialists in its employ?

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**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02285-24**

**Comment:**

The EIR acknowledges the substantial impacts to the Centinela Adobe of the Alternatives under consideration, but then cavalierly dismisses them. In an area of the country where we have little depth of history to begin with, LAWA's cavalcade of progress would wipe out our treasures from the past.

The historical impact of this proposal is too severe. The LAX Master Plan is out of line with resources in the area.

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02285-25**

**Comment:**

LAX EIR

"surface transportation"

No Action/No Project Alternative	
planned parking capacity	35,612
P-6 garage	686
Corrected capacity	36,298

Table 4.3.1-7 at EIR page 4-260  
as restated to include garage P-6 in NA/NPA

	demand yr 2005	planned capacity	ratio as corrected
Environmental Baselin	17,330	20,279	85.5%
No Action/No Project	29,600	36,298	81.5%
Alt A	29,288	33,257	88.1%
Alt B	29,288	31,037	94.4%
Alt C	29,288	36,127	81.1%

	demand yr 2005	planned capacity	ratio as corrected
Environmental Baselin	17,330	20,279	85.5%
No Action/No Project	36,600	36,298	100.8%
Alt A	35,636	36,621	97.3%
Alt B	35,636	34,401	103.6%
Alt C	35,636	39,441	90.4%

**Response:**

Please see Response to Comment PC00248-5.

**PC02286**

**Poyourow, Joanne**

**None Provided**

**5/30/2001**

**PC02286-1**

**Comment:**

Today I happened to read Ruth Galanter's website, and of her pursuit of a regional approach to the airport situation. I also read about how she called on the airport to reduce air pollution.



In that vein, here is yet another point I have been developing. You may find useful stuff in the footnotes; the Special Report and the list of other aviation companies surprised me when I found it. There is a lot there, that we could hold LAWA to, from their own industry.

More points to come, I am working on several angles on regional allocation.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02286-2**

**Comment:**

Subsection 4.6, page 4-459  
Issue: Air Quality - Greenhouse Gasses

The Worldwatch Institute says: "Airplanes can be especially fuel-inefficient . . . they are the primary source of heat-trapping greenhouse gas emissions from humans that are deposited directly in the upper atmosphere, and scientists have noted that these emissions have a greater warming effect than they would have if they were released at the surface."<sup>1</sup>

The Union of Concerned Scientists evaluates airborne environmental impact in two categories, Air Pollution and Greenhouse Gasses.<sup>2</sup> Your EIR touts your commitments and mitigations under SCAQMD and emissions of "five criteria pollutants."<sup>3</sup> This pertains to Air Pollution. What are you doing about Greenhouse Gasses?

<sup>1</sup> page 111, State of the World 2001, the Worldwatch Institute. ISBN 0-393-32082-0

<sup>2</sup> The Union of Concerned Scientists

<sup>3</sup> EIR Section 4.6 page 4-459

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02286-3**

**Comment:**

How do your Alternatives A, B, C measure up in terms of the 6 major greenhouse gasses, most notably carbon dioxide? How does the increased volume portrayed in your Alternatives A, B, C, measure up to what is quickly becoming the world standard of 6-8% below 1990 emissions levels of greenhouse gasses?<sup>4</sup>

<sup>4</sup> reference the Kyoto Protocol, implementation called for by United Nations by 2008-2012, which is well within your project timeline. Source of my information [http://www.state.gov/www/global/oes/fs\\_kyoto\\_climate\\_980115.html](http://www.state.gov/www/global/oes/fs_kyoto_climate_980115.html) Despite current U.S. political climate, the European Union and Australia are carrying this forward to become a world standard. There will be some standard of this caliber incorporated into U.S. law during the duration of the LAX Master Plan.

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

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**PC02286-4**

**Comment:**

What are your commitments and mitigations to the United Nations Framework Convention on Climate Change?

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02286-5**

**Comment:**

Many of your international travelers come from countries that are already committed to positive action on this issue<sup>5</sup>. As a member of the world market, how do you plan to support their efforts? What commitments and assurances can you offer to them?

Other members of the international aviation community are already active in this regard.<sup>6</sup> Where is LAWA?

<sup>5</sup> For United Nations Framework Convention on Climate Change list of countries that have ratified the treaty to date, see <http://www.unfccc.de/resource/convkp.html>

<sup>6</sup> The Pew Center on Global Climate Change lists as members of its Business Environmental Leadership Council such aviation industry giants as Boeing and Lockheed/Martin (May 2001). See <http://www.pewclimate.org/index.html>. For the text of the Intergovernmental Panel on Climate Change's special report "Aviation and the Global Atmosphere" see <http://www.ipcc.ch/>

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02286-6**

**Comment:**

If this plan is truly to uphold its stated objective of "an environmentally sound manner,"<sup>7</sup> LAWA must make some attempt to bring CO<sub>2</sub> emissions from its volume and operations into compliance.

"World airports" call for world-class responsibility and world-level leadership in response to world-class issues. Can you "reduce some of the impacts below the level at which they would be considered significant"<sup>8</sup> by the United Nations?

<sup>7</sup> The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

<sup>8</sup> quoting your paragraph 1 under EIR Section 4.6

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02287**

**Poyourow, Joanne**

**None Provided**

**6/9/2001**

**PC02287-1**

**Comment:**

Subsection 4.3.1.6.1  
Evidence of statistical tampering

The EIR's preparer was obviously instructed to distort statistics in order to derive LAWA's desired results. Section 4.3.1.6.1 is clear evidence of this manipulation.

**Response:**

Comment noted. Please see Responses to Comments PC02287-2 and PC02287-3 below.

**PC02287-2**

**Comment:**

In many areas of the EIR the point is made that No Action/No Project Alternative is the true "baseline", since 1996 is now outdated.

**Response:**

Although the No Action/No Project Alternative provides a benchmark for comparison of the four build alternatives, in accordance with the State CEQA Guidelines, conclusions regarding the significance of impacts for all the build alternatives are based on the 1996 baseline or, for certain environmental disciplines, the adjusted environmental baseline. Please also see Topical Response TR-GEN-1 regarding baseline issues.

**PC02287-3**

**Comment:**

Yet in Section 4.3.1.6.1 the EIR admits that the P-6 parking garage (which already exists) is included only in the 2005 and 2015 scenarios<sup>1</sup>. It is not included in the No Action/No Project Alternative!

By consciously deleting P-6 from the No Action/No Project Alternative scenario, Alternatives A, B & C falsely appear to offer additional parking spaces. In fact, for 2005, Alternatives A, B & C each offer LESS parking spaces than if I drove to LAX today to park my car!<sup>2</sup>

Add to this, LAWA's assertion that parking demand will remain the same under Alternatives A, B & C as it will under No Action/No Project Alternative 3. The statistics given for forecasted vehicle trips indicate 5,668 to 7,621 additional vehicle trips per hour<sup>4</sup>. The EIR plans that none of these cars will be stopping!

<sup>1</sup> First paragraph of EIR Section 4.3.1.6.1 Page 4-253

<sup>2</sup> Table 4.3.1-7 at EIR page 4-260 "Planned Capacity" under the No Action/No Project Alternative should be 686 spaces higher for the P-6 garage. Therefore NA/NPA capacity would be 36,298 (=35,612 + 686). This is higher than planned capacity shown for any of the Alts A, B, C for 2005. Alt A is essentially the same as the present day for 2015. Parking today is higher than Alt B for 2015.

<sup>3</sup> Table 4.3.1-7 "Daily Demand (Spaces)" is essentially the same for Alternatives A, B & C as it is for No Action/No Project Alternative.

<sup>4</sup> EIR Table 4.3.1-4 "1996" columns, inbound plus outbound, compared to each of Tables 4.3.1-10, 4.3.1-11, and 4.3.1-12 "2015" columns, inbound plus outbound

**Response:**

Please see Response to Comment PC00248-3.

**PC02287-4**

**Comment:**

The credibility of this EIR is seriously shaken. All statistics in this EIR should be reviewed by independent auditors prior to being taken as fact! Findings such as the tampering of parking statistics cast doubt and question upon ALL statistics contained in the EIR.

### 3. Comments and Responses

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When LAWA's EIR alleges that there will be little to no impact (or positive impact) from their Alternatives A, B & C, we cannot believe them!

**Response:**

Comment noted. The EIS/EIR was prepared by a large number of independent consultants and experts. While there is no reason to question the overall accuracy of the statistics in the report, the public review period required under NEPA and CEQA affords agencies, interested parties, and the general public the opportunity to review, and question if desired, the assumptions, calculations, and conclusions of the analyses. In the case of the LAX Master Plan, a 295-day review period was provided for the Draft EIS/EIR and a 120-day review period was provided for the Supplement to the Draft EIS/EIR.

**PC02287-5**

**Comment:**

EIR Tables 4.3.1-4, and 4.3.1-10 through -12  
Freeways at LOS-F

Additional vehicles PER HOUR

Over the traffic we are currently experiencing

	Alt. A	Alt. B	Alt. C
Airport Peak	7,621	7,150	5,668
P.M. Peak	6,451	6,403	6,095

This is in addition to other massive increases looming in the area!5

The greater Los Angeles infrastructure cannot support this influx of traffic.

The EIR admits that the I-405 and the I-105 were already at LOS E-F in 1996 6. The LAX Master Plan would add 5,668 to 7,621 ADDITIONAL VEHICLES PER HOUR to these already overburdened roadways.

The EIR conspicuously fails to reveal how many of these 5,668 to 7,621 ADDITIONAL VEHICLES PER HOUR will be driving on the I-405 between I-101 and SR-90. This stretch of freeway never seems to flow well, at any hour of day, any day of the week. The EIR fails to give breakdowns, to reveal how many of these additional vehicles will be using the I-105 east of Hawthorne Blvd, or using the I-405 south of Imperial Hwy. The EIR simply marks these LOS E-F freeway stretches "more airport with project"7

The EIR takes the approach that because LAWA proposes the LAX Expressway, Alts A, B & C will "improve" the current traffic issues. In saying this, they are only looking at the immediate geographical vicinity of the airport8. They avoid considering the burden this Plan will place on the total freeway system.

The LAX Master Plan will "significantly impact" transportation corridors up the I-405 beyond the I-10 through the Sepulveda Pass. It will "significantly impact" I-405 flow (or lack thereof) through the South Bay curve, and I-105 through Hawthorne and beyond. In short, the LAX Master Plan will create massive gridlock throughout the greater LA basin.

No Thanks!

5 Developments like Playa Vista, etc. are mentioned in other sections of the EIR (Sec 4.17.1.7.1 on Natural Resources for example) but are suspiciously absent from the discussions of surface transportation!

6 EIR Figure 4.3.2-2

7 EIR Figure 4.3.2-4

8 EIR Section 4.3.2 page 4-299, paragraph 1, even goes so far as to say that increased traffic congestion on the I-405 north of the LAX Expressway "should not be construed as adverse impacts created by the project"! They slickly try to avoid taking responsibility for the fact that their proposal is way out of line with the area's overall resources!

**Response:**

This comment is similar to comment PC00249-1. Please see Response to Comment PC00249-1.

**PC02287-6**

**Comment:**

EIR Subsection: Figure 1-3  
Exaggerated 60-Min.Accessibility

The 60-minute accessibility statistics used in the EIR are grossly exaggerated. The Airport Travel Time Zones shown on Figure 1-3 are laughable. LAWA has overstated its 60-minute geographic territory, and thus has overstated its projected passenger load, in order to distort the readers impression of demand for LAX air services.

LAWA simply wants to monopolize Los Angeles air transportation, and they have produced misleading figures to get us to approve their facilities expansion, to "sustain and advance"<sup>9</sup> their market share.

Section 1.2.1.2 makes a big point of "market accessibility," the idea that a passenger has to be able to get to an airport to use it.

LAWA claims that 44 MAP<sup>10</sup> are within the 60-minute access zone of LAX.<sup>11</sup> These 44 MAP won't get to LAX in 60 minutes; some won't even get there in 2 hours!

<sup>9</sup> The Purpose and Objectives of the Proposed Project, EIR section 2.1, third bullet point

<sup>10</sup> EIR section 1.2.2.1, page 1-17 paragraph 2

<sup>11</sup> LAWA is careful not to reveal the exact boundaries of this supposed 60-minute access zone, giving us only a fuzzy map without street name identifications (Figure 1-3). So I compared their Fig 1-3 to my Thomas Guide and then applied the results to Yahoo on Maps/Mapquest.com

**Response:**

Comment noted. Please see Response to Comment PC00250-1.

**PC02287-7**

**Comment:**

In Section 4.3.2.6.1 the EIR makes a dramatic issue about future traffic: "In 2020 ... a 12-mile trip will take 60 minutes." Given LAWA's own assertion about future traffic speeds, and the LOS-F freeways that already exist<sup>12</sup>, those 44 MAP will quickly find other travel options and will avoid LAX. They will choose other airports.

Analyzing 4 geographic points from what Fig 1-3 claims is LAX's 60-minute accessibility zone:

Northernmost - 405 fwy near Roscoe Blvd, Van Nuys. From here a passenger would travel approximately 23 miles to LAX<sup>13</sup>. At 12 miles per 60 minutes<sup>14</sup>, this would mean just under 2 hours to get to LAX.

Northeast - near the intersection of the 605 and the 10 fwys, El Monte. From here a passenger would travel approximately 30.2 miles to LAX<sup>15</sup>. At 12 miles per 60 minutes, this would mean about 2 and a half hours to get to LAX.

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East - intersection of 5 fwy and 91 fwy, Fullerton. From here a passenger would travel approximately 29.3 miles to LAX<sup>16</sup>. At 12 miles per 60 minutes, this would mean about 2 and a half hours to get to LAX.

Southeast - intersection of 405 fwy and 605 fwy, Long Beach. From here a passenger would travel approximately 22.2 miles to LAX<sup>17</sup>. At 12 miles per 60 minutes, this would mean about 2 hours to get to LAX.

LAWA derives its incredible demand statistics by usurping the geographic territory already served by other local airports. For some geographic pockets, consumers already have a choice between two or even three other local airports, yet LAWA still includes these people in the count for LAX.<sup>18</sup>

As a result, any analysis attempting to use these figures is hopeless. LAX's stated 55% of regional demand<sup>19</sup> merges with Long Beach's 43% of regional demand<sup>20</sup>, which includes some Orange County noses in its count. From figures such as these, it appears that Long Beach needs the expansion plan, not LAX!

Additionally, LAWA has downwardly distorted the 60-minute accessibility volume portrayed for other airports. From personal experience: I used to live at the intersection of 405 fwy, 55 fwy and 73 fwy in Orange County. We regularly used Ontario for certain air routes. It took us less than an hour to get there. Yet the location of my former residence is far outside the odd zone shown for Ontario.

Thus LAX will not draw passengers from nearly the geographic territory they claim they will. Traffic congestion will send these people to other airports. The demand figures for future LAX air travel services are grossly exaggerated in the LAX Master Plan, in order to support this project to preserve LAWA's stranglehold on Southern California air transport.

LAX does not require facilities expansion of the magnitude that LAWA would have us believe.

<sup>12</sup> by their own acknowledgement at Figure 4.3.2-2

<sup>13</sup> On Yahoo Maps, starting point 15800 Roscoe Blvd, Van Nuys. Arriving point 5300 century blvd, LA. I did not use Arbor Vitae because Mapquest.com does not acknowledge random points on the fwy and this is not yet an offramp.

<sup>14</sup> EIR Section 4.3.2.6.1

<sup>15</sup> On Yahoo Maps, starting point 12200 Garvey, El Monte. Arriving point 5300 century blvd, LA.

<sup>16</sup> On Yahoo Maps, starting point 1200 Magnolia, Fullerton. Arriving point 5300 century blvd, LA.

<sup>17</sup> On Yahoo Maps, starting point 1900 Studebaker Rd, Long Beach. Arriving point 5300 century blvd, LA.

<sup>18</sup> Reference Figure 1-3, in particular, Long Beach

<sup>19</sup> EIR section 1.2.2.1, page 1-17

<sup>20</sup> EIR section 1.2.2.6, page 1-1 8

**Response:**

This comment is similar to comment PC00250-2. Please see Response to Comment PC00250-2.

**PC02287-8**

**Comment:**

EIR Subsection 4.1.7.2  
Conflicting opinions!

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The EIR states, regarding Level of Significance After Mitigation: "Although Master Plan Commitment N-I and Mitigation Measures MM-N1 through MM-N3 would reduce aircraft noise impacts, the residual impact would not be less than significant. As such, a significant and unavoidable impact from aircraft noise is expected.<sup>21</sup>"

The EIR states, regarding Cumulative Impacts:

"The cumulative effects of noise from aircraft, construction and roadway noise are not expected to be significant.<sup>22</sup>"

The EIR authors have so completely scrambled the facts that they cannot themselves derive a consistent opinion on this Plan!

This EIR is not to be trusted!!

21 EIR section 4.1.9.1 Level of Significance After Mitigation: Aircraft Noise. Emphasis added.

22 EIR section 4.1.7.2 Cumulative Impacts: Alternatives A, B, C. Emphasis added.

**Response:**

The content of this comment is identical to comment PC00251-1; please refer to Response to Comment PC00251-1.

**PC02287-9**

**Comment:**

EIR Subsection 4.3.2, page 4-296  
"Cutting through" north surface streets

FALSE: "...impacts to arterial and local streets - particularly to the north - would be minimized by shifting much of the north airport demand to the new LAX expressway. This reduction in the number of LAX vehicles 'cutting through' the north surface streets is apparent ..."<sup>23</sup>

How stupid do the Master Plan authors think the Southern California public is?

The EIR (all Alternatives) depicts drivers as preferring to drive several miles out of their way rather than cutting through Westchester on Sepulveda. The Master Plan would have vehicles taking the LAX Expressway, paralleling I-405 east and around the La Tierra curve, down to Arbor Vitae, before turning back west toward the airport. Preposterous!

Computers may crank number charts, but people are not that stupid! Take a basic map of the area, draw a straight line from I-405 in Culver City, to LAX, and there is Sepulveda through Westchester. People will take the straight-line shortcut, en masse.<sup>24</sup> Sepulveda will continue to be a major cut-through to access LAX. But with the addition of Alternatives A, B & C, our residential neighborhood will become a cut-through for even MORE volume in taxis, limos, autos, etc.

The LAX Expressway will not eliminate the Sepulveda north cut-through issues.

The impacts of Master Plan Alternatives A, B, C on the Westchester community are intolerable.

23 EIR Section 4.3.2 page 4-296, second paragraph

24 even YahooMaps at Mapquest.com shows this route, instead of recommending that drivers use Century.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways, Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-6 regarding neighborhood traffic impacts. Also

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please see Topical Response TR-ST-7 regarding a brief history of LAX Northside/Westchester Southside, its role in the Master Plan, and the impact/benefits of the proposed airport alternatives. Please note that Alternative D does not include an LAX Expressway or a Ring Road.

#### PC02287-10

**Comment:**

EIR Subsection 4.1.3.1.1 and Figure 4.2-9  
Baseline Noise understated

The noise impact circles drawn on figure 4.2-9 25 are inaccurate. The area truly affected by LAX noise levels is significantly understated.

25 It is interesting that the maps depicting the 65 CNEL contours are not provided in section 4.1 Noise; only a text description of these contours (4.1.2.1.1, bottom of page 4-29) is provided. One must go to section 4.2 Land Use to find the 65 dB contour maps. They have hidden the maps, just like they want to hide the future impact!

**Response:**

The content of this comment is identical to comment PC00253-1; please refer to Response to Comment PC00253-1.

#### PC02287-11

**Comment:**

I live about half way between Grid point HO7 and HO8 on Figure 4.1-1. The 1996 65dB circle as drawn on figure 4.2-9 would seem to exclude my residence. Yet at current airport activity levels, most days I can hear aircraft over the sound of my appliances<sup>26</sup>. Particularly when the weather is under Santa Ana wind conditions, on Monday mornings, Friday afternoons, and during certain hours of day.<sup>27 28</sup>

<sup>26</sup> According to the "Noise Levels in Decibels" chart at [www.temple.edu](http://www.temple.edu), if I can hear an aircraft over the sound of my vacuum cleaner, dishwasher or garbage disposal, then it is in excess of 65dB.

<sup>27</sup> Overall area noise level is highest on a clear sunny day with a light breeze. Low marine layer dampens the sound, while high marine layer (frequent) amplifies it over the level of a still sunny day. Under Santa Ana conditions, the airport operates "backwards" which means the acceleration and take-off points are all different. This condition is the noisiest of all.

<sup>28</sup> These observations are from spring 2001, and thus include "federally mandated phase out of older, noisier Stage 2 jets."

**Response:**

The content of this comment is identical to comment PC00253-2; please refer to Response to Comment PC00253-2.

#### PC02287-12

**Comment:**

It's great that the EIR preparers utilized the latest INM computer projection system, but has anyone checked actual noise levels?<sup>29</sup> Has anyone checked real LAX airport noise on a day with onshore winds? Santa Ana conditions? How about at 5-9 a.m. on a Monday? Any weekday morning with high marine layer? Before a holiday weekend? Any Friday afternoon, anytime after noon? What about the sound of an aircraft that is called off, does not land, and accelerates over the residences to climb back to altitude?<sup>30</sup> These are not rare spikes in the sound pattern; their sum total, and the fact that one flows into the next, create a constant barrage of airport noise.



29 Appendix K section 4.6.2.5 page 42 would seem to indicate some noise measurements were done. However these were for road noise, and to calibrate the computer!

30 Who selected the "average day" to create the models? What was the weather like on the days the data was accumulated? What proportion of flights actually adhered to noise abatement procedures? What proportion of flights were called off? Were any statistics accumulated from east flow?

**Response:**

The content of this comment is identical to comment PC00253-3; please see Response to Comment PC00253-3 regarding accuracy of the INM.

**PC02287-13**

**Comment:**

EIR Section 4.1.3.1.1 states that "LAX operates in west flow 95-98 percent of the time." I wonder who sat and counted planes, under what perfect weather conditions, to derive this incredible figure. By my personal observation, LAX operates in east flow quite often, a situation that gives rise to extraordinary noise patterns that cannot possibly be reflected in the circles of impact included in the EIR.<sup>31</sup>

31 If this 95-98% west flow statistic were correct, that would mean LAX operated in west flow 7 to 18 days per year (365 x 2%, 365 x 5%); no way. If you were to tell me they used west flow 30 to 70 days per year, I would say you were on the low side of accurate.

**Response:**

The content of this comment is identical to Comment PC00253-4; please see Response to Comment PC00253-4.

**PC02287-14**

**Comment:**

LAX is one of the biggest airports in the world. Was the INM computer system created to handle this? Or was this system designed for a more "average" airport. Also, computers calculate based upon data. Has anyone audited the statistics that LAX fed them to achieve these results? We already know what LAX does with statistics!<sup>32</sup>

I believe the INM computer is grossly understating the number of acres and number of people significantly impacted by LAX's DNL. And if 1996 noise impact circles on figure 4.2-9 are so grossly inaccurate, then we cannot possibly trust the projected 2005 and 2015 impact circles as drawn.

32 Reference my finding of intentional distortion of parking garage statistics in the EIR, discussed in another Public Comments form.

**Response:**

The content of this comment is identical to comment PC00253-5; please refer to Response to Comment PC00253-5.

**PC02287-15**

**Comment:**

This plan is NOT designed "in an environmentally sound manner that is compatible with surrounding land uses."<sup>33</sup> The LAX Master Plan is out of line with the surrounding community.

33 The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

**Response:**

Comment noted. Please see Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding compatibility issues.

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#### PC02287-16

**Comment:**

EIR Subsections 4.1.9.1  
Aircraft Noise Key Conclusions

The EIR states:

"Although Master Plan Commitment N-1 and Mitigation Measures MM-N1 through MM-N3 would reduce aircraft noise impacts, the residual impact would not be less than significant. As such, a significant and unavoidable impact from aircraft noise is expected.<sup>34</sup>"

The EIR states:

"Alternatives A and C are roughly equivalent to the No Action/No Project Alternative"<sup>35</sup> Based upon their statements about environmental baseline, I don't believe it.<sup>36</sup>

The EIR states:

"Alternative B . . . would expose considerably more total people to 65 CNEL ..."37

34 EIR section 4.1.9.1 Level of Significance After Mitigation: Aircraft Noise.

35 EIR section 4.1, page 4-11, paragraph 4

36 reference my Public Comment form on the inaccuracies of Figure 4.2-9 baseline noise exposure.

37 EIR section 4.1, page 4-11, paragraph 5

**Response:**

The content of this comment is identical to comment PC00254-1; please refer to Response to Comment PC00254-1.

#### PC02287-17

**Comment:**

These impacts are unacceptable.

This plan is NOT designed "in an environmentally sound manner that is compatible with surrounding land uses."<sup>38</sup>

The Master Plan is out of line with the surrounding community.

38 The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

**Response:**

Comment noted. Please see Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding compatibility issues.

#### PC02287-18

**Comment:**

EIR Subsection:  
Appendix K, section 5.15  
Centinela Adobe

The EIR admits that impacts to the Adobe could be "Adverse" under two Alternatives under study.<sup>39</sup>

The EIR admits that the single viaduct alternative "could result in indirect impacts on the Centinela Adobe ... due to vibration and potential structural damage."<sup>40</sup> The EIR contradicts itself in Table 5.15-1 by saying that the single viaduct would not have adverse effect on the Adobe, a statement that is in direct conflict with the implications of section 5.15.1.3.

The EIR states: "Adverse impacts to . . . the Centinela Adobe . . . would be reduced and possibly mitigated with the implementation of the mitigation measures "<sup>41</sup>

Adverse impacts of the LAX Master Plan's LAX Expressway on the Centinela Adobe would be substantial, even severe. This is intolerable; the Centinela Adobe is a treasured historical resource, not just to the city of Los Angeles, but in the eyes of California history.

39 under LAX Master Plan EIR Alternatives A and C. reference footnote 1 to Table 5.15-1(Appendix K)

40 quoted from Appendix K, section 5.15.1.2, paragraph 2, which is incorporated into section 5.15.1.3 by reference: "as with Alternative 2, this alternative [alternative 3 - single viaduct] also involves the use of heavy machinery and equipment to erect the elevated viaducts and associated ramps and overpasses." This heavy machinery and equipment is admitted to cause potential damage by vibration under sec 5.15.1.2 for Alternative 2, yet this fact is slyly not restated under sec 5.14.1.3 for Alternative 3.

41 EIR Appendix K, section 5.15.4, paragraph 1, page 108

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02287-19**

**Comment:**

The EIR would have us believe that "placing [the HOV lane] ...out of view of both resources' primary elevation"<sup>42</sup>, a visual mitigation, would be sufficient to mitigate impact on the Adobe. Yet the EIR admits that vibration is an issue to the Adobe. Vibration will come not just from construction equipment, but from automobile volume during usage.<sup>43</sup> "Out of view" will hardly solve the impact of vibration on the structural integrity of this historic Adobe.

42 Appendix K section 5.15.4, bullet point 1, page 108

43 The EIR gives no indication that they have even considered this point

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02287-20**

**Comment:**

The EIR implies under Mitigation Measures that relocating the Centinela Adobe is an option under consideration!<sup>44</sup> I believe that the Missions at Santa Barbara and San Juan Capistrano have experience with rebuilding adobe structures. This is not a simple process, must be undertaken by archeological masons skilled in the specific time period<sup>45</sup>, and of course destroys much historical detail despite the level of care taken. This is not just a matter of popping the structure onto an airport luggage transport tram!

44 Appendix K, Section 5.15.4, bullet point 2, page 108

45 has LAWA consulted with any of these specialists about what is truly involved?

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**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02287-21**

**Comment:**

The EIR acknowledges the substantial impacts to the Centinela Adobe of the Alternatives under consideration, but then cavalierly dismisses them. In an area of the country where we have little depth of history to begin with, LAWA's cavalcade of progress would wipe out our treasures from the past.

The historical impact of this proposal is too severe. The LAX Master Plan is out of line with resources in the area.

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe.

**PC02287-22**

**Comment:**

EIR Subsection 4.17.1  
Renewable Energy Sources

LAWA gives lip service to alternative energy with a 4 color bar graph proclaiming their "alternative fuel" consumption projection. Yet every one of the alternative fuels highlighted in this banner display are produced from gas wells, or in conjunction with crude oil production or petroleum refining, i.e. are from non-renewable energy sources.<sup>46</sup>

LAWA's "Environmental Action Plan"<sup>47</sup> is so minute in its true impact as to be laughable.

What programs does LAWA have toward transitioning their volume and operations to sustainable energy resources, renewable energy sources, fuels derived from biomass feedstock, non-fossil and non-petroleum feedstocks?

LAWA downplays the difference between sustainable and depletable energy sources. They would have us believe that their use of "alternative fuels (CNG, LNG and propane)" is a heroic departure from "petroleum-based fuels"<sup>48</sup> In fact, both fuel sources remain firmly in the non-renewable category.

No matter how you slice it, the environmental impact of all three Alternatives under study is a dramatically greater draw on fossil fuels, something our society can ill afford.

As a world leader in the transportation industry, LAWA has a societal obligation to lead the parade toward sustainable fuel sources.

<sup>46</sup> reference <http://www.afdc.nrel.gov/altfuel/gas-general.html> for LNG and CNG, and [http://www.afdc.nrel.gov/altfuel/lpg\\_general.html](http://www.afdc.nrel.gov/altfuel/lpg_general.html) for Propane.

<sup>47</sup> EIR section 4.17.1, page 4-778

<sup>48</sup> this contrast is made in EIR section 4.17.1, bottom of page 4-778, second-to-last paragraph

**Response:**

This comment is identical to comment PC00256-1; please see Response to Comment PC00256-1 regarding green power and alternative energy sources.

#### PC02287-23

**Comment:**

This Master Plan falls substantially short of its stated purpose and objectives to "provide [airport capacity] in an environmentally sound manner."<sup>49</sup>

49 EIR section 2.1, paragraph 1

**Response:**

Comment noted.

#### PC02287-24

**Comment:**

EIR Subsection 5, page 5-16, item MM-ST-1  
Emerson off-ramp

The EIR touts the fact that the off-ramp from the airport ring road to Emerson Street will be right-turn only, as if that makes it better. Any Emerson offramp from a high-volume ring road will destroy a neighborhood. It will dump vehicles into the residential neighborhood between LAX and Manchester. And it will invite airport traffic to cut-through the Westchester residential neighborhoods north of Manchester Blvd.<sup>50</sup>

Emerson Street is a low-volume little street in a residential neighborhood. This proposed off-ramp would take vehicles past a preschool, a church, a grade school, and many single family residences.

If vehicles elect to continue on Emerson beyond Manchester, they would pass a community center, another grade school, multiple single family dwellings.

An Emerson offramp would have vehicles zipping past these residences.

Traffic from the Emerson offramp would pour past this church and connected elementary school

Emerson, to 83rd street east, and out to Sepulveda, creates a handy cut-through for those who wish to access the Culver City area, or bypass the ridiculous loop-around of the LAX Expressway.

Photo shows low-volume intersection of Emerson and 83rd, looking toward Sepulveda

Emerson, to 83rd street west, and out to Lincoln provides a handy route for residents of Playa Vista, Marina del Rey, and other beach communities. If there is any slow-down on Manchester at all (delays at traffic lights, construction, etc.) you can be sure that people will use these small residential streets in volume!

An Emerson offramp of ANY form will destroy these neighborhoods. It will invite the kind of traffic issues that have Braddock Street in Culver City constructing speed bumps, traffic circles, additional stop sign intersections. Even with all these constructs, Braddock Street still receives incredible volume cutting through to Sepulveda.

<sup>50</sup> This cut-through activity is already acknowledged by LAWA at EIR 4.3.2, page 4-296. The LAX Expressway would be no solution; this issue is discussed in another Public Comments form.

**Response:**

The mitigation plan includes provision of a westbound off-ramp only, from the Ring Road to Emerson Street. This is the only access provided between Emerson and the Ring Road. It was included strictly to provide the residents living along Emerson an additional route to get home from I-405, in addition to La Tijera. Because of the location of Emerson relative to the other streets in the area, and the location of the off-ramp, it is not expected that this ramp would encourage any "cut-through" traffic on Emerson.

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Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

#### PC02287-25

**Comment:**

The Westchester neighborhood that LAWA is proposing to destroy in this fashion is a family neighborhood. Kids ride bikes and scooters on these streets, and walk to school. People jog, and walk their dogs here. The elderly stroll along these streets. This is not the place to dump high volume traffic from an Expressway!

The impact of any offramp at or near Emerson Street on this neighborhood is too significant to be tolerated.

**Response:**

This content of this comment is similar to comments PC02189-3 and PC01250-5. Please see Response to Comment PC02189-3 regarding Westchester and Response to Comment PC01250-5 regarding Emerson Street. Please note that Alternative D does not include the LAX Expressway or Ring Road, as detailed in the Supplement to the Draft EIS/EIR.

#### PC02287-26

**Comment:**

EIR Subsection 4.6, page 4-459  
Greenhouse Gasses

The Worldwatch institute says: "Airplanes can be especially fuel-inefficient ... they are the primary source of heat-trapping greenhouse gas emissions from humans that are deposited directly in the upper atmosphere, and scientists have noted that these emissions have a greater warming effect than they would have if they were released at the surface."<sup>51</sup>

The Union of Concerned Scientists evaluates airborne environmental impact in two categories, Air Pollution and Greenhouse Gasses.<sup>52</sup> Your EIR touts your commitments and mitigations under SCAQMD and emissions of "five criteria pollutants."<sup>53</sup> This pertains to Air Pollution. What are you doing about Greenhouse Gasses?

<sup>51</sup> page 111, State of the World 2001, the Worldwatch Institute, ISBN 0-393-32082-0

<sup>52</sup> The Union of Concerned Scientists

<sup>53</sup> EIR Section 4.6 page 4-459

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

#### PC02287-27

**Comment:**

How do your Alternatives A, B, C measure up in terms of the 6 major greenhouse gasses, most notably carbon dioxide? How does the increased volume portrayed in your Alternatives A, B, C, measure up to what is quickly becoming the world standard of 6-8% below 1990 emissions levels of greenhouse gasses?<sup>54</sup>

<sup>54</sup> reference the Kyoto Protocol, implementation called for by United Nations by 2008-2012, which is well within your project timeline. Source of my information [http://www.state.gov/www/global/oes/fs\\_kyoto\\_climate\\_980115.html](http://www.state.gov/www/global/oes/fs_kyoto_climate_980115.html) Despite current U.S. political climate, the European Union and Australia are carrying this forward to become a world standard. There

will be some standard of this caliber incorporated into U.S. law during the duration of the LAX Master Plan.

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02287-28**

**Comment:**

What are your commitments and mitigations to the United Nations Framework Convention on Climate Change?

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02287-29**

**Comment:**

Many of your international travelers come from countries that are already committed to positive action on this issue<sup>55</sup>. As a member of the world market, how do you plan to support their efforts? What commitments and assurances can you offer to them?

Other members of the international aviation community are already active in this regard.<sup>56</sup> Where is LAWA?

<sup>55</sup> For United Nations Framework Convention on Climate Change list of countries that have ratified the treaty to date, see <http://www.unfccc.de/resource/convkp.html>

<sup>56</sup> The Pew Center on Global Climate Change lists as members of its Business Environmental Leadership Council such aviation industry giants as Boeing and Lockheed/Martin (May 2001). See <http://www.pewclimate.org/index.html>. For the text of the Intergovernmental Panel on Climate Change's special report "Aviation and the Global Atmosphere" see <http://www.ipcc.ch/>

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

**PC02287-30**

**Comment:**

If this plan is truly to uphold its stated objective of "an environmentally sound manner,"<sup>57</sup> LAWA must make some attempt to bring CO<sub>2</sub> emissions from its volume and operations into compliance.

"World airports" call for world-class responsibility and world-level leadership in response to world-class issues. Can you "reduce some of the impacts below the level at which they would be considered significant"<sup>58</sup> by the United Nations?

<sup>57</sup> The Purpose and Objectives of the Proposed Project, EIR section 2.1, first paragraph

<sup>58</sup> quoting your paragraph 1 under EIR Section 4.6

**Response:**

Please see Response to Comment PC00258-1 regarding the topic of greenhouse gases.

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**PC02287-31**

**Comment:**

EIR Page 1-23

"Losses" are a scare tactic

The EIR ominously threatens: "there is a chance that future growth in international service - and the jobs and investment stimulated by this activity - could be lost to airports outside the region, perhaps outside the state."<sup>59</sup>

Yet elsewhere, the EIR states clearly: "LAX . . . is projected to remain as the region's primary international airport, with or without any expansion of facilities."<sup>60</sup>

LAWA is using scare tactics to get us to let them go ahead with a bad plan. They're trying to scare us that the LA area might lose jobs & revenues if we don't get behind LAWA's ill-conceived expansion plan.

But then LAWA contradicts itself when it admits that the economy & demand for air transport in the LA area is only going to increase.<sup>61</sup> With or without their expansion plan!

The fact is, there will be no losses. LA demand is not going to decrease. If world demand for air transport is going out of sight like LAWA would have us believe, then even if some companies transfer business to Burbank, Denver, etc., the new demand of other companies will take up the slack!

There will be no net decrease to the City of Los Angeles, even if we decline LAWA's poorly designed Master Plan.

"the airlines, and not government, make the decision about which airports they will serve."<sup>62</sup>

LAWA sounds laughably pathetic about this one. If it were really an issue, if LAWA really feared that major airlines would abandon LA, they would have flooded us with reports, statistics, analyses, graphics, about what if this airline left, what if that one left, what would be the impact? But they gave us no such statistics, which means they really didn't lose any sleep over this issue. Again, they are just trying to scare the reader.

Similarly, several times LAWA cries about losing business and freight. But then they reveal that 50% of LAX users are leisure travelers!<sup>63</sup>

In short, we cannot believe LAWA's threats about losses to the LA area, because there just won't be any. Even if we reject their outrageous expansion plan.

<sup>59</sup> EIR section 1.2.3, page 1-23, paragraph 3.

<sup>60</sup> EIR section 1.2.2.1, page 1-17 paragraph 2. Emphasis added.

<sup>61</sup> LAX Master Plan, page 1-4.4

<sup>62</sup> EIR section 1.2.2 page 1-14, first full paragraph

<sup>63</sup> EIR section 1.3.4 final paragraph, page 1-29

**Response:**

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



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

#### PC02287-32

**Comment:**

Master Plan page 1-3.14 to .16  
Air traffic

"Airlines consider several factors in making decisions about which airports to serve in a region with multiple airports. The key factors include . . . Airspace limitations"<sup>64</sup>

64 LAX Master Plan, page 1-3.16

**Response:**

Comment noted.

#### PC02287-33

**Comment:**

From my Westchester residence I can see the planes lined up in the sky, queued up for approach into LAX. These planes get in line like schoolchildren to file into LAX's runways.

When you fly into LAX, the plane gets into that queue with reduced altitude and airspeed over Las Vegas.

Basically, it's gridlock in the skies over Los Angeles.

60 Minutes recently aired an article about the overcrowded state of air travel<sup>65</sup>. In this article they discussed how airplanes currently fly "from navigation point to navigation point, one plane behind the other"<sup>66</sup> in a line across the country. The FAA will soon implement a new satellite navigation system called Freeflight, as a solution to the current traffic congestion on air "highways" (for want of a more technical term), that line-up of aircraft following each other point-to-point across the country. This system will allow pilots to plot their own direct routes and ease that congestion.

But when all the airplanes flying Freeflight approach the Los Angeles area, they will still have to deal with the lines. And it will only get worse under the volume of LAWA's Alternatives A, B, C.

Freeflight can't help airspace gridlock over the Los Angeles area, if all the airplanes have to snap back into linear formation to approach a single airport. Freeflight would beg for multiple locations on the ground that airplanes could approach.

65 CBS News 60-Minutes "Delays" aired May 27, 2001.

66 Quote from "Delays"

**Response:**

Free flight, though not yet implemented, would potentially allow for more efficient access to the Los Angeles basin by eliminating the need for aircraft to cross over one waypoint while on approach to LAX. Though busier than many other regions of the country, the airspace in Southern California remains well organized and capable of handling the volume of air traffic associated with each of the alternatives.

### 3. Comments and Responses

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#### PC02287-34

**Comment:**

We must develop a network of airports in the region. We must focus our resources, not to overdevelop one single airport, but to develop a cohesive network of airports in the greater Los Angeles area.

**Response:**

Comment noted. Please see Response to Comment PC02287-31 above.

#### PC02287-35

**Comment:**

EIR Subsection 3.1.1 .2  
Growth constraints at LAX

The EIR says about other local airports: "These airports each have growth constraints arising from some combination of limited physical size; physical, man-made, or natural impediments to expansion; policy limits imposed by ordinances, plans or agreements of the local jurisdiction that operates the airport; capacity limits on surface transportation facilities; and various environmental problems."<sup>67</sup>

And LAX does too! LAX faces just as many growth constraints as other local airports.

LAX has limited physical size. It has already had to reject several Alternatives including ones which involved runway expansion into the Pacific Ocean. LAWA felt compelled to publish 133 pages<sup>68</sup> trying to explain away the environmental issues surrounding land use.

<sup>67</sup> EIR see 3.1.1.2, paragraph 2, page 3-2

<sup>68</sup> page count, EIR section on Land Use

**Response:**

The content of this comment is identical to Comment PC00260-1. Please see Response to Comment PC00260-1.

#### PC02287-36

**Comment:**

LAX has severe accessibility constraints as represented by the greater LA Basin freeway infrastructure. It is certainly up against "capacity limits on surface transportation facilities."

**Response:**

This comment is identical to Comment PC00260-2. Please see Response to Comment PC00260-2.

#### PC02287-37

**Comment:**

LAX also has "various environmental problems" in the El Segundo dunes and the Centinela Adobe, to name a few.

The local policy limits that LAWA asserts about other local airports<sup>69</sup> will lessen considerably as the potential passengers from these geographical areas get fed up with LA Basin freeway traffic.

While LAWA does bring to light some of the sticking-points to full regional development, none of the items listed is justification for overdevelopment of a single airport site (LAX) to the detriment of others.

We must work to develop the region as a whole.

69 in Section 1.2.2.2, section 1.2.2.4, section 1.2.2.5 and section 1.2.2.6

**Response:**

Comment noted. Please see Response to Comment PC02287-31. Also, please see Topical Responses TR-ET-1 regarding potential impacts to the El Segundo blue butterfly and TR-HA-1 regarding the Centinela Adobe. Alternative D does not include the LAX Expressway.

**PC02287-38**

**Comment:**

EIR Subsection 4.2  
LAX Northside access

The Master Plan touts roads that "would provide access for the Westchester community to Southside facilities.<sup>70</sup>" This one should be read in reverse: The roadway system LAWA has designed would provide thoroughfares through Westchester residential neighborhoods for the 6,340-7,000 Southside vehicles.

70 Master Plan page V-Q-2 paragraph 2

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02287-39**

**Comment:**

LAWA has slipped into their Massive Plan certain land use approvals on a development they have been calling LAX Northside. With a subtle name change, now calling it "Westchester Southside", LAWA would fold airport related business and bustling hotels into quiet residential neighborhoods.

The Westchester neighborhoods that parallel the proposed parcels are communities of single family residences, schools and churches. This is no place for the hustle and bustle of a hotel. This is no place for the traffic of rental car agencies. This is no place for "light industrial". No place for "airport support" which for all we know could be machine shops.

LAX Northside does not meet [Q] conditions of "uniformity of development"<sup>71</sup>. The LAX Northside proposal is out of line with the adjoining residential neighborhood!

Ordinance 159,526 [Q] conditions have already dictated to LAWA that their traffic volume from Westchester Southside must be under 6,340 to 7,000 vehicle trips per day.<sup>72</sup> But 6,340 to 7,000 vehicles is too many for these neighborhoods! These are low volume narrow streets, with children and dogs playing on the sidewalks, and elders taking a daily stroll. This is not the place for 6,340 to 7,000 vehicles per day!

71 [Q] Condition requirement, per EIR page 4-93, first paragraph

72 For some unexplained reason the number of inbound trips is 570 vehicles less than the amount of outbound trips. Also, who would police this, if LAWA slipped in extra traffic volume?

**Response:**

The content of this comment is identical to comment PC00261-2; please refer to Response to Comment PC00261-2.

### 3. Comments and Responses

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#### PC02287-40

**Comment:**

The Master Plan reveals LAWA's plan to extend La Tierra to create access to LAX Northside 73. The EIR has an Emerson offramp from the airport ring road<sup>74</sup>. The Master Plan implies that the plans for LAX Northside connections to tiny residential streets such as Stanmoor and Rayford are likely<sup>75</sup>.

73 Master Plan page V-Q-2, paragraph 2

74 EIR section 5, page 5-16, item MM-ST-1

75 reference Master Plan V-Q.2 paragraph, quoted at opening to this Public Comment form.

**Response:**

Comment noted.

#### PC02287-41

**Comment:**

LAWA has selected land uses for their LAX Northside parcels that make the project part of the airport, not part of Westchester. Since it's part of the airport, make it part of the airport. LAX Northside should be a limited-access project, accessible only by the major arterials of La Tierra, Pershing and Lincoln.

**Response:**

The content of this comment is identical to comment PC00261-4; please refer to Response to Comment PC00261-4.

#### PC02287-42

**Comment:**

All connections to the residential neighborhoods should be permanently closed off. Trees and landscaping berms<sup>76</sup> should be permanently installed where the LAX Northside property adjoins with Falmouth, Stanmoor, Rayford, and Emerson. Only permanent physical, visual and sound barriers will protect the residences from the airport-related LAX Northside development.

Any other solution is too substantial an adverse impact on these little neighborhoods.

<sup>76</sup> like those along 88th street, between Emerson and McConnell, so prominently featured in Photo 2 at EIR Appendix K, section 4.17 These berms should continue across Falmouth, Stanmoor, Rayford, and Emerson, sealing the openings such as the one displayed in Photo 1 at EIR Appendix K, section 4.17

**Response:**

Please see Topical Response TR-ST-6 regarding neighborhood traffic impacts. Note that Alternative D does not include the LAX Expressway or the ring road. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

#### PC02287-43

**Comment:**

EIR Subsection 4.17.1.7.2  
Energy Supply - Electricity Consumption

FALSE: "Because adequate supplies of electricity . . . are anticipated to be available, the impact of increased consumption of electricity . . . within the Master Plan boundaries resulting from the three build alternatives would be less than significant."77

The table on p. 4-778 shows electricity usage at least doubling over baseline levels. In light of the current electricity shortages in Southern California, what are your plans to mitigate the impact of your increases? Electing DWP Green Power (p.4-778) seems to be the only positive mentioned.

Southern California simply cannot afford to add your increases to The Grid

77 EIR Section 4.17.1.7.2 Cumulative Impacts, paragraph 1

**Response:**

Please see Response to Comment AL00033-188 regarding energy supply within the LADWP service area and Response to Comment PC00256-1 regarding LAX-related use of renewable energy sources.

**PC02287-44**

**Comment:**

EIR Subsection 2.1  
A plan for the region

The LAX Master plan is not a plan for the region. It is a plan for a LAWA "empire". Their approach is not service, but domination and annihilation.

The Master Plan would have us concentrate the predominance of our air travel resources at one major Southern California location. The Plan is an attempt to stay centralized in approach, when population concentrations at that center are at capacity.

LAWA is seeking to overbuild an airport that local passengers and freight trucks won't be able to get to, rather than working with other areas to dissolve hurdles to their expansion.

Under the LAX Master Plan the region as a whole will be caught short of accessible (thus useable) air transportation by 2015.

**Response:**

A master plan is intended to present the land use and facility plans for a specific airport, in this case LAX. LAWA is attempting to meet a portion of the regional demand, especially for international service. However, LAWA is not attempting to meet all of the regional demand not met by other airports in the region. SCAG's regional planning process is an attempt to meet the demands of the entire region. The regional plan must be based on a sound analysis of airline consumer demand because airlines will only provide regular service on routes where there is a strong and steady demand. Since deregulation, airlines have been driven to provide air service close to the air travelers. Alternative D, Enhanced Safety and Security Plan, has been designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient and efficient. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region.

**PC02287-45**

**Comment:**

If we are to approach the problem of air transport in Southern California with a regional viewpoint, we will consider the situation not just through 2015 but even further into the future. Population demographics are shifting. The center is too impacted, and new outlying "centers" are beginning to emerge. We should plan now to cultivate accessible air transport where population development is taking place.

### 3. Comments and Responses

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**Response:**

Comment noted. Please see Response to Comment PC02287-31.

**PC02287-46**

**Comment:**

If we are to look at the entire regional transport picture, not just the air portion, we will acknowledge that mass transit systems such as subways and light rail are conspicuously lacking in Southern California. They have not been made part of the fiber of LA culture. Light rail represents a significant savings and conservation of our common-wealth: energy and fuel resources, pollution including greenhouse issues, land use for space gobbling freeway interchanges. Connection of light rail systems to major airports would be a major step toward this transition.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02287-47**

**Comment:**

A Master Plan that was truly regional in its thinking would incorporate these issues as an integral part of its design. The 12,000 pages before us don't even approach the mark of a regional solution.

**Response:**

Comment noted. Please see Response to Comment PC2287-31.

**PC02287-48**

**Comment:**

Master Plan Figure 1-3.5  
Historical advantages

LAWA touts LAX's history as a reason for expanding this airport site. This is absurd.

LAWA uses charts<sup>78</sup> to show us LAX's past dominance over air travel in the Southern California area. We know that LAX has dominated the market. And we need to change that, not perpetuate it.

Master Plan Figure 1-3.5 is meaningless to the future. This Figure simply shows LAX's historical monopoly, and the fact that prior to 1994 there was no need to develop other area airports. Times have changed.

LAWA tells us that airport demand for passenger transportation is a "trend line that closely tracks employment and population." This "trend" for using LAX will quickly alter when accessibility becomes an issue. Passenger demand for LAX will quickly plateau, and may taper off, when it becomes impossible to get to the airport to use it.

The LAX Master Plan indicates that population and economic growth in other counties will exceed that in LA County<sup>79</sup>. If population growth in other areas is greater, then why are we considering a plan to overdevelop an airport in this area?<sup>80</sup>

There is no reason to perpetuate LAX's history of dominance when the future is going to be different. Rather than proceeding with a flawed plan that seems designed with the sole objective of maintaining LAX dominance in the region, we need to develop other airports in the area.

<sup>78</sup> like the bar graph at Master Plan Figure 1-3.5

<sup>79</sup> Master Plan 1-4.4

80 discussion of the flaws in LAWA's assertion of greater growth constraints at other local airports is covered in a different Public Comments form.

**Response:**

Comment noted. Please see Response to Comment PC02287-31.

**PC02287-49**

**Comment:**

EIR Appendix K, Figure 3.2-4 and -8  
Westchester interchanges

The LAX Master Plan would wipe out the heart of Westchester village with massive interchanges and/or cloverleaves.

The stretch of Sepulveda depicted in "Segment C" of both Figures 3.2-4 and 3.2-8 is the heart of Westchester's "business district". Land acquisitions would take out much of the area<sup>81</sup>. Noise, traffic, and general proximity to such a major thoroughfare would render the rest of the area unpleasant and undesirable.

Westchester is an all-American neighborhood. This is a community that has the kind of neighborliness that generates an annual Fourth of July parade and Christmas Parade. The Boy Scouts and Indian Guides are huge here, as are school- and kid- centered activities. Many retired people live here. Mom & pop businesses abound. This is apple-pie America, and LAWA wants to wipe it out with massive freeway interchanges.

81 Master Plan Figure 4.2-11

**Response:**

The content of this comment is identical to comment PC00263-1; please see Response to Comment PC00263-1.

**PC02287-50**

**Comment:**

LAWA wants to put 6 lane highways between residences<sup>82</sup>, send volume offramps shooting onto tiny streets of houses<sup>83</sup>, and put big hotels and light industrial buildings in residential zones<sup>84</sup>.

These plans will destroy the heart of Westchester. They yield substantial adverse impact to far more families than the limited count LAWA provides in their reports. They will devastate neighborhoods.

This Master Plan is, plain and simply, out of line with the surrounding community.

82 Arbor Vitae expansion

83 Emerson offramp from LAX ring road

84 EIR Table 4.2-3

**Response:**

The content of this comment is identical to comment PC00263-2; please refer to Response to Comment PC00263-2.

**PC02287-51**

**Comment:**

EIR Subsection 1.2.1.2

### 3. Comments and Responses

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#### Accessibility

"The concept of 'market accessibility' applies not only to the distance a passenger must travel, but also to the traffic conditions of the road system and the availability of alternative modes of travel to and from the airport."<sup>85</sup>

"Passengers will go where the combination of ground accessibility and airline schedules is most convenient."<sup>86</sup>

<sup>85</sup> EIR section 1.2.1.2, page 1-13

<sup>86</sup> Master Plan section 3.1.2, page 1-3.5

#### **Response:**

The content of this comment is identical to comment PC00265-1; please refer to Response to Comment PC00265-1.

#### **PC02287-52**

##### **Comment:**

LAX has met its capacity. And its capacity is being defined by its accessibility (or lack thereof).

##### **Response:**

The content of this comment is identical to Comment PC00265-2. Please see Response to Comment PC00265-2.

#### **PC02287-53**

##### **Comment:**

As freeway loads get drastically worse around the LA basin<sup>87</sup>, passengers and freight haulers will quickly look to alternatives to fighting the gridlock to use this airport site. People will book flights using other area airports.

<sup>87</sup> EIR Section 4.3.2.6.1 projects year 2015 year traffic speeds of 12 miles per 60 minutes

##### **Response:**

This comment is identical to Comment PC00265-3. Please see Response to Comment PC00265-3.

#### **PC02287-54**

##### **Comment:**

LAWA tells us that airlines will go where the passenger demand is. Well, the airlines will follow the passengers, resulting in a grand exodus away from the gridlock, away from LAX, toward the other area airports.

Most areas of the LA Basin are close to another area airport. Many areas are in closer proximity to another airport than to LAX.<sup>88</sup> As traffic gridlock around LAX and the overall LA Basin worsens, the inaccessibility of LAX will cause people to select other airports.

<sup>88</sup> reference EIR Figure 1-3

##### **Response:**

The content of this comment is identical to comment PC00265-4; please refer to Response to Comment PC00265-4.



#### PC02287-55

**Comment:**

The Master Plan seems to rely on SCAG/RTP highway projects on freeway sections near LAX<sup>89</sup>. Yet EIR Figure 4.3.2-4 demonstrates that these road improvement projects won't help. There will still be gridlock, given the volume that LAWA plans to dump onto our freeways<sup>90</sup>.

SCAG/RTP highway projects are in the works that will improve traffic flow to Ontario, Burbank, Long Beach, and San Bernardino. Therefore these other area airports, with the benefit of better accessibility than LAX, will receive even more of the area's air business. Passengers and freight shippers will select them for proximity and accessibility.

<sup>89</sup> Master Plan 4.3.3. These plans are presumably already incorporated into EIR Figure 4.3.2-4 and didn't help a bit!

<sup>90</sup> freeways currently at LOS-F are projected to receive additional airport vehicle volume of 5,668 to 7,621 vehicles per hour (per comparison of EIR Table 4.3.1-4, Table 4.3.1- 10 and Table 4.3.1-12). reference my Public Comment form on LOS-F roadways.

**Response:**

Please refer to Topical Response TR-ST-4 regarding airport area traffic concerns. The LAX Master Plan, if implemented, would provide major investments that would greatly improve operations on the freeway system. These proposed improvements would receive airport funding only if the LAX Master Plan is approved. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

#### PC02287-56

**Comment:**

Master Plan 4.3.4 indicates that rail may one day connect all the areas. This is great, but the rail isn't here yet. And since the rail will connect all the area airports, it will improve area accessibility to other airports just as much as it will improve accessibility to LAX.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

#### PC02287-57

**Comment:**

Overwhelmingly, LAX has met its capacity. Its capacity is being defined by the site of the airport, the fact that it is located in the heart of a city that relies on its freeways. LAX cannot grow bigger than its site; it cannot exceed the capacity of the freeways and "off-airport surface transportation" in the greater LA Basin.

This Master Plan far exceeds the area's full portfolio of resources.

**Response:**

The content of this comment is identical to Comment PC00265-7. Please see Response to Comment PC00265-7.

#### PC02287-58

**Comment:**

EIR Figure 4.2-4 and Table 4.2-3

### 3. Comments and Responses

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#### Golf Course

The Westchester Golf Course is one of the few remaining public open spaces in Westchester. And it is pretty clear that LAWA plans to build upon this piece of property.

The current "Westchester Southside" map includes a portion of the golf course<sup>91</sup>, and it is a sure bet that the remainder of this community-cherished open space will soon go the same way.

The EIR makes a big show of the golf course on page 4-89 by designating it "Area 1" at the top of the list of zoning restrictions. Yet it is notable that the Westchester public golf course is not given a separate lot designation on Figure 4.2-4 and Table 4.2-3, but rather portrayed as "lot 12B". It appears as a footnote appendage to Lot 12A at Table 4.2-3, which notes in very contingent language: "assumed to be allocated for the golf course." Reading between the lines, this acreage will not be kept off the "Westchester Center" map for long.

Furthermore, in Figure 4.2-4, LAWA has already taken a portion of this precious open space. The portion of the golf course that borders Westchester Parkway has been scooped into their Lot 12A, as part of their hotel/restaurant/office complex<sup>92</sup>.

91 EIR Figure 4.2-4

92 Comparison of Figure 4.2-3 and Figure 4.2-4 reveals 2 different shapes for the golf course lot. In figure 4.2-4, the southern third of the golf course is chopped off, and a minor sliver of land off to the side has been substituted into Lot 12B. This is hardly a fair substitute!

#### Response:

The content of this comment is essentially the same as comment PC00264-1; please refer to Response to Comment PC00264-1.

#### PC02287-59

##### Comment:

The Westchester public golf course is one of the last remaining public open spaces in an area that is already short of park space. Comparable communities, such as El Segundo and Culver City, have many parks, each with unique neighborhood flavor. Westchester has none of these, and no green belts in the public domain. The golf course and adjoining recreation area are all we have.

##### Response:

Please see Response to Comment PC00264-2 regarding expansion of parks and recreation areas.

#### PC02287-60

##### Comment:

We need more public open space in Westchester, not less!

In evaluating whether LAWA's LAX Northside development has met the Ordinance 159,526 [Q] conditions "to mitigate potential effects on surrounding uses and ensure uniformity of development"<sup>93</sup>, LAWA should be required to double Westchester's 1996 Baseline public open space.<sup>94</sup>

Converting any part of Westchester's last remaining public open space is absolutely intolerable.

This is a significant impact to the neighborhood in terms of conversion of land use.

93 Description of [Q] conditions per EIR section 4.2, page 4-93

94 The developers of the downtown LA Sports and Entertainment District, near the Staples Center, just promised park space within their development to local residents. Reference LA Times, Saturday, June 2, 2001, Business section page 1, "Staples plan spotlights invisible communities"

**Response:**

The content of this comment is essentially the same as comment PC00264-3; please refer to Response to Comment PC00264-3.

**PC02287-61**

**Comment:**

EIR Tech Report 2B, Section I.B.  
Traffic Analysis Zones

The geographic scope of the LAX Master Plan's off-airport traffic mitigation efforts is entirely insufficient.

In Technical Report 2B, someone has gone to great lengths to define different zones around LAX: the LAX Area, the Focus Area, the Framework Model Area, the Buffer Area and the Outlying [sic] Area. As the entirety of Technical Report 2B seems to be about the setting up and testing of the models, there is no indication of the results derived from the study.

In particular, I find nowhere in the EIR the results of LAWA's analysis of Alternative A, B, C's impact on traffic in the geographical areas that Technical Report 2B places in "3. The Framework Model Area" and "4. The Buffer Area".<sup>95</sup> The Alternatives A, B, C represent such massive changes that their impact will be felt farther than the narrow area that EIR Technical Report 2B has defined as its model dimensions "Focus Area".

For example, the map on EIR Figure 4.3.2-4 stops at what is basically the border of "the Focus Area"<sup>96</sup> yet it shows red-marked "more airport traffic with project" freeways extending beyond the borders of the display. Since these same areas of freeway are shown at EIR Figure 4.3.2-2 as Level of Service F, it is significant that the adverse impact the project will have on these roadways is being downplayed!

The EIR focuses on traffic impacts on surface streets in the immediate geographical area of the airport. However, the EIR skillfully avoids directly stating the traffic impact their Plan will have on the LA freeway grid.

LAWA thus gets to dodge the real issue: that their Plan will throw freeway systems in the greater LA basin over the edge of gridlock.

LAWA has provided no mitigations for I-405 between the 90 fwy and the 101. LAWA has provided no mitigations for the I-405 through the South Bay curve. LAWA has provided no mitigations for the I-105 east of Hawthorne.

The lone freeway mitigation that LAWA does provide (the LAX Expressway) is ridiculous in its placement. It basically makes the airport look good, while the rest of the city suffers.<sup>97</sup>

Alternatives A, B, C will create massive gridlock in the greater LA Area. No way!

<sup>95</sup> EIR Technical Report 2B, section I.B., bullet points 3 and 4, page I-2

<sup>96</sup> "the focus area is bounded on the south by Artesia Boulevard, on the east by Hawthorne Blvd/La Brea and on the north by I-10/Wilshire Blvd." EIR Technical Report 2B, section I.B., bullet point 2, page I-1

<sup>97</sup> The EIR captures this attitude in black and white at EIR Section 4.3.2 page 4-299, paragraph 1, when it says that increased traffic congestion on the I-405 north of the LAX Expressway "should not be construed as adverse impacts created by the project. They are inevitable positive responses that occur whenever an effective regional improvement is provided" ! No, I beg to correct this: the traffic congestion at the ends of your Expressway is the inevitable result of over-expanding one element of the region's transportation system beyond the capacity that the overall system can bear.

**Response:**

This comment is identical to Comment PC00266-1. Please see Response to Comment PC00266-1.

### 3. Comments and Responses

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#### PC02287-62

**Comment:**

LAX EIR

"surface transportation"

No Action/No Project Alternative	
planned parking capacity	35,612
P-6 garage	686
Corrected capacity	36,298

Table 4.3.1-7 at EIR page 4-260  
as restated to include garage P-6 in NA/NPA

	demand yr 2005	planned capacity	ratio as corrected
Environmental Baselin	17,330	20,279	85.5%
No Action/No Project	29,600	36,298	81.5%
Alt A	29,288	33,257	88.1%
Alt B	29,288	31,037	94.4%
Alt C	29,288	36,127	81.1%

	demand yr 2005	planned capacity	ratio as corrected
Environmental Baselin	17,330	20,279	85.5%
No Action/No Project	36,600	36,298	100.8%
Alt A	35,636	36,621	97.3%
Alt B	35,636	34,401	103.6%
Alt C	35,636	39,441	90.4%

**Response:**

Please see Response to Comment PC00248-5.

**PC02288      La Rouche, Mark      None Provided**

#### PC02288-1

**Comment:**

As a resident of Los Angeles I am against any LAX expansion due to health concerns.

First, the increased number of people passing through LAX means that there will be more cars traveling along the already crowded 405 and surface streets leading to LAX. This means more pollution around these areas.

Secondly, because of the increased number of people passing through LAX this means there will be more flights per day landing and taking off from LAX. This means that more toxic pollutants will be dumped upon Los Angeles residents that are under or near the arrival and departure flight paths or corridors.

With all these pollutants, at what point, can not just animals but humans continue to filter these from ones system. At what point are the medical issues going to out weight the money benefit of a few. If we have laws concerning smokers why are we not dealing more with these pollutants as well. I thought we as a society no longer accepted the ways of the past to sacrifice human health to earn a dollar.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, traffic in Section 4.3, Surface Transportation, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E, and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-3 regarding human health impacts and Topical Response TR-AQ-2 regarding toxic air pollutants. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02289      La Rouche, Mark      None Provided**

**PC02289-1**

**Comment:**

As a resident of Los Angeles I am against any LAX expansion due to regional population growth that requires a regional airport plan not an LAX only plan.

The increased number of people passing through LAX means that there will be more cars traveling along the already crowded 405 and surface streets leading to LAX. This means that connecting freeways will become more crowded as more and more people travel from LA's suburbs (Santa Clarita, San Bernadino etc) to reach LAX. There is no proposed plan that will handle cramming more cars along LA's freeways that lead to LAX. The suggested expressway is a joke. With this, a regional plan is a must to help spread the vehicle traffic to other areas such as Palmdale, Ontario, Orange County etc.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR Section 1, Regional Context, discusses the allocation of passenger service and cargo service among the regional airports. In addition, please see Topical Response TR-RC-1 regarding the regional role LAX fulfills regarding passenger and cargo demands. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways.

**PC02289-2**

**Comment:**

Also other regions such as the Bay Area (San Francisco, Oakland, San Jose), London (Gatwick, Heathrow), Tokyo, Munich all have regional plans to handle the increased regional and international airplane traffic destined for these regions.

**Response:**

Comment noted. The San Francisco Bay Area does not have a regional plan for air traffic. Each commercial airport (San Francisco, Oakland, San Jose) has its own independent master plans for the air traffic demand expected at each airport. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys Airport. The decision to develop any airport is the responsibility of local government. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

### 3. Comments and Responses

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**PC02289-3**

**Comment:**

Lastly, LAX is a small airport that is just not meant to handle this amount of traffic you support. Other airports that are twice the size handle these levels.

**Response:**

Comment noted.

**PC02289-4**

**Comment:**

Again, I am against any LAX expansion.

**Response:**

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

**PC02290**

**Paz, Cynthia**

**None Provided**

**8/20/2001**

**PC02290-1**

**Comment:**

I am sorry that this letter is beyond the July 25th deadline - but I felt I must write and let you know where I stand as a Playa del Rey resident and homeowner.

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02290-2**

**Comment:**

I am opposed to LAX expansion - it is absurd to continue to expand here, when it would be viable & effective to do so at Palmdale & Ontario airports.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02290-3**

**Comment:**

The noise is increasingly worse by the year, as well as smog.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR.

**PC02290-4**

**Comment:**

I was saddened to hear such a low number of people sent in letters or emails to oppose this. I truly believe the majority of residents are opposed to LAX expansion - perhaps the attitude "what's the use?" is at work here...apathy?

I hope this letter "better late than never" counts for something!

**Response:**

Comment noted.

**PC02291          Habib, Magi                  None Provided                  8/22/2001**

The content of this comment letter is identical to comment letter PC02045; please refer to the responses to comment letter PC02045.

**PC02292          Habib, Hazem                  None Provided                  8/22/2001**

The content of this comment letter is identical to comment letter PC02045; please refer to the responses to comment letter PC02045.

**PC02293          Jenkins, Lillian                  None Provided                  8/23/2001**

The content of this comment letter is identical to comment letter PC02049; please refer to the response to comment letter PC02049.

**PC02294          Keppel, John                  None Provided                  3/31/2001**

**PC02294-1**

**Comment:**

To save our citizens money, reduce congestion at LAX and provide for the future of aviation in Los Angeles I am sending you a simple one page plan to shift traffic from LAX to Palmdale.

This should not only help the people you represent but it should help our Mayor relax his position as it would allow for the expansion of passenger traffic into LAX without any increase in takeoffs and landings, as passenger aircraft would take over the many slots now being used by cargo aircraft.

### **3. Comments and Responses**

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I would appreciate your response, and any other information about shifting traffic away from LAX.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02294-2**

**Comment:**

PALMDALE AIRPORT

THE FOLLOWING STEPS SHOULD BE UNDERTAKEN TO PROPERLY UTILISE THE FACILITIES AT THE AIRPORT AT PALMDALE CALIFORNIA, AND RELIEVE CONGESTION AT THE LOS ANGELES INTERNATIONAL AIRPORT

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02294-3**

**Comment:**

1. Landing fees, for the next five years, shall be 50% less than those charged at LAX,

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02294-4**

**Comment:**

2. Palmdale Airport shall be open and operating 24 hours a day.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02294-5**

**Comment:**

3. All cargo companies, which do not own and operate their own physical operating facilities at LAX, shall be routed to PALMDALE AIRPORT, or elsewhere.

4. All cargo companies, which have not averaged ten landings a month, for the last three years, shall be routed to Palmdale, or elsewhere.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Please see Response to Comment PC00599-54 for more information about cargo activity. Neither the FAA nor LAWA have the authority to direct airlines to use one airport in favor of another airport. The Airline Deregulation Act of 1978, as amended, ended federal, state, and local governments role in determining the location for air service by airlines. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.



**PC02294-6**

**Comment:**

5. All cargo companies, which have averaged ten, or more, landings a month at LAX shall be allowed to increase thier average number of landings at LAX to a maximun of ten percent above what their average number of landings has been over the last three years. This rule shall be in effect for the next five years.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02294-7**

**Comment:**

6. An amount equal to ten percent of the current proposed budget for the expansion of LAX, shall immediately be designated for the operation and improvements at Palmdale Airport.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02294-8**

**Comment:**

7. Work shall immediately begin on future plans for improved access to the Palmdale Airport, this shall include, but not be limited to, a new freeway from the vicinity of the airport, to connect with Route 2 and Route 210 somewhere near the point at which the Angeles Crest Highway now intersects the 210.

8. Work shall immediately begin on plans to link Metrorail to the Palmdale Airport.

**Response:**

Please see Topical Response TR-RC-3 which discusses high-speed rail connections and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02294-9**

**Comment:**

It is necessary to immediately implement this program to relive LAX of its campacity problems and to enhance the future of aviation in Southern California.

**Response:**

Comment noted. Please see Response to Comment PC02294-5.

**PC02295**

**Bobak, Juliet**

**None Provided**

**7/23/2001**

The content of this comment letter is identical to comment letter PC01566; please refer to the responses to comment letter PC01566.

### 3. Comments and Responses

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**PC02296**      **Cassman, Esq., Alan**    **None Provided**

**7/2/2001**

**PC02296-1**

**Comment:**

I attended and spoke at the hearing last month at the Furama Hotel. I am deeply concerned about the future of our City. I have practiced law in Westchester for 48 years, where my wife, Mary Ellen and I have resided since 1951. I belong to many civic and community organizations and I can tell you that I have never witnessed such an overwhelming majority opposing governmental action as exists in this case.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02296-2**

**Comment:**

The EIR/EIS is fatally flawed because it is based upon maximum annual passenger determinations (known as MAP) that are not realistic, and I believe deceptive. The most recent master plan which was adopted in 1980 projects 40 million maximum annual passengers (MAP). That plan indicated that additional capacity would be handled at other sites, specifically mentioning Palmdale and Ontario. How can LAWA be taken seriously about their projections this time, when experience shows that previous MAP projections are meaningless? I don't mean that LAWA is dishonest. They want to do their job, and if doing their job means 78 million maximum annual passengers can grandfather in on 40 MAP, that suits them fine. Where are the mitigations that should have been in place to shield the community from this massive overuse? That 1980 master plan would never have been approved had it asked for 78 million MAP. LAWA apparently views a master plan as a licence for uncontrolled expansion.

Where are the mitigations needed to protect us from massive overuse in the future, which will inevitably follow as the night the day.

I have not read the entire eir/eis but I am told that the mitigations deal with the MAP numbers set forth and ignore or discount the effect of potential overuse, which will occur. In the light of the admitted inability of LAWA to discipline itself to live within its anticipated MAP limits, can anyone believe LAWA will be able to improve its performance in the future? Under the present laws and regulations which appear to remove the power of LAWA to control the number of flights and passengers, LAWA can perhaps claim that they have no right to impose limits. It is in reference to this lack of power that the EIR/EIS lacks credibility.

The current draft EIR/EIS now assumes that under the 1980 master plan the MAP is 78 million, which is almost double the 40 million maximum annual passengers called for.

It is clear that the EIR/EIS determinations cannot be relied upon - for a variety of reasons:

- 1) Under existing law, LAWA cannot control the map;

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, the ability to mitigate the impacts of growth in airport activity, and legal limits on the ability to control activity levels at airports.

**PC02296-3**

**Comment:**

2) The State Department actually determines which foreign carriers may use LAWA, and, as I understand it, also the number of flights.

**Response:**

The rights granted to both domestic and foreign carriers to fly between points in the U.S. and international airports are dependent upon the bilateral rights of the two countries involved. The specific bilateral rights may be restricted to certain airlines, or to certain airports, and may also restrict the number of daily/monthly flights and/or seats. Most of the recent bilateral agreements have been open skies agreements, whereby domestic and foreign flag carriers can fly to any city in the U.S. from any city in the other country that is a party to the agreement.

**PC02296-4**

**Comment:**

3) At the present time, the air carriers have more power and control than LAWA. Ask any representative of LAWA why they don't concentrate on expanding Palmdale, LAWA explains that the carriers will not consider it as an alternative.

**Response:**

Palmdale's remote location and limited local passenger market have made it difficult for airlines to maintain air service at the airport despite past subsidies by LAWA. Palmdale's only air service in the past consisted of commuter operations into LAX. About 19,000 passengers used the airport in 1997. In early 1998, the sole airline providing service at Palmdale ceased operations. Currently, Palmdale has no scheduled air service. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02296-5**

**Comment:**

4) Since the law governing airport growth as of 1980 law remains relatively unchanged, MAP in the future could well be double the estimates set forth in the current EIR/EIS, and there are no mitigations provided for this likely eventuality.

5) uncontrolled growth has caused a strain on LAWA, the surrounding communities and the entire Los Angeles basin. Had the 1980 limits of growth (40 MAP) been adhered to, then the current mitigation - based on current projected estimates - would perhaps make sense.

**Response:**

Please see Topical Response TR-GEN-3 regarding projected versus actual capacity levels at LAX, the ability to mitigate the impacts of growth in airport activity, and legal limits on the ability to control activity levels at airports.

**PC02296-6**

**Comment:**

6) Once the airlines are convinced that LAWA will not be permitted to expand further, then they will realize the need to plan for their growth under a regional concept that must include Palmdale, Ontario and other options in Orange County and elsewhere.

7) Only by turning down all of the proposals for growing LAWA will it be possible to develop a comprehensive plan that shares the burden in increased air traffic more equally among the communities of Southern California.

### 3. Comments and Responses

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**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-4 regarding Orange County air transportation demand, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02296-7**

**Comment:**

8) With the election of a new mayor who is committed to opposing growth at LAWA, and incidently all of the candidates in the primary, and, of course the general election signed a pledge opposing any growth at LAWA, it is time that the will of the people be heard. LAWA should provide the political leadership and send a strong message to the air lines that enough is enough.

**Response:**

Please see Response to Comment PC00578-1 regarding the development of Alternative D-Enhanced Safety and Security Plan, which was developed at the direction of Mayor James Hahn.

**PC02296-8**

**Comment:**

9) To become the city of the future an airport the size of Palmdale will be required. It cannot be accomplished on the 3600 plus acres at LAX. No amount of mitigation can change the size of LAX, unless, of course, LAX were to take over all the surrounding communities. Fortunately even the airlines have not suggested such a disastrous undertaking.

**Response:**

Comment noted.

**PC02296-9**

**Comment:**

I will await your response to my letter.

**Response:**

In accordance with the provisions of NEPA and CEQA, written responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR are provided herein as part of this Final EIS/EIR. Responses to individual comments included in this comment letter are provided above.

**PC02297**

**Coleman, Chris**

**None Provided**

**6/28/2001**

**PC02297-1**

**Comment:**

My name is Chris Coleman and I am a resident of the Westchester, Playa Del Rey area within your District. I have lived here my entire life, and although I am only seventeen I have witnessed a lot of growth in the area, and not all of it good. I am writing to you because of my objections of the Los Angeles Airport Expansion Plan. This so-called "Complete Plan" of the Los Angeles Airport will only worsen the already trying and uncomfortable conditions of the area surrounding the Los Angeles Airport.

**Response:**

Comment noted. Alternative D - the Enhanced Safety and Security Plan, the LAWA Staff preferred alternative includes a variety of mitigation measures that would reduce the potential adverse impacts if this alternative is selected for development. Also, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02297-2**

**Comment:**

I strongly believe it should not only be up to the Los Angeles Airport to continue to expand to meet the growing demand for transportation by air but also the other surround airports.

**Response:**

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

**PC02297-3**

**Comment:**

LAX expansion has already caused numerous areas of one time residential area to be zoned off for a LAX safety net.

**Response:**

Comment noted. Also please see Response to Comment PC02117-7 regarding the former residential development that was located at the west end of the runways.

**PC02297-4**

**Comment:**

Traffic is horrible now because roads are small and cramped. With an expansion these roads will only become more burdened and cause even more traffic to the morning and evening commutes. With more outgoing and incoming flights traffic will grow exponentially over time, causing a congested and dangerous area.

**Response:**

Comment noted.

**PC02297-5**

**Comment:**

The new Airport expansion will also cause more noise and air pollution.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of

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the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### **PC02297-6**

**Comment:**

The Los Angeles Airport is already the leading contributor of Air Pollution in the Pacific area, and more flights would only worsen the problem.

**Response:**

Please see Response to Comment PC00070-1 regarding LAX as a source of air pollution. Also, please see Topical Response TR-AQ-3 regarding air pollution increase.

#### **PC02297-7**

**Comment:**

The Community surrounding the Airport has learned to cope with the noise level, but it is strenuous for most. To increase that level will do very little for the public's view of the Airport, and with city projects such as these the public's opinion matters a great deal.

**Response:**

Comment noted. Noise impacts were addressed in Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. Supporting technical data and analyses are provided in Appendix D and Technical Report 1 of the Draft EIS/EIR and Appendix S-C and Technical Report S-1 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-6 regarding noise increase.

#### **PC02297-8**

**Comment:**

Mainly, I am asking you to continue your fight against the expansion of the Los Angeles Airport and emphasize the idea that other Airports should be required to adapt to the increase of Air Traffic and not only LAX.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### **PC02297-9**

**Comment:**

Also I am writing to ask that if LAX does expand that you please support the move to enlarge roads and create more efficient traffic routes as today's roads are nowhere near what will be needed to handle the traffic increase.

**Response:**

The mitigation plan does include a series of road widenings, where necessary, in addition to adding new efficient routes such as the LAX Expressway, which should alleviate traffic on roads near the airport.

**PC02298**      **Cook, Richard B. & Rena D.**      **None Provided**

**PC02298-1**

**Comment:**

My simple response is NO.

Over the years we have seen friends loose their homes to this expansionist regime called Los Angeles International Airport.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include any residential acquisition.

**PC02298-2**

**Comment:**

I notice that one of the plans of expansion is to destroy what little we have left of downtown Westchester plus the elimination of many, many homes. We recently got a new grocery store, drug store and many eateries that LAX wants to destroy by expanding this airport.

**Response:**

The content of this comment is identical to comment PC01250-2; please refer to Response to Comment PC01250-2.

**PC02298-3**

**Comment:**

I do not want increased traffic on the freeways and on the surface streets as surely this will happen. The plan (cost) to improve traffic will not be born by the airport but will fall upon the tax payers. Traffic improvement will not happen in a timely fashion or at all. The taxpayers will be required to foot the bill for building roads to ease the traffic congestion, not the Airline Industry.

**Response:**

Please see Response to Comment AL00008-6 regarding funding and Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02298-4**

**Comment:**

Congestion and gridlock will definitely be the order of the day.

**Response:**

Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways and Topical Response TR-ST-4 regarding airport area traffic concerns.

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#### **PC02298-5**

**Comment:**

I find it difficult to enter Emerson Ave from my street 6722 W. 87 Th..St. now because of all the traffic trying to by-pass Sepulveda during the morning commute. I believe that the future plan is to open up Emerson Ave. to the Westchester Parkway, this will be an utter disaster as we will not be able to leave our homes due to the traffic jams on this street.

**Response:**

Please see Response to Comment PC01250-5 regarding Emerson Avenue.

#### **PC02298-6**

**Comment:**

We will be inundated with more pollution from both Aircraft, Aircraft support vehicles and surface vehicles trying to get to the Airport.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed the impacts of air pollution in and around the airport in Section 4.6. In general, the predicted air pollution impacts of any of the LAX Master Plan build alternatives would be lower than the predicted impacts of the No Action/No Project Alternative. Also, please see Topical Response TR-AQ-3 regarding air pollution.

#### **PC02298-7**

**Comment:**

I do not want to have an Arbor Vitae off ramp at the 405 freeway as it will just clog up the already congested streets.

**Response:**

Please see Subtopical Response TR-ST-2.3 for information on the Arbor Vitae interchange. Subsequent to the publication of the 2001 Draft EIS/EIR, the FHWA withdrew its support for a half interchange at Arbor Vitae. The interchange is not part of the LAX Master Plan. FHWA policy is only to consider full proposed interchanges, not partial ones.

#### **PC02298-8**

**Comment:**

Extending the Green Line into Westchester will do nothing to alleviate traffic but will in turn bring more crime into our neighborhood.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan for more information. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed law enforcement in Section 4.26, Public Services, and traffic impacts in Section 4.3, Surface Transportation. In addition, please see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester.



**PC02298-9**

**Comment:**

LAX has gobbled up enough land already, they do not need to expand. Since most of the LAX passengers are not from LA but are coming from Orange county and Antelope Valley. It is time for other counties to take their share of the traffic. Stop dumping on us.

**Response:**

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

**PC02298-10**

**Comment:**

Additionally, increased noise, outside of any building will be the order of the day.

**Response:**

Comment noted. Please see Topical Response TR-N-6 regarding noise increase and Topical Response TR-LU-4 regarding outdoor noise levels.

**PC02299**

**Cox, Ph.D., P.E.,  
Donald**

**None Provided**

**7/26/2001**

**PC02299-1**

**Comment:**

I have reviewed a portion of the ERI related to the LAX expansion, and followed media reports related to LAX expansion and development/expansion of regional airports in the Southern California area (i.e. El Toro, Palmdale, Long Beach, Ontario, etc). There is no doubt that handling additional air traffic in the Southern California area with a plan than relies on regional airports is best for the people of Southern California, and is the only long-term solution. Expansion of LAX is not a solution, will decrease the quality of life for the people of Southern California, and only benefit the major airlines and other companies that want a centralized system of air travel.

**Response:**

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

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

#### **PC02299-2**

**Comment:**

Expansion of LAX will exasperate the horrific traffic congestion that already exists (from Santa Clarita to north San Diego County) along the 405 Freeway and those that feed it. It's not just the air travelers or cargo handling companies trying to reach LAX that will suffer from this increase in freeway traffic; all people that use and/or live near the freeway system will suffer.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02299-3**

**Comment:**

It makes no sense at all to have people (or cargo) traveling all the way to LAX from Santa Clarita, north San Diego County or areas east of L.A. County, when there is the option of developing airports in El Toro and Palmdale or expanding the existing regional airports to handle this traffic. Wasted time, fuel consumption and pollution would all be less with a regional plan that decreases the travel distance required for people (or cargo) to get to a plane.

It makes no sense at all to decrease the quality of life for a large number of people around LAX (resulting from increased traffic, noise, pollution, etc.) when development or expansion of regional airports will affect many less people.

It makes no sense at all to close or relocate businesses and households that already exist around LAX, and at the same time, allow developers to build houses on vacant land surrounding an existing airport (El Toro) or in an area where the people want an airport (Palmdale.)

All politicians and government officials must view the increase in air traffic as a regional issue, involving all of Southern California. More importantly, they must do what is best for the people of Southern California, not what best serves the interests of the major airlines and other entities promoting expansion of LAX and restriction of regional airports.

**Response:**

Comment noted. Please see Response to Comment PC02299-1 above.

#### **PC02299-4**

**Comment:**

Mayor Hahn, City Counsel, County Supervisors, etc., should be using their positions to 1) encourage politicians (and others in power) in the surrounding areas (i.e. Irvine Co. and other developers) that regional airports are the solution and, 2) do all they can to make sure the Master Plan for LAX is not implemented.

**Response:**

Comment noted. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02299-5**

**Comment:**

Development and/or expansion of regional airports will best serve all the people of Southern California and is the only viable long-term solution to increased air traffic.

**Response:**

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

**PC02300**

**Glennon, Ruth &  
Don**

**None Provided**

**4/20/2001**

The content of this comment letter is identical to comment letter PC00059; please refer to the responses to comment letter PC00059.

**PC02301**

**Shrake, C. Alan**

**None Provided**

**9/19/2001**

**PC02301-1**

**Comment:**

1. The EIR states that the endangered California Least Tern and Brown Pelican are now absent from the El Segundo Dunes. Yet, the Audobon Society's 1994-95 bird survey and the 1989-97 Bird Strike List show these species to be present. The EIR also states that the Least Bell's Vireo is now absent from the Dunes, but lists it as an expected "fly-in" in an appendix. Can all of these birds still be found on the Dunes and, if not, why not? Have the Dunes been effectively managed to ensure their continued presence?

**Response:**

Please see Table 4.11, Federally and State-Listed Plant and Wildlife Species Potentially Occurring within the Master Plan Boundaries, in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR for a discussion of California least tern, California brown pelican, and least Bell's vireo. The California brown pelican was determined to be absent within the Master Plan boundaries as a result of focused surveys in the spring of 1998 and 2000. The closest known roosting occurrence is San Pedro harbor. The California least tern was determined to be absent within the Master Plan boundaries as a result of focused surveys in the spring of 1998 and 2000. The nearest known breeding colony is 3 miles north of the Master Plan boundaries. Individuals may periodically move through the Master Plan boundaries, however, they have not been seen utilizing sites within Master Plan boundaries for roosting or breeding. The least Bell's vireo was determined to be absent within the Master Plan boundaries as a result of focused surveys in the summer of 1998 and 2000. The vireo could potentially utilize sites within the Master Plan boundaries during migration, which could explain why the species was listed as a "fly-in." The least Bell's vireo is not known to breed within the Master Plan boundaries.

With regard to the management of the Dunes for bird species, the City of Los Angeles prepared a Long-Term Habitat Management Plan for the Dunes in 1994. The goal of the Long-Term Habitat Management Plan is to preserve the Dunes and to assure full recovery and long-term survival of a sustainable ecosystem and its component communities and plant and animal inhabitants. Among the management issues addressed, the Long-Term Habitat Management Plan assigns a high priority to baseline and on-going bird surveys. Historic and more recent bird surveys indicate that at least 75 native species and as many as 173 total species are expected to utilize the Dunes. The level of use varies significantly between resident and migratory birds, and it has been estimated that only 20 bird species are potential breeders on the Dunes. Since 1938/1939, an estimated 12 bird species have not been seen again at the Dunes and that may be for various reasons, including lack of suitable breeding

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locations elsewhere to increased risk of predation by exotic species. Nonetheless, the Dunes will continue to be managed for the long-term survival of the entire ecosystem.

#### PC02301-2

##### Comment:

2. The EIR proposes moving pupae of the endangered El Segundo Blue Butterfly from site 23 on the Dunes to a less desirable on-site mitigation to allow construction for the AOA. Curiously, the Dunes Long Term Habitat Management Plan gave the lowest maintenance priority to the area around site 23 even though it is prime habitat for the El Segundo Blue Butterfly. This incidental taking seems to have been conveniently facilitated. Also, the EIR has contradictory maps for Blue Butterfly habitat. One gives the impression that it doesn't exist west of the AOA, nor between the AOA and the VOR along the dune bluff, due to "cut-and-fill, including work done up to 2000." (Has cut-and-fill work been done in this ESHA?) But, an older appendix map portrays a greater range for the Blue, i.e., around the VOR, along the back dune crest, and the crest around the AOA.

##### Response:

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly.

As described in Mitigation Measures MM-ET-2 and MM-ET-4 of the Supplement to the Draft EIS/EIR, coast buckwheat plants and the pupae of El Segundo blue butterfly would be relocated from areas potentially impacted by the installation of navigational aids and associated service roads to Subsite 23. Subsite 23 is the preferred subsite for these relocation activities. As a result of surveys undertaken to identify and map all existing coast buckwheat plants within the Los Angeles/El Segundo Dunes, Subsite 23 was determined to have scattered coast buckwheat plants with low seedling recruitment. This subsite was chosen as the mitigation site to which coast buckwheat and butterfly pupae would be relocated thereby bridging the disjunct population of El Segundo blue butterfly currently present to the north and south of Subsite 23. Please see Figure 4.6-11, 1998 El Segundo Blue Butterfly Densities, in this Final EIS/EIR for the revised information regarding El Segundo blue butterfly habitat.

#### PC02301-3

##### Comment:

3. The EIR states that the efforts to restore the vernal pools and reintroduce the Beach Spectacle Pod in the Dunes were unsuccessful. However, when I saw this area in 1990, it was rich in plant and insect life. Why has it been allowed to deteriorate since, especially given its XP3 priority for management? The EIR claims that the "site is on fill, (with) no native soil," and that the only "ephemeral aquatic habitats" were east of Pershing. However, this is contradicted by the standard practice of restoration ecologists to work with degraded habitats regardless of condition, as well as by the 1918-1920 maps that show vernal pools covering the backdune area below the bluff of the Dunes.

##### Response:

The Los Angeles/El Segundo Dunes occupy a 307 acre site composed of 202.8 acres designated as the El Segundo Blue Butterfly Habitat Restoration Area (Habitat Restoration Area) and an additional 104.3 acres of dunes and adjacent landforms to the north of the Habitat Restoration Area. The Habitat Restoration Area first underwent ecological restoration in 1987. The focus of the initial restoration was conservation and enhancement of occupied habitat for the federally endangered El Segundo blue butterfly. Subsequent restoration efforts between 1987 and 1994 continued the conservation efforts for the El Segundo blue butterfly and in addition, sought to revegetate the highly degraded coastal dune plant communities. Restoration efforts culminated in the revegetation of approximately 100 acres of southern foredune and southern dune scrub communities. In 1994, the city of Los Angeles prepared a long-term habitat management plan for the Los Angeles/El Segundo Dunes. Since 1995, Los Angeles World Airports (LAWA) has assigned two full time landscape personnel to perform landscape maintenance within the Habitat Restoration Area. Pursuant to funding by the California Coastal Commission, restoration efforts have been dedicated solely to the removal of California buckwheat, a species not found in coastal areas, however, present within the Los Angeles/El Segundo Dunes as a result of hydro seeding efforts. From 1996 to 2000, volunteers visited the site on a monthly basis and conducted weed abatement activities. Since the events of September 11, 2001, safety and security

issues have prompted airport operators at LAWA to reconsider allowing volunteers to work at the Los Angeles/EI Segundo Dunes.

With regards to the latter part of the comment, vernal pool restoration cannot take place within the Los Angeles/EI Segundo Dunes or east of Pershing Drive within the LAX airfield as the FAA has determined that creation of vernal pools within these areas presents an unacceptable wildlife hazard pursuant to Title CFR 139.339 (please see Section 4.11, Endangered and Threatened Species of Flora and Fauna (subsection 4.11.3), of the Draft EIS/EIR for more information regarding the Wildlife Hazard Management code).

#### PC02301-4

**Comment:**

4. The EIR states that you can scoop-and-scoot the cyst population of the endangered Riverside County Fairy Shrimp to off-site mitigations in Orange County such as El Toro, or to the nearby Ballona Bluffs. However, these sites are also under pressure from urban sprawl. Why not design an on-site mitigation that will allow this rare species to finally complete its life cycle as well as provide an ecotourism attraction? Jamaica Bay in New York and other airport wildlife habitats show that ecosystems can coexist successfully with airport operations rather than be considered an "attraction nuisance." Besides, the Fairy Shrimp areas to be lost have already been designated as critical habitat for that species, even though the EIR claims they are not suitable habitat.

**Response:**

On-site mitigation is not suitable pursuant to FAA Wildlife Hazards Management Guidelines. The FAA has determined that the presence of vernal pools is technically infeasible due to the attractive nuisance they would represent for birds and the corresponding threat to public health and safety through the heightened risk for bird strikes. Title 14, CFR Part 39 mandates that the airport operations area be maintained in such a condition as to minimize or eliminate wildlife usage, which includes mowing or discing the vegetation to reduce its attractiveness to wildlife and eliminating standing water. These activities would not be conducive to the completion of the Riverside fairy shrimp lifecycle. In addition, allowing public access onto the Los Angeles/EI Segundo Dunes for "ecotourism" purposes poses a potential threat to the ecologically sensitive dunes-habitat and also to airport security and public safety.

With regard to critical habitat for the Riverside fairy shrimp, the 1.3 acres of occupied habitat east of Pershing Drive has never been designated critical habitat for the Riverside fairy shrimp, only areas west of Pershing Drive in the Los Angeles/EI Segundo Dunes have been considered (please refer to Figure 4.11-5, Proposed Designation of Critical Habitat for the Riverside Fairy Shrimp, of the Draft EIS/EIR). Since publication of the Draft EIS/EIR, the United States District Court for the District of Columbia vacated the final rule on critical habitat for the Riverside fairy shrimp and as a result, the Los Angeles/EI Segundo Dunes do not currently contain designated critical habitat for this species.

#### PC02301-5

**Comment:**

5. The EIR proposes off-site mitigations for impacts on the Western Spadefoot Toad, but doesn't give details. The San Diego Horned Lizard is also a species-of-concern that will be affected.

**Response:**

Relocation sites for the western spadefoot toad have been determined in Section 7 consultation with USFWS. A monitoring plan will also be developed and implemented to monitor the success of relocated tadpoles. Please see mitigation measure MM-BC-4 in subsection 4.10.8 of Section 4.10, Biotic Communities, of the Supplement to the Draft EIS/EIR.

The San Diego horned lizard was determined present on the Los Angeles/EI Segundo Dunes from directed surveys conducted in 1998. Under all build alternatives, installation of navigational aids on the Los Angeles/EI Segundo Dunes would result in impacts to potential habitat for this species. Thus, preconstruction surveys would be conducted to determine whether the San Diego horned lizard is present within areas slated for installation of navigational aids. If determined present, relocation efforts

### 3. Comments and Responses

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would be coordinated with CDFG. The San Diego horned lizard would be captured using live traps and relocated to adjacent, undisturbed areas of the Los Angeles/El Segundo Dunes.

#### PC02301-6

##### Comment:

6. The EIR assumes that if the Master Plan is realized, a doubling will occur in pollution of the air, soundscape and lightscape. Yet, it claims there would be no adverse impacts on flora and fauna. New studies in bioacoustics and other environmental disciplines suggest further examination.

##### Response:

Potential impacts from air quality, noise, and light emissions on biotic communities, including sensitive species of flora and fauna, were examined in Section 4.10, Biotic Communities, and Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR. The analysis of air quality was based on a field investigation of air emissions and deposition on the Los Angeles/El Segundo Dunes and the findings documented in Section 4.7, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. This analysis was substantiated with a review of similar studies conducted at other airports. The analysis of lighting conditions considered both existing and future light emissions within the southern half of the El Segundo Blue Butterfly Habitat Restoration Area and was based on the findings documented in Section 4.18, Light Emissions, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and was substantiated with the findings of published literature. The analysis of noise was based on findings documented in Section 4.1, Noise, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, and Appendix S-C, Supplemental Aircraft Noise Technical Report, and was substantiated with the findings of published literature.

#### PC02301-7

##### Comment:

7. The EIR states that its "Winter, 1998 Bird Survey" consisted of four hours on one day, January 15, 1998. Yet, the survey area consists of two hundred acres! Is four hours on one day enough for a thorough seasonal survey? Do the other surveys, labelled "Spring, 1998," etc., consist of similar efforts? The EIR claims its survey methodology is based on DFW and FWS protocols, but these are not detailed in the appendices. Many surveys seem insufficient, such as the one for the Blue Butterfly, where areas north of a latitude parallel to Dockweiler Park were ignored. Surveys for the Pacific Pocket mouse did not include the southwest, southeast, and northeast quarters of the Dunes, nor the backdune/vernal pool restoration area. The plant surveys ignored areas along the strand or south of the VOR. Mammal trap lines ignored the VOR area as well as the backdune. Amphibian and reptile transects ignored the strand and the backdune.

##### Response:

Birds: Survey methods used to conduct all bird surveys are described in detail in seven Memoranda for the Record contained in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR. Bird surveys were conducted during periods of highest activity and greatest vocality for most bird species in habitats where target bird species are expected to occur. Thus, surveys were typically carried out between the times of 6:30 a.m. and 12:30 p.m. during the winter, spring, and summer seasons (seasonal residence at LAX varies for bird species). Directed surveys for sensitive species were conducted with regard to the natural history of the species and suitable habitat for the species. Burrowing owl surveys, for example, were conducted for 4 hours at dusk and dawn in the winter and spring of 1998, across 900 acres of potentially suitable habitat within the Master Plan Study Area. All bird surveys were conducted pursuant to protocols approved and/or published by California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (USFWS). Published survey protocols can be readily obtained from CDFG and USFWS. Copies of all material referenced in Section 4.10, Biotic Communities, Section 4.11, Endangered and Threatened Species of Flora and Fauna, and Section 4.12, Wetlands, of the Draft EIS/EIR were available during the public review period at the LAX Master Plan public reading room. Bird survey efforts were not only adequate but also extensive. Seven memoranda in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR thoroughly report the results of bird surveys. A review of these reports indicates that surveys were conducted over several days, several months, and several years, depending on the objectives of the survey efforts. El Segundo Blue Butterfly: Extensive

surveys, including a direct count of El Segundo blue butterflies (ESBs) present on the Los Angeles/El Segundo Dunes (Dunes) have been conducted since 1984. Permanent transects were established in 1984 by Dr. Rudi Mattoni to traverse areas of large buckwheat clusters suitable for ESB. These transects were monitored by Dr. Mattoni for 10 years (Mattoni, R., City of Los Angeles, Environmental Affairs Department, El Segundo Sand Dunes Revegetation at LAX 1994.) In 1996, the entire Habitat Restoration Area of the Dunes was surveyed in addition to surveys conducted along the permanent transects. From 1997 to 2001, qualified biologists surveyed the entire 307-acre Dunes, which include the Habitat Restoration Area (202.8 acres) and the area north of Vista Del Mar Park (104.3 acres). Surveys were also conducted along the permanent transects. The location of every buckwheat plant within the Dunes was mapped, and every plant was visited, looking for ESB adults. Although the area north of Vista Del Mar Park is devoid of buckwheat plants, the area continued to be surveyed as part of the comprehensive effort to monitor ESBs. Surveys conducted from 1995 to 2000 are described in detail and with accompanying graphics in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR. Survey results from 1995 to 2000 were also reported in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR. Survey results from 2001 were reported in Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Supplement to the Draft EIS/EIR.

1. Pacific Pocket Mouse: An intensive and comprehensive survey for the Pacific pocket mouse was conducted on the entire 307-acre Dunes. The survey effort was divided into five sessions, with each session consisting of five consecutive nights of trapping that follows protocol established by the USFWS for the Pacific pocket mouse. The survey proceeded from south to north across the Dunes, from the highest quality habitat to disturbed, marginally suitable habitat. Individual traps were placed every 10 meters along transect lines following the contours and landforms of the Dunes. This survey effort totaled 18,300 trap nights over a 26-day period. Three areas were not surveyed, but only after consultation with the USFWS, who determined that the three areas did not need to be surveyed because they were unsuitable habitat. These areas included land that was subject to intense agricultural practices, an area south of the VOR that had no captures recorded in a previous survey year, and areas east of the VOR situated on steep slopes with sandy soils unable to support burrow structures. Access onto the VOR area is strictly prohibited by LAWA and the FAA. Again, any areas not surveyed for the Pacific pocket mouse were determined to be unsuitable habitat by the USFWS. A detailed description of the methods and results of the Pacific pocket mouse survey is published in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR.

Plant Communities: Plant communities within the Master Plan Study Area were most recently surveyed on January 4, 2000, resulting in a plant community map utilized as a base map from which potential impacts from Master Plan Improvements were analyzed. In addition, surveys for sensitive plant species have been incorporated into the annual qualitative plant surveys conducted within the Habitat Restoration Area since 1995. Plant communities are described in accordance with designations and definitions provided by Holland (used by the CDFG in the California Natural Diversity Database). The area south of the VOR within the Habitat Restoration Area contains plant communities classified as southern dune scrub, southern foredune, valley needlegrass grassland, and disturbed dune scrub/foredune. Plant community maps were included in Section 4.10, Biotic Communities, of the Draft EIS/EIR. Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR contains four memoranda documenting the methods and results of plant community surveys within the Master Plan Study Area since 1995.

Mammals: Mammal surveys were conducted within the Habitat Restoration Area on the Los Angeles/El Segundo Dunes. Surveys employed three methods: Sherman live traps set at 10- to 20-meter intervals along transect lines, pitfall traps in areas of potential habitat, and walking transects. Trap lines were placed throughout the Habitat Restoration Area, which includes the backdunes (which contained five trap lines) and areas south and west of the VOR (which contained two trap lines). The VOR area itself did not contain a trap line because it is asphalt and because access into this area is strictly prohibited by LAWA and the FAA. A detailed description of the methods and results of the mammal survey is published in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR.

Reptiles and Amphibians: Reptile and amphibian surveys employed two methods: permanent transects and meandering transects. Permanent transects were established in the Dunes, including the Habitat Restoration Area, to facilitate repeated surveys that will allow for tracking population trends over time and, ultimately, help determine the effects of habitat management and the maturation of restoration plantings on reptile and amphibian populations. Meandering transects were very extensive, covering the entire Dunes (which includes areas south of the VOR and the backdune), 100 acres north of Sandpiper Street, north of Westchester Parkway and east of Cum Laude Avenue, west of the south runways and east of Pershing Drive, north and northwest of the north runways and south of Westchester Parkway. In addition to general surveys, directed surveys have been conducted for sensitive species of reptiles and amphibians. Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR contains six memoranda documenting the

### 3. Comments and Responses

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methods and results of general and directed reptile and amphibian surveys conducted within the Master Plan Study Area since 1995.

#### PC02301-8

**Comment:**

From these observations, I have come to the conclusion that it would be advisable to have the Dunes surveyed by an independent team of scientists to assess the true composition of its flora and fauna, as well as to determine the efficacy of the Dunes Long Term Habitat Management Plan and its implementation. Even a windshield survey shows that much of the Dunes is still overrun by invasives such as ice plant and fennel. This is especially true for the strand next to Dockweiler Beach and Park, an area that was given XP2 priority for management!

**Response:**

The floral and faunal composition of the Los Angeles/El Segundo Dunes was surveyed by qualified permitted biologists, as described in Technical Report 7, Biological Memorandum for the Record on Floral and Faunal Surveys, of the Draft EIS/EIR. Surveys were conducted pursuant to protocols approved and/or published by California Department of Fish and Game and U.S. Fish and Wildlife Service. These published survey protocols can be readily obtained from CDFG and USFWS.

Areas of the Los Angeles/El Segundo Dunes have been classified as disturbed, namely the north 104 acres comprised of disturbed dune scrub/foredune and non-native grassland/ruderal plant communities. These communities were illustrated in Figure 4.10-1, Biotic Communities: Baseline Conditions, in Section 4.10, Biotic Communities, of the Draft EIS/EIR. Disturbed areas within the north 104 acres, including the strand surrounding Dockweiler Beach State Park, would be given primary consideration when undertaking restoration opportunities within the Los Angeles/El Segundo Dunes.

#### PC02301-9

**Comment:**

Lastly, the EIR exemplifies a basic problem in the current practice of environmental impact analysis in that it automatically proposes mitigations, often off-site, for incidental takings that seem to receive priority over other alternatives. Populations of a species may indeed exist elsewhere or a "scoop-and-scoot" could be accomplished, but it would be better to develop a "win-win" situation in which all species can survive in situ. The Journal of Conservation Biology has found that nine out of every ten off-site wetland mitigations ultimately fail. With management that is proactive and effective, perhaps someday even critters such as the Pacific Pocket Mouse and the California Coastal Gnatcatcher can return to the El Segundo Dunes!

**Response:**

Management of the airport operations area (AOA) must comply with Title 14, CFR Part 139, which mandates that the AOA be maintained in such a condition to minimize or eliminate hazards to public safety resulting from wildlife utilization of the area. Routine operations and maintenance activities include mowing or discing of vegetation and removal of standing water. These activities are not conducive to the Riverside fairy shrimp completing its lifecycle. In addition, the Federal Aviation Administration has determined that the Los Angeles/El Segundo Dunes is not a feasible vernal pool restoration site due to the potential hazards to public safety.

**PC02302**

**Galanter, Ruth**

**City of Los Angeles**

**9/24/2001**

#### PC02302-1

**Comment:**

Few environmental impacts are simple and straightforward. While it is certainly the case that the gases and particulates emitted by, for instance, an idling airplane, can be quantified, the real impacts of that idling airplane go far beyond its own emissions. Such additional impacts might include increases in the idling time of other airplanes or the added cumulative burden of noise from the original plane and the



others waiting behind it. To be useful, an environmental impact assessment must consider multiple layers of environmental consequences. It also helps if the project whose consequences are to be assessed can be understood as planned with forethought and a long-range as well as wide-ranging program.

Unfortunately, the Proposed Master Plan Improvements Project for LAX is so flawed in its conception that the environmental assessment is inherently flawed as well.

Nowhere in the Draft EIS/EIR can I find an explanation for why this particular "project planning horizon" was selected. The document does indicate that a major goal of the project is "to protect past investment." There is the first problem. The goal should be to protect future investment, such as the investment contemplated in this master plan. And thus the project planning horizon for LAX should be part of a larger project planning horizon for all the airports operated by LAWA.

Looking to the future, and its environmental impacts, it is clear that population distribution is changing. Increasing proportions of the Los Angeles region's population live and work in areas ever farther from LAX. As a result, now matter what "improvements" are made at LAX to protect past investment, the automotive air pollution generated by vehicles going to and from LAX will increase as total vehicle miles traveled increases, and even free flow traffic will require more time than such traffic today, undercutting the productivity of future investment.

LAWA has for several decades acknowledged, and does so again in this master plan, that LAX cannot itself meet the projected aviation demand in the Southern California region. Yet this master plan fails to address the comparative environmental consequences of providing airport growth at LAX versus planning for the same growth at other airports operated by the same agency. This is one of the flaws created by choosing such a limited project planning horizon and failing to place the chosen project planning horizon within a larger planning horizon.

Simple logic suggests that protection of future investment by both airports and airlines should lead to directing that investment to airports customers will in fact be able to reach from their homes and businesses on the ground. I can find no comparison of the total vehicle miles traveled, with the resulting calculation of vehicle-generated air pollution impacts, between centralizing airport development at LAX and distributing airport development to other airports throughout the region or even only to those owned and operated by LAWA.

**Response:**

The Draft EIS/EIR addressed the direct, indirect, and cumulative impacts of each of the Master Plan alternatives, including the types of impacts described at the beginning of the comment. Impacts, such as air pollutant emissions, associated with the taxing, idling, and queuing of departing and arriving aircraft were accounted for in the analysis of each alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR.

The year 2015 provides a reasonable planning horizon at which future activity levels can be estimated, necessary major improvements at LAX can be determined, and a logical systematic implementation plan can be formulated. In so doing, the efficient use of existing facilities can continue and cost-effective improvements to those facilities can occur, thereby protecting the City's existing investment at LAX. Improvements proposed under the LAX Master Plan are intended to reduce the environmental impacts of airport operations, as can be seen in many cases when comparing the future (2015) environmental impacts of the No Action/No Project Alternative to the impacts of the various build alternatives.

It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-GEN-4 regarding potential environmental impacts at surrounding other airports as a result of the LAX Master Plan.

### **3. Comments and Responses**

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#### **PC02302-2**

**Comment:**

More specifically, the Draft EIS/EIR attempts to address vehicular air pollution by promoting additional roads in the area surrounding LAX. Nice try, but no cigar. The road improvements may indeed smooth traffic flow in the limited areas covered by those roads, but their net effect will be to increase congestion on the 405 and 105 freeways and to spread vehicular emissions around the entire airport--affecting residential neighborhoods as well as the El Segundo Dunes Preserve, the last home on the entire planet for a number of federally protected endangered species.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR. The level of significance following mitigation of these impacts was addressed in Section 4.6.9 of each document.

Please see Topical Response TR-ST-4 regarding airport area traffic concerns, and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### **PC02302-3**

**Comment:**

Since LAWA began its planning effort which this Draft EIS/EIR assesses, events have overtaken the process. At all levels of government from the federal to the local, conditions have dramatically changed. These changes, while no doubt frustrating to the master planners, offer unprecedented opportunity to retreat from the misguided plan before you and to do it right.

Events of the past weeks have very probably rendered the entire proposed master plan obsolete. The September 11 assaults on the World Trade Center and the Pentagon have demonstrated that airports must operate differently or they may not be able to operate at all. While decisions as to the acceptable level of risk air travelers must assume are beyond the control of LAWA, it seems likely that future airport designs will have to assume far less intrusion by the private automobile than we have seen heretofore. This will have significant implications for the access roads and parking facilities, and consequently for the location of check-in facilities and security checks.

**Response:**

Comment noted. Alternative D, Enhanced Safety and Security Plan, as described and evaluated in the Supplement to the Draft EIS/EIR, responds to the concerns expressed in the comment. As part of Alternative D, safety is enhanced while improving traffic conditions especially with respect to neighborhood streets. Refer to Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of the Supplement to the Draft EIS/EIR for discussions regarding the impacts of Alternative D in comparison to the No Action/No Project Alternative and build Alternatives A, B, and C.

#### **PC02302-4**

**Comment:**

Even before September 11, trends within the airline industry have been unclear. While the LAWA Proposed Master Plan includes in all its alternatives runways to accommodate planes carrying 600 passengers or more, airlines have in fact been flying more and more of the 757s and 767s. Not all airports need to accommodate the behemoths, even if they are actually built.

**Response:**

Comment noted. The Master Plan has projected that the airlines would adjust air service patterns in several ways in response to the capacity constraints associated with the Master Plan alternatives. The projected air service changes include growth in international service, a focus on O&D passengers, a

reduction in commuter service, and reduced service to short-haul markets with high levels of air service (or an increase in the size of the aircraft serving these markets). The predicted air service changes are reasonable assumptions since they are based on the historical observation and aviation industry trends. Please see Responses to Comments PC00599-7 and PC00593-1 for a discussion on the fleet mix assumptions used in the development of the alternatives. Please see Appendix A, Existing Baseline Comparison Issues - 1996 to 2000, Figure A3 of the Master Plan Addendum for a look at the 40-year history of aviation traffic in terms of U.S. enplanements. Please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan for further discussion of the activity levels of the Master Plan Alternative.

#### **PC02302-5**

##### **Comment:**

While the September 11 overall loss of life was beyond horror, it is a sign of some drastic changes in demand that the four hijacked planes carried fewer than 400 total passengers and crew. Certainly since September 11, demand has dropped off the charts--and given both the previously developing trends and the uncertainty of both the economic fallout and the security questions posed by an age of terrorism, the demand forecasts on which the proposed master plan is based are no longer useful. Once the demand forecasts fall, so does the whole house of cards.

##### **Response:**

Aviation forecasts that were used for the analyses presented in the Supplement to the Draft EIS/EIS take into account trends in air transportation after September 11, 2001, the general downturn in the economy that has occurred over the past several years and the SARS incident in Asian Pacific countries. That revised forecast was provided in the LAX Master Plan Addendum and was summarized in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. Please also see Response to Comment AL00051-93.

#### **PC02302-6**

##### **Comment:**

It is time to recognize, as so many local governmental jurisdictions throughout the Los Angeles region and so many congressional representatives of the same areas have already done, that the proposed master plan for LAX will not succeed in its goal of improving the economy of this area. Gains offered through additional flights at LAX will be outweighed by delays and lost productivity as the population and economic centers disburse requiring longer trips across greater distances to bring passengers and cargo to the airport. These same local governments and congressional representatives have recognized that disbursing airport growth to the maximum extent to outlying airports throughout the region will have a more positive effect on the economy and will avoid many of the environmental consequences of centralization and expansion at LAX.

##### **Response:**

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

### **3. Comments and Responses**

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#### **PC02302-7**

**Comment:**

Until Mayor Hahn and the Board of Airport Commissioners act to seize the opportunity created by the abovementioned events and formally cancel this misguided expansion plan, legal and bureaucratic necessity requires comments as if the Draft EIS/EIR were not in fact flawed. Therefore, I offer the following specific comments for your consideration. I believe that a careful review of the consequences of the Proposed Master Plan weighed against the opportunities for a truly workable regional approach will lead you to agree that there are alternatives not yet fully evaluated under this Draft document that could produce less severe environmental impacts and more and more equitable economic benefits. Thank you for this opportunity to submit my views. See specific comments below.

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

Although the conclusion of the Draft EIS/EIR is that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

#### **PC02302-8**

**Comment:**

AIRCRAFT NOISE

No amount of "mitigation" at LAX, other than purchase and obliteration of surrounding communities, can produce the same benefits as locating the anticipated additional aircraft at airports that already include a larger buffer area between the airport and adjacent communities. LAWA owns two such airports, neither of which is addressed in the narrow context of this proposed plan. Only a determined effort to ignore reality can overlook this basic fact. The most effective mitigation measure for the cumulative effect of aircraft noise from ever increasing numbers of airplanes is to move as many of those airplanes as possible to Somewhere Else. LAWA alone among airport operators in this region, has that opportunity.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, with supporting technical data and analyses provided in Appendix D of the Draft EIS/EIR and Appendix S-C of the Supplement to the Draft EIS/EIR.

#### PC02302-9

**Comment:**

ON-AIRPORT SURFACE TRANSPORTATION

The most effective reduction of congestion (with resulting air quality impacts) within the Central Terminal Area would be the replacement of private cars with multi-passenger vehicles only, preferably powered by fuels with less impact than gasoline. The aftermath of September 11 has forcibly demonstrated that it is possible to run the airport without private cars in the CTA. It is already clear, however, that a combination of economic and political pressure will eventually force the re-introduction of private vehicles. The Draft EIS/EIR states that all proposed alternatives would produce less on-airport congestion than the "no project" alternative; however, it fails to note that the reason congestion is reduced on-airport is that the traffic is simply shifted to just the airport borders, adjacent to the surrounding communities.

**Response:**

The off-airport analysis, summarized in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Section 4.3.2, Off-Airport Surface Transportation, discussed the benefits and impacts of the alternatives outside of the airport boundaries. Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

#### PC02302-10

**Comment:**

Furthermore, the proposed mitigation package would require that traffic which now enters the airport at Sepulveda be distributed along new roads requiring traffic to drive the length of the airport to the west end, in order for passengers to come back eastward into the airport. Most vehicles would therefore be driving longer distances than today in order to reach the same Central Terminal Area. More vehicle miles traveled equals more air pollution, not less. (Granted that free-flow traffic over longer distances may emit less pollution than congested traffic over shorter distances, but does anyone really believe traffic to and into the airport will approach free-flow conditions?)

**Response:**

The west terminal area (in Alternatives A, B, and C) and the Ground Transportation Center [GTC] in Alternative D) would be designed to allow far greater travel speeds than currently exist in the CTA. Further, the reduced demand in the CTA would also allow CTA traffic to flow better than today in Alternatives A, B, and C. The detailed air quality analysis was provided in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### PC02302-11

**Comment:**

RELOCATION OF RESIDENTS AND BUSINESSES

No further relocation of residents and businesses is acceptable. See the discussion of economic benefits in the introductory session of my comments. Airport expansion at LAX has over the years swallowed much of the Westchester and Playa del Rey communities. Relocation of residents and destruction of the housing has not only exacerbated the region's housing shortage, it has also decimated the customer base of the local business community. Recovery from each successive wave of airport expansion has been slow and painful. As the housing and businesses disappear, they are being recreated not in areas easily accessible to LAX, but at the outer reaches of the region--in the Inland Empire, North County, and Orange County.

**Response:**

Comment noted. The Master Plan is considered separate from growth and expansion that has occurred at LAX in the past. Please see Response to Comment PC00035-2 regarding residential acquisition; Response to Comment PC00013-5 regarding business acquisition and relocation impacts, proposed

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collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan; and Response to Comment AL00018-1 regarding commercial property acquisition within the Westchester Business District. As discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, sufficient comparable housing within a 10-mile radius of LAX would be available for the displaced households. Substantial new housing is currently being developed in the local area at Playa Vista and in small, independent projects located throughout the City of Los Angeles and the region. Furthermore, implementation of the Proposed Relocation Plan would facilitate the relocation of affected residents to comparable housing near LAX, meet applicable federal requirements, and ensure that residential relocation impacts would not be significant. Please see Response to Comment AL00033-120 and Response to Comment PC01879-11 regarding mitigation of potential acquisition and relocation impacts. Please also see Topical Response TR-RBR-1 regarding residential acquisition and relocation issues, including affordable housing, and Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

#### **PC02302-12**

##### **Comment:**

LAWA currently holds a large piece of land from which residents were displaced decades ago and which LAWA in the 1980s declared not needed for aviation purposes. LAWA now proposes to offer that land as a relocation site for businesses. There are three major problems with this approach, to say nothing of the multitude of subsidiary problems that flow from the big ones.

##### **Response:**

The LAX Northside project is a previously approved development on airport property at the north side of LAX, located north and south of Westchester Parkway between Pershing Drive and Sepulveda Boulevard. The approval is for development of about 340 acres of commercial, recreational, and airport-related industrial land uses, totaling 4.5 MSF on 12 parcels. Approvals include the Final EIR; Zoning Ordinances (159,526, 169,254, and 169,768); and Final Tract Map No. 34836. Ordinance 159,526 entitled the development of LAX Northside for commercial, manufacturing, and recreational purposes, subject to additional [Q] conditions. Under the Master Plan, an LAX Specific Plan/LAX Zone would be created for LAX Northside/Westchester Southside and would incorporate applicable [Q] conditions, as specified in Master Plan Commitment LU-1, Incorporation of City of Los Angeles Ordinance No. 159,526 [Q] Zoning Conditions for LAX Northside into the Westchester Southside/LAX Northside Project (Alternatives A, B, C, and D), provided in Section 4.2, Land Use (subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR. Finally, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02302-13**

##### **Comment:**

First LAWA is not supposed to be in the land development business. If that land (formerly designated LAX Northside, currently designated Westchester Southside) is not needed for aviation purposes, it should be returned to the tax rolls. Indeed, it should have been returned to the tax rolls, or at very least to the City of Los Angeles, at the time Westchester Parkway was built to divide the land that was needed for future aviation purposes from that which was not.

Second, the decision to replace the former residential uses on that land with commercial uses is properly the province of the City of Los Angeles and its designated planning apparatus, not LAWA.

##### **Response:**

Comment noted. Given the proximity of the LAX Northside/Westchester Southside area to runways at LAX, the area is considered to be better controlled by LAWA relative to ensuring that future uses within the area are compatible with the noise and safety characteristics of the airport. Similarly, the Manchester Square and Belford Avenue areas, which are or were occupied by residential uses that are substantially impacted by airport noise, are being planned by LAWA for future uses that are compatible with airport noise levels. The city of Los Angeles retains zoning and land use controls over the area.

#### PC02302-14

**Comment:**

Third, few small businesses will survive relocation--as history amply demonstrates. Larger businesses once forced to shut down and move have no particular reason to move to Northside/Southside; they can as easily move to another jurisdiction depriving the City of Los Angeles of tax revenues and multiplier economic benefits.

**Response:**

As discussed in Appendix P to Chapter V of the Master Plan, Preliminary Property Acquisition and Relocation Plan, until the Relocation Plan is finalized it is impossible to predict precisely which businesses will relocate to LAX Northside/Westchester Southside. However, those businesses that have been targeted for relocation on the airport or within LAX Northside/Westchester Southside, as well as those that are expected to be absorbed by the local market are identified in Table A-3, Parcel Detail of Acquisition Areas Alternative A, Table B-3, Summary Statistics of Acquisition Areas Alternative B, and Table C-3, Summary Statistics of Acquisition Areas Alternative C, in Appendix P to Chapter V of the Master Plan, as well as in Table 2.7-2, Alternative D - Parcel Detail of Acquisition Areas, in Chapter 2.7 of the Master Plan Addendum. The Proposed Relocation Plan would provide all affected businesses with an array of relocation assistance that would meet requirements under state and federal law, and may include special assistance for displaced businesses in finding relocation sites within nearby areas of the City of Los Angeles, including LAX Northside/Westchester Southside. Please refer to Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester. Also note that Alternative D, evaluated in the Supplement to the Draft EIS/EIR and now considered LAWA staff's preferred alternative, involves the acquisition of far fewer businesses than the other build alternatives.

As was discussed in Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, a loss in property and business tax revenue would occur immediately following property acquisition. In the long term, the extent to which tax revenues associated with acquired businesses with no identifiable relocation opportunity might be lost to the City of Los Angeles would depend on the relocation choices of affected property owners. However, under each of the build alternatives new tax revenues generated over the life of the Master Plan (2015) would more than compensate for those lost. Property and business taxes would be quickly recouped as LAWA collateral development proceeds and acquired businesses move to airport-owned property. The economic impacts associated with the Master Plan were discussed in Section 4.4.1, Employment/Socio-Economics, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In addition to direct employment and economic output (gross sales) generated by each of the alternatives, indirect and induced job growth and economic growth would occur. Furthermore, construction of each of the build alternatives would have a "multiplier effect," yielding indirect jobs (i.e., those related to purchases of goods and services by companies directly involved in the design and construction of the project) and induced jobs (i.e., those related to the re-spending of earnings by direct and indirect job holders), as well as indirect and induced economic output associated with construction expenditures.

#### PC02302-15

**Comment:**

Were there no other alternatives available to LAWA at its other airports, there might be an argument for the disruption of lives and livelihoods contemplated by this plan, Under the circumstances, there is not.

**Response:**

Comment noted. The allocation of air service among regional airports and the feasibility of a regional approach to airport expansion were addressed in Section 1, Regional Context, and Chapter 3, Alternatives (subsection 3.1.1.2), of the Draft EIS/EIR. As discussed therein, certain services at LAX, such as its international service and accompanying domestic connecting flights, could not feasibly be transferred to other airports throughout the region without major negative consequences. Subsequent to publication of the Draft EIS/EIR, a fourth Master Plan build alternative, Alternative D - Enhanced Safety and Security Plan, was proposed and evaluated in the Supplement to the Draft EIS/EIR. Implementation of Alternative D would be consistent with a decentralized regional commercial airport

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system (i.e., by constraining growth at LAX and thereby promoting growth at former military and other underutilized airports outside of the region's urban core). Please see Response to Comment PC00035-2 regarding residential acquisition; and Response to Comment PC00013-5 regarding business acquisition and relocation impacts, proposed collateral development at LAX Northside/Westchester Southside, and the proposed Preliminary Property Acquisition and Relocation Plan. It was acknowledged within Section 4.4.2, Relocation of Residences or Businesses (subsection 4.4.2.6), of the Draft EIS/EIR that some residents may potentially experience an inconvenience or hardship as a result of relocation. However, implementation of the proposed relocation program would meet applicable federal requirements, facilitate the relocation of such residents to comparable housing within a 10-mile radius of LAX, and ensure that residential relocation impacts would be less than significant.

#### PC02302-16

##### Comment:

###### ENVIRONMENTAL JUSTICE

It is an inescapable fact that the worst impacts from LAX fall disproportionately on those communities under the landing pattern: South Los Angeles, Inglewood, and Lennox. These communities are overwhelmingly dominated by minority populations. Increasing the number of operations at LAX will unavoidably exacerbate this situation. The only way to approximate environmental justice is to distribute the burdens inherent in living close to a major airport more equitably across the region. Fortunately, LAWA owns other airports where no one need be as impacted as the City of Inglewood has been. If the proposed master plan is implemented, a plane will come down over Inglewood approximately every 3.5 seconds.

##### Response:

Please see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Alternative D was added to the Supplement to the Draft EIS/EIR as a build alternative designed to serve a level of future (2015) activity comparable to the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX, and instead, shifting the accommodation of future aviation demand to other airports in the region.

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

#### PC02302-17

##### Comment:

###### AIR QUALITY

See discussion in introduction. Air pollution associated with the proposed airport expansion occurs both in the air and on the ground. In order to adequately assess the relative impact of different courses of action, the EIS/EIR should include analysis of both primary and secondary impacts of increased air operations at LAX. More flights, or bigger engines, means more direct emissions in the areas near the airport, particularly under the landing pattern. Those emissions will generally be carried east with the prevailing winds, increasing pollution over additional communities east of the airport. Many of these communities are populated overwhelmingly by members of ethnic minorities. Were the additional flights directed instead to, for instance, Ontario airport and others in the Inland Empire, areas west of those communities would be spared the emissions associated with landing though subject to emissions associated with takeoff, it would be appropriate to assess the relative impacts of emissions associated with different parts of the flight cycle. Were the additional flights directed to Palmdale, it is likely that far fewer people would be subject to emissions than under any of the current proposed alternatives.



**Response:**

Please see Topical Response TR-AQ-3 regarding air pollution increase. Also, please see Topical Response TR-EJ-3 regarding environmental justice and regional context, as well as Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02302-18**

**Comment:**

With respect to air quality impacts from sources on the ground, the analysis proposes mitigation measures that would in fact redistribute vehicle pollution rather than significantly mitigate it.

Furthermore the analysis does not address reduction of traffic congestion on the three freeways that feed traffic to LAX. The 10 Freeway, for example, is severely congested westbound in the morning rush hour eastbound in the afternoons from other sources--primarily the growth of employment centers in Santa Monica, Culver City, and to a lesser extent Century City. While LAWA is powerless to address that issue directly, the proposed expansion plan would exacerbate the problem in two major ways. First, further concentrating airport capacity at LAX would increase the need for traffic from other parts of the region to reach the west side; second, its plans to remove housing would contribute to the shortage of housing relative to the number of workplaces, which also increases the need for traffic from other parts of the region to reach the west side.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR. The level of significance following mitigation of these impacts was addressed in Section 4.6.9 of each document.

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02302-19**

**Comment:**

ENDANGERED AND THREATENED SPECIES

Under orders from the California Coastal Commission, LAWA some years ago created the El Segundo Dunes Preserve. That small area, approximately 200 acres, is home to approximately the 30 threatened and endangered species and the last refuge anywhere on the planet for several of them. While LAWA is to be commended for its acceptance of the responsibility to maintain this habitat area, the proposed expansion plan threatens the viability of the habitat by intrusion of the "ring road" and increased activity at the west end of the airport. LAWA proposes to relocate species currently found on airport property. Relocation of endangered species is tricky and does not always work. No destruction of existing habitat should be permitted unless and until the species have successfully established new habitat, which determination should be made after a monitoring period set by and under the supervision of the US Fish and Wildlife Service and the California Department of Fish and Game.

**Response:**

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly. Section 4.11, Endangered and Threatened Species of Flora and Fauna, of the Draft EIS/EIR, stated that only one federally listed endangered species, the El Segundo blue butterfly, is present in the Los Angeles/El Segundo Dunes. Mitigation measure MM-ET-2 of the Supplement to Draft EIS/EIR, stated that plantings of coast buckwheat, the butterfly host plant, would occur 3 years prior to the impact to ensure their successful establishment, and that plants were mature enough to bloom. After which, relocation of El Segundo blue butterfly pupae would be conducted by a permitted and qualified biologist in coordination with the USFWS. Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly.

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Figures 33 through 36 of Appendix J1, Biological Assessment Technical Report, of the Draft EIS/EIR, depict a close-up view of the World Way West loop and the El Segundo Blue Butterfly Habitat Restoration Area. There would be no impacts to the Habitat Restoration Area or the El Segundo blue butterfly due to the proposed ring road for any of the Alternatives. Please note also that Alternative D, described in the Supplement to the Draft EIS/EIR, does not include a ring road.

#### PC02302-20

**Comment:**

CONSTRUCTION

Under even the best of circumstances, construction of the proposed airport activities would have to take place with minimal disruption of ongoing airport operations. Consequently, as noted in the Draft EIS/EIR, construction workers would have to be transported to and from the site, impacting traffic in the surrounding communities. Construction would have to occur during the least busy hours of airport operation as well as during the day. In effect, this means surrounding communities would be subject to noise, dust, and other impacts during the hours ordinarily reserved for some level of respite from peak activity.

**Response:**

The Supplement to the Draft EIS/EIR provided additional detail on construction-related traffic impacts of all alternatives. The analysis of off-airport traffic demands ensured that the three peak hours analyzed did account for the maximum traffic experienced throughout the day, including construction traffic. Also, please see Topical Response TR-ST-3 regarding construction traffic.

#### PC02302-21

**Comment:**

Throughout years of controversy over how best to meet future airport demand, no one has been willing to compare the number of jobs created by a centralized LAX expansion versus distributed expansion at a number of airports throughout the region. Intuitively, it would seem that more jobs would be created, and closer to neighborhoods where working people reside, if airport growth and associated construction activities were disbursed around the region.

**Response:**

Comment noted. Please see Response to Comment PC02302-8.

#### PC02302-22

**Comment:**

As with so many other impacts, the noise, dust, and traffic associated with construction would impact fewer residents and businesses if the construction took place at Ontario or Palmdale airports, both of which have better buffers than LAX.

**Response:**

Comment noted. Please see Response to Comment PC02302-8.

#### PC02302-23

**Comment:**

HUMAN HEALTH RISK ASSESSMENT

The most important issue here is whether enough assessment has been conducted and of the right substances. It is also important to recognize that the health impacts of any given substance may be significantly different for children or for older adults than for health adults in their prime. Because the areas nearest LAX include large numbers of children and of the elderly, including many schools, the

different impacts must be separately evaluated. The issues here include noise as well as chemical emissions and particulates. A number of studies indicate that high levels of noise can severely reduce learning capability as well as destroying the ears.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise in Section 4.1, Noise, Section 4.2, Land Use and in Section 4.24.2, Health Effects of Noise, air quality in Section 4.6, Air Quality, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. The human health risk assessment specifically evaluated possible health risks for children attending grade schools at locations where air quality impacts are predicted to be highest. As discussed in the health risk assessments, air quality is actually expected to improve somewhat at these locations. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-1 regarding air pollutant deposition and Topical Response TR-LU-5 regarding land use and noise mitigation.

**PC02302-24**

**Comment:**

It is important in evaluating the risks and the remedies available to look beyond the simplistic formulation inherent in this proposed master plan. Posing the issue as a certain amount of health risk versus economic stagnation will get us nowhere. It is important to remember that LAWA has options that would permit expansion of airport capacity without inflicting these health risks on the populations surrounding LAX; those options have, however, been left out of this proposed master plan.

**Response:**

Comment noted. Human health impacts are addressed in Section 4.24.1, Human Health Risk Assessment, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14 of the Draft EIS/EIR and Technical Report S-9 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-3 regarding human health impacts.

Subsequent to publication of the Draft EIS/EIR, an additional option was formulated for the LAX Master Plan. This new option - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifting the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment.

It should also be noted that although the Draft EIS/EIR concluded that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region.

**PC02302-25**

**Comment:**

LAWA argues that by spreading emissions across the airport east to west pollution will be reduced. Given that the prevailing winds blow west to east, carrying pollution from the beach areas through Los Angeles and into the Inland Empire. All that is accomplished by adding pollution at the west end is to allow it to take a little longer moving over Inglewood and South LA.

**Response:**

Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR discusses potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a

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community basis. Technical Report S-9a of the Supplement to the Draft EIS/EIR discusses potential impacts on a community basis in greater detail.

#### PC02302-26

**Comment:**

Executive Summary

Page ES-4 "LAWA's regional aviation analysis shows that the region's airports, including LAX, do not presently have the capacity to accommodate this projected need for air services." (146 MAP and 7.5 million tons in 2015) Given that the draft EIS/EIR has taken nearly ten years to compile, during which time March, Southern California Logistics, and other airports have been planning and implementing airport improvements, please provide a current (2001) analysis of the region's airport capacity in 2015.

**Response:**

As of 2001, the Southern California Association of Governments (SCAG) in its 2001 Regional Transportation Plan (RTP) estimated the existing airport capacity in the region at approximately 120 MAP. The 2001 RTP included El Toro as an integral part of the region plan to meet the forecast demand. Without the conversion of El Toro to a civilian airport, the region's airports would have a projected shortfall of approximately 30 MAP and would not have the capacity to accommodate the 2025 forecast for air services. Although SCAG's forecast horizon is 10-years beyond the planning horizon of this Master Plan, there is inadequate existing airport capacity in the region to serve long-term passenger demand. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02302-27

**Comment:**

Page ES-4 "Airlines, rather than the government, decide which airports will be served." This statement indicates a willingness to continue to let the airlines determine where the negative impacts of air travel and air cargo will occur, rather than develop a system of airports that will serve airlines' need to service the Los Angeles region through a mutually-beneficial regional plan. As has been seen elsewhere, this statement is not true.

**Response:**

Since passage of the federal Airline Deregulation Act of 1978, the airlines make the decision about which airports they will serve. As a general rule, airlines will choose to serve the airports near the highest concentrations of conveniently located customers. Within this general framework, however, airlines must make strategic decisions about air service to maximize their investments and gain competitive advantages. For instance, in regions with multiple airports, airlines tend to concentrate their air service at a single, well-located primary airport for reasons of economic efficiency. Concentrating service at a dominant airport also facilitates connecting service, which can significantly increase an airline's market and allow even greater frequencies to more destinations. International service in particular relies on the availability of domestic connecting flights to a wide range of destinations. Please see Topical Response TR-RC-2 regarding the role of deregulation in aviation planning. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

#### PC02302-28

**Comment:**

Page ES-4 "Over 50 percent of the region's passengers and shippers are located within 60 minutes driving time to LAX." This statement shows an amazing willingness to manipulate statistics. This, of course, means that at if 50% of the region's passengers have to drive up to an hour to get to LAX, another 50% have to drive longer than an hour, contributing to air pollution, traffic congestion, and other negative environmental impacts. This statement should be clarified with a true analysis of the entire region's air passenger statistics, as well as up-to-date cargo statistics that include the entire Southern California region.

**Response:**

Of the 50 percent of the region's passengers that are not within 60 minutes of LAX, some do choose to drive more than an hour to fly to/from LAX. Most of the other passengers, however, choose to fly from one of the other regional airports that is a shorter driving distance. The traffic and air quality sections of the Draft EIS/EIR and Supplement to the Draft EIS/EIR took into consideration all passenger and shipper travel times to LAX.

**PC02302-29**

**Comment:**

Page ES-4 "75% of population concentrated in 18% of region" Confirm that this is true in light of the 2000 census figures, showing tremendous growth in the northern portion of Los Angeles County and the Inland Empire.

**Response:**

The population forecast referred to was developed by SCAG prior to the release of the 2000 census figures. Even with higher than expected growth in northern LA County and the Inland Empire, the basic premise is unchanged. A large percentage of the region's population is and is projected to remain concentrated in a relatively small portion of the region's land area. The majority of the demand for air travel will continue to be generated in that small portion of the region.

**PC02302-30**

**Comment:**

Page ES-5 "Currently with changes to larger aircraft and other operational adjustments, LAX has the ability to serve approximately 78.7 million annual passengers and 3.1 million annual tons of cargo. The LAX Master Plan has forecast a demand at LAX for 97.9 million annual passengers (over half of which will be international) and 4.2 million tons of cargo in 2015." A forecast should be developed that relies on current information as well as assumptions utilizing both Palmdale and Ontario more heavily.

**Response:**

Comment noted. The LAX Master Plan forecast for passengers and operations was developed using twenty four years of passenger and operational activity data at LAX. The data was assessed over the time frame in terms of passenger and operational growth for international and domestic, O&D and connecting activity. While the unconstrained forecast for 2015 projects 97.9 million annual passengers and 4.2 million tons of cargo, this activity level is not accommodated by any of the Master Plan alternatives. The Master Plan alternatives are considered constrained because they do not have the ability to meet the forecast demand. Instead, the Master Plan alternatives were designed to maximize the amount of traffic that could be served in the limited space available. Please see Responses to Comment PC00260-1 regarding the level of activity that could be served at LAX under the three alternatives. Secondary, commuter and military airports in the Los Angeles Region (including Palmdale and Ontario) were evaluated to determine their role in meeting the forecast demand for the region. Although excess capacity exists at some of the region's commercial airports, the limited ability of airport operators and even airlines to allocate demand on this basis means that certain airports will become increasingly congested. LAX is the only airport in the region that can effectively compete with other international gateways because of its bilateral agreements between the U.S. and many foreign governments, its facilities capable of supporting travel too expensive to duplicate elsewhere, its off-airport network of business supporting a complex international trade center, and its opportunities for connecting passengers. The Master Plan forecasts increased demand for air service at LAX, despite anticipated growth at other airports. The LAX share of the region's total demand is projected to decline, but the number of passengers using LAX will continue to increase through 2015. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

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#### PC02302-31

**Comment:**

Page ES-5 "A multiple scenario analysis . . . conducted by SCAG in 1998 found that if LAX capacity were to be somehow constrained in an effort to "force" demand to other regional airports, much of the traffic would instead relocate outside the region to airports in cities such as San Francisco, Denver, and Dallas." Based on SCAG's recent adoption of the RTP, constraining LAX to 78 MAP, this statement should be revised to reflect this situation more accurately. This statement completely ignores the fact that Southern California is one of the largest O&D regions, it is one of the largest economies in the world, and if the airlines want to serve this huge market they will most certainly not relocate to Denver, Dallas, or anywhere else outside of this area.

**Response:**

Please see Response to Comment AL00033-113 regarding changed circumstances in the region's system of airports since SCAG's 2001 Regional Transportation Plan was adopted.

#### PC02302-32

**Comment:**

Purpose and Need Statement for the Project. This statement is based on a flawed premise: LAX is already so over crowded and congested, that passenger terminals, public parking, curbside roadways and other facilities must be expanded in order to accommodate the ever-increasing demand at this airport. In fact, congestion is increasing at LAX because the airlines are over-scheduling flights in and out of this airport instead of seeking ways to serve the traveling public from various facilities closer to where they live.

**Response:**

Comment noted.

#### PC02302-33

**Comment:**

Page ES-7 "Furthermore, evidence from other regions and nations indicates that attempts to relocate activity from an established airport to new facilities may result in failure and a loss of millions of dollars." This statement ignores the successes at many airports around the U.S. such as Baltimore/Washington D.C., Massport, Minneapolis/St Paul, etc.

**Response:**

Montreal Mirabel: In 1975, Transport Canada constructed a new international airport, Mirabel, located approximately 34 miles from Montreal's central business district. The original concept of Mirabel called for Dorval (Montreal's then major airport) to be closed to all commercial traffic. Instead, the international and transborder (i.e., U.S. flights) were segregated to Mirabel, while keeping all domestic Canadian flights at Dorval. Splitting the catchment area by sector devastated the connecting traffic volume and destroyed domestic-to-international and international-to-domestic connections. In February 1996, ADM, the operator of Dorval and Mirabel, announced that all scheduled passenger traffic would be transferred back to Dorval by April 1999. By the end of 1997, most of this transfer that already occurred. ADM recognized the value and impact of better serving origin & destination passengers, recapturing connecting passengers, and accommodating airline alliances at a consolidated facility. Today, Mirabel is consigned to serving only charter passenger and all-cargo flights. Its role has been denigrated from superlative gateway to supplemental airport. The attempted sector segregation is often cited as a major reason why several European airlines withdrew service from the Montreal market. The sector segregation also resulted in the near elimination of connecting activity in Montreal, once Canada's primary international gateway.

Mirabel is but one example of a failed attempt to relocate activity from an established airport to a new facility.

In order to make new facilities succeed, airport operators and Congress have instituted perimeter rules to restrict, in part, the type of scheduled, non-stop air service provided by scheduled air carriers at affected airports. Three perimeter rules are summarized below.

LaGuardia Airport (LGA) - The perimeter rule at LGA prohibits non-stop scheduled flights from exceeding 1,500 statute miles. The Port Authority of NY & NJ instituted the perimeter rule for a number of reasons related to LGA's runway length, the desire to keep transcontinental activity at JFK and the lack of long-term parking among other local airport considerations.

Dallas Love Field (DAL) - With the development Dallas/Ft. Worth International Airport (DFW) in the early 1970s, DAL was slated for closure with the opening of DFW in 1974. Southwest Airlines successfully challenged the City of Dallas and was granted permission to provide intrastate service from DAL. In 1979, Congress passed the Wright Amendment granting Southwest permission to serve any state contiguous to Texas. Other carriers and entities have sought additional rights under the Amendment from time to time.

Washington Reagan National Airport (DCA) - The DCA perimeter rule prohibits non-stop scheduled flights from exceeding 1,250 statute miles. The Metropolitan Washington Airports Authority instituted the rule for many of the same reasons as the Port Authority of NY & NJ cited with respect to LGA including DCA's runway length and to encourage long-haul traffic at Dulles International Airport.

The success of Baltimore/Washington International did not involve relocating traffic from another airport. Because of demand generated by low-fare carriers, BWI not only serves the population of Baltimore, but also draws passengers from Washington DC. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02302-34

##### Comment:

Page ES-9 Summary of Activity, Comparison of Alternatives chart The No Action/No Project alternative domestic (543,681) plus international operations (168,773) equals 712,454 total operations (using existing facilities). Alternative C domestic (510,574) plus international operations (203,393) equals 713,967 total operations, adding 1,513 operations/day. However, Alternative C dramatically reduces domestic operations while increasing international operations. Is this increase based on the use of the NLA's for international flights? If so, explain any increased environmental impacts that might be associated as a result of the larger planes.

##### Response:

The environmental analyses in the Draft EIS/EIR, including noise and air quality, addressed the potential impacts under the most practical and most likely activity level for Alternative C. The environmental analysis used the activity profiles and airside simulation results as input into the noise and air quality modeling. Individual activity profiles were developed for each alternative, based on the capacity of the alternative. Each of the Master Plan alternatives is considered "constrained" because none have sufficient runway capacity to meet forecast demand in 2015 without changes in the unconstrained forecast activity profiles. The Master Plan has predicted that the airlines would adjust air service patterns in several ways in response to the capacity constraints. Please see Response to Comment PC00599-7 for more information on the predicted air service changes.

Both Alternative C and the No Action/No Project Alternative would have four runways so they would have similar airside capacity. As a result, annual operations levels would be similar. The No Action/No Project Alternative assumes no improvements to the gates and landside facilities and this constraint limits the activity that could be served in the future. The landside constraint in particular results in lower international service than in Alternative C.

Both alternatives are projected to be served by NLA's by 2015. Please see Chapter V, Section 3.3.2 of the Draft LAX Master Plan for the assumptions used to develop the constrained activity profiles for the alternatives. For a discussion on how NLA's were taken into consideration when determining potential impacts under the various alternatives and for references to the Draft EIS/EIR and Supplement to the Draft EIS/EIR, please see Response to Comment PC00686-5.

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#### **PC02302-35**

**Comment:**

Page ES-10 Under Alternative C, the fuel farm is expected to increase from 20 to 32 acres. Explain how this will be accomplished, where it will be relocated, and how it will be protected in the event of an earthquake.

**Response:**

The existing 908,000 square foot fuel farm area would remain in place. Alternative C would expand the fuel farm in an area that is located south of the existing fuel farm and encompasses approximately 478,000 square feet. This expanded facility would serve the Central Terminal Area and the West Terminal Area via new fuel distribution lines that would connect into the existing fuel distribution system at the airport. Please also refer to Figure V-3.35 in Chapter V of the Master Plan for illustration of the proposed fuel farm location.

As was discussed in Section 4.22, Earth/Geology, in the Draft EIS/EIR, all proposed Master Plan facilities would be designed in accordance with the Uniform Building Code and the City of Los Angeles Building Code to minimize hazards associated with ground shaking.

#### **PC02302-36**

**Comment:**

Page ES-23 Explain how projections were made that indicate passenger traffic will continue to increase substantially above existing levels through 2015. Was this based on the stated 54% increase in passenger activity since 1984 at LAX?

**Response:**

Chapter II of the Master Plan contains a detailed description of the assumptions and methodology used to develop the unconstrained forecasts of aviation demand for LAX. The forecasts were developed partially based on historical trends and growth. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

#### **PC02302-37**

**Comment:**

Although the congestion relief package may relieve congestion in the Central Terminal Area (CTA), it will actually add to congestion on surrounding freeways and roadways since it is building capacity into the CTA. Explain how LAWA is not adding to this congestion, or if LAWA will be able to pay for needed surface transportation improvements off airport property, and how this will be done.

**Response:**

There are a series of traffic improvements off-airport that are part of the mitigation package, as were presented in the Draft EIS/EIR, Section 4.3.2, Off-Airport Surface Transportation. Please see Response to Comment PC02220-6, Topical Response TR-ST-2 regarding surface transportation analysis methodology, and Section 6.1.3 regarding funding and the Congestion Management Program. See also Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02302-38**

**Comment:**

The no-build alternative is stated to increase by 22 percent the number of peak hour trips in the CTA. Explain why action is not being taken to reduce the number of vehicles coming on to airport property rather than increase them. Also short-term parking stalls under Alternative C is expected to grow to



### 3. Comments and Responses

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15,500 versus 9,127 under the no build alternative. Why is LAWA not seeking to reduce the number of vehicles on airport property? Explain why under Alternative C, both long-term on airport and long-term off airport are expected to decrease from the no-build alternative.

**Response:**

There are actions being taken to try to discourage additional traffic in the CTA. Increased police enforcement of the curbs, increasing short-term parking rates, and attempts to expand the Van Nuys FlyAway service are three examples. However, even with such measures, there will be increased traffic growth in and around LAX as the region's economy expands in the future. The master plan is designed to manage that traffic growth in an acceptable way. Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and Topical Response TR-ST-4 regarding airport area traffic concerns.

While there are less long-term on-airport and long-term off-airport stalls in Alternative C than in the No Action/No Project Alternative, there is considerably more on-airport short-term parking stalls in Alt. C than in No Action/No Project. As a result, the total number of stalls is higher in Alt. C. This was done to provide the parking where patrons most desire them, which close-in to the terminals.

**PC02302-39**

**Comment:**

Page ES-24 Explain why LAWA did not factor in ways to employ disincentives for driving and/or parking at LAX in order to decrease congestion in the CTA.

**Response:**

Many disincentives were in fact factored into the analysis. For example, increased enforcement on the curbs was already factored into the No Action/No Project Alternative, as well as the project alternatives. Other disincentives may also be factored into the final design. However, the analysis was conducted assuming that most people that want to drive and park could do so, and mitigates that worst case scenario. If disincentives do reduce demand, the levels of service would be better than those shown in the Draft EIS/EIR.

**PC02302-40**

**Comment:**

Why wasn't use of a people-mover studied to move people from off-airport parking areas to the CTA?

**Response:**

Please refer to Response to Comment PC02198-18 regarding extension of the Automated People Mover. The APM system will run alongside the hotels in Alternative D, connecting the Ground Transportation Center and Intermodal Transportation Center to the CTA. In Alternatives A, B, and C an extension of the APM from the CTA to the hotels along Century Boulevard is cost-prohibitive.

**PC02302-41**

**Comment:**

Page ES-26 Explain what inventory was used to determine there is an adequate supply of housing to accommodate the residential relocation needs for the three build alternatives. Where is this housing? As every housing report released over the past year indicates a severe jobs/housing imbalance on the Westside of Los Angeles, the assertion that there is an adequate supply of replacement housing for the projected 84 plus 2500 homes in Manchester Square/Belford area that would be taken is puzzling.

**Response:**

Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation. As referenced therein and described further in LAWA's Final Relocation Plan - Voluntary Residential Acquisition/Relocation Program for the Areas Manchester Square and Airport/Belford (Existing

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Relocation Plan), dated June 2000, resources consulted included the Combined L.A./Westside Multiple Listing Service, Inc. and numerous newspapers, rental listings, and apartment guides.

#### **PC02302-42**

**Comment:**

Page ES-27 Business relocation. It is stated that for each alternative, displaced businesses could be relocated in the "Westchester Southside." However, this does not take into consideration: 1) many of the displaced businesses are industrial in nature and are not compatible with the adjacent residential uses directly north of the Southside area, 2) there is not enough square footage available for all of the displaced businesses in the Southside area, 3) industrial and commercial/retail would not be compatible in this area, and 4) the Southside area does not provide a suitable replacement environment for displaced Westchester downtown businesses that would have to be relocated in an area easily accessible by the public.

**Response:**

Mixed use development including office, retail, hotel, and light industrial uses has previously been approved for LAX Northside. As was discussed in Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, through the creation of a new LAX Zone/LAX Specific Plan, development within LAX Northside/Westchester Southside would incorporate the development requirements and performance standards previously identified in the [Q] zoning conditions for the property under Ordinance 159,526 (see Master Plan Commitment LU-1, Incorporation of City of Los Angeles Ordinance No. 159,526 [Q] Zoning Conditions for LAX Northside into the LAX Northside/Westchester Southside Project (Alternatives A, B, C, and D)). These standards would ensure compatibility with residential uses to the north. The site configuration and building density would be sensitive to residential uses; for example, the northern edge of LAX Northside/Westchester Southside would not contain uses that normally operate during late hours.

Until the Proposed Relocation Plan is finalized, it is impossible to predict precisely which businesses will relocate to LAX Northside/Westchester Southside. However, those businesses that have been targeted for relocation on the airport or within LAX Northside/Westchester Southside, as well as those that are expected to be absorbed by the local market are identified in Table A-3, Parcel Detail of Acquisition Areas Alternative A, Table B-3, Summary Statistics of Acquisition Areas Alternative B, and Table C-3, Summary Statistics of Acquisition Areas Alternative C, in Appendix P to Chapter V of the Master Plan, Preliminary Property Acquisition and Relocation Plan, and Table 2.7-2, Alternative D - Parcel Detail of Acquisition Areas, in Chapter 2.7 of the Master Plan Addendum. For those businesses that cannot be accommodated either at LAX or within LAX Northside/Westchester Southside, the Draft EIS/EIR and Supplement to the Draft EIS/EIR evaluated the amount and type of acquired uses that would need to relocate elsewhere in the surrounding area or else go out of business. Under each of the build alternatives development of LAX Northside/Westchester Southside would include a community commercial "village" providing community-serving uses intended to benefit Westchester residents and accommodate many of the displaced uses. However, it should be noted that, in contrast to the other build alternatives, Alternative D would not involve acquisition within the Westchester Business District. Please also refer to Topical Response TR-LU-2 regarding the potential effects of the Master Plan alternatives on the community of Westchester.

#### **PC02302-43**

**Comment:**

Page ES-28 Explain where this surplus supply of existing housing inventory exists. Is it in Westchester or Playa del Rey? If not, explain what communities contain this surplus housing inventories. (see comment re ES-26 above).

**Response:**

Please see Topical Response TR-RBR-1 regarding residential acquisition and relocation.

**PC02302-44****Comment:**

Was the EIS/EIR available in Spanish? As 30% of the study area speaks Spanish at home, how was the EIR made easily available to them? Were any public hearings held in these areas?

**Response:**

Please see Response to Comment PC02236-15 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR in the Spanish language. Also, please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the EIS/EIR for public review.

**PC02302-45****Comment:**

Page ES-29 Noise: As noted, projected increases in aviation activity at LAX would have a disproportionate impact on minority and low-income communities east of LAX under all the build alternatives. Studies have shown that regional expansion, rather than expansion at LAX would have less impact on communities of color and low-income. Knowing this, why is LAWA continuing to support expanding LAX?

**Response:**

Please see Response to Comment PC02302-16, regarding a regional approach to meet demand. Also see Topical Response TR-EJ-3 regarding environmental justice and regional context and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02302-46****Comment:**

Air Quality: SCAQMD identifies LAX as the second leading polluter of NO<sub>x</sub> and particulate matter in the Southern California area. This EIS/EIR states that air quality impacts have the potential to affect minority and low-income individuals more severely than the general population; however, due to the lack of available background data and limited information on the cumulative effect of multiple air pollutants, the effect of the LAX Master Plan on cumulative health risks among minority and low-income populations cannot be quantified or fully analyzed. Using current data, re-analyze the impact of all of the build alternatives on low-income and minority communities that would be affected by LAX expansion.

**Response:**

Please see Responses to Comments AL00017-190, AL00017-194, and PC02236-7.

**PC02302-47****Comment:**

Page ES-30 Why won't final air quality mitigation measures be developed until the final EIS/EIR is released?

**Response:**

The mitigation measures contained in the Draft EIS/EIR were recommended and, in some cases, not committed for inclusion in the Supplement to the Draft EIS/EIR. Information regarding cost-effectiveness, control efficiency, legal authority, etc., was refined and used to develop the list of recommended mitigation measures contained in the Supplement to the Draft EIS/EIR. See Section 4.6.8, Mitigation Measures, of the Supplement to the Draft EIS/EIR for a discussion of recommended mitigation measures.

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#### PC02302-48

**Comment:**

On-Airport Emissions: Emission impacts would be significant for NOx and SO2 for each Master Plan alternative. In light of this, can they be mitigated? If so, how?

**Response:**

All environmental impacts will be mitigated to the maximum extent feasible. The Draft EIS/EIR and Supplement to the Draft EIS/EIR described air quality mitigation measures in Section 4.6.8, Mitigation Measures, with supporting technical data and analyses provided in Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR. The mitigation measures include several technologies for reducing both NOx and SOx emissions.

#### PC02302-49

**Comment:**

Off-Airport Emissions: since the analysis shows that by 2015 all three Master Plan alternatives would result in unavoidable significant impacts for all five criterion pollutants, why is this still being pursued?

Construction Emissions: Since construction-related emissions for each of the Master Plan alternatives would exceed the CEQA thresholds of significance for all criterion pollutants, why is this still being pursued?

**Response:**

Under both NEPA and CEQA, a project can be approved despite significant, unavoidable impacts. If a project would result in significant effects which cannot be avoided or substantially lessened, the agency must prepare a written statement of overriding considerations. Economic, legal, social, technological, or other project benefits are all possible bases for a statement of overriding considerations. See Pub. Res. Code § 21081(b); 14 Cal. Code Regs § 15093(a). Accordingly, projects are regularly approved on the basis of policy considerations despite unmitigated environmental effects. See, e.g., *San Francisco Ecology Ctr. v. City & County of San Francisco* (1975) 48 Cal.App.3d 584, 596-97 (goals of making international airport more convenient, safe, efficient, and quiet were valid overriding considerations).

#### PC02302-50

**Comment:**

Page ES-31 Although the traffic congestion relief package of the ring road, LAX Expressway and extension of the I-105 may reduce surface street vehicle idling and congestion, it may also increase idling on all three of these roadway improvements, thereby increasing emissions. Was this analyzed? If so, explain.

**Response:**

Idle emissions factors were included in the calculation of both regional emission inventories and the CO Hotspot analysis. The CO Hotspot analysis does include idle emission considerations based on number of vehicles idled and time they are at idle. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality impacts, including traffic emissions, in Section 4.6, Air Quality, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology. Alternative D would not include the LAX Expressway or the ring road.

**PC02302-51****Comment:**

Page ES-31 Explain where documentation was found that supports the assertion that the extension of the MTA Green Line would help take airport-bound traffic off the streets.

**Response:**

Technical Reports 3a, On-Airport Ground Transportation Report, and 3b, Off-Airport Ground Access Impacts and Mitigation Measures, provide the detailed assumptions, analysis, and discussion of traffic impacts associated with the No Action/No Project Alternative and Alternatives A, B, and C. Technical Reports provide similar type information relative to Alternative D.

**PC02302-52****Comment:**

Page ES-32 Water Quality Explain how removal of the water retention basin will be handled within the Environmental Action Plan. How will it compensate for the loss of the water quality treatment function of the basin? Will LAWA be responsible for off-site maintenance facilities if they are removed from LAX? If not, who would be?

**Response:**

If the Imperial retention basin is eliminated, additional structures will be built to replace the function of the Imperial retention basin in compliance with SUSMP requirements. LAWA will be responsible for the maintenance of the structures built to replace the function of the Imperial retention basin.

**PC02302-53****Comment:**

Page ES-33 Under the Preferred Alternative C, six out of eleven historic resources would be affected, including the historic Centinela Adobe, Randy's Donuts, and the Merle Norman Complex. Was there an attempt to find alternative ways to not impact these resources? If so, what were those alternatives?

**Response:**

LAWA is mandated by CEQA and NEPA to evaluate alternatives to a project that can avoid or reduce its impacts on the environment. In identifying and analyzing alternatives, LAWA had to consider a range of alternatives which ultimately led to certain trade-offs regarding what impacts might be avoided or reduced among 27 competing environmental issues. Steps were taken in the design of the Master Plan build alternatives, where feasible, to avoid identified historic resources. One specific example of avoidance was a redesign of the ring-road proposed under Alternative C in order to avoid impacts on the Merle Normal Complex.

Please note that Alternative D, LAWA Staff's new preferred alternative, does not have an impact on any historic resources eligible for or listed on the National Register of Historic Places. Furthermore, it would only have a significant impact on one historic resource, the Airport Industrial District, a State and locally eligible historic resource.

Regarding the Centinela Adobe and Randy's Donuts under Alternative C, please see Section 4.9.1, Historic/Architectural and Archaeological/Cultural Resources of the Supplement to the Draft EIS/EIR.

**PC02302-54****Comment:**

Page ES-34/35 The California Least Tern nests and forages in the nearby Ballona Wetlands, Ballona Lagoon, and Marina Peninsula. Has the Least Tern been sighted in the Dunes? If so, how would each of the alternatives affect this endangered bird?

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**Response:**

Please see Response to Comment PC02301-1 regarding the status of California least tern within the Master Plan boundaries.

**PC02302-55**

**Comment:**

Page ES-36 Since construction activities would result in noise levels 5 dBA Leq over ambient levels near sensitive residential and school uses, how would mitigation measures reduce these impacts? Timing noisiest activities to avoid sensitive times of the day would be difficult since school is in session from 9 am to 3 pm, and residential sensitivity would be from 7 am to 9 am and 3 pm to 7 pm. When would construction take place?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed construction noise impacts in Section 4.1, Noise; Section 4.2, Land Use; and Section 4.20, Construction Impacts. Noise-sensitive uses that would be exposed to noise levels of 5 dBA Leq over ambient levels under Alternatives A, B, and C are located within 600 feet of the LAX Northside/Westchester Southside northern boundary, as were shown on Figure 4.1-6 of the Draft EIS/EIR. These uses include approximately 970 dwelling units, six schools, and two churches. Affected schools include Paseo Del Rey Magnet School, Visitation Center Catholic School, Westchester-Emerson Community Adult School, Westchester High School, Saint Bernard High School, and one other private school. Noise-sensitive uses that would be exposed to high noise levels from construction activities under Alternative D are also located within 600 feet of the LAX Northside northern boundary as were shown on Figure S4.1-5 of the Supplement to the Draft EIS/EIR. These uses include approximately 1,360 dwelling units, five schools, and two churches. Affected schools include Paseo del Rey Magnet School, Visitation Center Catholic School, Westchester-Emerson Community Adult School, Westchester High School, and Saint Bernard High School. One of the construction equipment noise mitigation measures referenced by the commentor is MM-N-11 Construction Scheduling, in the Supplement to the Draft EIS/EIR which stated, "The timing and/or sequence of the noisiest construction operations shall avoid sensitive times of the day." Therefore construction activities taking place near the affected schools would be coordinated, to the extent practicable, to avoid high noise levels during school hours. Such times may include evening hours, weekends, and holidays. In addition, Master Plan Commitment C-1 of the Supplement to the Draft EIS/EIR provides for the establishment of a ground transportation/construction coordination office to act as a liaison with affected neighbors to address traffic concerns and provide a public notification system to advise affected areas of major construction activities. Other mitigation measures that would reduce construction equipment noise were presented in Section 4.1.8.3 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. These mitigation measures control construction noise at the source by requiring equipment mufflers and other noise-reducing measures on construction equipment, placing barriers between construction equipment and noise-sensitive uses where practicable, and locating construction staging areas away from noise-sensitive uses. However, as was stated in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, even with the implementation of mitigation measures, periodic construction noise impacts would be temporarily significant and unavoidable for those noise-sensitive uses located within 600 feet from the LAX Northside/Westchester Southside northern boundary.

**PC02302-56**

**Comment:**

What mitigation measures be used to reduce impacts to surrounding land uses?

**Response:**

Mitigation measures that reduce impacts to surrounding land uses were identified in Chapter 5, Environmental Action Plan (subsection 5.3) of the Supplement to the Draft EIS/EIR. Although most of the mitigation measures presented in Chapter 5 would reduce impacts on surrounding land uses, those that most directly promote compatibility of adjacent land uses through buffers or other measures include the following: MM-LI-1, LAX Expressway Lighting Assessment (Alternatives A, B, and C); MM-DA-1,

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Construction Fencing (Alternatives A, B, C, and D); MM-DA-2, LAX Expressway View Analysis (Alternatives A, B, and C); and MM-DA-3(a)(b), Scattergood Visual Effects (Alternative B).

In addition the following Master Plan Commitments, listed in Chapter 5, Environmental Action Plan (subsection 5.2) of the Supplement to the Draft EIS/EIR would promote land use compatibility and minimize potential impacts to surrounding land uses: LU-1 Incorporation of City of Los Angeles Ordinance No. 159,526 [Q] Zoning Conditions for LAX Northside into the LAX Northside/Westchester Southside Project (Alternatives A, B, C, and D); LU-2, Establishment of a Landscape Maintenance Program for Parcels Acquired Due to Airport Expansion (Alternatives A, B, C, and D); LU-4 Neighborhood Compatibility Program (Alternatives A, B, C, and D); LI-1, Ring Road Landscaping (Alternative B); LI-2, Use of Non-Glare Generating Building Materials (Alternatives A, B, C, and D); LI-3, Lighting Controls (Alternatives A, B, C, and D); C-1, Establishment of a Ground Transportation/Construction Coordination Office (Alternatives A, B, C, and D); DA-1, Provide and Maintain Airport Buffer Areas (Alternatives A, B, C, and D); and DA-2, Update and Integrate Design Plans and Guidelines (Alternatives A, B, C, and D).

See Chapter 5 of the Supplement to the Draft EIS/EIR for other mitigation measures and Master Plan Commitments that reduce impacts to surrounding land uses resulting from noise, air emissions, and traffic. See also Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02302-57**

**Comment:**

What mitigation measures would be used for noise, emissions, surface transportation improvements? None are supplied.

**Response:**

Measures to mitigate air quality, noise and traffic impacts during construction activities were identified in Section 4.1, Noise, Section 4.6, Air Quality, Section 4.3, Surface Transportation, and 4.20, Construction, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, which provided the basis for the Master Plan commitments and mitigation measures presented in this Final EIS/EIR.

#### **PC02302-58**

**Comment:**

While runways are under construction, how will planes land and take off? Will they be forced to reverse their normal course? Is this safe? How long would it last? Years?

**Response:**

Runways under construction would not typically be available for aircraft operations. Please see Response to Comment PC00171-10 regarding aircraft operation safety during construction.

#### **PC02302-59**

**Comment:**

Page ES-37 Why does "changes in airport fence line and runway configurations that would place greater distances between emission sources and off-site residents" only include Alternatives A and C and not the no-build alternative?

**Response:**

Please see Topical Response TR-GEN-2 regarding No Action/No Project assumptions. Please also refer to Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a description of features of alternatives considered.

The No Action/No Project Alternative assumes that none of the Master Plan alternatives are implemented but does assume that airport improvements already approved are constructed and that air traffic continues to increase as demand for services grows.

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#### PC02302-60

**Comment:**

Define exactly "some areas immediately east of LAX" that would experience a slight increase in potential cancer risk... Where are these areas? And what are those risks? Are the populations at risk those which are already at risk for other illnesses? Are these populations already at risk from current activity?

**Response:**

Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR discussed potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a community basis. Technical Report S-9a of the Supplement to the Draft EIS/EIR discusses potential impacts on a community basis in greater detail. The Supplement to the Draft EIS/EIR also presented figures of the geographical extent of incremental cancer risks and hazards associated with LAX operations for communities in the study area.

#### PC02302-61

**Comment:**

Page ES-38 The EIR/EIS states that "under the No Action/No Project Alternative, no runway extensions, relocations, or additions are proposed. LAX would continue to operate safely with the existing runway configurations and the special operational procedures and limitations would continue to be implemented." Why is LAWA now maintaining that without the expansion runway improvements, LAX would not be safe?

**Response:**

Under the No Action/No Project Alternative, no runway extensions, relocations, or additions are proposed. LAX would continue to operate safely with the existing runway configurations and the special operational procedures and limitations would continue to be implemented. With the anticipated increase in daily flight operations, the ongoing departures from design standards would enable operations to continue to meet FAA safety requirements, but may reduce operational efficiencies due to the associated flight delays. Under the build alternatives, all new and redesigned runways and taxiways would meet FAA Airport Design Standards and increase the operational efficiency of the airfield. Specifically, the proposed improvements would increase runway and taxiway separations for larger aircraft by adding parallel taxiways between runways and by increasing safety areas to meet current FAA standards. These changes would reduce controller workload and the associated risk of runway incursions, as well as reduce the risk of aircraft damage in the event of a runway overrun. As a result of these proposed changes, no adverse impacts with respect to aviation safety would occur under the build alternatives. Please see Topical Response TR-SAF-1 regarding aviation safety and Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for additional data and analyses regarding aviation safety.

#### PC02302-62

**Comment:**

Page ES-41-2 LAWA staff has continually maintained in public meetings that the number of residences exposed to aircraft noise above 65 CNEL would decrease under the three build alternatives due to new aircraft noise standards. However, 4.1 notes that the total population, number of dwelling units, and new populations exposed to noise above 65 CNEL will increase under the three build alternatives and this presents a significant and unavoidable impact.

**Response:**

While it is not clear from the comment what LAWA staff has presented in meetings, Section 4.2, Land Use (subsection 4.2.6), of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, presented a comparison of overall exposure to the 65 CNEL for Alternatives A, B, C, and D to overall exposure to the 65 CNEL under the 1996 baseline. In some cases the number of incompatible uses would



decrease compared to the 1996 baseline. For example, under Alternative A, the overall number of incompatible uses would be reduced by 2,210 units and 4,620 residents; under Alternative C, the overall number of incompatible land uses would be reduced by 2,260 units and 4,420 residents; under Alternative D, the overall number of incompatible land uses would be reduced by 3,380 units and 6,020 residents. Under all build alternatives some residents and dwelling units would be newly exposed to the 65 CNEL noise contour, as was presented in Section 4.1, Noise (subsection 4.1.6.1.6), Table S4.1-30 of the Supplement to the Draft EIS/EIR. However, the population and dwelling units exposed to the 65 CNEL contour would not be considered a significant and unavoidable impact. As was stated in Section 4.2, Land Use (subsection 4.2.9.1) of the Supplement to the Draft EIS/EIR, aircraft noise impacts would remain significant and unavoidable under the following circumstances: where aircraft noise levels of 75 CNEL or greater affect residential properties with exterior habitable areas or other outdoor community areas; for interim impacts prior to sound insulation or acquisition; where properties do not qualify for sound insulation due to inconsistent zoning, land use, or substandard housing that is not feasible to insulate; and at schools newly exposed to significant single event noise levels that would result in classroom disruption when classroom activities take place outdoors.

#### PC02302-63

##### Comment:

4.1 notes that "sensitive uses" exposed to aircraft noise above 65 CNEL will increase under the three build alternatives. What are the "sensitive uses"? How many are schools, affecting how many children?

##### Response:

Please see Topical Response TR-LU-5 regarding noise mitigation. A listing of noise-sensitive uses newly exposed to the 65 CNEL or that would experience a 1.5 CNEL increase within the 65 CNEL under Alternatives A, B, and C, compared to the 1996 baseline is provided in Technical Report 1, Land Use Technical Report of the Draft EIS/EIR.

Since publication of the Draft EIS/EIR, a Supplement to the Draft EIS/EIR was prepared to evaluate an additional Master Plan alternative (Alternative D), incorporate information on Year 2000 conditions, and provide new analysis of single event and cumulative aircraft noise levels that result in classroom disruption. This information was provided in Section 4.1, Noise, Section 4.2, Land Use, Appendix C-1, Supplemental Aircraft Noise Technical Report, and Technical Report S-1, Supplemental Land Use Technical Report, of the Supplement to the Draft EIS/EIR. The Supplemental Land Use Technical Report provided a listing of noise-sensitive uses that would experience a significant noise increase for Alternatives A, B, and C compared to Year 2000 conditions and for Alternative D compared to 1996 baseline and Year 2000 conditions. A listing of schools that would experience high single event or cumulative noise levels resulting in classroom disruption under the Master Plan alternatives compared to 1996 baseline and Year 2000 conditions was included in Section 4.2.6 of the Supplement to the Draft EIS/EIR.

Under all of the Master Plan alternatives, the greatest number of schools that would be affected by a significant noise increases would be under Alternative B compared to 1996 baseline conditions. As shown on Table 47 of the Land Use Technical Report, 15 public schools and 15 private schools would be significantly impacted by high noise levels under Alternative B. Under all of the Master Plan alternatives, Alternative D would have the least number of schools affected by significant noise increases compared to the 1996 baseline. As shown on Table S51 of the Supplemental Land Use Technical Report, under this scenario, 3 public schools and 5 private schools would be significantly impacted by high noise levels. Compared to all the Master Plan alternatives, Alternative B would result in the greatest number of schools that would be newly exposed to high single event or cumulative noise levels against the 1996 baseline, including 9 public schools and 10 private schools. Compared to all the Master Plan alternatives, Alternative D would result in the least number of schools that would be newly exposed to high single event or cumulative noise levels against the 1996 baseline, including 3 public schools and 8 private schools. Please see Topical Response TR-LU-3 for a description of noise mitigation payments, avigation easements, and other provisions of the "Settlement Agreement" that resolved land use incompatibility and aircraft noise mitigation issues between affected schools and aircraft operations.

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The number of children that would be affected by significant noise increases or high single event noise levels changes from year to year depending on school enrollment, interior noise levels, and existing aviation easements of the affected schools. To definitively identify the number of children that might be impacted by significant noise increases is considered speculative and beyond the scope of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### **PC02302-64**

**Comment:**

4.2 notes that land incompatibilities could result from acquisition and reuse of land east and north of LAX and with development of Northside/Southside and ring road. As LAWA has been talking to business and landowners regarding relocation to the Northside/Southside properties from Manchester Square/Belford and the downtown business area (DBA), is there a comprehensive specific plan relating to the Northside/Southside area that would plan to reduce incompatibilities between this area and adjacent residential community?

**Response:**

Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### **PC02302-65**

**Comment:**

Has the plan for this area been integrated into the 13 Community Plan Update for Westchester/Playa del Rey?

**Response:**

Comment noted. Please see Response to Comment PC02284-9, regarding the current status of the Community Plan Update

#### **PC02302-66**

**Comment:**

Page ES-45 4.4.2 "Relocation of Residences or Businesses" Alternatives B & C impacts are significant and unavoidable. However, no alternative addresses ways to avoid these impacts, such as reconfiguring the existing Central Terminal Area.

**Response:**

Comment noted. Alternatives A and D provide alternatives that would not have significant unavoidable adverse impacts relative to the relocation of residences or businesses.

#### **PC02302-67**

**Comment:**

Page ES-46 Air Quality section. As the document states, all of the build alternatives will produce air pollution emissions that cannot be mitigated to a less than significant level. LAX is already a "hot spot" in Los Angeles County for high levels of various air pollution contaminants. In order to protect the health of community members surrounding LAX, as well as workers at the airport, all possible measures should be undertaken to REDUCE emissions, not increase them.

**Response:**

Please see Response to Comment PC01196-12 regarding air quality impacts and further mitigation measures.

**PC02302-68****Comment:**

Page ES-48 Alternatives A and C produce significant and unmitigatable impacts to the historic Centinela Adobe property as well as Randy's Donuts, another property listed as an historic resource due to development of the LAX Expressway. The Centinela Adobe, in particular, is important to the history of Los Angeles and should not be disturbed for an expressway.

**Response:**

Please see Topical Response TR-HA-1 regarding impacts to the Centinela Adobe and Randy's Donuts.

**PC02302-69****Comment:**

Page ES-50 Bicycle access will be diminished by the ring road. What plans are there to provide dedicated bike lanes so that bicycle access will be maintained from the South Bay to the Westside of Los Angeles?

**Response:**

As was indicated in Section 4.14, Coastal Zone Management and Coastal Barriers, of the Draft EIS/EIR, under Alternatives A, B, and C, roadway improvements and construction of the ring road would result in the removal of existing bicycle lanes along Westchester Parkway and Imperial Highway. As was stated on pages 4-768 and 4-771 in Section 4.14, Coastal Zone Management and Coastal Barriers, in the Draft EIS/EIR, the bicycle lanes along Westchester Parkway would be replaced with a Class 1 bicycle path as part of Westchester Southside. Under Master Plan Commitment LU-3, Comply with City of Los Angeles Transportation Element Bicycle Plan (Alternatives A, B, and C), bicycle lanes would be provided along Imperial Highway between Sepulveda Boulevard and immediately west of Pershing Drive. This commitment would ensure that bicycle access to the coast is maintained.

**PC02302-70****Comment:**

Page ES-51 4.17.1 "Energy supply" indicates that electricity and natural gas consumption would increase under all scenarios, although would produce impacts at a less than significant level. However, this was written before the current energy crisis that is affecting the state. Natural gas is predicted to be the next resource affected by shortage and price increases. Under these circumstances, this section of the document is outdated and should be revised to reflect new data.

**Response:**

Please see Response to Comment AL00033-188 regarding energy supply.

**PC02302-71****Comment:**

4.18 "Light Emissions" Residents and sensitive uses (schools and other community-serving facilities) will be affected by light and glare due to the expressway and ring road. None of the alternatives address a project that reduces the need for the expressway or ring road. Suggested mitigations are landscaping improvements. Are these required under all three build alternatives?

**Response:**

Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR and is currently considered LAWA staff's preferred alternative. Alternative D does not include the ring road or LAX Expressway, and therefore, would preclude light, glare, and other impacts associated with such

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improvements. Please refer to Section 4.18, Light Emissions, of the Supplement to the Draft EIS/EIR for further discussion and analysis of the lighting effects associated with Alternative D, which would be less than significant.

Regarding mitigation, Mitigation Measure MM-LI-1, LAX Expressway Lighting Assessment (Alternatives A, B, and C), would be required for build Alternatives A through C. Refer to Response to Comment AL00033-197 for further discussion of this mitigation measure.

#### **PC02302-72**

**Comment:**

Page ES-53 4.22 "Earth/Geology" states that low to moderate susceptibility to liquefaction and seismically induced settlement may be present throughout LAX. Does this also affect the Sepulveda Tunnel and tunnels proposed in this master plan? Are their plans to reinforce the tunnels to maximum protection?

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the Sepulveda Tunnel and tunnels proposed in the Master Plan in Section 4.22.6.2 Alternative A - Added Runway North - Construction Considerations. Tunnel construction and underground excavation would be associated with components of the proposed Master Plan.

As was described, tunnel improvements under each of the alternatives would be designed according to the requirements of the State of California, the UBC, the City of Los Angeles Building Code, and current design practice. These requirements dictate that the potential for seismic settlement and liquefaction be investigated for all projects during preliminary design. Established measures for remediation of seismically-induced settlement and liquefaction-prone area are described under the No Action/No Alternative and would be the same for all the alternatives.

#### **PC02302-73**

**Comment:**

Page ES-54 4.24.1 "Human Health Risk Assessment) #1 states that "people living, working, recreating, or attending school in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants in horizon year 2005" and that all build alternatives are potentially significant and unavoidable. What is the definition of "near the airport"? How many schools, parks, golf courses (existing and planned), beaches, RV parks will be affected? How will this affect airport workers?

**Response:**

Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR discussed potential health impacts from exposure to TAPs for each of the Master Plan alternatives on a community basis. Technical Report S-9a of the Supplement to the Draft EIS/EIR discussed potential impacts on a community basis in greater detail. The Supplement to the Draft EIS/EIR also presented figures of the geographical extent of incremental cancer risks and hazards associated with LAX operations for communities in the study area.

As was discussed in Section 4.24.1.6, Environmental Consequences, of the Supplement to the Draft EIS/EIR, results of the human health risk assessment performed for the Draft EIS/EIR indicate that airport emissions with or without implementation of the LAX Master Plan would not exceed acceptable threshold levels for worker exposure. Therefore, on-site workers were not reevaluated in the Supplement to the Draft EIS/EIR.

**PC02302-74****Comment:**

4.24.1 #5 states the same in horizon year 2015. What is the difference between 2005 and 2015 in terms of risks? How many more people will be negatively affected due to community growth over those ten years?

**Response:**

Estimated cancer risks associated with each of the Master Plan alternatives were discussed in Section 4.24.1, Human Health Risk Assessment, of the Supplement to the Draft EIS/EIR. The year 2005 was identified as a reasonable interim date during implementation of the LAX Master Plan for evaluation of potential health impacts during construction. The year 2015 was identified as the horizon year, when build out was anticipated to be complete. Emission estimates vary depending upon the year in question, due to differences in operations, activities, etc.

**PC02302-75****Comment:**

4.24.3 "Safety" #3 indicates the fuel farm poses a risk of fuel release with subsequent ignition. How many people could be adversely impacted by a fuel spill under all three build alternatives? What would the air quality impacts be from such a spill and resulting fire? Are there potential toxic risks?

**Response:**

The risk of upset associated with the fuel farm under each of the Master Plan alternatives was discussed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. As was discussed on page 4-1103 in Section 4.24.3 of the Draft EIS/EIR, fuel farm facilities are required to comply with several specific regulations and function accordingly to strict operating procedures in order to minimize the risk of release. The fuel farm under any of the alternatives would comply with these regulations. Further, structures would meet all seismic safety requirements. Emergency fuel shutoff valves and high-level detectors would be in-place, and inspections would be performed regularly. In addition, the likelihood of a rupture and the fuel to subsequently ignite, resulting in a pool fire, would be low. In the unlikely event of a pool fire at any of the alternative fuel farm scenarios, no residences or other sensitive receptors would be affected. Please refer to the hazard footprints that were shown in Figures 4.24.3-13, 4.24.3-16, and 4.24.3-19 of the Draft EIS/EIR, and Figure S4.24.3-6 of the Supplement to the Draft EIS/EIR. As concluded in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, the risk of upset impact associated with any of the fuel farm scenarios would be less than significant.

**PC02302-76****Comment:**

Preface/introduction

1. The FAA's role is to ensure the safe and efficient use of navigable airspace and administer federal funds for airport development. Why, then, has this master plan not been developed after the federal airspace study was concluded?

**Response:**

Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02302-77****Comment:**

2. Decisions regarding future development of airport are the responsibility of the City of Los Angeles. The City of Los Angeles on numerous occasions has instructed the Department of Airports to develop a

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regional plan for the use of our other two airports, Ontario International and Palmdale Regional, through marketing, advertising, and other creative methods. However, to date, no marketing plans have been implemented for either airport, even though in July, 2002, Cannondale produced a marketing plan for Ontario.

**Response:**

Comment noted. Please see Response to Comment PC02302-8.

**PC02302-78**

**Comment:**

Also, in 1987, the City Council of the City of Los Angeles instructed the Airport Commission to 1) work with the Southern California Regional Airport Authority under a joint program with SCRAA and SCAG that will look at market demands that would share on a region-wide basis, the impact and burdens of such demands,

**Response:**

Comment noted. The decline in air travel demand due to the economic recession, the events of September 11, 2001, the war in Iraq, and SARS has largely driven the Southern California Regional Airport Authority (SCRAA) back to inactivity. Riverside County voted in July 2002 to withdraw from SCRAA. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan (RTP) and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02302-79**

**Comment:**

2) development by the Airport Commission of an appropriate Capacity Control Regulation at LAX, 3) development by the Airport Commission of a supplemental EIR establishing a maximum range that would be accepted at LAX annually.

**Response:**

Comment noted. As a result of comments received on the Draft EIS/EIR and the terrorist attacks of September 11, 2001, Mayor Hahn directed LAWA staff to develop a new alternative that focused on safety and security. This new Alternative D, the Enhanced Safety and Security Plan, reduces the number of gates at the airport and provides safety enhancements that will accommodate 78.9 MAP which is the approximate number of passengers accommodated by the No Action/No Project Alternative. The FAA and LAWA published the Supplement to the Draft EIS/EIR in July 2001 that addressed the new Alternative D.

**PC02302-80**

**Comment:**

Obviously, the City Council was very concerned about the impacts and burdens on the surrounding communities at that time of continuing to funnel airport traffic to LAX rather than to our other airports. It appears that we are repeating the past and have squandered the past 14 years when we could have been effectively planning regional air capacity solutions.

**Response:**

Comment noted. Please see Response to Comment PC02302-8.

**PC02302-81**

**Comment:**

Cargo Demand

Although cargo demand is expected to triple over the coming years, trends indicate that "just in time" manufacturing inventory needs and shelf-life needs mandate that cargo arrive expeditiously at its intended location. Accordingly, cargo carried in the bellies of passenger planes is decreasing in favor of all-cargo planes. Internet usage is also increasing use of express package air freight. As over 90% of all air freight landing at LAX is intended for delivery to regions east of Los Angeles, and freeway congestion causes time delays and economic losses, Ontario International Airport is the logical solution to solving these problems. There should be a concentrated effort by LAWA to move as much cargo as possible to ONT, which will eliminate those trucks traveling from LAX to Riverside, San Bernardino and further eastern counties.

**Response:**

Comment noted. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02302-82**

**Comment:**

Master Plan Data Consistency

Data throughout the Master Plan EIR/EIS is not consistent. Planning figures are estimated for 2015 and 2020, without continuity.

**Response:**

There are six (6) areas within the Draft EIS/EIR that reference data for 2020. They include: (1) Chapter 1, Regional Context; (2) Section 4.2, Land Use; (3) Section 4.3.2, Off-Airport Surface Transportation; (4) Section 4.19, Solid Waste; (5) Section 4.25.1, Water; and (6) Section 4.25.2, Wastewater. In each instance, the reference to 2020 data is derived from SCAG projections for 2020 or on agency projections that are based on SCAG data for 2020. The impacts analyses throughout the Draft EIS/EIR and Supplement to the Draft EIS/EIR are consistent in using only 2015 as the planning horizon for the LAX Master Plan.

**PC02302-83**

**Comment:**

Palmdale and Burbank-Glendale-Pasadena Airport

1.2.2.5 states there are policy, environmental, and physical constraints of Burbank-Glendale- Pasadena Airport and indicates that B-G-P Airport would be unsuitable for capturing additional demand. However, added expansion at LAX will certainly push additional air traffic to this airport and compound their capacity problems. Palmdale Airport could be a reliever airport for B-G-P, as most air passengers from the Antelope Valley and northern San Fernando Valley use B-G-P as their primary airport. This is not addressed in this document.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

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#### **PC02302-84**

**Comment:**

Results of LAX Master Plan and SCAG RTP Forecast

This section is outdated and should be updated with SCAG's recently adopted RTP which constrains LAX at 78 MAP.

**Response:**

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

#### **PC02302-85**

**Comment:**

This section should also be updated to include marketing data from the County's marketing study. This paragraph contains outdated data.

**Response:**

The information contained in the Draft EIS/EIR and Supplement to the Draft EIS/EIR was current as of the date of publication. The comment does not specifically state which data the Council Member believes are outdated.

**PC02303**

**Erskine, John**

**Airport Trade Center**

**9/24/2001**

#### **PC02303-1**

**Comment:**

This firm represents the owners of the Airport Trade Center ("ATC"), a four-building business office complex located at 9111 S. La Cienega Boulevard, at the intersection of Arbor Vitae Street and La Cienega Boulevard in the City of Inglewood. This letter provides the comments of the ATC with respect to the above-captioned matter. ATC representatives want to express that they do not oppose the concept of expansion of Los Angeles International Airport ("LAX"), if done in a manner that does not adversely and unnecessarily impact Inglewood property owners and businesses such as ATC. However, as set forth below, the Master Plan and EIS/EIR for the LAX expansion project, in particular the traffic analysis which provides justification for the location of the LAX Expressway connecting ramps to the 405 Freeway, are not supported by either the traffic analysis or evidence regarding future demand and usage of LAX.

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include the LAX Expressway.



#### PC02303-2

**Comment:**

I. INTRODUCTION

On January 18, 2001, Los Angeles World Airports ("LAWA") and the Federal Aviation Administration ("FAA")<sup>1</sup> released a Draft LAX Master Plan ("Master Plan") and Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") to describe and analyze plans for expansion of LAX over the next fifteen years.

Pursuant to applicable provisions of the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"), the public and affected property owners are permitted to review and comment on the Master Plan and EIS/EIR. (CEQA Guidelines, § 15087.) The ATC hereby submits its comments on the Master Plan and EIS/EIR.

As LAWA is aware, the City of Inglewood submitted extensive comments on the Master Plan and EIS/EIR to LAWA on July 10, 2001. The ATC incorporates by reference the City of Inglewood's comments, and the exhibits attached thereto, in their entirety.

ATC respectfully submits that the Draft EIS/EIR fails to satisfy the requirements of CEQA and NEPA because, among other deficiencies, the EIS/EIR specifically fails to analyze the traffic, visual, vibration, lighting, access, noise, air quality, and construction impacts on the City of Inglewood, and on property owners within the City, from the LAX Expansion, the LAX Expressway, which is a component of all alternatives analyzed and discussed in the EIS/EIR for such expansion, and more specifically, the impacts and potential property displacement caused by the linkage of the southbound 405 Freeway with the LAX Expressway.

<sup>1</sup> For ease of reference, authorship of the LAX Master Plan Draft EIS/EIR will be attributed to LAWA herein.

**Response:**

Please see Responses to Comments below.

#### PC02303-3

**Comment:**

Further, in light of the impact of the national tragedy that occurred on September 11, 2001, and the continued, adverse economic impact of security threats and potential Middle East conflicts on commercial airline domestic and overseas travel demand, ATC respectfully requests that LAWA extend its comment period for the Draft EIS/EIR, provide additional hearings on the EIS/EIR, and specifically analyze the scope of and necessity for the expansion project at the present time.

**Response:**

Comment noted. In response to the events of September 11, 2001, LAWA and the FAA rescheduled the six hearings originally planned to be held in September, 2001 to October and November, 2001. In addition, the public comment period was extended to November 9, 2001, for a total of 295 days. Following input from the public on the Draft EIS/EIR, and the events of September 11, 2001, Alternative D was added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02303-4

**Comment:**

II. STUDY OF THE EFFECTS OF THE PROPOSED LAX EXPRESSWAY IS INADEQUATE AND MUST BE EXPANDED; LAX EXPRESSWAY CONNECTION TO SOUTHBOUND 405 FREEWAY UNNECESSARILY AND ADVERSELY IMPACTS THE ATC BUSINESS COMPLEX

### **3. Comments and Responses**

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A. The Study of the Effects of the Proposed LAX Expressway is Inadequate and Must be Expanded to Analyze and Minimize Impacts of Same.

The proposed LAX Expressway is designed, in theory, to facilitate the flow of traffic to LAX to meet projected increases in both annual passenger traffic and cargo demand at LAX. The LAX Expressway would consist of four vehicle lanes added to I-405, beginning south of the Sepulveda Boulevard overpass, extending to La Cienega Boulevard, and connecting to an airport ring road at Arbor Vitae Street. The airport ring road is designed, in theory, to facilitate traffic flowing around LAX.

The Draft EIS/EIR proposes two LAX Expressway alignment alternatives. Alternatives A ("Added Runway North") and C ("No Additional Runway") both propose that the LAX Expressway be built along side the I-405 freeway to provide direct freeway access to the airport via a connection to an airport ring road. Alternative B ("Added Runway South") proposes that the LAX Expressway be built along side the I-405 to provide direct freeway access to the airport via the MTA railroad right-of-way adjacent to Florence Avenue, and a connection to the airport ring road.

**Response:**

Please see Response to Comment for PC02207-04.

**PC02303-5**

**Comment:**

Based on Traffic Engineer Paul E. Cook's review<sup>2</sup> of the traffic analysis in the Draft EIS/EIR, LAWA's review of the impact of the LAX Expressway must be revised because it fails to consider impacts of the LAX Expressway on the City of Inglewood. (Cook Report, p. 7.) The traffic analysis does not study the effects of the LAX Expressway or the airport ring road on the City of Inglewood, and more specifically, on key business properties and employment centers such as the ATC business complex. LAWA's failure to analyze and thoroughly evaluate these critical traffic/transportation links renders the Draft EIS/EIR inadequate.

Further, even though the proposed LAX Expressway borders areas in the City of Inglewood, including the ATC business complex, the Draft EIS/EIR states, "this facility is proposed within existing rights-of-way and would not intrude into Inglewood or interfere with access to community services." (Draft EIS/EIR, p. 4-436.) The LAX Expressway will impact the City of Inglewood. Although the plans for the LAX Expressway are included in Appendix K (Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements) of the Draft EIS/EIR, the analysis in Appendix K should be expanded to include a detailed analysis of the potential effects of the LAX Expressway on communities and businesses in the City of Inglewood, including the ATC.

<sup>2</sup> Paul Cook, of Paul E. Cook and Associates, has prepared a report entitled "Identification and Evaluation of Key Traffic and Transportation Related Issues in the LAX Master Plan Draft EIR/EIS," dated May, 2000 ("Cook Report") (attached to City of Inglewood's Comment Letter as Exhibit "G").

**Response:**

Please refer to Responses to Comments AL00018-13, PC02207-8, and AL00017-43.

**PC02303-6**

**Comment:**

B. The LAX Expressway Connection to Southbound 405 Freeway Would Unnecessarily and Adversely Impact the ATC Business Complex.

As indicated previously, the ATC property is located at the northwest intersection of La Cienega and Arbor Vitae. This office complex contains 109,000 square feet of fully leased business office space in four buildings located on 4.3 acres of property.

Both Alternatives A and C would unnecessarily and adversely impact the ATC business complex. Preferred Alternative C, as well as Alternative A, includes an LAX Expressway connection with the

southbound 405 Freeway at Arbor Vitae and La Cienega. ATC, for the reasons outlined herein, does not believe that LAWA has adequately analyzed the need for the Expressway, or its connection in this location to the 405 Freeway, due to an inadequate traffic impact analysis.

However, assuming *arguendo* that such a connection was necessitated by current or future traffic demands of LAX or the LAX expansion project, it appears that such connection can easily be made south of the locations currently identified in Alternatives A and C, on City of Los Angeles/LAWA property.

While the relocation of the 405 Freeway connecting ramps to the Expressway in a location south of the location proposed in the Draft EIS/EIR and Master Plan would apparently reduce the amount of additional cargo space within the LAX expansion area, this de minimis impact on forecast cargo space needs should be well within an acceptable range of provision of additional cargo capacity, and would result in LAWA thereby more closely adhering to established principles and goals for the development of the Master Plan as follows:

1. LAWA has adopted Guiding Principles which include a statement that LAWA will:

"Balance LAX modernization plans with local community concerns."

As the City of Inglewood has pointed out, the Master Plan and EIS/EIR has not addressed impacts on the City of Inglewood, nor has it addressed community/property owners' concerns that key business parcels will be eliminated, thereby eroding the City of Inglewood tax base.

2. The LAX Master Plan Goals formulated early in the process to "ensure that the airport design concepts properly focus on the needs of the local community and the region," include Goal 5:

"Through enhanced urban design, maximize compatibility between LAX and the demand for housing, employment and service, and protect surrounding neighborhoods." (Emphasis added.)

Obviously, significant employment and business services will be lost if properties in the City of Inglewood such as the ATC business complex are eliminated to provide connecting ramps that could otherwise be located on City of Los Angeles property that does not contain existing employment.

3. Forecast demand for cargo areas is not so precise that a minor adjustment to the Manchester Square/Air Cargo Space areas cannot be made in order to avoid significant adverse impact on the ATC business complex. This is especially true in light of recent world events that should cause LAWA to reassess these forecasts.

**Response:**

Please see Response to Comment PC02207-6.

**PC02303-7**

**Comment:**

- C. The Traffic Relief Congestion Package in the Draft EIS/EIR is Inadequate and Must be Expanded.

Section 4.3.2 of the Draft EIS/EIR, relating to off-airport surface transportation, includes a package of three congestion relief measures ("Congestion Relief Package"). The purpose of the Congestion Relief Package is to link the regional freeway system to the airport and reduce off-airport congestion. One component of the Congestion Relief Package is to tie all freeway connections into a ring road that connects motorists directly to all parts of the airport.

The Congestion Relief Package is inadequate and must be expanded. (Cook Report, pp. 6-7.) The LAX Expressway borders areas in the City of Inglewood; however, on preliminary review, it appears that South Bay Cities are excluded from the relief package. (Cook Report, p. 7.) There is a gap in the analysis of impacts of the Congestion Relief Package to the City of Inglewood. LAWA should revise the Draft EIS/EIR to include the South Bay Cities in the Congestion Relief Package.

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**Response:**

This comment is identical to comment PC02207-7. Please see Response to Comment PC02207-7.

**PC02303-8**

**Comment:**

LAWA should also conduct an extensive evaluation of the impacts of the LAX Expressway upon the citizens and businesses of the City of Inglewood, including impacts to the ATC.

**Response:**

This comment identical to comment PC02207-8; please see Response to Comment PC02207-8.

**PC02303-9**

**Comment:**

D. The Draft EIS/EIR is Inadequate Because it Does Not Include Any Indication on How the Implementation of the Proposed LAX Expressway will be Funded.

The Draft EIS/EIR includes a section on funding. The total program cost of the project is \$12 billion dollars. The Draft EIS/EIR suggests that funding for the project could come from a combination of private, state, local and federal funding sources. (Draft EIS/EIR, p. 2-19.) Although the Draft EIS/EIR describes a few potential funding programs, there is no indication on how the implementation of the proposed LAX Expressway will be funded. (Cook Report, pp. 5, 7.) The uncertainty of how the LAX Expressway will be funded raises the issue of whether the LAX Expressway and the airport ring road are even feasible.

LAWA should revise the Draft EIS/EIR and take necessary steps to ensure that funding of this aspect of the LAX Master Plan is secured. The Draft EIS/EIR must include identification of the source of funding for the proposed LAX Expressway and the airport ring road.

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02303-10**

**Comment:**

E. The Draft EIS/EIR Fails to Include Analysis of Visual Impacts, Vibration Impacts, Lighting Impacts, and Access Impacts of the LAX Expressway.

LAWA has not yet completed any analyses that address the following impacts of the LAX Expressway: aesthetic/visual impacts, vibration impacts, lighting impacts, and access impacts. (Draft EIS/EIR, p. 5-27.) LAWLA has stated that these studies will be completed with the final design of the LAX Expressway. In addition, LAWLA concedes that a detailed analysis of the environmental impacts of the LAX Expressway is forthcoming and is not included in the Draft EIS/EIR:

While this EIS/EIR provides an assessment of environmental impacts of the Expressway, a more detailed study is forthcoming as a Project Study Report (PSR) for Caltrans. That study will provide a highly detailed analysis of potential alignments, and traffic and noise impacts.

(Draft EIS/EIR, p. 4-295.)

These studies must be included in the Draft EIS/EIR. Both CEQA and NEPA require LAWLA to include information in the Draft EIS/EIR that will inform decision makers and the public about the potential, significant environmental effects of the LAX Master Plan. The LAX Expressway is a significant roadway development proposed by the LAX Master Plan, and studies of the impacts of the LAX Expressway are critical in evaluating the impacts of the LAX Master Plan as a whole. The public cannot make an informed decision or submit informed comments without such information. Any such analysis must

include properties within the City of Inglewood, to document proposed roadway elevations, setbacks, and landscaped buffer areas, to determine the extent to which existing views and conditions are degraded by the LAX Expressway. The legal defensibility of the Draft EIS/EIR is questionable, based on LAWA's omission of the study of these impacts.

**Response:**

Please see Response to Comment PC02207-10.

**PC02303-11**

**Comment:**

F. The Study of Air Quality Related Impacts of the Proposed LAX Expressway is Inadequate and Must be Expanded.

According to LAWA, the proposed ring road and LAX Expressway will play a major role in reducing traffic congestion and air quality emissions in the vicinity of LAX. Although construction of the LAX Expressway and the ring road are not listed as "mitigation measures," the construction of these roadway improvements is the basis for many of the Environmental Action Plan emission reductions. (Draft EIS/EIR, p. 4-461.) The Draft EIS/EIR states that features such as the LAX Expressway and the ring road "would substantially reduce air pollutant emissions due to increased airport activity levels." (Id.) This assumption of increasing capacity to improve traffic flow to reduce air pollution should be further examined in light of other potential mitigation measures.

**Response:**

Please see Response to Comment PC02207-11.

**PC02303-12**

**Comment:**

In addition, the analysis of the impacts of implementing mitigation measures for the impact of increased air emissions on the City of Inglewood is inadequate. While most of Inglewood is within the Land Use Study Area noted in Figure 4.2-1, there is little or no analysis of the impacts on affected property owners, employees and residents within the City of Inglewood from the mitigation measures and roadway improvements. LAWA should revise the Draft EIS/EIR to include analysis of the impacts of the mitigation measures and roadway re-configurations upon the City of Inglewood, and specifically on the ATC business complex.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed air quality issues in Section 4.6, Air Quality. Air quality issues related to the proposed LAX Expressway and SR-1 improvements are addressed in Section 5.5, Air Quality, of Appendix K of the Draft EIS/EIR.

Please see Topical Response TR-ST-2 for a discussion of the surface transportation analysis methodology used in the Draft EIS/EIR. Please see Topical Response TR-ST-6 for a discussion of neighborhood traffic impacts and issues.

Impacts to residents and businesses are discussed in their respective sections in Appendix K of the Draft EIS/EIR (i.e., noise, air quality, land use). Section 5.1, Land Use, of Appendix K discloses the number of homes, commercial businesses, public and community facilities that would potentially be impacted by the proposed LAX Expressway and SR-1 improvement areas. Please refer to Topical Response TR-APPK-2 for a description of the conceptual nature of the proposed LAX Expressway alignment and next steps regarding LAX Expressway property acquisition and relocation issues.

To reduce impacts, mitigation measures are recommended upon implementation of the proposed improvements. LAX Master Plan commitments and Mitigation Measures related to the LAX Master Plan were summarized in Chapter 5, Environmental Action Plan, of the Supplement to the Draft EIS/EIR.

### 3. Comments and Responses

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#### PC02303-13

**Comment:**

G. The Study of Construction Impacts of the Proposed LAX Expressway is Inadequate and Must be Expanded.

The analysis of construction impacts of the LAX Expressway upon the City of Inglewood is inadequate. The Draft EIS/EIR provides that the construction of the LAX Expressway and the ring road will involve critical issues such as road closure, maintenance of traffic, and handling of additional traffic. The Draft EIS/EIR focuses only on the immediate construction zone, and does not discuss impacts to nearby businesses or communities in the City of Inglewood. (Draft EIS/EIR p. 4-868.)

**Response:**

The content of this comment is identical to comment PC02207-13; please refer to Response to Comment PC02207-13.

#### PC02303-14

**Comment:**

The construction of the LAX Expressway will involve tunnel construction and underground excavation. The potential impacts of settlement, ground loss, and earth movement can affect or damage the ground surface, utility lines, roadways and nearby structures. (Draft EIS/EIR p. 4-887.) The Draft EIS/EIR has a gap in its analysis, as it does not discuss the impacts of tunnel construction and underground excavation on the City of Inglewood. The Draft EIS/EIR should be revised to discuss these impacts of construction to the City of Inglewood and more particularly, to the ATC.

**Response:**

Please see Response to Comment PC02207-14.

#### PC02303-15

**Comment:**

Finally, in light of recent world events, the region's air traffic demand has decreased and will continue to decrease considerably, and may never return to previous levels or reach forecast demand utilized as a basis for the Master Plan Expansion. This significant change in the commercial aviation business, alone, should cause LAVA to revisit the expansion as proposed in the Master Plan, and in particular, reexamine the presently unfunded circulation improvements to minimize the impact on existing property owners and the cost of same.

**Response:**

The comment is the same as Comment PC02207-18; please see Response to Comment PC02207-18.

**PC02304      Poyourow, Joanne      None Provided      9/20/2001**

#### PC02304-1

**Comment:**

(overall)  
Alternatives under study

The Alternatives Under Study in this EIR are all Alternatives for expanding airport capacity at one single geographic location: LAX.

No Alternative is studied for

1. modernizing current facilities, without expanding MAP capacity
2. simultaneous expansion of the three LAWA-owned facilities (Palmdale, Ontario and LAX)
3. airport capacity expansion on a Regional level, including facilities expansion at Burbank, Long Beach, Orange County and Ontario<sup>1</sup>

The public should be given environmental impact information on these three additional scenarios, including full disclosure and side by side comparison to LAWA's Alternatives A, B, C for

1. noise impacts
2. aircraft safety (on ground and in air)
3. air quality (including complete statistics and figures)
4. off-area surface transportation (including regional freeway grid impacts)
5. other EIR sections and items of concern

The magnitude of these omissions truly renders the current draft EIR invalid. A subsequent draft EIR should be required, including opportunity for public comments and hearings. The public must be given opportunity to comment on a complete analysis of a truly regional alternative, prior to the release of any final form of this EIR.

1 Prepared in conjunction with officials from these locations

**Response:**

This comment is identical to PC02284-1; please see Response to Comment PC02284-1.

**PC02305      Poyourow, Joanne      None Provided      9/20/2001**

**PC02305-1**

**Comment:**

(overall)

Authority and Accountability

Our government was designed by Thomas Jefferson et al with a system of checks and balances to protect the interests of all. How has LAX and LAWA managed to slip through untamed?

LAWA is an arm of LA City<sup>2</sup>, yet apparently not within the full domain of City Council<sup>3</sup> LAWA is the publisher of the Master Plan, yet they declare they can't control when airlines schedule flights <sup>4</sup>

The FAA and air traffic controllers should be monitoring how many flights can safely use the airport, yet it sure looks like the airlines dictate capacity.

Who really defines LAX capacity? The airlines? If the airlines are in charge of capacity, then this entire Master Plan process is a farce because the airlines are not recipients of the public process!

The interim Master Plan is for some 40 MAP<sup>5</sup>, yet LAX has gone ahead and expanded without a Plan to a capacity of more than 64 MAP.<sup>6</sup> Who has the authority to hold this monster to the 98 MAP cited in this Plan?

2 "LAWA is a self-supporting branch of the City of Los Angeles" - LAWA's website at [www.lawa.org](http://www.lawa.org)

3 per Council Member Ruth Galanter's recorded statement, LAX hearings, Furama Hotel 6/9/01

4 EIR page 1-14: "... the airlines, and not government, make the decision about which airports they will serve." EIR page 3-3: "Federal law...limits the City of Los Angeles' authority to place restrictions on aircraft activity at LAX."

### 3. Comments and Responses

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5 Certain speakers at the LAX hearings at the Furama Hotel, 6/9/01, cited figures in the 40MAP range. I have not seen this figure.

6 1999 statistic from Alternatives Under Study

**Response:**

The comment is the same as Comment PC02284-2. Please see Response to Comment PC02284-2.

**PC02305-2**

**Comment:**

Many of the mitigations proposed by LAWA in this Master Plan are apparently the same ideas that were put forth in the past Master Plan, which were never implemented.<sup>7</sup> Who has enforcement authority to make sure the promised environmental mitigations are truly implemented?

<sup>7</sup> per community members who spoke at the LAX hearings at the Furama Hotel, 6/9/01, and who were around for the last round of LAX expansion discussions.

**Response:**

Comment noted. This comment is identical to PC02284-3. Please see Response to Comment PC02284-3.

**PC02305-3**

**Comment:**

In any business contract, there are stated legal ramifications if the parties default. The injured party has a course of action, a remedy.

What are the consequences if LAX goes overboard? And who has authority to enforce them?

Authority, accountability and consequences should be defined in the Master Plan. This EIR was written for an expansion to 98MAP. Any expansion beyond this volume would produce even more severe environmental impacts on the citizenry than the already severe ones outlined in this EIR document. Enforceable legal consequences for excesses are our only way of containing the environmental impact on our lives.

Without enforceable legal consequences, this EIR is a farce, because the true environmental impact of LAWA's unconstrained expansion on the citizens will be far, far in excess of that stated here.

**Response:**

The comment is the same as Comment PC02284-4. Please see Response to Comment PC02284-4.

**PC02306**

**Poyourow, Joanne**

**None Provided**

**9/20/2001**

**PC02306-1**

**Comment:**

EIR Air Pollution  
Air Pollution statistics omitted

LAX is currently the greatest polluter in the greater LA area. It comes as no surprise that the EIR section on Air Pollution has omitted all statistics; it contains no hard data.

I am no expert at EIR's. This seems strange to me, yet government officials who know the EIR requirements have commented that this data is required for a complete EIR filing.

LAWA should be required to present, in format that allows comparison between scenarios: Baseline pollution figures, No Project Alternative, pollution figures for Alternatives A,B,C, and the Regional



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Expansion scenario that needs to be added.<sup>8</sup> These should be given for at least the SCAQMD monitored pollutants, gasses and particulates. In light of our current global situation, I think that statistics should be presented regarding Greenhouse gasses<sup>9</sup> as well.

The air pollution statistics for Alternatives A, B, C must include the full impact of pollutants from these Alternatives. That means the air pollution figures from these single site expansion alternatives should include pollutants from all the individual passenger automobile<sup>10</sup> of this tremendous additional volume of passengers, idling in LOS-F traffic on freeways across the entire greater LA basin freeway grid.<sup>11</sup>

Under the LAWA single-site location Alternatives<sup>12</sup>, passengers and freight trucks (in fact, all freeway travelers) will spend substantial amounts of time stuck in traffic on the freeways to cross the entire city to gain access to a single airport site. Regional expansion of other area airports would have these passengers and trucks making shorter trips, or even using local mass transit (example: Burbank), which can only result in less air pollution and fuel consumption!

Given that LAX is such a major polluter, this missing data represents a significant and substantial omission from this EIR. LAWA has failed to present an accurate description of the true environmental impact on this City.

<sup>8</sup> see separate Public Comment form

<sup>9</sup> carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), non methane volatile organic compounds (NMVOCs) and sulphur dioxide (SO<sub>2</sub>)

<sup>10</sup> LAWA offers little in the way of real public transportation solutions, see separate Public Comment form)

<sup>11</sup> see separate Public Comment form on LOS-F freeways and 2015 traffic speed projections.

<sup>12</sup> Alternatives A, B, C

**Response:**

This comment is essentially the same as PC02284-5. Please see Response to Comment PC02284-5.

**PC02307      Poyourow, Joanne      None Provided      9/20/2001**

**PC02307-1**

**Comment:**

EIR Section 4.4.4.4  
Community Disruption

FALSE: "implementation of the Master Plan alternatives would not disrupt . . . any existing communities"<sup>13</sup>

The authors of EIR Section 4.4.4.7.2 under "Cumulative Impacts" conveniently misread the CEQA threshold quoted at Section 4.4.4.1.

The CEQA threshold speaks of build alternatives that would "physically divide or substantially disrupt an established community."<sup>14</sup>

The proposed Sepulveda /Westchester Parkway intersection (whether a "diamond" or an "urban" intersection) takes out several blocks of "downtown Westchester", the heart of our business community. These properties have been in limbo over the looming threat of this project for so long that the SUBSTANTIAL DISRUPTION to businesses and property values is already occurring, even before the bulldozers roll!

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The proposed Ring Road near Arbor Vitae and Aviation takes out many long established residences, and reduces the property value of many, many more. It takes out a Library, a community center that has been standing for well over 30 years. This is SUBSTANTIAL DISRUPTION of our community.

13 EIR section 4.4.4.7.1, page 4-443

14 EIR section 4.4.4.4.1, emphasis added

**Response:**

The content of this comment is identical to comment PC02284-6; please refer to Response to Comment PC02284-6.

**PC02307-2**

**Comment:**

The Ring Road offramps at Emerson would SUBSTANTIALLY DISRUPT long established low traffic residential neighborhoods there.

**Response:**

The content of this comment is identical to comment PC02284-7; please refer to Response to Comment PC02284-7.

**PC02307-3**

**Comment:**

The proposed land uses of LAX Northside would SUBSTANTIALLY DISRUPT many residential pockets, placing hotel volume and light industrial next to homes, churches and schools.

The EIR makes blatantly false statements about the severe Community Disruption impact this project will have on Westchester!

**Response:**

The content of this comment is identical to comment PC02284-8; please refer to Response to Comment PC02284-8.

**PC02308**

**Poyourow, Joanne**

**None Provided**

**9/20/2001**

**PC02308-1**

**Comment:**

EIR page 4-93  
Coordinate with Community Plan

A Committee is currently at work, under the direction of members of the LA City Council, to update the Westchester-Playa del Rey Community Plan (a component of the LA General Frameworks).

Part of the Ordinance 159,526 [Q] conditions for the LAX Northside development is "uniformity of development".

The LAX Northside / "Westchester Southside" portion of the LAX Master Plan should be placed on hold, pending the completion of the Westchester Community Plan. Other planned development projects in the area have already been placed into this "on hold" status, pending the completion of the Community Plan.

Upon completion of the Community Plan, the plans for LAX Northside development should be reviewed to assure that they are in alignment with the updated Community Plan, before proceeding.

### 3. Comments and Responses

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Only by waiting for the outcome of the updated Community Plan and by adhering to its terms, can LAX Northside / "Westchester Southside" truly meet the "uniformity of development" requirement of Ordinance 159,526 [Q] conditions.

**Response:**

The content of this comment is identical to comment PC02284-9; please refer to Response to Comment PC02284-9.

**PC02309      Poyourow, Joanne      None Provided      9/20/2001**

**PC02309-1**

**Comment:**

Tech Report 3b - Attachment B  
Geographic Distribution of Trips

EIR Technical Report 3b gives the reader no confidence that it has accurately predicted the future traffic situations around LAX and throughout the greater LA Basin. Technical Report 3b's Section 2.3 describes "Regional Socio-Economic Assumptions" yet these descriptions are so vague that the reader cannot determine what really went into LAWA's calculations. The restatement of assumptions at EIR section 4.3.2 (page 4-279 and following) does nothing to clarify.<sup>15</sup>

For example: Employees.

Where does the forecast think that future additional LAX employees are going to live<sup>16</sup>: have these employees been included in the additional load calculations for local surface streets, or in calculations for the long haul on freeways?

If the employees have been included in local surface street calculations, specifically what housing units does LAWA think these families will use (a housing unit supply issue)? If the employees have been included in local surface street calculations, does LAWA plan on paying them enough to afford the housing prices in areas immediately surrounding LAX (an economic issue)?

If the employees have been included in long haul freeway calculations, have their automobile emissions been included<sup>17</sup> in air pollution statistics for Alternatives A, B, C (an air pollution issue)? If the employees have been included for the freeway long haul, how far down the greater LA Basin freeway system will these additional employees impact the flow (a traffic issue)?<sup>18</sup>

Lastly, who are these employees? Are they only additional LAWA employees, or do the surface transportation figures include additions to the staff of American Airlines, Federal Express, Budget Rent-A-Car, consessioniers and taxi companies?

LAWA's careless assumption making has totally missed the mark in forecasting what real traffic in the greater LA Basin will be like if Alternatives A, B, or C are built.

We will have a traffic nightmare because of this Master Plan.

<sup>15</sup> Is this intentional subterfuge, or mere goofball oversight? The former is appalling and the latter terrifying.

<sup>16</sup> All I can find on this matter is EIR page 4-279 paragraph 3: "future employee distributions were modified based on changes in population." That conveniently tells the reader nothing.

<sup>17</sup> We know the answer to this one: No. LAWA has totally omitted any statistics on additional air pollution. See separate Public Comment form.

<sup>18</sup> Maps at Tech Report 3b stop well short of the end of the bold and heavy color coded lines. The maps do not disclose the full extent of the traffic impact.

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**Response:**

Please see Response to Comment PC02284-10 regarding employee trips.

**PC02310      Poyourow, Joanne      None Provided      9/20/2001**

**PC02310-1**

**Comment:**

EIR Tech Report 3b -Table 2.2 page 2-10  
LAX Northside Excessive Density

LAWA clearly plans to defy the Ordinance 159,526 [Q] conditions for vehicle trips.

Ordinance 159,526 [Q] conditions restrict the LAX Northside (aka "Westchester Southside") development to 6,340 inbound and 7,000 outbound vehicle trips per day.

Yet, Table 2.2 (item 135) reveals that LAX Northside is projected to have 1,625 retail employees<sup>19</sup> and 13,672 non-retail employees<sup>20</sup> for a total of 15,297 employees.

These headcounts don't even take into account hotel guests, office visitors, delivery trucks, restaurant customers, etc.

How are all these people going to come and go daily, within the [Q] condition vehicle trip cap of 6,340 inbound and 7,000 outbound vehicle trips per day?

The answer is, LAWA has no intention whatsoever of adhering to the Ordinance 159,526 [Q] conditions. LAWA plans to jam a massive development in the slender strip of land adjoining long standing low traffic volume residential neighborhoods.

The LAX Northside development is totally out of line with the adjoining community.

19 945 + 550 + 130

20 5,200 + 2,072 + 6,380

**Response:**

Please see Topical Response TR-ST-7 regarding Westchester Southside traffic.

**PC02311      Poyourow, Joanne      None Provided      9/20/2001**

**PC02311-1**

**Comment:**

(overall)  
Modernization versus Expansion

"I don't know how someone can look at the report that came out and say that we don't need to upgrade this airport ..."

-- John Agoglia, Airport Commission president, to LA Times<sup>24</sup>

Much ado has been made in the press about the antiquated state of LAX and the need for modernization. I agree that we need to modernize this facility.

However: The LAX Master Plan before us is not a plan for modernization; it is a plan for profiteering, for market share, and for annihilation of other regional airports under development.

It is a plan for sheer volume expansion; "upgrade" or "modernization" plays a very distant second!

### 3. Comments and Responses

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Its focus is on the profit to be derived by taking airport volume to 98 MAP and blasting out any competition for international flights.

Here are a few quotes from The Purpose and Objectives of the Proposed Project<sup>25</sup>:

- sustain and advance the economic growth and vitality ...
- ensure that new investments ... are efficient and cost-effective
- Maximizing the return on existing infrastructure capital
- sustain and advance the ...regional economy

It should be noted that profit and economic concerns are the focus of every single line of this Purpose and Objectives section, whereas the word "safety" never appears. And the only mention of "efficiency" is in conjunction with "investments".

Any idea of upgrading or modernizing the airport facilities is totally eclipsed by the greed for profit and power that drafted this Master Plan.

I believe that LAX facilities should be modernized. The terminals and mass transit access, perhaps the runways, most certainly the security systems, should be brought up to year 2001 standards. However, I see no reason whatsoever that any additional infrastructure should be built at this single-site location to increase airport volume.

The LAX site is already saturated. It is severely constrained by traffic and accessibility issues, by neighborhood noise and pollution issues, by land use issues<sup>26</sup>.

Increased demand for air services will be coming from the outlying areas of the Southern California geography.<sup>27</sup> There are airfields in those areas that in some cases are even EAGER to take on LAX's excess demand<sup>28</sup>. I see no reason that LAX should be positioned to supply air services for these areas.

The only conceivable reason is so that LAWA officials can increase their "empire", increase the profit their "self-sufficient" department generates, and have more revenues at their disposal. Profit and Power.

Give us a reasonable plan. Give us a workable plan for modernizing (not expanding) LAX, and expanding (not squelching) other area airports!

<sup>24</sup> LA Times "No. 1 in Airfield Close Calls, LAX Finds Solutions Elusive", 6/24/01

<sup>25</sup> EIR page 2-1, section 2.1

<sup>26</sup> see separate Public Comments forms on each of these issues.

<sup>27</sup> See separate Public Comment form on this issue.

<sup>28</sup> per recorded testimony of their representatives, Furama Hotel hearings, 6/9/91

**Response:**

Comment noted. See Response to Comment PC02284-13.

**PC02312**

**Poyourow, Joanne**

**None Provided**

**9/20/2001**

**PC02312-1**

**Comment:**

Tech Report 3b - section 2.3  
Planned Development Projects

### 3. Comments and Responses

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The Socio-Economic Assumptions and associated Table 2.2 are appalling. The Assumptions do not give the traffic forecasting computer nearly the daily vehicle trip volume that we will experience!

Table 2.2 lists statistics for various Planned Development Projects in the LAX area. Yet the figures it uses are substantially understated. I have sampled these figures based on my knowledge of some local projects and find Table 2.2 grossly erroneous!

For example, Loyola Marymount University (lines 102,103 and 105) has been granted certification for a student capacity of 7,800 students<sup>29</sup>. That means LMU has the potential for an expansion of 3,300 students<sup>30</sup>. Vehicle trip calculations should include these additional planned students, plus anticipated additional faculty, administration and support services<sup>31</sup>. But Table 2.2 lists "population" at 1346 <sup>32</sup> with non-retail employees of 230.<sup>33</sup> This is ridiculously wrong!

The Assumptions are outlined at Tech Report 3b, section 2.3 with such vagueness and brevity that I seriously question the figures that were fed to the computer model. Table 2.2 lists residential projects by "population," yet retail and non-retail are listed by "employees." How did LAWA translate "employees" into vehicle trips per day? A supermarket (line 116) is listed at 94 employees. Did the computer model get fed "94 vehicle trips per day"? An appalling proposition when you consider the HUNDREDS of daily vehicle trips a supermarket generates.

This is not a lone example. Schools and childcare centers (lines 90, 01) are listed at 4 and 9 employees. What about daily traffic of parents picking up and dropping off? Home Depot (line 98) is listed at 420 employees. Are the thousands of customers factored in? Gas stations (lines 89, 95) are listed at 4 employees. Did these go into the computer model at 4 vehicle trips per day? These are only samples -the entire Table is like this!

The Playa Vista sales office says their Phase II (line 114) includes 560,000 square foot of retail. By what formula do you derive only 1120 employees? Are customer trips included?

The Assumptions at Tech Report 3b, Section 2.3 give no indication of how office square footage is converted to vehicle trips per day. The Playa Vista Phase II project is listed at 15,620 non-retail employees. Phase I and II plans 5.2 million square feet of office uses. Playa Vista Phase II also includes a 750 room hotel and up to 640,000 square feet of community serving (Phase I and II combined). Is the LAX EIR correct with respect to this project? The formulas for evaluating this have been concealed from the public.

Playa Vista Phase II appears in line 114 with 0 SFDU (single family dwelling units). YIKES! They hope to put in 2,576! This Table 2.2 lists this project with residential population at 19,678, yet the LA Times recently gave the figure 28,000!<sup>34</sup> According to Playa Vista management, industry standard<sup>35</sup> would assume 2.2 persons per "dwelling unit"; Table 2.2 uses a factor of 2 for most projects listed.

Overall, Tech Report 3b appears to seriously understate the number of vehicle trips per day for each and every project listed! Any surface transportation mitigation plans made based upon these outlandishly low figures will fall far short of the magnitude required!

<sup>29</sup> I am not sure if this represents just full-time undergraduates. If it does, then certified capacity may be far greater, when one takes into account part-time undergrads and graduate students.

<sup>30</sup> Their enrollment at the current time is projected to be 4500 full time undergrads, per my 7/18/01 telephone conversation with Mr. Fissinger of the Admissions Office.

<sup>31</sup> The University should be contacted so that proper faculty figures can be reflected, because I believe LMU has a higher than typical ratio of faculty to students.

<sup>32</sup> 450 + 270 + 626

<sup>33</sup> 180 + 50

<sup>34</sup> LA Times, Monday July 16, 2001, "Playa Vista's Public Role"

<sup>35</sup> Institute of Transportation Engineers

**Response:**

Please see Response to Comment PC02284-14.

**PC02313      Poyourow, Joanne      None Provided      9/20/2001**

**PC02313-1**

**Comment:**

EIR Surface Transportation  
Metro Green Line

The LAX EIR makes a big deal about direct freeway access to airport terminal areas,<sup>21</sup> yet completely neglects direct access by mass transit systems.

Why, in all the "surface transportation" reports<sup>22</sup> is no mention made of the Metro Green Line<sup>23</sup>? Why does the Aviation-105 station remain the closest rail or light rail connection to LAX?

Most major airports connect with their city's Metro equivalent: Chicago O'Hare, Boston, Philadelphia, Atlanta Hartsfield, Washington D.C. National, even Burbank! LA City Hall has a Metro Station. Why not LAX?

All surface transportation mitigations presented in this EIR are based upon a continued reliance on the individual passenger automobile. This is an approach our society cannot sustain and will soon have to abandon. The makeup of surface transportation in the LA area will be changing, within the expected "lifetime" of this Master Plan.

The Metro Green Line should be extended into LAX, to let off passengers directly at one of the Peoplemover stations. Alternatively, the Peoplemover could be extended out to the Aviation-105 Green Line station, as the system at Paris' Orly airport does.

Mass transit systems must be incorporated into any true modernization plan for this airport.

<sup>21</sup> EIR section 4.3.2.6.2

<sup>22</sup> reference EIR section 4.3.2.6.2

<sup>23</sup> the only mention I find is at the Alternatives Under Study at which is a public relations narrative not an official planning document.

**Response:**

This comment is similar to comment PC02284-12. Please see Response to Comment PC02284-12.

**PC02314      Poyourow, Joanne      None Provided      9/20/2001**

**PC02314-1**

**Comment:**

EIR Technical Report 14c  
Safety Statistics concealed

Technical Report 14c contains a purportedly complete listing of aircraft incidents at LAX.

Yet, in the public testimony at the LAX hearing at the Furama Hotel on June 9, 2001, a representative of the air traffic controllers indicated that there had been 24 recent incidents "not deemed runway incursions"<sup>36</sup>.

### 3. Comments and Responses

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These incidents are not included in the incident and accident reports at Technical Report 14c section 2.2.1

"Not deemed runway incursions" sounds like a legal technical phrase, but as it was explained in the verbal testimony: each of these incidents was a potential aircraft accident on the ground.

And LAWA proposes to increase airport capacity to bring still more planes into this melee?

I cannot see where drastically increasing the number of moving objects in a limited space area can do anything but increase the number of incidents.

The volume of LAX is already at maximum capacity for the resources (land space) available.

The LAX Master Plan is totally out of line with area resources!

36 To verify this, check court reporter's transcript. This man was one of the first few speakers of the day.

**Response:**

This comment is identical to comment PC02284-15; please see Response to Comment PC02284-15.

**PC02315**

**Poyourow, Joanne**

**None Provided**

**9/20/2001**

**PC02315-1**

**Comment:**

EIR Technical Report 14c  
Safety in the air

Technical Report 14c omits entirely, any evaluation of safety in the skies. Rumor around the city has it that pilots already regard LAX as one of the most hazardous places to fly into.

I lived in Orange County during the Cerritos air disaster. Safety in the airspace above our heads is definitely an environmental concern (hopefully not an "impact"! ) to those who live and work beneath and beside the flight zones.

Full disclosure of aircraft safety statistics must be given, for both the in-air approachways and on the runways.

The EIR should reveal the standards to be measured up to for air safety, just as it does for any other EIR issue under analysis.<sup>37</sup>

The EIR should reveal: What are safe aircraft spacing parameters in approach to runways? How does Baseline and No Project Alternative volume load measure up to these parameters? Where will proposed (increased) flight volumes under Alternatives A, B, C place us with regards to these parameters?

If we had this information, I believe it would be plainly clear that planes today approach LAX at very close to the maximum safe frequency. I'll bet these statistics would prove that adding more aircraft volume to the air approachway for one single-location airport is unthinkable.

The only realistic alternative is landing the increased air traffic volume at multiple airport sites throughout the region.

LAX is already a Cerritos air disaster in the making. This Master Plan is beyond the capacity of area resources.<sup>38</sup>

37 For example, the EIR section on Noise gives the CNEL 65 dB standard, describes the procedure, etc.



38 in this case, "resources" equals basic air and ground space!

**Response:**

This comment is identical to comment PC02284-16. Please see Response to Comment PC02284-16.

**PC02316      Poyourow, Joanne      None Provided      9/20/2001**

**PC02316-1**

**Comment:**

(overall)

Security

Since the Sept. 11, 2001 terrorism incident, several articles have appeared in the media alluding to safety recommendations that were made and never implemented.

"Two commissions, one formed after the terror attack on Pan Am 103 over Lockerbie, Scotland, and one after the crash of TWA 800 off Long Island, New York, made a series of recommendations to improve airline security. Several suggestions never were followed."<sup>39</sup>

"'Serious vulnerabilities in our aviation security system exist and must be adequately addressed,' the GAO warned in April 2000."<sup>40</sup>

6000+ people died when the FAA had in their hands airline security suggestions that could have saved them.

The security recommendations of these commissions were undoubtedly well considered. They were not folly. It is unconscionable to cast them aside without implementation.

I'll bet the recommendations not implemented were cast aside due to expense -

LAWA should not be investing in a massive expansion of passenger and freight volume when they aren't taking care of what they've got! LAWA should invest in airport security facilities to assure the safety and security of the existing passenger volume, and the safety and security of our citizens on the ground.

Implement all the suggestions of the Pan Am 103 commission, the TWA 800 commission and correct the GAO findings; only then are you ready to discuss the possibility of volume expansion.

<sup>39</sup> "Security tightened at U.S. airports" September 12, 2001, Associated Press [www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/](http://www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/)

<sup>40</sup> "Security tightened at U.S. airports" September 12, 2001, Associated Press [www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/](http://www.cnn.com/2001/TRAVEL/NEWS/09/12/security.airports.ap/)

**Response:**

This comment is identical to comment PC02284-17; please see Response to Comment PC02284-17.

**PC02317      Loef, Peter      None Provided      9/9/2001**

**PC02317-1**

**Comment:**

I have lived here for 15 years. I do not want add'l expansion of LAX.

### 3. Comments and Responses

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**Response:**

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

**PC02317-2**

**Comment:**

Please focus on using existing facilities at El Toro & Palmdale/Lancaster area.

**Response:**

Comment noted. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses. Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02318**

**Paterson, Julie**

**None Provided**

**9/10/2001**

**PC02318-1**

**Comment:**

I would like to voice my strong objection to the LAX Expansion. As a life long resident of Westchester, and a homeowner of 10 years, I am very familiar with the toll the LAX currently takes on Westchester, El Segundo, and other surrounding communities. LAX HAS NOT been a good neighbor.

Adding more to LAX will only serve to take away more from Westchester. The only thing it will add to our community is more traffic, more pollution, more noise and more people to an already over burdened area.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and population growth in Section 4.5, Induced Socio-Economic Impacts (Growth Inducement). Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02318-2**

**Comment:**

The answer lies in developing other airports outside of LAX, in Southern California - Ontario, El Toro, Palmdale, even Burbank. There is no way to make larger the area in which LAX is situated without completely encroaching further on the surrounding communities where there are thousands of homes, hundreds of schools and businesses and most importantly hundreds of thousands of individuals who will be adversely affected.

Let other areas share some of the burden. Let them also share in what will also help their local economies.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-RC-4 regarding Orange County air transportation demand, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02319**      **Skehan, Pat & Bernie**      **None Provided**

**PC02319-1**

**Comment:**

We are opposed to the expansion of the airport at LAX for the following reasons: increased traffic, noise and air pollution to the communities in the surrounding area.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02319-2**

**Comment:**

We are in favor of a regional solution in which the Ontario and Palmdale airports would be developed to increase the number of flights arriving and departing at these locations. The addition of the El Toro facility would also allow for a more effective regional solution to the projected increase in air travel.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County Air transportation demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

**PC02320**      **Quinn, Marjorie**      **None Provided**      **9/9/2001**

**PC02320-1**

**Comment:**

I have lived in Westchester forty seven years, raised my children here and want to remain here.

**Response:**

Comment noted.

### **3. Comments and Responses**

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#### **PC02320-2**

**Comment:**

The noise is already so loud it is difficult to converse on the phone.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR. However, please see Response to Comment AL00006-2 regarding current measures underway to address existing high aircraft noise levels. Regarding high noise levels at the commentor's property (located at 6420 West 85th Street), properties must be exposed to 65 CNEL or greater noise levels to qualify for soundproofing. As was shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 in Technical Report S-1, Supplemental Land Use Technical Report, in the Supplement to the Draft EIS/EIR, the subject property in Westchester is located outside the 1992 fourth quarter, 1996 baseline, and Year 2000 65 CNEL contour. As was also shown on Figure 4.2-5 of the Draft EIS/EIR and Figure S1 of the Supplement to the Draft EIS/EIR, under 1996 baseline and Year 2000 conditions, the 65 CNEL contour is completely within the 1992 fourth quarter 65 CNEL contour. The 1992 fourth quarter 65 CNEL noise contour establishes eligibility for sound insulation under the Aircraft Noise Mitigation Program (ANMP) as described in Topical Response TR-LU-3. Also relative to single event noise levels that result in nighttime awakening (as established by the 94 dBA SEL noise contour), the subject property is located within the 94 dBA SEL contour under 1996 baseline conditions but not under Year 2000 conditions, as was shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-LU-4 regarding outdoor noise levels.

#### **PC02320-3**

**Comment:**

The smell of plane fuels is annoying.

**Response:**

Please see Response to Comment PC00045-4 regarding the topic of odor.

#### **PC02320-4**

**Comment:**

The black oily substance from the planes is on my house.

**Response:**

Please see Topical Response TR-AQ-1 regarding air pollutant deposition.

#### **PC02320-5**

**Comment:**

Please don't expand and make it worse to cope.

**Response:**

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



### **3. Comments and Responses**

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As a supporter of the LAX master plan, I feel this plan is the perfect solution to fitting the needs of the community. The master plan will also provide more business and employment for the surrounding cities.

As we all know, the economy is constantly fluctuating. By adhering to the LAX plan, it will help topple the economy to the positive side. Have no doubt that my full support will be directed to this project. Los Angeles is my hometown and I will do everything I can to further enhance it.

**Response:**

Comment noted.

**PC02324      Chan, Kellogg      Zentech, Inc.      7/9/2001**

**PC02324-1**

**Comment:**

As the President of an international biotech business that engage in frequent travel through LAX, I wholeheartedly welcome the proposed LAX Master Plan.

Los Angeles is a World Class City and the Los Angeles International Airport is a World Class Airport. It needs to maintain that profile to continue to provide the kind of service and facilities necessary to serve the people of Los Angeles and the world.

Its ability to perform not only for its traveling customers but for the good of its neighbors and for the whole city is critical. To do this requires the commitment to update and improve all aspects of this facility and the surrounding areas. The LAX Master Plan is a decisive step in this direction. Not only will it benefit the productivity and functionality of the Airport, it will create an economic uplift for the whole region.

**Response:**

Comment noted.

**PC02325      Woo, Peter      Megatoys      6/9/2001**

**PC02325-1**

**Comment:**

My name is Peter Woo. I am a businessman here in Los Angeles. I was born in Hong Kong and immigrated to the U.S. with my family in 1971. We have been fortunate. We worked hard and, I am proud to say, have been responsible for creating the wholesale "Toy District" in Los Angeles.

For the past ten years, I have become more and more involved in civic life here in Los Angeles. I was appointed by the late, great Tom Bradley, when he was the mayor, to the Los Angeles Downtown Strategic Plan Advisory Committee. I co-chaired the "Los Angeles Week in Hong Kong" event in 1991 and led a delegation of government and business leaders to Hong Kong to promote Los Angeles. Mayor Richard Riordan appointed me as an advisor on international trade.

I do a lot of traveling. It isn't unusual for me to travel to the Far East two or three times in one month. I've been to the best airports in the world, and I've been to the worst. LAX does not rank at the top of that list.

I've studied the Master Plan and the Recommended Alternative. I support it, but only because it seems to be the one that has the best chance of approval. Personally, I believe in being realistic and the reality is that aviation passenger loads will double. The Recommended Alternative will only accommodate a portion of the projected growth.

### 3. Comments and Responses

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I am sympathetic to people who are concerned that more passengers at LAX will mean more traffic, noise and air pollution. But the modernization engineers have anticipated all of that. They are required by law to address environmental issues and mitigate the impact. No one will or can mitigate the economic impact of the loss of business and jobs we will face if we do not do something about LAX.

I urge approval of the LAX Master Plan.

**Response:**

Comment noted.

**PC02326      Kong, Grace                      Chinese Chamber of Commerce      9/5/2001**

**PC02326-1**

**Comment:**

Enclosed are support letters collected by the Chamber office. Hope you will find them helpful.

We look forward to assisting LAWA in making the LAX Master Plan a success.

**Response:**

Comment noted.

**PC02327      Sauer, Paul                      None Provided                      9/23/2001**

**PC02327-1**

**Comment:**

I would like to ask you to withdraw the proposed LAX Master (Expansion) Plan in favor of development of other airports.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02327-2**

**Comment:**

We have lived in Westchester for over a decade. Over the years we have seen more and more traffic in our neighborhood, heard more and more noise and have inhaled more and more polluted air from both the bigger airplanes and from more cars coming to and from the airport. We have had a more than a fair share of auto emissions, emissions from idling planes and jet fuel emissions.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

### 3. Comments and Responses

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#### PC02327-3

**Comment:**

Now, more than in the past, the increased ground and air traffic will result in increased emissions of all five EPA classified major air pollutants, chemicals affecting respiratory system and causing cancer. Our neighbors next to us lived in their home for more than 40 years. The husband died from cancer ten years ago, his wife Ivy followed him just last year. Our neighbor across the street, also living his whole life in the same place, died of cancer 4 years ago...

We are not blaming anybody for their death, we are not suing anybody, we are just a little scared what will happen to our children that have been growing in this neighborhood, playing in the backyards, swimming in our pool, eating the fruit from our trees.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed human health and safety in Section 4.24, Human Health and Safety, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix G and Technical Reports 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C and S-E and Technical Reports S-4, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-1 regarding air pollutant deposition, Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-ST-4 regarding airport area traffic concerns.

#### PC02327-4

**Comment:**

We cannot keep our windows open during the night because of the very high noise level from the planes rolling to and departing from the northern runway. Even during the day it is difficult to maintain conversation in our backyard. And this problem is getting worse over the years also.

**Response:**

The Supplement to the Draft EIS/EIR, Section 4.1, Noise, and Section 4.2, Land Use, included an analysis of high single event noise levels that result in nighttime awakening. This area is defined by the 94 dBA SEL noise contour. The 94 dBA SEL contours for the 1996 baseline and Year 2000 conditions were shown on Figure S4.2-3 of the Supplement to the Draft EIS/EIR. Please also see Topical Response TR-LU-4 regarding outdoor noise levels.

#### PC02327-5

**Comment:**

We need long term planning and we need a regional solution, not the Master Plan for LAX.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02327-6

**Comment:**

But, first of all, we need somebody who will listen and respect us, common people living in this area. You cannot expect thousands of public comments on your Master Plan from ordinary people living in the surrounding neighborhoods, because they do not understand the technical issues, they do not have



the technical skills and knowledge or simply they do not have a proper voice in today's mass media controlled society. But they do suffer and do mind all the noise and the pollution.

**Response:**

Comment noted.

**PC02327-7**

**Comment:**

Since, after the tragic events on September 11, 2001, there are additional safety concerns that need to be incorporated into the design of most of our airports, and you have to modify your Master Plan anyway, please, move more traffic to other airports and do not expand LAX. We all, the local residents with our children, will be very grateful to you.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Safety impacts were addressed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14c of the Draft EIS/EIR and S-9b of the Supplement to the Draft EIS/EIR.

**PC02328**

**Potter, Julie**

**None Provided**

**PC02328-1**

**Comment:**

Early turns, flying over El Segundo.

Every time I call to report, document & to complain about an early turn I am told they are for "Safety Reasons".

Hogwash!! Early turns are a man made product of crammed arrivals & departures. This is the unsafe common practice of L.A.X..

Over the past two years I have made more than 30 complaints about early turns & noise. To date I have received 10 replies. Each time I call I also ask for an ARIS map.

All but 2 of my conversations have been with live people. Two have been messages left on recordings.

**Response:**

Early turns over El Segundo have been a focus of public complaint for years. In accordance with long-standing LAWA policy, aircraft departing to the west are directed to fly to the coastline before initiating turns, unless directed otherwise by ATC. The airport has attempted to deal with the issue for years through the posting of signs at the end of each runway calling for flight to the coastline prior to turns, but occasional deviations from the procedure continue to occur. Deviations from straight out routes are provided when there is a need to safely separate slower turboprop aircraft from following jet aircraft that might overtake them in flight. Another part of the reason is the alignment of the runways relative to the community. The west end of the runways nearest El Segundo are closer to the community than the east ends (the runways are aimed more toward the community's west end), while the north runways are both farther away (except in Alternative A) and aimed away from the community. Please see Topical Response TR-N-3 regarding aircraft flight procedures, in particular Subtopical Response TR-N-3.4 regarding standard missed approach procedure.

### 3. Comments and Responses

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**PC02328-2**

**Comment:**

We do not need a larger airport. We do need a safer airport. (1) Fewer flights, better spacing between arrivals & departures

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02328-3**

**Comment:**

(2) no air activity from 11:00 pm - 6: pm. We are bombarded 24 hours a day now!

**Response:**

Comment noted.

**PC02328-4**

**Comment:**

I was born in 1958. I have spent most of my life in this area. I have always tried to be a good neighbor. I can not say the same thing about L.A.X.! Please NO EXPANSION!

**Response:**

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

**PC02328-5**

**Comment:**

Enclosed please find "Aircraft Noise Complaints" I only call to complain when an airplane flies OVER my house. I find it very interesting they (LAX) say they did not or their equipment was not properly working.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR or Supplement to the Draft EIS/EIR; however, please see Topical Response TR-LU-3 regarding the Aircraft Noise Mitigation Program, regarding how noise complaints are filed and how they are handled.

**PC02329**

**Krauch, Robert**

**None Provided**

**9/26/2001**

**PC02329-1**

**Comment:**

LAX - SECURITY/EXPANSION

'Tis sad and pathetic it took terrorists to force Los Angeles leaders -- Mayor and Airport Commissioners -- to finally recognize that no single airport safely can handle 2,200 average flights per day !

### 3. Comments and Responses

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Yes, LAX must dramatically beef-up security, but equally or more important, in the long-run, is the need to immediately accelerate efforts to achieve a truly regional solution for air travelers using Southern California airports.

Before the Sept. 11th tragedies, LAX was handling seven-to-ten times more flights daily than John Wayne, Ontario or Burbank. Or, more than TWICE the flights as all other nearby commercial airports combined.

To date, for the past 25 years, it suggests that LA's leaders were greedy (hogging most of the revenues at LAX, intentionally ignoring Palmdale for 30 years). AND that LA, all the airlines, and the FAA were grossly unrealistic in recent years aggressively promoting even more "expansion" plans for LAX -- already over-crowded 26,000,000 passengers per year in excess of the 1974's Master Plan capacity of 41 million. . .

Of the \$12 BILLION claimed to be necessary to expand LAX, set aside one billion to increase security and, at the same time, move full-speed ahead to develop Palmdale International site for (huge new air-busses) and, also, expand Ontario as needed.

LA's Mayor and Airport Commissioners must totally re-think airport realities. Security yes, but, NO growth at LAX. Encourage use of other airports.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02330 Benveniste, Ph.D., Valerie None Provided 9/13/2001**

**PC02330-1**

**Comment:**

LAX Expansion will have negative consequences for those living near LAX as well as all users of L.A.X. for several reasons:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02330-2**

**Comment:**

(1) Increased noise will harm children living under flight path - unfairly harming already disadvantaged children of Lennox School District, Hawthorne School District, Inglewood School District

**Response:**

Please see Responses to Comments AL00017-52 and AL00038-11 regarding the health effects of aircraft noise and the impact of high noise levels on children, respectively. Please see also Topical Response TR-EJ-1 regarding potential air quality and health risk impacts on low-income and minority communities.

### **3. Comments and Responses**

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#### **PC02330-3**

**Comment:**

(2) Increased noise causes psychological stress for those living near airport

**Response:**

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

#### **PC02330-4**

**Comment:**

(3) Increased capacity will mean even larger traffic difficulties for those wishing to use LAX

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4, regarding airport area traffic concerns.

#### **PC02330-5**

**Comment:**

(4) Overburdened 405 & 105 freeways w/increased capacity

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

#### **PC02330-6**

**Comment:**

(5) Increased central service capacity increases potential for catastrophic consequences in light of recent terrorist activities.

Don't give terrorists a bigger more damaging target PLEASE.

**Response:**

Comment noted. Please see Responses to Comments AL00051-93, PC01881-31, and PC01213-5.

#### **PC02332**

**Potter, Julie**

**None Provided**

#### **PC02332-1**

**Comment:**

Subject: LAX - No Expansion!

Community Safety - Sept. 11, 2001 El Segundo

As an El Segundo resident (originally 1958). Sept. the 11, 2001 was very creepy! On the day terrorist used airplanes as missiles to attack America it was quite & clean at LAX for a few days.

### 3. Comments and Responses

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Those of us that are longtime residents knew LAX had long been depriving us of peace, quiet & clean air. On Sept. 11, it became just how much we had lost in our quality of life here.

Terrorist using American Airplanes to kill & destroy Americans is a real tragedy! LAX could have been or could still be a terrorist target! The Twin Towers PROVED Bigger is NOT Better! Bigger makes you a Bigger Target!

DO NOT EXPAND LAX. Give back some of the peace, quiet & clean air LAX has stolen from us as surrounding communities. For nearly 3 days I could actually leave my doors & windows open, hear the birds & see/smell clear Blue Skies!

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-LU-1 regarding impacts on quality of life, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-LU-4 regarding outdoor noise levels, and Topical Response TR-AQ-3 regarding air pollution increase. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed the effects of single event noise at night in Section 4.1, Noise, with supporting technical data and analyses provided in Appendix D of the Draft EIS/EIR and Appendix S-C1 of the Supplement to the Draft EIS/EIR. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR.

**PC02333      Potter, Julie      None Provided**

**PC02333-1**

**Comment:**

Subject: LAX - No Expansion

Air Quality - Noise Levels - 24 hours a day El Segundo, Ca

I was born to this area in 1958. As a child growing up I can remember there always being airplanes.

I can remember when they were a better neighbor than they are now.

Over the last few years they have continued to expand their schedule to a 24 hour 365 day operation.

LAX touts anytime/anywhere with total disregard for its neighboring communities.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. Please note that Alternative D-Enhanced Safety and Security Plan is designed for an activity level comparable to that of the No Action/No Project Alternative. Additionally, the design of Alternative D includes an emphasis on enhanced safety and security at LAX.

**PC02333-2**

**Comment:**

LAX has become so loud it is difficult for me to enjoy daily outdoor activities.

**Response:**

Please see Topical Response TR-LU-4 regarding outdoor noise levels.

### 3. Comments and Responses

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#### PC02333-3

**Comment:**

In the morning when I leave for work I can actually smell & taste jet fuel in the air.

**Response:**

Please see Response to Comment PC00045-4 regarding the topic of odor and Topical Response TR-AQ-1 regarding air pollutant deposition.

#### PC02333-4

**Comment:**

I am a homeowner in El Segundo. Do NoT EXPAND L.A.X. It is wrong for L.A.X. to encroach & pollute every community surround it or in its path!

**Response:**

Comment noted. Air quality was addressed in Section 4.6, Air Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Appendix G and Technical Report 4 of the Draft EIS/EIR and Appendix S-E and Technical Report S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02334

**Potter, Julie**

**None Provided**

#### PC02334-1

**Comment:**

Subject: LAX - No Expansion

Traffic caused by L.A.X. - Pershing  
5 Traffic photos enclosed 105 E & W

I leave my home aprox. 5:30 am. to go to work. I return home aprox. 4 - 6:30 pm.

Almost every morning I see cars & trucks lined up, bumper to bumper on Sepulveda, the 105 W & the 405 waiting to get into L.A.X. Pictures enclosed.

Almost every night I am stuck in traffic 405, 105 W &/or Imperial. At least twice a week I see an accident involving the L.A.X. exits.

Now we have learned that LAX wants to close Pershing to the public & use it as a ringroad.

We as residents know this will be a total nightmare for us commuting/shopping El Segundo, Manhattan, Hermosa, Playa Del Rey, Marina Del Rey, Culver City, & Weschester!

Pershing is our only relief. Sepulveda is always congested with LAX traffic & Vista Del Mar with beach-tourist traffic.

Please keep Pershing a Public thruway to all communities!

**Response:**

This comment is similar to comment AL00018-30. Please see Response to Comment AL00018-30.

**PC02335      Potter, Julie      None Provided**

**PC02335-1**

**Comment:**

Subject: LAX - No Expansion

Clean Air/Water El Segundo & surrounding communities

I was born in 1958. LAX has been my neighbor for much of my life.

If I created the noise 24 hours a day 365 days a year as LAX does I would be arrested & jailed.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, and noise impacts in Section 4.1, Noise, and Section 4.2, Land Use. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. Water quality impacts were addressed in Section 4.7, Hydrology and Water Quality, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR with supporting technical data and analyses provided in Technical Report S-5 of the Supplement to the Draft EIS/EIR.

**PC02335-2**

**Comment:**

If I created the airpollution as LAX does 24 hours a day 365 days a year I would be arrested & jailed.

If I leaked/dumped the fuel in the ocean as LAX does 24 hours a day 365 days a year I would be arrested & jailed.

**Response:**

The comment is essentially the same as Comments PC02333-1 and PC02335-1. Please see responses to those comments.

**PC02335-3**

**Comment:**

If I created the traffic jams, accidents & destruction to public roads as LAX does I would have been arrested & in jail.

LAX has been the rudest, most destructive (safety, air quality, water quality, high noise levels) neighbor we have ever had.

**Response:**

Comment noted. Issues related to traffic were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Also, issues related to safety, air quality, water quality, and noise were addressed in Sections 4.24, 4.6, 4.7, and 4.1, respectively, of those documents.

**PC02335-4**

**Comment:**

Please do NOT allow them to expand with their current "Modernization Master Plan."

### 3. Comments and Responses

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We as residents know it is a smoke screen to continue expanding their flights & destroying our air (I have developed asthma) quality, our water quality, our air safety, our road safety, our ever increasingly small amount of air quiet time.

LAX has already consumed literally & figuratively to many communities.

For a safer airpor we need FEWER FLIGHTS & real modernization.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, human health and safety in 4.24, Human Health and Safety, water quality impacts in Section 4.7, Hydrology and Water Quality, traffic impacts in Section 4.3, Surface Transportation, noise in Section 4.1, Noise, and 4.2, Land Use, and relocation impacts in Section 4.4.2, Relocation of Residences or Businesses. Supporting technical data and analyses are provided in Appendix D, Appendix G and Technical Reports 1, 2, 3, 4, 6, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1, S-2a, S-2b, S-4, S-5, S-9a, and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-SAF-1 regarding aviation safety, Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-N-6 regarding noise increase. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02336      Lindner, Dorothy      None Provided      6/16/2001**

The content of this comment letter is identical to comment letter PC00534; please refer to the responses to comment letter PC00534.

**PC02337      Rodriguez-Lara, Christine      South Bay Association of Chambers of Commerce      7/3/2001**

The content of this comment letter is identical to the main text of comment letter PC00592; please refer to Responses to Comments PC00592-1 through PC00592-8.

**PC02338      Sullivan, Mr. & Mrs. Gerald      None Provided**

The content of this comment letter is identical to comment letter PC00310; please refer to the responses to comment letter PC00310.

**PC02339      Stanford, Dick      City of Azusa      6/9/2001**

**PC02339-1**

**Comment:**

DRAFT LAX EIR/EIS FAULTY BECAUSE IT DOES NOT ADDRESS A REGIONAL AIRPORT SYSTEM AS AN ALTERNATIVE TO LAX EXPANSION

Honorable Hearing Officers, my name is Dick Stanford. Although I am a member of the Southern California Association of Governments' Regional Council and Transportation and Communications Committee, my testimony is presented solely in my capacity as a City Councilmember of the City of Azusa and for the City of Azusa.



**Response:**

Comment noted. Please see Responses to Comments below.

**PC02339-2**

**Comment:**

Azusa is one of some 100 cities and other entities that respectfully request the City of Los Angeles to terminate plans for LAX expansion and concentrate, instead, on developing a truly regional airport system.

It is because of the exclusion of this alternative that the draft EIR/EIS is inadequate.

It is a basic tenet that EIRs/EISs address all alternatives to the proposed action. The Draft EIR/EIS for the proposed expansion of LAX only addresses three slight variations of the same alternative.

**Response:**

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

**PC02339-3**

**Comment:**

I have heard the excuse that regionalization is not in the EIR/EIS because the airport owner ostensibly cannot impact airline decisions on which flights will operate from which airport in a region. As one of the earliest employees of the Dallas/Fort Worth Airport, as the former coordinator of Friends of Austin's Mueller Airport, as a former member of Ontario's Blue Ribbon Airport Commission, and as a former Marine Corps fighter pilot who flew in and out of El Toro, I know that that excuse is without merit.

**Response:**

Please see Response to Comment PC02302-27 and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02339-4**

**Comment:**

The Ontario Airport serves a population mass that would make that airport much more profitable for many more airline flights than presently operate to and from there. Many more passengers would spend considerably less time on the freeway and concurrently less time fouling the air if their ground travel was to ONT instead of LAX.

But, the beautiful terminal there - which took entirely too long to become a reality - is presently a ghost town because the flights are not there

**Response:**

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

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#### PC02339-5

**Comment:**

because most convenient schedules are given to LAX and because fare pricing deliberately forces passengers to use LAX.

**Response:**

The average fare for domestic flights from LAX is higher than for Burbank, Long Beach, Ontario, and Orange County. Since passage of the federal Airline Deregulation Act of 1978, the airlines make the decision about which airports they will serve. As a general rule, airlines will choose to serve the airports near the highest concentrations of conveniently located customers. Within this general framework, however, airlines must make strategic decisions about air service to maximize their investments and gain competitive advantages. For instance, in regions with multiple airports, airlines tend to concentrate their air service at a single, well-located primary airport for reasons of economic efficiency. Concentrating service at a dominant airport also facilitates connecting service, which can significantly increase an airline's market and allow even greater frequencies to more destinations. International service in particular relies on the availability of domestic connecting flights to a wide range of destinations.

#### PC02339-6

**Comment:**

Burbank, Long Beach, and John Wayne are not at near the same percentage of capacity as LAX. And proposals relating to Palmdale, El Toro, and other existing airports all provide the basis for planning a truly regional system.

So, we respectfully request that you join the many cities, Mayor Hahn, the Los Angeles County Board of Supervisors, a number of Members of Congress, and the Southern California Association of Governments in supporting a truly regional system that would be more efficient and less polluting for air travel in the greater Los Angeles region.

**Response:**

Comment noted. Please see Response to Comment PC02339-2. Also, please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale. In spring 2002, the voters of Orange County rejected the use of El Toro for a commercial airport. The Department of the Navy is disposing of the property for non-airport uses.

#### PC02340

**Weir, Jr., Ph.D.,  
Alexander**

**None Provided**

#### PC02340-1

**Comment:**

Enclosed are copies of my comments mailed today to David Kessler, AICP US Department of Transportation, Federal Aviation Authority and to Jim Ritchie, Los Angeles World Airports, LAX Master Plan. Briefly, they request an explanation of what, if anything, will be done to counteract the increased air pollution in Playa del Rey which will be caused by implementation of the LAX Master Plan. My elder son, a Judge, says that you will probably not print my comments because they are too technical. You have my permission to paraphrase, abbreviate, or eliminate the "technical" portions or any other portions of my comments, but I hope you will at least print a portion of my comments.

The LAX Master Plan Draft and the FAA Draft Environmental Impact Statement/Environmental Impact Report are 12,000 pages long and I have been unable to find any elected officials (or their staff members or even a librarian) who have read both of the entire documents. I have read them both. My comments contain several options, which will decrease, not increase, air pollution in Playa del Rey.

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**Response:**

Comment noted. Please see Responses to Comments below. Responses are provided for all public comments received on the Draft EIS/EIR and Supplement to the Draft EIS/EIR within this Final EIS/EIR.

**PC02340-2**

The attachment included as part of this comment letter is identical to comment letter PC00039; please refer to the responses to comment letter PC00039.

**PC02342          Gregg, Philip          None Provided          9/24/2001**

**PC02342-1**

**Comment:**

Freezing the assets allows banks even in Arab nations, and those governments, a chance to participate in the anti-terrorism campaign.

No more millions of school kids, dreaming of pilot licenses, so they can fly commercial jets into skyscrapers: like the Republicans and Journalists were leading everyone to believe in after September 11.

The United States could even petition the United Nations for capital spending projects authority in the desperate of those nations: to put UN policing troops on the ground in those nations.

It would be a kind of apology for all the stupid Republican rhetoric commencing with the collisions of September 11. After all, the Republicans have allowed the terrorist organizations almost two weeks to find sufficient mattresses in which to place their loot, before putting a freeze on all that money.

And in a Bush Administration, it probably looks Jewish to someone. Only 12 days ago it might even have looked white and not black, which is of course between Laura and George Bush.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02343          Frankel, Ross          None Provided          8/9/2001**

**PC02343-1**

**Comment:**

I oppose the LAX Master Plan adoption. I ask the commissioners & City Council to oppose it too. The Plan is fatally flawed. It provides unrealistic estimates, too low, of the negative impacts upon the environment & surrounding communities. It provides inadequate mitigations for all impacts. It fails to safeguard communities.

**Response:**

Comment noted.

**PC02343-2**

**Comment:**

It fails to provide an adequate alternate plan: for expanding Palmdale Airport.

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**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR and Response to Comment AF00001-56 regarding the Draft EIS/EIR assumptions pertaining to Ontario International and Palmdale Regional airports. Please also see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02343-3**

**Comment:**

It fails to provide an adequate, composite mass transit plan to reduce passenger & freight traffic of existing & future traffic by at least 1/3rd.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02343-4**

**Comment:**

It fails to provide a clear plan to end stage 2 aircraft usage.

**Response:**

It is not the purpose of the Master Plan to provide an end to the use of Stage 2 aircraft at the airport. Aircraft noise levels fall under the jurisdiction of the FAA, which has overseen the removal of all Stage 2 aircraft in excess of 75,000 pounds from the lower 48 states by December 31, 1999. Congress has not seen fit to mandate the elimination of Stage 2 aircraft weighing less than 75,000 pounds. In practically all cases, these aircraft are corporate jet types. For a local community to attempt that action, completion of a Part 161 access restriction study by LAWA and its acceptance by the FAA would be required. It is anticipated that since Stage 2 aircraft have not been newly constructed since the early-1980s, all such aircraft will be gradually phased out of the operating fleet by the end of the planning period. For additional information on this subject, please see Topical Response TR-N-7 regarding noise abatement measures/enforcement, in particular TR-N-7.6 regarding ANCA Phase-out of Stage 2 aircraft.

**PC02344**

**Haupt, Robert**

**None Provided**

**8/15/2001**

**PC02344-1**

**Comment:**

Against Airport Expansion!

**Response:**

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

**PC02345**

**Keith, Dorothy**

**None Provided**

**PC02345-1**

**Comment:**

When my husband and I moved into our new home in Westchester in 1947 the Airport was housed in small buildings at the foot of Airport Boulevard. We have watched the Airport grow and become a "Blob". Each succeeding growth or "improvement" has had a negative effect on traffic, businesses, churches and schools, and homes in the community. (Because of the destruction of homes, business

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suffered and schools and churches lost attendance. Homes were destroyed or required expensive soundproofing.)

**Response:**

The comment is the same as Comment PC01140-1; please see Response to Comment PC01140-1.

**PC02345-2**

**Comment:**

Instead of creating a monster that will finally destroy this community, here are some suggestions:

**Response:**

Comment noted. Please see Responses to Comments below. In addition, it should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02345-3**

**Comment:**

1. Move all cargo flights to the Palmdale Airport. This is an area that would benefit from increased usage.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02345-4**

**Comment:**

A high speed rail line could move merchandise rapidly and efficiently.

**Response:**

Please see Topical Response TR-RC-3 regarding high-speed rail as a solution to airport capacity and demand. None of the high-speed rail systems planned in the state involve transportation of significant amounts of cargo. All of these high-speed rail systems focus on passenger traffic.

**PC02345-5**

**Comment:**

2. Move a portion of passenger flights to El Toro Airport, an existing facility which is ready to be utilized, and would benefit Orange County passengers.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02345-6**

**Comment:**

3. There are other airports in the basin which need to be better utilized.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and

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security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

#### PC02345-7

**Comment:**

These changes would greatly reduce traffic on the 405 Freeway and eliminate the need to build an expensive interchange at Arbor Vitae.

**Response:**

This comment is identical to comment PC01140-5. Please see Response to Comment PC01140-5.

#### PC02345-8

**Comment:**

My question now is: who will benefit financially from a mega-airport? Who will line his/her pockets at the expense of the general public?

**Response:**

The economic benefits of the LAX Master Plan alternatives were described in Section 4.4.1, Employment and Socio-Economics, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, with supporting technical data provided in Technical Report 5.

#### PC02345-9

**Comment:**

We, the people of Westchester, urge you to please aid us in our campaign to save our community.

**Response:**

Please see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester.

**PC02346**

**Nelson, Susan**

**None Provided**

**8/10/2001**

#### PC02346-1

**Comment:**

It is clearly inappropriate for the City of Los Angeles to produce such drastic proposal for the expansion of LAX when you do not have a Masterplan for the entire City of Los Angeles.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Preparing a master plan for the entire City of Los Angeles is beyond the scope of this project.

**PC02346-2****Comment:**

It is clear that there is no transportation plan for this area. SCAG R Dot will not and do not qualify for such a plan. We need a real regional plan/city plan agency.

**Response:**

Comment noted.

**PC02346-3****Comment:**

It is my opinion that one reason for the expansion is military policy as well commercial expansion - certainly the city is responding not only to the commercial lobby but to Gatt & NAFTA - to federal trade policy. The FAA should be represented congress people as well as county & regional officials.

**Response:**

Comment noted.

**PC02347      Reyes, Francisco      None Provided**

**PC02347-1****Comment:**

I am Francisco Reyes. I have lived in Westchester all my life. Just recently I was forced to move from Manchester Square due to the Lax Expansion. Now they are trying to move me out from where I recently moved in. Didn't they have enough land from where they moved us out of? Now I am asking as a concerned resident what you are exactly going to do with this land of ours. There are thousands of children that play Ayso and Little League baseball every year at Neilson. Where would we have to go if this plan goes through. What will happen to the local businesses? What exactly do you plan to do with all the land you will buy out.

**Response:**

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR addressed land acquisition for each of the alternatives in Chapter 3, and Section 4.2, Land Use. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. Also note, as was described in Section 4.2, Land Use (subsection 4.2.6.5) of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's new preferred alternative), does not include any residential acquisition or acquisition within the Westchester Business District. Also note that Neilson Youth Park will be expanded under Alternatives A, B, and C. The park will not be affected by Alternative D. As was described in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA programs for the acquisition of residences and business properties will conform to governing federal and State requirements for the payment of just compensation for the purchase of any needed property and applicable relocation assistance and payments will be provided to any person displaced from their home or business. Also please see Topical Response TR-RBR-1 regarding residential acquisition and relocation.

**PC02347-2****Comment:**

How many years will this plan take to go in action. I would highly appreciate your response to my question.

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**Response:**

The LAX Master Plan is proposed to be constructed through 2015.

**PC02348      Rodriguez, Laura      None Provided**

**PC02348-1**

**Comment:**

I'm wirtting to you in regards to the LAX expansion. First of all I'm a senior at St. Bernard High School, and my Government Teacher, Mr. Harris has given us, his students an assignment to write to a government official. Being part of the Inglewood Community I thought it would be best to write to yourself to find out about the LAX expansion. First off who would this expansion affect and why?

**Response:**

Chapter 2, Purpose and Need For The Proposed Action, of the Draft EIS/EIR described the basic need for and objectives of the proposed Master Plan. Chapter 3, Alternatives, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR described the five alternatives currently being considered for the LAX Master Plan. Alternatives A and B propose improvements to, and expansion of, LAX to accommodate approximately 98 million annual passengers (MAP) and approximately 4.2 million annual tons (MAT) of cargo in 2015, and Alternative C provides for 89 MAP and 4.2 MAT. The No Action/No Project Alternative calls for no notable improvements to or expansion of LAX, resulting in activity levels of approximately 78.7 MAP and 3.1 MAT in 2015. Alternative D proposes substantial improvements to the existing facilities at LAX but is designed for 2015 activity levels comparable to those of the No Action/No Project Alternative. The various sections in Chapter 4 of the Draft EIS/EIR and Supplement to the Draft EIS/EIR identified and evaluated the impacts of each of the five alternatives on the surrounding communities (e.g., Section 4.1, Noise, Section 4.2, Land Use, Section 4.3, Surface Transportation, Section 4.4, Social Impacts, Section 4.5, Induced Socio-Economic Impacts, Section 4.6, Air Quality, Section 4.20, Construction Impacts, Section 4.24, Human Health and Safety, etc.). A comprehensive summary of potential impacts associated with each of the Master Plan build alternatives was provided in the Executive Summary of the Supplement to the Draft EIS/EIR.

**PC02348-2**

**Comment:**

To what City would the taxes and proceeds benefit?

**Response:**

Please see Response to Comment PC02399-22 regarding fiscal impacts on jurisdictions near LAX.

**PC02348-3**

**Comment:**

And finally with this expansion won't it be creating more pollution than before and if it does how do you plan to help the problem?

**Response:**

Please see Topical Response TR-AQ-3 regarding air pollution increase.

**PC02348-4**

**Comment:**

Well thank you for your patients and time. I hope to hear from you soon and I also invite you come visit our St. Bernard community.



**Response:**  
Comment noted.

**PC02349 Williams, Richard None Provided 7/2/2001**

**PC02349-1**

**Comment:**  
As you embark on your service as Mayor of Los Angeles, I wish to express my deep concern about the proposed expansion of Los Angeles International Airport.

My wife and I have lived in Westchester for 35 years. We have witnessed the steady encroachment of LAX northward and eastward, displacing elements of our community and degrading our environment.

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

**PC02349-2**

**Comment:**  
All too often we have seen and heard huge aircraft roaring at full throttle over our neighborhoods, diverted from landing at the last moment because of air traffic congestion at LAX.

**Response:**  
The commentor resides more than one mile north of the east end of the north runway complex and beyond the confines of the surface area of the Class B airspace. The commentor may be seeing an arriving aircraft on 24R as a departure becomes airborne from the parallel runway 24L. The incidence of missed approaches from the north complex are exceptionally low. When they occur, missed approaches from the north runway complex are instructed by air traffic control to fly a heading of 250 degrees. This heading contains the aircraft within the airport boundary and assures it will not interact with an instrument departure from Santa Monica Airport. The missed approach aircraft must be contained within Class B airspace, thus, it is directed west of the LAX airport. The routine flight path would take the aircraft approximately fifteen miles west before being re-sequenced for another approach. The aircraft would be sequenced to cross the Santa Monica VOR similar to a normal instrument arrival from the west or northwest.

**PC02349-3**

**Comment:**  
Our major surface streets, especially Sepulveda Blvd., have become dangerous "racetracks", crowded with vehicles speeding to and from LAX, often endangering the lives of our local residents.

**Response:**  
Please see Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02349-4**

**Comment:**  
Several news articles have recently appeared in the local media concerning the hazards posed by "runway incursions" at overcrowded LAX. As you are aware, LAX has the worst record of any major airport in the United States for runway incursions involving a high risk of collision.

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Yet the expansion plan currently being proposed by LAX authorities would more than double the air cargo volume arriving at and departing from LAX. These additional flights would only increase the runway incursion dangers which already exist at LAX.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02349-5**

**Comment:**

Expansion of cargo operations at LAX would also result in further degradation of our overcrowded surface streets near the airport.

**Response:**

Please see Topical Response TR-ST-1 regarding cargo truck traffic (see Section 4, Neighborhood Impacts from Trucks). Alternative D, which is addressed in the Supplement to the Draft EIS/EIR, would not increase cargo handling facilities at LAX. As was indicated in Table S3-2 (page 3-23) of the Supplement to the Draft EIS/EIR, cargo operations are projected to increase to about 3,120,000 tons/year at LAX by 2015 under the No Action/No Project Alternative and Alternative D. The traffic impacts of this level of cargo activity were described in Section 4.3.2.6.1 (beginning on page 4-293) of the Draft EIS/EIR.

**PC02349-6**

**Comment:**

Bringing more cargo into LAX is a misguided approach! An equitable distribution of cargo operations among several airports in southern California can shorten the distances cargo must be trucked to its ultimate destination, thereby reducing the traffic impact on our freeways and surface streets.

**Response:**

Comment noted. Subsequent to the publication of the Draft EIS/EIR, a new alternative, Alternative D - Enhanced Safety and Security Plan, was added to the range of alternatives currently being considered for the LAX Master Plan. That alternative was evaluated in the Supplement to the Draft EIS/EIR. Alternative D, developed pursuant to the direction of Mayor Hahn, provides an emphasis on safety and security improvements and is designed to serve a future (2015) airport activity level comparable to that of the No Action/No Project Alternative. The Alternative D approach of not expanding the capacity of LAX is consistent with the SCAG Regional Transportation Plan (RTP) policy framework, which is intended to accommodate future regional aviation demand at airports other than LAX. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. For additional information, please see Topical Response TR-MP-2 regarding the SCAG Regional Transportation Plan and Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Please see Response to Comment PC00599-54 for more information about cargo activity.

**PC02349-7**

**Comment:**

The apparent desire by some members of your predecessor's administration to increase city revenues by greatly expanding LAX must not be allowed to endanger our citizens who live near the airport, nor to degrade their living environment any further. Los Angeles government officials must no longer tolerate the safety risks and environmental impacts which would result from LAX expansion.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental impacts both adverse and beneficial in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. Safety impacts were addressed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical

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Report 14c of the Draft EIS/EIR and S-9b of the Supplement to the Draft EIS/EIR. Please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

#### PC02349-8

**Comment:**

Mayor Hahn, I urge you to intervene against the proposed expansion plan by directing the LAX authorities to develop a new and downsized modernization plan which will correct the existing safety problems, but which will not expand air cargo operations at LAX.

**Response:**

Comment noted. Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity-including cargo activity-comparable to that of the No Action/No Project Alternative, and will make the airport safer and more secure, convenient, and efficient.

#### PC02349-9

**Comment:**

In addition, I urge you to lead the government of Los Angeles in the direction of working more effectively with other local governments to develop a regional plan which can accommodate future air traffic growth in a safe and equitable manner.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand and Topical Response TR-SAF-1 regarding aviation safety.

**PC02350**

**Williams, Rick**

**None Provided**

**4/12/2001**

#### PC02350-1

**Comment:**

I strongly support your motion to rezone the land which Los Angeles World Airports is acquiring from homeowners in the eastern part of Westchester, to provide some open space between LAX and our remaining residential neighborhoods.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed land use in Section 4.2, Land Use, with supporting technical data and analysis in Technical Reports 1 and S-1 of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, respectively. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

#### PC02350-2

**Comment:**

Westchester has been steadily eroded by the out-of-control growth of LAX, which has expanded ever-further into our community.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed land acquisition for each of the alternatives in Chapter 3 and Section 4.2, Land Use. Please see Topical Response TR-LU-2 regarding impacts to the Community of Westchester. Also note, as described in Section 4.2, Land Use

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(subsection 4.2.6.5), of the Supplement to the Draft EIS/EIR, in contrast to the other build alternatives, Alternative D (LAWA Staff's preferred alternative), does not propose any residential acquisition or acquisition within the Westchester Business District. As was described in Section 4.4.2, Relocation of Residences and Businesses, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, LAWA's programs for the acquisition of residences and business properties would conform to governing federal and State requirements for the payment of just compensation for the purchase of any needed property and applicable relocation assistance and payments will be provided to any person displaced from their home or business. Also please see Topical Response TR-RBR-1 regarding residential acquisition and relocation.

#### PC02350-3

**Comment:**

Our quality of life is seriously impacted by the aircraft and helicopter noise, increased surface street traffic, and the enormous amount of air pollution caused by Los Angeles International Airport.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; traffic impacts in Section 4.3, Surface Transportation; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-1 regarding impacts on quality of life.

#### PC02350-4

**Comment:**

The recent decisions of more than 500 homeowners in the Manchester Square and Belford neighborhoods of Westchester to be bought out by LAWA, and to uproot their families rather than continue living in their homes with improved noise insulation, is powerful evidence of the degraded living environment which exists near LAX.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

#### PC02350-5

**Comment:**

The establishment of open space as a buffer between LAX and our residential neighborhoods will make it a little easier for us to continue living near this out-of-control airport.

**Response:**

Comment noted. Please see Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR regarding land use compatibility. Also, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester.

**PC02351**

**Alpern, M.D.,  
Kenneth**

**None Provided**

**4/17/2001**

#### PC02351-1

**Comment:**

I'm very concerned about recent actions trying to prevent the establishment of a freeway rapid-access offramp from the 405 freeway to LAX. Although I personally have doubts about the wisdom of

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preventing LAX expansion (Palmdale ain't a place many folks, other than the anti-LAX activists, are gonna go, like it or not!), I respect the will of the majority to go in that direction.

I will take issue, however, with avoiding the correction of a decades-old error of linking the 405 with LAX. The lack of freeway access has made the 405 worse for wear with the congestion it causes, and does considerable harm to local communities flooded with cars (and their pollution) that must traverse surface streets to get to the airport. The argument that preventing access will prevent LAX expansion is a childish and thoughtless one, which flies in the face of all reason and foresight. Will this same argument be used to prevent the Green Line from linking with LAX as well?

Lets not throw the baby out with the bathwater: let's at least try to make LAX more attainable and make the West L.A. stretch of the 405 more drivable as well. I have been regularly attending meetings of the Mar Vista Community Council, and I intend to bring this up as an issue.

I feel it is important to the credibility of both Ms. Gallanter and all of those opposed to LAX expansion to not antagonize West L.A. (and, for that matter, L.A. in general) by preventing a long-overdue correction on the 405 from occurring. Especially since it is Ms. Gallanter who has been championing the Playa Vista development, which should be abandoned and converted into a state park encompassing all of the Ballona Wetlands.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed traffic impacts in Section 4.3, Surface Transportation, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Report S-2 of the Supplement to the Draft EIS/EIR.

**PC02351-2**

**Comment:**

Furthermore, I find it wholly inappopriate that those pushing the Palmdale airport idea are not more active on mass transit issues facing Los Angeles. For the Palmdale airport to work, a high speed rail would be needed to link LAX and/or Union Station with Palmdale. Ms. Gallanter, to date, has remained noncommittal on the Expo Line, a light rail that would link Santa Monica and the West Side to the MidCity area and the Red Line. Furthermore, it has been proposed that the Green Line be extended not only to LAX but to the Marina and beyond to further reduce the impact on the 405 (a large number of those living in Santa Monica, West L.A. and adjacent areas use LAX for their business needs).

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02351-3**

**Comment:**

I think MsGallanter and her constituents, in their enthusiasm to prevent LAX expansion, are at risk of antagonizing the constituents of Ms. Miscikowski and those in other L.A. districts and in other adjacent Southland cities. Please, everyone: let's not let this happen. Let's work together on this like adults, and compromise when appropriate for the well-being of everyone involved.

**Response:**

Comment noted.

**PC02352**

**Bobak, Juliet**

**None Provided**

**7/22/2001**

The content of this comment letter is identical to comment letter PC01566; please refer to the responses to comment letter PC01566.

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**PC02353**

**Delia, Toni**

**None Provided**

**7/22/2001**

**PC02353-1**

**Comment:**

I have lived here in the Westside (Mar Vista, Venice, PdR, Westchester areas) all my life. I have watched the beautiful fields that I enjoyed so much as a child be taken over by massive building.

**Response:**

Comment noted.

**PC02353-2**

**Comment:**

I have seen the traffic grow to a point that a simple drive from Playa del Rey to Marina del Rey can take up to 30 plus minutes.

**Response:**

Comment noted.

**PC02353-3**

**Comment:**

I have seen are air quality change to the point were I have to keep my windows closed due the pollution.

**Response:**

Please see Response to Comment PC00070-1.

**PC02353-4**

**Comment:**

I am a 48 year old married woman raised on Tivoli Ave, a graduate of Venice High School, was in the first class admitted to Marina del Rey Junior High, and like many of us in the area attended Short Ave. Elementary. So as you probably realize, I have seen numerous changes over the years. How much more can are small communities take? Where does it stop? They has to be an end to all of this. How much more of are quality of life is going to be taken from us? Why must be built and built to the point were our quality of life is compromised? These are family orientated areas, where families enjoy living and raising the families. Soon there will be nothing left if we don't stop. NO MORE we have had enough.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02353-5**

**Comment:**

Why not send some work and income to other areas of our state that need it. Why must it all be here?

**Response:**

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

**PC02353-6**

**Comment:**

This all has to stop before what all of us have worked so hard to achieve has been destroyed. I urge to do what is necessary to stop all of this. As you probably have gathered I feel very passionate about this. And I should, this is my home! Don't we all want to protect our homes from any harm? I am praying that we can; by stopping this expansion. Your help and help of others of position is needed. Help us!

**Response:**

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

**PC02354          Burns, Barbara          None Provided          9/23/2001**

The content of this comment letter is identical to comment letter PC02211; please refer to the responses to comment letter PC02211.

**PC02355          Burns, Bruce          None Provided          9/23/2001**

**PC02355-1**

**Comment:**

Los Angeles International Airport should not be expanded in any way.

LAWA is too small for the existing traffic and its airspace is dangerously crowded.

Especially now, since the terrorist attacks on September 11th, vital facilities like airports should be geographically dispersed and not concentrated in one location.

Please enter these comment into the public record.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, Topical Response TR-SAF-1 regarding aviation safety, and Topical Response TR-SEC-1 regarding security issues.

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**PC02356**      **Burns, Barbara G. & Bruce E.**      **None Provided**      **7/19/2001**

The content of this comment letter is identical to comment letters PC00824 and PC01524; please refer to the responses to comment letters PC00824 and PC01524.

**PC02357**      **Cassidy, Michael**      **Colliers/Seeley**      **8/8/2001**

**PC02357-1**

**Comment:**

Your comments are correct. A logical approach would be to reduce the number of operations per day until the incursions cease. The Airlines will continue to cram flights into LAX, 24 hours per day if we let them. There needs to be a cap on operations and a curfew at night. This will bring the most efficient aircraft to LAX and force excess demand elsewhere.

**Response:**

Comment noted. Please see Response to Comment PC00297-9 regarding dispersing LAX flights to secondary airports, and Response to Comment PC02218-6. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. It is airlines' decision to schedule and operate flights with their choice of aircraft. The decisions airlines make as to where and when to operate and their choice of aircraft are largely based on the markets they serve, passenger and cargo demands, and profitability. In other words, the airlines would fly where and when passengers want to fly to stay financially healthy and viable. It is not possible to control the interests of the flying public so there is no way to constrain the ways to meet the demand. Please see Response to Comment PC00297-9 regarding dispersing LAX flights to secondary airports.

**PC02357-2**

**Comment:**

The capacity of LAX is 150 operations per hour in good weather. They should be allowed to operate from 8:00am -10:00pm which is 14 hours and could allow for 2100 flights per day. To make LAX safer we should not operate at maximum capacity. A good cap would be 1500 operations per day.

**Response:**

The commentor's opinion that 1,500 operations per day would be a good cap is noted, however the airlines schedule flights at an airport based on passenger demand. It is the airlines' decision to schedule and operate flights. The decisions airlines make as to where and when to operate and their choice of aircraft are largely based on the markets they serve, passenger and cargo demands, and profitability. In other words, the airlines would fly where and when passengers want to fly to stay financially healthy and viable. In fact, passenger demand fluctuates throughout the day and there are a few times during the day the demand peaks.

One of the guiding principles in the LAX Master Plan proposal is to enhance the margin of safety for the LAX airfield while preparing the airfield and terminals to efficiently handle higher capacity passenger and cargo aircraft. Each of the Master Plan build alternatives proposes improvements on the airfield to increase operational efficiency and enhance safety. The improvements include runway extension, construction of a center taxiway between closely spaced parallel runways, and an upgrade of existing facilities and proposed construction of new facilities to provide sufficient taxiway clearness for all aircraft types. For a more detailed discussion on the airfield and safety improvements made under each of the Master Plan alternatives please see the Draft LAX Master Plan Chapter V, Section 3.3.1. Alternative D, the Enhanced Safety and Security Plan, has been added since publication of the Draft EIS/EIR in light of the events of September 11, 2001, and is specifically designed to protect airport users and crucial airport infrastructure, and to incorporate federal security recommendations as they are developed to the



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greatest extent possible. Please see Chapter 2, Section 2.1 of the Draft LAX Master Plan Addendum regarding the airfield and safety improvements associated with Alternative D.

#### PC02357-3

**Comment:**

Night time operations should be limited to 6:00am-8:00am and 10:00pm-12:pm in the westerly configuration only. A cap must be placed on these operations also to minimize the impact and allow for cancellation of operations when the airport cannot operate over the ocean. A good cap would be 120 for those periods.

**Response:**

Comment noted. The commentor suggests establishing new restrictions that would prohibit specific runways during certain periods. Federal laws and regulations severely restrict the ability of the FAA or a local airport sponsor to prohibit or restrict the number of aircraft operations as suggested in the comment. Please see Response to Comment PC00689-1 regarding the difficulty of implementing a curfew at LAX. Currently, there are no restrictions on the type of aircraft that may land or depart at LAX during the night hours. LAWA will be pursuing federal approval of a restriction to alleviate that situation by making over-ocean procedures mandatory when they are in effect between midnight and 6:30 a.m. As noted by the noise abatement procedures delineated in Topical Response TR-N-7, exceptions to the over-ocean procedures are available when weather or wind conditions require east traffic flow. Any noise or access restriction must comply with the Airport Noise and Capacity Act of 1990 and its implementing regulations found at 14 CFR Part 161.

#### PC02357-4

**Comment:**

1620 operations per day should keep the impact minimized in good and bad weather and make the entire LAX experience better. The airlines will just have to be more efficient and the rest of the region will automatically get the excess demand.

**Response:**

Comment noted. Please see Response to Comment PC02036-1 regarding the airport's ability to limit the number of operations and Response to Comment PC02218-6 regarding ability to limit future activity at the airport.

#### PC02357-5

**Comment:**

Caps will force LAX to be a good neighbor because we know they won't do it on their own.

**Response:**

Capping LAX operations or passenger levels would require an act of congress.

#### PC02358

**Ciancimino, Judith**

**None Provided**

**4/13/2001**

#### PC02358-1

**Comment:**

I spent the better part of yesterday in SCAG's boardroom listening to testimony on the Regional Transportation Plan, most of it having to do with LAX expansion. Everyone spoke of the burden of air travel and how the entire region should share it.

What I find really strange is, in the years that LAWA and Mayor Riordan have been trying to ram the Master Plan down our throats, they have always equated expansion to economic benefit. We have

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heard time and again that the survival of Los Angeles as a "World Class City" rests directly on the expansion of LAX!!! Since people who can think for themselves know that there will always be a LA and it will continue to be the great city it is today, don't you think it's time to share that incredible economic benefit with the entire Southern California region. It's time for Los Angeles to be a good neighbor and share passengers and cargo with everyone.

What do you say, don't you think it's time we let other cities benefit from air traffic and the dollars it represents?

**Response:**

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

**PC02359      Conn, Kathryn      None Provided      7/15/2001**

The content of this comment letter is identical to comment letter PC01082; please refer to the responses to comment letter PC01082.

**PC02360      Costa, Charlene      None Provided      6/14/2001**

**PC02360-1**

**Comment:**

I am a resident of Playa Serena on Pershing Drive. I am opposed to the proposed plan to allow Pershing Dr. to become an airport entrance for the expanded terminals.

I work at the airport and under the plan, Pershing Drive will be blocked off and all through traffic curtailed.

I hope there is something you can do to prevent this from happening.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Under Alternative D - the Enhanced Safety and Security Plan, the LAWA staff's preferred alternative, Pershing Drive would not be blocked from use by airport employees.

**PC02361      Cutolo, Lynn      None Provided      7/9/2001**

**PC02361-1**

**Comment:**

I have enjoyed living in Playa del Rey, and specifically in Playa Serena Condominiums, located at Pershing and Westchester Parkway, for twelve years. In the past five years, a marked increase in noise

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generated by LAX threatened the quality of life for myself and my neighbors. Recently, the Department of Airports sound proofed the development which has made a huge improvement to our peace of mind...but now I hear this was just a means to an end. LAX wants to expand and that would make living in this beach community a nightmare. Increased air pollution, enormous amounts of traffic, huge cement parking structures, and more noise than ever, would certainly lower real estate values and would make living here like living in the inner city...dirty, crowded and depressed. This is not what I signed up for when I purchased my condo in 1988, and I hope you will expend your energies to stop this expansion before it makes a mess out of a beautiful, peaceful community.

**Response:**

Comment noted. Overall, for the community of Westchester-Playa del Rey, the number of dwelling units that would be exposed to 65 CNEL or greater noise levels in 2015 would decrease under all of the build alternatives when compared to the 1996 baseline or Year 2000 conditions. The greatest reduction in dwelling units exposed to 65 CNEL or greater noise levels would occur under Alternative D, LAWA Staff's preferred alternative, with 4,431 fewer units exposed compared to the 1996 baseline and 2,589 fewer units exposed compared to Year 2000 conditions. Similarly, new analysis of single event noise levels presented in Section 4.1, Noise (subsection 4.1.6) and Section 4.2, Land Use (subsection 4.2.6) of the Supplement to the Draft EIS/EIR showed that the number of residential units in Westchester exposed to 94 SEL or greater noise levels would be reduced in 2015 under all of the alternatives when compared to 1996 and Year 2000 conditions. The greatest reduction in 94 SEL exposure or nighttime awakenings would occur under Alternative D, with 5,957 fewer units exposed compared to the 1996 baseline and 1,753 fewer units exposed compared to Year 2000 conditions. Also, see Topical Response TR-LU-2 regarding impacts to the community of Westchester, Topical Response TR-ES-1 regarding impacts to residential property values, Topical Response TR-AQ-3 regarding air pollution increase, and Subtopical Response TR-ST-2.21 regarding traffic impacts surrounding neighborhoods, and TR-ST-4 regarding surface traffic concerns.

**PC02362**

**Ernstoff, Michael**

**None Provided**

**7/22/2001**

**PC02362-1**

**Comment:**

When I purchased my home in the Mar Vista Section of Los Angeles, I very carefully selected a site which I thought would not subject me to significant aircraft noise. Currently, my home is not under any of the lower level approach or departure paths for LAX. Only on rare occurrences do we hear aircraft noise when planes executing "missed approach - go around" procedures for Santa Monica Municipal Airport pass over the house.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR.

**PC02362-2**

**Comment:**

According to Appendix D, Section 3.3, Figure 9, of the LAX expansion EIR, departure route D6RW will pass essentially directly over my home under all of the alternatives being considered. Although I'm not necessarily opposed to all aspects of airport expansion, I am opposed to one that places my home under a flight path.

Attached .gif file illustrates proposed flight paths over the Mar Vista area as shown in Figure 9 cited above. ( It is 91 Kbytes. ) Figure 2 of the same report (not attached) indicates no flight paths of the Mar Vista area.

**Response:**

Flight path D6RW is representative of a broader swath of the flight paths flown by a portion of the propeller driven aircraft that takeoff to the east on Runway 6R and turn to the north to exit the airport environs. It is projected to be used by 4 to 5 propeller aircraft per average day in 2015, regardless of the alternative selected. The track is not projected for use by jet aircraft. Non-turbojet aircraft departing

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runway 6R are required to fly the runway heading until the departure end of the runway (Sepulveda Blvd/Lincoln Blvd). Once past the departure end the aircraft is instructed to turn to a northeast heading of 040 degrees. The aircraft remains on this heading until approximately five miles northeast of the airport. The aircraft is then routed north or northwest, passing through the commentor's area, to join Victor Airway 23 slightly south of the Van Nuys VOR near the 405 and 101 freeways.

#### PC02362-3

##### Comment:

Please continue your efforts to limit airport expansion. Please register this as a comment on the LAX expansion EIR.

##### Response:

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

#### PC02363

**No Author Identified, None Provided**

**6/13/2001**

#### PC02363-1

##### Comment:

I have lived in PDR for 11 years on Pershing Drive. I have raised my children there and if the City continues on its present course PDR will be destroyed. Between Playa Vista and the LAX Expansion PDR will in no way provide the quality of life it does today.

##### Response:

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

#### PC02363-2

##### Comment:

As I understand one the proposed LAX expansion plans calls for Pershing Drive to be blocked off and used as an entrance for an LAX terminal. My family and I live on Pershing. This must not be allowed or even considered.

DO NOT ALLOW THE LAX EXPANSION ONTO PERSHING DR.. MY FAMILY AND I ARE COUNTING ON YOUR SUPPORT.

##### Response:

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00018-30 for a discussion of Pershing Drive. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D would not alter the existing Pershing Drive.

#### PC02364

**Irwin, Thomas**

**None Provided**

**7/27/2001**

#### PC02364-1

##### Comment:

dear Ruth my name is Tom Irwin and I'm not very good with computers but I want to respond to a email from your office. let me give you some of my history. I grew up in Westchester at 7355 w.83 st. went

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to lyola village elm. school when the noise of the la airport from aircraft disrupted my class room and my sleep. went to orville wright jr.high and on to Westchester high. during that time I saw a lot of my friends lose there homes from the airport expansion and was very sad to lose those places were I could leave my surf board. also I used to ride my dirt bike in the beenfields as we called them had a wonderfull time growing up I understand that we needed to protect that land because we were abusing it and im glad it's fenced and protected for now. I live In van nuys now and commute to LAX were I haved worked since 2/20/79 for flying tigers and fed ex as a sr. aircraft maint. tech. this is my bread an butter for my family. but I extremely oppose of any expansion for safety and the enviornment

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed environmental impacts both adverse and beneficial in Chapter 4, Affected Environment, Consequences, and Mitigation Measures. Safety impacts were addressed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14c of the Draft EIS/EIR and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02364-2**

**Comment:**

traffic is out of control comming down culver and on to pershing on to world way west where I work there is no possible way for that route to handle any more without fatalities on those roads.

**Response:**

Comment noted.

**PC02364-3**

**Comment:**

I support the idea of a rail north to the bay area and would pay my taxes for it.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02364-4**

**Comment:**

MY WISH IS FOR NO LAX EXPANSION good luck and look for my support

**Response:**

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

**PC02365**

**Klingberg, Paul**

**None Provided**

**7/15/2001**

The content of this comment letter is identical to comment letter PC01062; please refer to the responses to comment letter PC01062.

### 3. Comments and Responses

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**PC02366      Lathrop, Bruce      None Provided      8/7/2001**

**PC02366-1**

**Comment:**

Interesting to read this on the day I experienced a go-around on United Flight 117 from Chicago to LAX, around 2:00 p.m. We were about 500 feet up when it took place. The first officer later explained "there was traffic on the runaway." He said it casually enough that it didn't seem to occur to my fellow passengers that either the pilots or a controller were once again thanking the Almighty that calamity was avoided.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 regarding aviation safety.

**PC02367      McDaniel, Gary      None Provided      5/9/2001**

**PC02367-1**

**Comment:**

Reduce Santa Monica airport takeoff noise for Venice residents. No jets at Night or in the AM before 9:00. They can use LAX if they need to take off in the early AM or in the night time hours.

**Response:**

Comment noted.

**PC02368      Niederman, Aharon,      None Provided      6/9/2001**  
**Janet, Hannah &**  
**Ron**

**PC02368-1**

**Comment:**

As a family residing near LAX we are already suffering from the noise and air pollutio.

Please help us to stop the expansion of LAX

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02368-2**

**Comment:**

The family that wakes up at night from airplane noise on a regular basis.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings in homes associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. Please see Topical Response TR-N-5 regarding nighttime aircraft operations.

**PC02369**

**Padilpsky, Michael**

**None Provided**

**6/12/2001**

**PC02369-1**

**Comment:**

This is the unretouched statement I merely handed in at the LAX dog-and-pony show last Saturday despite the fact that I didn't expect any response beyond a form letter because I'd composed it under the impression that speakers were to have 5 minutes rather than the 3 it turned out to be, so it didn't seem worth waiting around to confirm my expectation that they would cut me off once I got going (although I have removed my letterhead since it wouldn't have survived the "copying and pasting").

**Response:**

Due to the extensive amount of public speakers at all of the hearings conducted to receive input on the LAX expansion project, the 3 minute rule was established so as to maximize the amount of public participation. In addition to comments received at hearings, LAWA has accepted extensive written comments and is responding to each oral and written comment within this Final EIS/EIR.

**PC02369-2**

**Comment:**

If anybody does read it this time, my compliments to Councillor Galanter and here's some further ammunition in the war on LAX expansion. In addition to the personal point I make, there's also a major abstract point about "the EIR", though I hope she's already well aware of the fact that government-sponsored "studies" at all levels of government almost invariably reflect the desires of the sponsors in their findings; if not, she certainly should be by now, anyway. Unfortunately, I don't have any evidence that would stand up in court, but my 13 years with an "FCRC" left me utterly convinced that EIRs can't be trusted. (As I like to put it, not only don't I have to eat a whole egg to know it's rotten, given my experience I can tell by the shell. And as suggested in my statement, we can pretty much tell a priori that the current LAX expansion EIR is a bad egg without even needing to rebut it in detail.)

At any rate, herewith the statement, as submitted:

**Response:**

Comment noted.

**PC02369-3**

**Comment:**

My name is Michael Padlipsky. If I wanted to, I could lay claim to Westchester residency since 1946 when my parents moved me into the then brand-new house I am again living in now, despite having spent almost all my time from mid-1956 to mid-1989 elsewhere. As will be seen, my childhood years here bear some relevance to the current proceedings, but first I'd like to address the relevance of the intervening years.

**Response:**

Comment noted.

### 3. Comments and Responses

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#### PC02369-4

**Comment:**

A number of those years were spent in the employ of a "Federal Contract Research Center", another branch of which performed environmental impact studies, so I came to know a fair amount about just how UN-objective and "political" environmental impact reports can be. Based on that experience, I feel quite strongly that I don't even need to see the latest "EIR" on the airport to know that it's inadequate: the simple fact that we're here implies it, for if it were adequate, expansion would not be permitted and contraction would probably be mandated.

**Response:**

Comment noted.

#### PC02369-5

**Comment:**

That might seem somewhat superficial, so let me expand on it a bit. I only have one degree from MIT and it's only a Bachelor's and not even in Chemistry, so I can't claim expert status, but it's abundantly clear to me that given the airports current traffic load merely the byproducts of the combustion of fuel must be adding so much "gunk" into the surrounding air that if the planes were fuelled by tobacco the state of California in its self-assumed wisdom would ban the airport entirely. (By the way, the metaphor was chosen merely to emphasize how political such matters are, at bottom; but I must say that as a smoker, I'd far rather be subjected to "second-hand smoke" up close than to jet-engine exhaust fumes a mile or two away because I have studied just how phony the statistics are which have been used to persecute that particular minority of mine.) All I have to do is look at my front porch to know what a messy neighbor LAX is: the oily, dusty residue on it isn't coming f!

!rom my car in the driveway, after all.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-1 regarding air pollutant deposition.

#### PC02369-6

**Comment:**

But others are presumably better qualified to address the issues of physical pollution; where my own background, particularly having been a child here, really comes into play is in the area of what might be called psychological pollution. For the very first time the airport expanded, which I back-calculate must have been in late 1953 or early 1954, among the houses that were torn down was the one in which the first great unrequited love of my life lived. Her family wound up moving out to Reseda, and it was so difficult to get there from here by public transportation that I only recall seeing her once during the three years between their departure and my high-school prom, which I'd promised myself I'd take her to when we graduated from junior high school and did manage to achieve. It's an overstatement I won't make to claim that LAX ruined my life, but without going into inappropriate detail beyond mentioning that I found it particularly appealing that she went on to graduate!

!e from Stanford at 19 and then to Harvard Med, it's quite fair to say that at some level I never got over the impact of its first expansion.

The point should be clear: There is a "human cost" to expansions of LAX, and even if this time--again, I can't be bothered to dig out the details--all that's targeted turns out to be commercial property rather



### 3. Comments and Responses

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than more family homes, people's lives will be changed as a consequence of the expansion . . . and not for the better. (Nor should the literal threat to life and limb engendered by all the "airport shuttles" charging along Sepulveda be overlooked, speaking of human costs.)

Despite the MIT degree, by the way, one of the other things I did during my out of Westchester years was to teach Freshman Composition for a time, so I feel obligated to conclude by pointing out that there might appear to be a bit of "special pleading" associated with the psychological pollution argument, and I cheerfully admit to "always" having had a grudge against the airport ever since it cost me Andrea, but I really do believe it generalizes: when families, or even businesses, are forced to leave a vicinity, the area at some very real level IS diminished for those who remain in the vicinity, irrespective of whether the displaced entities wind up in a "better place" or not.

Another way of putting it, perhaps not too fanciful, is that in my considered opinion and after having been exposed to it for some 55 years, LAX does foul the air, both literally and spiritually.

**Response:**

Comment noted. Please see Topical Response TR-LU-1 regarding impacts on quality of life.

**PC02370          Rodgers, Ronald          None Provided          7/19/2001**

**PC02370-1**

**Comment:**

I was against fencing in the area west of the airport to support the blue butterfly -- they must be rare because in the 30-years I've been in Playa del Rey, I have yet to see one. This area proudly displays your name as a driving force behind this project, but have you seen it lately? It is not used for recreational purposes, but as a smelly, unkept trash lot.

This is sad and typical of bad government --

**Response:**

Please see Topical Response TR-ET-1 regarding potential impacts to the El Segundo blue butterfly.

**PC02371          Schaffer, Tony          None Provided          8/7/2001**

**PC02371-1**

**Comment:**

I am failing to see the justification of your position regarding LAX. It is my understanding that staff at LAX is recommending Alternative C to the Master Plan which involves modifying LAX to include the larger capacity planes which are already in production. The hitch here is that the distance between runways need to be widen and that will in turn affect the area where In & Out Burger is located only. Staff is also recommending that a regional approach be taken in conjunction with these modifications to help spread the traffic load throughout Southern California.

So what is wrong with this? What are you opposing? Do you want LAX to scale back its mission by not being an international airport and just be a regional airport? What are you offering as an alternative? Finally, why are you fighting the very department you are overseeing on your Council committee? It seems more effective to work with the department to see what the community want is enacted.

**Response:**

Comment noted.

### 3. Comments and Responses

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**PC02372      Schiller, Stephen      Foundation Financial, Inc.      8/8/2001**

**PC02372-1**

**Comment:**

If the Palmdale Airport were to be expanded to accommodate Cargo and/or Passenger volume how will the access roads and light rail be expanded to accommodate this increased flow? The 14 freeway is the primary route in and out of there and light rail is desperately needed to handle the traffic volume that is already there. Most L.A. residents are reluctant to drive all the way there and back to pick up passengers. I am positive, though, that if light rail were available then that attitude would change dramatically and quickly.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02373      Schneider, Denny      None Provided      4/10/2001**

**PC02373-1**

**Comment:**

Comments to the January 2001 MTA Draft Long Range Transportation Plan for Los Angeles County (E-Transmitted April 11, 2001)

Summary

Continuing in a "business as usual" mode will no longer work. The underlying assumption throughout the LRTP is that automobile transportation will continue as the primary, preferred mode of transportation, and that changing public attitudes toward increased use of mass transit is impractical. We will never improve (or even keep the present) quality of life without a major campaign of change. Building a mass transit system is not just desirable, it is a must.

**Response:**

Comment noted. This suggested concept of improving mass transit is very similar to the new Enhanced Safety and Security Plan, Alternative D, which was analyzed in detail in the Supplement to the Draft EIS/EIR. The proposed Alternative D includes an extension to the Green Line and a people mover train to transport passengers across airport property.

**PC02373-2**

**Comment:**

The airport area is already overburdened by traffic even without implementing the Master Plan Expansion requested by LAWA. MTA MUST TAKE A STRONG STAND IN OPPOSITION.

We recognize that this plan is a work in process and hope that major modifications will still be added before release. THE STATUS QUO WILL LEAVE THE SAN DIEGO FREEWAY LOOKING MORE LIKE A PERPETUAL PARKING LOT. The 1998 map included in the LRTP already shows that traffic is less than 20 MPH during commute times and is expected to go down.

MTA should increase visibility of project plans so that the public can determine the impact of planned projects on their communities.

General Comments

The LRTP states that Los Angeles is recognized as the most congested metropolitan area in the nation and will only be getting far worse. Traffic congestion IS ALREADY a major issue facing Los Angeles City/County. Lost productivity and increased pollution from people sitting in traffic is accelerating.

The overriding plan theme is "doom and gloom"-not enough money for projects and no relief in sight. MORE IMAGINATIVE, INNOVATIVE PROJECTS ARE MANDATORY. Expanding auto traffic capacity is insufficient. WE NEED LIGHT RAIL-NOW along with a convenient, efficient tiered bus system THROUGHOUT the city. MTA already owns many rail line rights which could be converted as well as along the centers of freeways. We need to regress 70 years to when a rapid transit system existed in Los Angeles.

Foremost in the minds of most of us in Westchester-Playa del Rey and Inglewood areas (and the rest of the West Side) is concern about LAX expansion. MTA, LIKE SCAG, MUST TAKE A STAND AGAINST EXPANDING LAX. The attendant traffic and pollution will be horrific. Even if LAX can get the cars and trucks out of the airport facilities they are still being added to an already overtaxed arterial and freeway system. Without the proposed LAX Master Plan expansion about 10 million more cars annually will be added to the surrounding areas along with increased numbers of trucks carrying freight! Implementing expansion causes the number of cars added to go up many times and also adds thousands of trucks resulting from doubling freight to 4.3 million annual tons. The LRTP report says that truck lanes are being studied, but the cost is not feasible.

**Response:**

Comment noted. Alternative D is designed to constrain the traffic at LAX to a level commensurate with the No Action/No Project Alternative. Please see Topical Response TR-ST-5, (see Subtopical Response TR-ST-5.3 on Transit) for information on the rail and transit plan. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Air quality impacts were presented in Section 4.6, Air Quality. In addition, please see Topical Response TR-MP-1 regarding air cargo activity and demand and Topical Response TR-ST-1 regarding cargo truck traffic.

**PC02373-3**

**Comment:**

The resultant traffic increases from LAX is major health impact on the surround areas due to increased pollution.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR address air quality in Section 4.6, Air Quality, traffic in Section 4.3, Surface Transportation, and human health and safety in Section 4.24, Human Health and Safety. Supporting technical data and analyses are provided in Appendix G, and Technical Reports 2, 3, 4, 14a, and 14c of the Draft EIS/EIR and Appendix S-E, and Technical Reports S-2a, S-2b, S-4, S-9a and S-9b of the Supplement to the Draft EIS/EIR.

In addition, please see Topical Response TR-HRA-2 regarding airport emissions and link with adverse health effects, Topical Response TR-HRA-3 regarding human health impacts, Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-ST-4 regarding airport area traffic concerns.

The Draft EIS/EIR and the Supplement to the Draft EIS/EIR evaluated the potential risk of adverse health effects for each of the Master Plan Alternatives based on the emissions associated with each of the alternatives. The No Project/No Action Alternative assumes that no substantial changes are made to current LAX facilities, and is based on projections of growth in airport activity between 1996 and horizon year 2015. Airport congestion during this time is expected to grow worse without additional capital improvement. In all cases, build alternatives are expected to relieve current and predicted future congestion by making airport operations, particularly aircraft operations, more efficient.

After implementation of mitigation measures, the build alternatives would reduce predicted impacts to human health compared with the No Project/No Action Alternative. Implementation of any of the build alternatives is therefore anticipated to reduce future health impacts for most people living, working or going to school near the airport. However, as was indicated in the Supplement to the Draft EIS/EIR, predicted chronic non-cancer human health impacts for maximally exposed residents under Alternatives B and C are slightly higher for some areas than those predicted with the No Project/No Action Alternative.

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#### PC02373-4

**Comment:**

Another 405-freeway exit at Arbor Vitae coupled with the proposed LAX Connector Road is a recipe for disaster-more cars, more pollution, and more environmental injustice. Construction of this off-ramp will cause the removal a large number of minorities and lower income people from their homes. This is yet another example of a Title VI violation. The proposed route of the LAX Connector Road is ill-conceived and would even destroy properties designated as national historic.

**Response:**

The proposed expressway would not generate more cars, rather, it would accommodate an already expected increase in the number of travelers projected for LAX in the year 2015. Air quality impacts resulting from construction of the proposed expressway are discussed in Section 5.5, Air Quality, of Appendix K. The impacts to minority populations and low-income bracket families are discussed in Section 5.3.1.5, Relocation of Residents and Businesses, of Appendix K. The number of minority and/or low income status of the individual occupants of the residential and business properties potentially affected will be determined at the Caltrans Project Development process and CEQA review stage. Please refer to Topical Response TR-APPK-1 for clarification on supplemental CEQA analysis. Impacts to nationally historic properties are addressed in Section 5.15, Cultural Resources, in Appendix K. Subsequent to the publication of the 2001 Draft EIS/EIR, Alternative D, the subject of the Supplement to the Draft EIS/EIR, was prepared and does not include the LAX Expressway or the proposed ring road. Alternative D, Enhanced Safety and Security Plan, is the LAWA staff preferred alternative. The Federal Highway Administration has withdrawn its support for a partial interchange at Arbor Vitae. FHWA policy does not permit the agency from approving less than full complete interchanges. Further, the proposed Arbor Vitae interchange is not part of the LAX Master Plan.

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

#### PC02373-5

**Comment:**

The limited mitigation for our area, the Westside Sub-region, around LAX airport has resulted in even far less livable conditions. Our area, for example, is the only section of 405-freeway without a sound wall visible for miles. Section 3 of the draft says that these are implemented.

**Response:**

Comment noted. Please see Section 5.6, Noise, Appendix K Supplemental Environmental Evaluation for LAX Expressway and State Route 1 Improvements of the Draft EIS/EIR for a review of potential noise abatement measures.

#### PC02373-6

**Comment:**

Major north-south arterials (such as Lincoln and Sepulveda Boulevards) are already bumper-to-bumper many hours of the day in both directions. Arterial expansion projects planned as "mitigation" due to massive local development and/or LAX traffic growth will not improve present conditions. Expansion of Lincoln Boulevard, for instance, calls for removing sidewalks and the median. Old time residents remind us that the median was added to reduce frequent traffic accidents.

Coordination with SCAG and utilization of this LRTP as an input to SCAG's RTP is appropriate (and necessary). I understand that the environmental reviews used in this report show mitigation is not practical in many cases. Further, SCAG's report is using newly released population, employment, and environmental data not addressed by MTA.

### 3. Comments and Responses

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Since this is a general plan without specific project details it is very frustrating to review those sections addressing aviation travel and related ground transportation issues for local impacts. Data is hard to find and we understand that decisions are still being contemplated-even after the close of the draft comment period. It is like aiming at a moving target while wearing a blindfold.

Insufficient information is contained in the documentation to assess the relative merits (and true public/private costs) of alternative transportation initiatives. Ridership mode percentages are assumed to be relatively inelastic in presented analyses, not habit modifiable. Cost per passenger mile relating auto versus bus versus light rail is not readily comparable.

I will note that in the Westchester area bus service is very limited and relatively inaccessible. A quick survey of many friends, neighbors, and acquaintances revealed not one person had been on a bus recently. The major reasons given were "it doesn't go where I want to go," "bus frequency is inconvenient," or "I'm not willing to walk many blocks to get to a bus."

We urge you to revise the plan to increase mass transit plans in all areas. Accept that the problems will not be solved without forward thinking. Accept that things will get worse in the short run, but commit to projects that will improve conditions in the overall.

Thanks for your consideration. Even though this plan is not completed it is time to start working on the next.

**Response:**

Comment noted. The technical analysis used conservative transit mode splits to create a "worst case" scenario for roadway impacts. Significant focus is placed on improving transit under each of the Master Plan alternatives. In all likelihood, this will result in higher market shares for transit than is assumed for the "worst case" technical analysis. Please see Topical Response TR-ST-5 regarding the rail/transit plan, particularly Subtopical Response TR-ST-5.4, for more information. The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02374**

**Shehab, Susan**

**None Provided**

**7/26/2001**

**PC02374-1**

**Comment:**

I have been a resident of Play del Rey for about 17 years. I have been very happy here. About 1 1/2 years ago I purchased a condo on Manitoba Street between Pershing and Falmouth. I was told that there would be no airport expansion in this area and our condos would be. Lately I am hearing that may not be so.

Does anyone realize how much of a fight they would be up against to consider this option? As you probably know we are like a small town here. That is the beauty of this area. I am not thrilled with Playa Vista going in, but it looks like we have no choice on that subject. As long as there is no building West of Lincoln I

feel that we will be okay. I also feel that we are not informed enough on some projects going on in this area.

1)As you know "The Polynesian" apartment building has been torn down and "Acapulco" restaurant has closed it's doors. The first story I heard {from the Argonaut about 1 year ago} was that apartments were being built. The latest story is now Condos. Which is it? And what is happening on the corner where Acapulco was?

2)"Tokai Bank" has been closed for some months now. The Hanan family wants to build condos. Is "JT's" restaurant going also? We are not receiving straight forward information on any of these subjects. And, as citizens of this area we all feel that we need better and more precise information.

### 3. Comments and Responses

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**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed property acquisition/relocation in Section 4.4.2, Relocation of Residences or Businesses. In addition, please see Topical Response TR-PO-1 regarding the public hearing process. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D does not include any residential acquisition.

**PC02374-2**

**Comment:**

3) The airport soundproofing. None of us can get a return phone call from anyone there!!! We want our units soundproofed. Evidently we were given two proposals. The first one was a very complete proposal. And the second one was less that what they proposed the first time. We want what they first proposed for our complex, that is why our Home Owner Association rejected the second one and we have not been able to get what everyone else is getting and allot of us here want.

**Response:**

This is not a comment on the contents of the Draft EIS/EIR; however a description of the ANMP is provided under Topical Response TR-LU-3, including contact information for jurisdictions that administer the residential soundproofing program.

**PC02374-3**

**Comment:**

4) Is there a neighborhood committee for Playa del Rey? If not we want to form a committee. We are very interested in what goes on in Playa del Rey. This is our home. For most of us, it is our permanent home.

Thank you for taking the time to read this letter. I hope I get a response back. This is very important to all of us, as I am sure you know.

**Response:**

Responses to comments submitted on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR are provided in this Final EIS/EIR. Please see Responses to Comments PC02374-1 and PC02374-2 above.

**PC02375**

**Shumaker, Deborah None Provided**

**7/7/2001**

**PC02375-1**

**Comment:**

As a long time resident of Westchester, I would like to state that I agree that LAX is in dire need of modernization, however, not at the expense of local businesses and homeowners.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed residential and business relocations in Section 4.4.2. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. As indicated in TR-LU-2, Alternative D does not include any residential acquisition or acquisition within the Westchester business district.

**PC02375-2**

**Comment:**

We can only hope and want Orange County to do its part in providing additional airports for their residents. El Toro would make a great location. However, lets be realistic and understand we cannot count on Orange County to do their fair share.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02375-3**

**Comment:**

We can only count on us to do what is right. Either way, this is a very emotional issue for those of us that live here. Yes, the Airport was here when I bought my house. Yes, I learned to accept the noise and traffic. But I will not accept increasing the size of LAX.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D and Technical Reports 1, 2, and 3 of the Draft EIS/EIR and Appendix S-C and Technical Reports S-1, S-2a, and S-2b of the Supplement to the Draft EIS/EIR.

**PC02375-4**

**Comment:**

LAX is large enough to handle the anticipated growth in passenger traffic. The current and projected growth in freight is unacceptable. Move freight out of LAX to the outlying airports of Palmdale and Ontario where there is either the infrastructure in place or can be easily built to accommodate this traffic.

**Response:**

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

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand, for information on El Toro, John Wayne Airport, and Ontario International Airport, and Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

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#### **PC02375-5**

**Comment:**

Provide incentives to businesses to fly in and out of these Airports. Lower landing fees or provide tax incentives to the airlines and businesses that would prosper from this alternative to LAX. These are all viable options to expanding LAX from its current footprint.

**Response:**

The landing fees and terminal rentals at a given airport typically represent between 4 and 6 percent of an airline's cost to operate at that airport. Differential pricing between airports in a region would be a minor factor among the many that an airline would consider when deciding whether to provide service to a given airport.

#### **PC02375-6**

**Comment:**

The proposed LAX expansion doubles freight traffic in and out of LAX. Where there is freight, there will be more trucks to move this cargo to its destination.

**Response:**

Please see Topical Response TR-ST-1 regarding cargo truck traffic. Alternative D, which was addressed in the Supplement to the Draft EIS/EIR, would not increase cargo handling facilities at LAX. As was indicated in Table S3-2 (page 3-23) of the Supplement to the Draft EIS/EIR, cargo operations are projected to increase to about 3,120,000 tons/year at LAX by 2015 under the No Action/No Project Alternative and Alternative D. The traffic impacts of this level of cargo activity were described in Section 4.3.2.6.1 (beginning on page 4-293) of the Draft EIS/EIR.

#### **PC02375-7**

**Comment:**

The plan also includes additional freight terminals at the North/East end of the proposed expansion. This area will already be hard hit, if the proposed plan is approved, by the removal of 57 homes. For those of us that would be remaining, we would be subject to additional noise, traffic and air pollution from this growth.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed impacts regarding land use and relocation in Section 4.2, Land Use, and 4.4.2, Relocation of Residences or Businesses, respectively, and supporting documentation is provided in Technical Reports 1 and S-1. In addition, the Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; traffic impacts in Section 4.3, Surface Transportation; and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In contrast to the other build alternatives, no residential acquisition is proposed under LAWA Staff's new preferred alternative, Alternative D. See also Topical Response TR-LU-2 regarding impacts to the community of Westchester and Topical Response TR-LU-1 regarding overall impacts to adjacent communities.

#### **PC02375-8**

**Comment:**

The proposed airport ring road and LAX Expressway are fundamentally flawed in their design. The ring road as designed, goes in a counter clockwise direction. For the 105 freeway and the proposed LAX Expressway, to handle traffic effectively and efficiently, the use of Imperial Highway, Pershing and



### 3. Comments and Responses

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Westchester Parkway should be in a clockwise direction to enter LAX. This would eliminate the need for a complete ring road as proposed. The traffic could enter and exit LAX within its current boundaries.

**Response:**

The Ring Road is planned to allow two-way traffic. It is not counter-clockwise as the commentor implies.

**PC02375-9**

**Comment:**

The LAWA Master Plan assumes that the traffic on the 405 freeway is all LAX bound. The 405 freeway is the only Northbound/Southbound route available on the Westside. Without adding additional Northbound/Southbound freeways, how is the proposed LAX expansion plan going to improve the current traffic situation on the 405 freeway?

**Response:**

Please see Topical Response TR-ST-4 regarding airport area traffic concerns and Topical Response TR-ST-2 regarding surface transportation analysis methodology.

**PC02375-10**

**Comment:**

I attended the Public Hearing on June 9, 2001 and to my dismay, the two representatives there from LAWA did not even live in the City of Los Angeles. How can someone that does not live in the city be objective in their views on this matter? We hear all this talk of a regional approach to air traffic, but those representing LAWA have their own personal agenda. If asked, they are most likely against any additional airports in Orange County. Keep all the noise and pollution in someone else's backyard would be their desire.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed noise impacts in Section 4.1, Noise, and Section 4.2, Land Use, and air quality in Section 4.6, Air Quality. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1 and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E and Technical Reports S-1 and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand, and Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02376**

**Shumaker, Deborah None Provided**

**7/21/2001**

**PC02376-1**

**Comment:**

I would like to thank you for your continued support of a Regional Airport Transportation Plan.

**Response:**

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

**PC02376-2**

**Comment:**

As a long time resident of Westchester, I truly believe that this a regional issue and the burden of air travel and commerce should not be shouldered by the communities directly surrounding LAX.

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**Response:**

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

**PC02376-3**

**Comment:**

Traffic in and around the area is unbearable at best and the proposed plan does nothing to mitigate this.

**Response:**

The surface transportation impacts of the Master Plan alternatives were presented in Section 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. Please see Response to Comment AL00043-3 regarding proposed traffic improvements for off-airport roadways. Regarding existing traffic concerns surrounding LAX, percent contribution of airport traffic in the adjacent communities, and how traffic conditions around the airport would change with implementation of the Master Plan Alternatives, please see Topical Response TR-ST-4 regarding airport area traffic concerns.

**PC02376-4**

**Comment:**

I am however, a little concerned with the selection of Airport Commissioners announce by Mayor Hahn. If Hahn is telling the truth that he is in favor of a regional plan and his selection was to have a balance of new and old faces, then this might work. I am a little suspicious of anything coming from the Mayor's office however. During his campaign he did not court the Westchester Community like his opponent. He still needs to gain my support.

Hahn's extension of the comment period and increased public hearings is a step in the right direction.

I guess time will only tell.

**Response:**

Comment noted. Pursuant to the direction of Mayor Hahn, Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. A description of Alternative D was provided in Chapter 3, Alternatives, of the Supplement to the Draft EIS/EIR. Additionally, the environmental impacts specific to Alternative D are fully addressed in the Supplement to the Draft EIS/EIR.

**PC02377**

**Smith, Daniel &  
Kathy Bristow**

**None Provided**

**6/10/2001**

**PC02377-1**

**Comment:**

My wife and I attended the LAX expansion hearings yesterday (June 9, 2001) and we are writing to encourage you to continue your fight against LAX expansion. We believe the speakers representing

### 3. Comments and Responses

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dozens of communities surrounding LAX and in LAX's flight path articulated the case against LAX expansion and for a regional solution much better than we could in a short email. However, we did see the blank, dispassionate faces of the bureaucrats from LAWA sitting at the front of the ballroom as the community voiced its concerns, and we felt a chill. It looked as though the LAWA officials would ignore the will of the community in a heartbeat if our elected officials allowed them to do so. We drive past Playa Vista on automobile-choked Lincoln Boulevard and are saddened when we think how the voices of the community were ignored and a gigantic eyesore is now being built.

We are terribly concerned that LAWA, the FAA, the City of Los Angeles, and the State of California will ignore the legitimate concerns of the community and expand LAX at the urging of the airlines, air cargo companies and broader business community.

Please do everything in your power to fight the expansion of LAX.

**Response:**

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

**PC02377-2**

**Comment:**

LAWA, the FAA the City of Los Angeles, the airlines and air cargo companies must be forced to forego the easy solution and implement a regional solution which spreads airport capacity and environmental impacts of that capacity throughout the region.

**Response:**

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

**PC02378**

**Smith, Marcia &  
Roger**

**None Provided**

**6/13/2001**

**PC02378-1**

**Comment:**

As two of your longtime supporters, we urge you to fight the LAX expansion, especially regarding the Pershing Drive airport entrance. Let's preserve what is left of Playa del Rey. Thank you for your time and efforts on this issue.

**Response:**

Comment noted. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. Please refer to Response to Comment AL00018-30 for a discussion of Pershing Drive. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Alternative D would not alter the existing Pershing Drive.



**Response:**

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

**PC02381-2**

**Comment:**

(2) There is insufficient planning for regional mass transit initiatives by either the LAX Expansion EIR/EIS and by its opponents - there is no expanded Green Line to LAX, the Westside and the South Bay to reduce local pollution and traffic.

**Response:**

Comment noted. Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02381-3**

**Comment:**

(3) There is no mass transit initiative connecting LAX to a statewide high-speed rail grid to reduce unnecessary intrastate high speed air travel.

**Response:**

Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02382**

**Callahan, J. Dianne**      **None Provided**

**7/24/2001**

**PC02382-1**

**Comment:**

This plan is so absurd it is beyond comprehension as to how it got this far. All bets are off on this airport. They have renigged on every promise made re: expansion.

**Response:**

Comment noted.

**PC02382-2**

**Comment:**

What about those poor people in the Valley? Why should they have to drive to LAX to get "out of town"?

**Response:**

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

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**PC02382-3**

**Comment:**

John Wayne Airport charges double for some flights. Naturally the passengers fly out of LAX.

**Response:**

Please see Response to Comment PC01583-10.

**PC02382-4**

**Comment:**

What's wrong with our political leaders who forgo the wish of the people & ignore common sense & practical business policies? What's in it for them that we don't know about. The stupidity that prevails around LAX is mind boggling!

**Response:**

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

**PC02382-5**

**Comment:**

Look at the Green Line. It doesn't come anywhere near LAX. Who made that decision & why?

**Response:**

Comment noted. The decision not to extend the Green Line into the airport was likely a mutual decision between the Metropolitan Transportation Authority (MTA) and LAWA.

**PC02382-6**

**Comment:**

Much more of this self serving practice will result in total rebellion.

**Response:**

Comment noted.

**PC02383**

**Boyiazis, Nick**

**None Provided**

**5/23/2001**

**PC02383-1**

**Comment:**

I have enclosed six comments that I want directed to the proper entities.

I would like to thank you for your efforts to limit the airport expansions at Los Angeles International.

**Response:**

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

**PC02383-2**

The attachments included as part of this comment letter are identical to comment letters PC00061 through PC00066; please refer to the responses to comment letters PC00061 through PC00066.

**PC02384      Bobak, Juliet                  None Provided                                  7/22/2001**

**PC02384-1**

**Comment:**

I am forwarding 3 separate letters to Jim Richie regarding the LAX Master Plan/Draft EIR: a two-page letter signed by my husband Martin Bobak, a one-page letter signed by my neighbor Kayoka Sasa, and a 5 page letter from myself. All three of these letters were dropped off to the main post office today, but in case of postal delay or airport clerical delay can you please make sure that they are faxed or delivered before the Wednesday 5:00PM deadline?

**Response:**

Comment noted. Please see responses to comment letters PC01563, PC01570, and PC01566 for responses to the letters referenced in the above comment.

**PC02384-2**

The attachments included as part of this comment letter are identical to comment letters PC01570, PC01804 and PC01829; please refer to the responses to comment letters PC01570, PC01804 and PC01829.

**PC02385      Dawson, Ruth                          None Provided                                  6/23/2001**

**PC02385-1**

**Comment:**

Please find enclosed a copy of my letter to the MASTER PLAN LAX. I am very much against the EXPANSION plan at LAX. I think you folks "Downtown" and "all around Los Angeles", are very much aware of this and I hope for many reasons that you will say NO to LAX expansion.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Responses to Comment letter PC00545.

**PC02385-2**

The attachment included as part of this comment letter is identical to comment letter PC00545; please refer to the responses to comment letter PC00545.

### **3. Comments and Responses**

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**PC02386          Gordon, Arnold          None Provided**

**PC02386-1**

**Comment:**

I will not waste my time reading even one page of the 12,000+ pages of the master plan. Nothing in it will change my opinion about the idea of airport expansion.

IT SHOULD NOT BE DONE!!

Since we moved into Westchester in 1956 the airport has wiped out too many homes and businesses. EVEN THE MINIMUM PROPOSAL GOES TOO FAR!!! The major backers of expansion are not residents of Westchester. They have no interest in preserving one of the finest residential neighborhoods in Los Angeles.

**Response:**

Comment noted. Please see Topical Response TR-LU-2 regarding impacts to the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02386-2**

**Comment:**

Palmdale should be developed as quickly as possible to the greatest extent possible.

**Response:**

Please see Topical Response TR-RC-5 regarding transferring LAX operations to Palmdale.

**PC02386-3**

**Comment:**

Developing El Torowould also eliminate the need for more passenger capacity at LAX.

**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02387          Grino, Orlando          None Provided          8/9/2001**

**PC02387-1**

**Comment:**

I have worked in the Airlines Industry for over 30 years at LAX most of them, when Lax renovation was finished, we in the industry determine because of traffic grows that then was saturated & more so today over saturated.

**Response:**

Comment noted.



**PC02387-2**

**Comment:**

In order for the industry to accept an International Airport Have to be at SEA Level to obtain mat. Gross wt. At T.O. vicinity Airports could alleviate by moving local traffic & cargo & free LAX for long range Flts. again infrastructure that make a move to Lancaster or Orange County impractical.

**Response:**

Comment noted. Neither the FAA nor LAWA have the authority to direct airlines to use one airport in favor of another airport. The Airline Deregulation Act of 1978, as amended, ended federal, state, and local governments role in determining the location for air service by airlines. Please see also Response to Comment PC00599-54 for more information about cargo activity.

**PC02388**

**Levin, Chuck**

**None Provided**

**8/9/2001**

**PC02388-1**

**Comment:**

MAKING LAX safer and a good neighbor IS INCOMPATIBLE with any notions of expansion.

**Response:**

Comment noted. Safety impacts were addressed in Section 4.24.3, Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Report 14c of the Draft EIS/EIR and S-9b of the Supplement to the Draft EIS/EIR. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02388-2**

**Comment:**

A better way to go is to reduce arrivals & departures To previous established safety levels.

**Response:**

Comment noted. Please see Topical Response TR-SAF-1 for further discussion regarding aviation safety.

**PC02389**

**Mattson, Ruth**

**None Provided**

**8/9/2001**

**PC02389-1**

**Comment:**

The LAX has out grown its location.

**Response:**

Comment noted.

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**PC02390**      **Pratt, Michael**      **Friends of Southern California's Highways**      **8/9/2001**

**PC02390-1**

**Comment:**

I support LAX expansion. LAX is an economic engine for LA, and it will need to be expanded even if other airports (Palmdale, Burbank, etc.) are expanded.

**Response:**

Comment noted.

**PC02390-2**

**Comment:**

I especially like the plans for LAX Expressway, ring road, and I-105 extension. I would also like to see the La Cienega Freeway finished between I-405 and I-10; this would also help traffic tremendously. Even if the airport isn't expanded, these traffic improvements should still be built.

**Response:**

Comment noted.

**PC02391**      **Stevens, Mike**      **LAX Expansion No!**      **7/24/2001**

**PC02391-1**

**Comment:**

My name is Mike Stevens President of L.A.X.E.N. (LAX Expansion No!) L.A.X.E.N. is an educational non political organization comprised of homeowners in the communities of Playa Del Rey, El Segundo, Lennox, Hawthorne, Los Angeles, Inglewood, Westchester and other communities that believe they would be impacted negatively as a result of LAX Expansion and its Master Plan EIR/EIS. Including but not limited to Incremental Expansion which is a result of LAX Expansion projects that can be accomplished without an approved EIR (Environmental Impact Report) or EIS (Environmental Impact Report) Statement).

**Response:**

Comment noted. Subsequent to publication of the Draft EIS/EIR, Mayor James Hahn directed the Los Angeles Board of Airport Directors to develop a new LAX Master Plan alternative that, consistent with public comment calling for a regional approach alternative, would be designed to accommodate passenger and cargo activity levels at LAX that would approximate those of the No Action/No Project Alternative, have fewer environmental impacts than the No Action/No Project Alternative and, in light of the events of September 11, 2001, would be designed to enhance airport safety and security. This new alternative - Alternative D-Enhanced Safety and Security Plan, is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX and, instead, shifts the accommodation of future aviation demand to other airports in the region. The Supplement to the Draft EIS/EIR provided a comprehensive analysis of Alternative D and was circulated for public review and comment. Although the conclusion of the Draft EIS/EIR was that Alternative C would have the least negative impacts to the communities and the region, that conclusion has been superseded by the conclusion of the Supplement to the Draft EIS/EIR. Alternative D is now considered to be the Environmental Superior alternative and would have the least negative impacts to the communities and the region. Please see Topical Response TR-GEN-3 regarding actual versus projected activity levels.

#### PC02391-2

##### Comment:

Our organization believes there are transportation projects that will assist LAX (Los Angeles International Airport) in facilitating the expansion of LAX in contradiction to the position of the Southern California Association of Governments recommendation that LAX should not exceed 78 million annual passengers or less. On this foundation we oppose the following projects as listed in 2001 Regional Transportation Improvement Program Project Listing Volume III of III June, 2001.

1. Page 9 of 36 of section: Los Angeles County State Highways /project ID 49160 Description "In Inglewood at Arbor Vitae Avenue - Construct South Half of Inter-Change"
2. Page 21 of 86 of section: Los Angeles County Local Highways/project ID LAOB7078 Description La Tijera Blvd. Bridge Widening over I-405-Includes Environ. Studies & Prep. Of Plans, Specifications, & Estimates For Widening Existing La Tijera Blvd.
3. Page 24 of 86 of section: Los Angeles County Local Highways / project ID LA974313 Description "Sepulveda Blvd. / I-105 Westbound Off ramp Widening Northbound Sepulveda Blvd. 1 to 2 Lanes Add Westbound Exit Lane.
4. Page 25 of 86 of section: Los Angeles County Local Highways / project ID LA97442 Description "Los Angeles World Airport (LAWA) Intelligent Transportation Systems (ITS) Program For The Airport Area Traffic Circulation System."
5. Page 27 of 86 of section: Los Angeles County Local Highways / project ID LA996408 Description "Widen Arbor Vitae Street To Provide For Two Lanes In Each Direction And Two-Left Turn Lane From La Cienega Blvd. To Airport Blvd." (From 2 To 4 Lanes)
6. Page 1 of II of section; Federal Highway Priority Projects /project ID LA000373 Description "Aviation Blvd. From Manhattan Beach Blvd. To Arbor Vitae Widen From 4 To 6 Lanes."
7. Page 3 of II of section: Federal High Priority Projects / project ID LA974424 Description "Los Angeles World Airport (LAWA) Intelligent Transportation Systems (ITS) Program For The Airport Area Traffic Circulation System"

After reviewing the Regional Transportation Improvement Program Volume II of III we have concluded there are the following inconsistencies existing between the RTIP Volume II of Three and the RTIP Volume III of III. These inconsistencies range from projects listed in the RTIP Volume II of III but not listed in the RTIP Volume III of III.

Specific projects such as the Arbor Vitae Interchange deleted by the Regional Council from the RTP (Regional Transportation Plan) at there 6/28/01 meeting (Specific Project ID 49160) appears in the RTIP Volume III of III as a project scheduled for funding, but yet in the RTIP Volume II of III the project is identified as "DELETED". L.A.X.E.N, on behalf of its members and the residents of the communities that surround, and who are impacted by LAX respectfully ask that the before mentioned projects, in conjunction with projects listed below be removed from the RTIP Volume II of III and also where applicable those projects contained in Volume III of III.

Our position is based upon the EIR / EIS Master Plan released by LAX that shows these projects either completed, pending, or necessary for LAX to mitigate traffic. We believe these projects will send conflicting messages as it relates to SCAG's recommendation to hold LAX to 78 million annual passengers or less.

1A. Page 4 Los Angeles County Modeling, Project ID LA996408 / Description "Widen Arbor Vitae Street To Provide For Two Lanes In Each Direction And Two-Left Turn Lanes From La Cienega Blvd. To Airport Blvd. (From 2 To 4 Lanes)"

2A Page 4 Los Angeles County Modeling, Project ID LA996390 / Description "Widen Sepulveda Blvd. From Centinela Ave. To Lincoln Blvd - Widen Sepulveda Blvd Between Lincoln And Centinela To Provide Bus / Carpool Priority Lane"

##### Response:

Comments regarding perceived inconsistencies in the Regional Transportation Plan and Regional Transportation Improvement Program, as well as opposition to specific RTP/RTIP recommendations, should be addressed to the Southern California Association of Governments. The Southern California

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Association of Governments (SCAG) removed the Arbor Vitae half-interchange from the RTP and RTIP on April 12, 2001 but then amended the RTP and RTIP on March 9, 2002 to incorporate the half-interchange. None of the projects referenced in the comment are proposed as mitigation measures in the LAX Master Plan Draft EIS/EIR, but are assumed as background improvements.

#### **PC02391-3**

**Comment:**

In closing L.A.X.E.N.! and its members supports network development of rail and air services throughout the Southern California region by starting systematic and sequential development of airports throughout the 5 counties of Southern California. It is time for other counties, such as Orange County, to step-up-to-the-plate and assume the responsibility of providing their fair share of air service for their region

**Response:**

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

#### **PC02391-4**

**Comment:**

Let it be known L.A.X.E.N.! is opposed to any further development and growth of Los Angeles International Airport.

**Response:**

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

#### **PC02391-5**

**Comment:**

Let it be known that the before mentioned comments are submitted on behalf of all L.A.X.E.N. Members and Residents who would like to comment on the acceptance and approval of the RTIP Regional Transportation Implementation Plan before and not limited to the Transportation and Telecommunications Committee / The Regional Council of the Southern California Association of Governments.

**Response:**

Comment noted.

**PC02392**      **Alpern, M.D.,  
Kenneth**                      **Mar Vista Community Council**

**PC02392-1**

**Comment:**

To date, opposition to the current LAX expansion plan has not sufficiently and pragmatically addressed three key issues:

**Response:**

Comment noted. Please see Responses to Comments below.

**PC02392-2**

**Comment:**

1) Which specific airports should best be used as an alternative to LAX?

a) Should the construction of the Alameda and Alameda East Corridors be considered as an instrument to diverting cargo air traffic to Long Beach and/or Ontario Airports? Would such a move be favorable to Southern California's commercial interests? Since Ontario is owned by LAWA, and because Ontario is more eager for increased air traffic than Long Beach, is Ontario the preferred airport to divert such cargo traffic?

**Response:**

In order to meet the forecast passenger demand in the region, all of the regional airports will be required. LAX by itself, nor any other airport in the region can meet the demand. As discussed in Topical Response TR-RC-1 regarding LAX Master Plan role in the regional approach to meeting demand, Ontario is the airport best positioned to meet a portion of the projected increase in demand. An update of the master plan for Ontario is currently underway. The ONT master plan will recommend the needed improvements to address the projected demand in the Inland Empire.

**PC02392-3**

**Comment:**

b) Does the higher temperatures at Palmdale and its distance both in geography and road access make Ontario the more favored airport to divert passenger traffic?

**Response:**

The role other airports play in serving the regions passenger and cargo activities, as well as the forecast future passenger levels, was outlined in the Draft EIS/EIR Sections 1.2.2.2.1, Palmdale Regional Airport, and 1.2.3., International Demand, make Palmdale's remote location and limited passenger market difficult for airlines to maintain air service at the airport despite past subsidies by LAWA. Ontario airport has both direct freeway access and a larger population base to serve, making it more favorable to both passengers and airlines. Higher temperatures at Palmdale, particularly in the summer, have little or no effect on air service since there is sufficient runway length for departures. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand.

**PC02392-4**

**Comment:**

c) Since El Toro is not owned by LAWA, and there remains much local opposition to an El Toro airport by Orange County residents, does not Ontario again become the favored airport to increase passenger traffic? Should federal/state transportation funds be diverted to Los Angeles, Riverside and San Bernardino Counties if Orange County should vote against an airport at El Toro?

### **3. Comments and Responses**

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**Response:**

Please see Topical Response TR-RC-4 regarding Orange County air transportation demand.

**PC02392-5**

**Comment:**

2)How can pollution and 405 freeway traffic be mitigated by local mass transit initiatives?

a) Should the original plan to connect Aviation Station on the Green Line with Lot C via Aviation Blvd. (and from there a people mover to an envisioned non-expanded LAX) be pushed by local city and county governments?

b) Supervisor Burke has considerable funds towards a Crenshaw District light rail/busway mass transit, which would connect with the recently-approved Exposition light rail line and Lot C. The current LAX expansion plans use land now owned as an MTA right-of-way and would complicate the construction of such a mass transit initiative. Should the city and county of Los Angeles weigh in on this problem?

c) There has been no plan to extend the Green Line north (possibly along Lincoln Blvd.) to Westchester, Marina Del Rey, Venice and Santa Monica. These communities exclusively use LAX. Furthermore, now that the Los Angeles City Council has approved construction of a Playa Vista community that is likely to further aggravate traffic on the 405 freeway, doesn't this Council have an obligation to back such an initiative as critical for both LAX- and Playa Vista-related long term planning-even if the Council does not have the authority to fund such construction?

**Response:**

Pollution and I-405 traffic can be partially alleviated by greater use of mass transit. However, the analysis in the Draft EIS/EIR and Supplement to the Draft EIS/EIR conservatively keep the expected Green Line ridership to a small amount, since the ridership may not be very high.

a) The old plan to connect the Green Line to Lot C would not be sensible for Alternatives A, B, and C, since the "front door" of the future airport would be on the west side. It is desired to have the Green Line station be at the front door.

b) The alternatives could accommodate a Crenshaw District light rail/busway system; however that is not part of this proposed project.

c) A further extension of the Green Line to the north could be accommodated with the proposed Green Line extension to the West Terminal. However, such an extension is not part of the project.

**PC02392-6**

**Comment:**

d) There have been no specific plans to construct a link from LAX to a proposed high-speed rail system linking the major cities of California. Does not the question of long-term LAX planning necessitate the construction of either a subway or an above-and ground rail system in the median of the 405 freeway, connecting LAX with the Valley and the rest of the state, and be immediately addressed? Does Caltrans, the FTA and the FAA need to be included on such a critical initiative that would mitigate both regional air and automobile traffic congestion, each among the worst in the nation?

**Response:**

Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02392-7**

**Comment:**

3) How can LAWA be used a partner in a regional air traffic plan, rather than as an opponent, to facilitate such a plan?

### 3. Comments and Responses

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- a) Can parking and distant airport check-in at the termini of an expanded Green Line be used to LAWA's advantage with respect to financial gain and smoother operations?
- b) Should LAWA receive some of the profits of increased fares from an expanded Green Line, in return for its partial funding of a Green Line expansion?

**Response:**

Please see Topical Response TR-ST-5 regarding the rail/transit plan. The surface transportation impacts of the Master Plan alternatives were presented in Sections 4.3.1, On-Airport Surface Transportation, and 4.3.2, Off-Airport Surface Transportation, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR.

**PC02392-8**

**Comment:**

c) Should LAWA (and the airlines it serves, such as United) assist in and profit from the construction of a high-speed rail system that would obviate the need for more intrastate flights and the planes it would need to purchase and service? Although these entities do not have a background in rail systems, it is more likely that flights and high-speed trains would operate more in concert than in opposition if these entities stood to financially benefit from the construction of a high-speed rail grid.

**Response:**

Please see Topical Response TR-ST-5 regarding the rail/transit plan.

**PC02393**

**Bronzaft, Arline**

**None Provided**

**3/21/2001**

**PC02393-1**

**Comment:**

As I stated in message to entire Aviation group, look at articles I have written for League for the Hard of Hearing Hearing Rehabilitation Quarterly, ([www.lhh.org/noise](http://www.lhh.org/noise)), volumes 22 and 24, which deal with noise impacts on children, including my own research (my studies were cited in March issue of Smithsonian magazine). I have written a number of articles on effects of noise on children and children's learning. With my children and grandchildren living in Los Angeles, I am particularly sensitive to aircraft noise impacts in that area. I have worked with Val Cole, whom I am certain you know.

**Response:**

Comment noted. Please see Responses to Comments AL00017-52 and AL00038-11 regarding the health effects of aircraft noise and the impact of high noise levels on children, respectively. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1.

**PC02393-2**

**Comment:**

My own grandson for his science project this term, he is in eighth grade, took around 1800 measurements of sound in community adjacent to LAX. Although just a student project, his measurements indicated doubling of sound with overflights. Do contact me if you wish further information.

**Response:**

Comment noted. Please see Topical Response TR-N-6 regarding noise increases. Also, see Section 4.1, Noise, and Section 4.2, Land Use, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for more information on noise and noise related land use impacts under the baseline and Year 2000 conditions and the various Master Plan alternatives.

### **3. Comments and Responses**

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**PC02394      Johnson, Gregory      None Provided**

**PC02394-1**

**Comment:**

It is very (very) difficult and unfair to let the majority of the community know of this meeting only the day of or the day before this meeting. Please help

**Response:**

Comment noted. The commentor is referring to a meeting of the City Council's Commerce, Energy and Natural Resources Committee. The regular times of Council Committee meetings are posted on the Internet. Committee agendas are posted online 72 hours prior to the Committee meeting.

**PC02395      Berlin, Barry      Hillside Memorial Park & Mortuary      5/11/2001**

The content of this comment letter is identical to an attachment contained in comment letter AL00018; please refer to Responses to Comments AL00018-115 through AL00018-130.

**PC02396      Meecham, Ph.D., W.      None Provided      2/6/2001**

**PC02396-1**

**Comment:**

Regarding your opposition to expanding LAX - a gift from our lame duck mayor; I enclose a report (one of an on going series) showing the - not surprising - health damage / mortality increase as a result of the extreme noise around the airport.

**Response:**

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

**PC02397      Galanter, Ruth      None Provided**

**PC02397-1**

**Comment:**

Thank you very much for sending along your report on increase in mortality rates due to aircraft noise. I urge you to obtain a copy of the recently-released Draft Environmental Impact Report on Riordan's proposed expansion of LAX and review it for comment. Your expertise would be valuable, and you will most likely find the Los Angeles World Airports' assertions on noise impacts most interesting.

**Response:**

Comment noted.

**PC02399      No Author Identified, City of Culver City      6/21/2001**

**PC02399-1**

**Comment:**

City of Culver City, California



#### City Council Agenda Item Report

proposed Master Plan. Staff requested that issues related to traffic, air quality, overflight operations, regional context, and other subject areas impacting Culver City be analyzed in the environmental review documents. A copy of the NOP/NOI comment letter is provided as Attachment No. 2 of this staff report. Upon evaluation of the Draft EIS/EIR and associated documents, none or minimal analysis of the issues staff had requested be analyzed are contained in the Draft EIS/EIR.

**Response:**

Please see Response to Comment AL00018-22. It should be noted that Attachment No. 2 of the staff report, referred to in this comment, was not included in the information submitted as part of the comments on the Draft EIS/EIR.

**PC02399-2**

**Comment:**

In September 1998, through the efforts of a coalition concerned that all of the region's air travel growth would be directed to LAX and not be spread throughout the region, the City Council along with other South Bay and Westside cities, adopted Resolution No. 98-R087 (Attachment No. 3) calling for the development of a Regional Airport Plan for Southern California that constrains LAX to operate within the capacity of its existing facilities and promotes development of additional capacity at the many other commercial airports in Southern California to serve the expanding air commerce market place. The Draft EIS/EIR still presumes that vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. In 2000, Culver City along with the Cities of Santa Monica and El Segundo collaborated in developing a soon to be released report on the existing regional aviation infrastructure and capability. The report is expected to be released to the public later in June.

As stated in City Council Resolution No. 98-R087, the City's official position regarding the proposed expansion is one of opposition to LAX capacity expansion beyond that which can be accommodated by existing LAX facilities. and support for developing the capacity of other commercial airports within Southern California. At tonight's meeting, the City Council is requested to consider Resolution No. 2001-Rxxx, which states the City's position that various environmental impacts affecting the City are inadequately addressed and re-states the City's opposition to the airport expansion plan per Resolution No. 98-R087.

**Response:**

Comment noted. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative. Please see Topical Response TR-RC-1 regarding the LAX Master Plan role in the regional approach to meeting demand. Please see Response to Comment AL00018-114 which addresses Culver City Council Resolution No. 98-R087.

**PC02399-3**

**Comment:**

On May 25, 2001, City Council representatives from the four Westside Cities met at the Westside Cities Summit to discuss pending regional transportation projects. At the conclusion of their discussion, the representatives agreed that a joint letter expressing concerns about the inadequacies of the LAX Draft EIS/EIR be prepared for signature by the four Mayors from the Westside Cities.

On May 29, 2001, the City Council held a meeting to introduce and discuss the LAX Master Plan Draft EIS/EIR, which was released in January 2001. A staff memorandum was prepared and presented to the City Council summarizing the proposed Master Plan alternatives and discussing the adequacy of the Draft EIS/EIR in addressing potential impacts to Culver City.

**Response:**

Comment noted.

### 3. Comments and Responses

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#### PC02399-4

**Comment:**

DISCUSSION:

A City staff team, consisting of various City Departments as well as a traffic consultant and a noise consultant hired by the City, was established to evaluate and comment on the adequacy of the Draft EIS/EIR as an informational document in addressing the potential impacts to Culver City. The Staff/Consultant team identified numerous issues and concerns of the Draft EIS/EIR. A detailed list of the comments is provided as part of "Exhibit A" of Resolution No. 2001-Rxxx that is before Council for consideration at tonight's meeting (Attachment No. 1).

A predominate issue of concern for the City is that the Draft EIS/EIR does not contain adequate information regarding environmental impacts to Culver City, despite the City's close proximity to the airport and the proposed LAX Expressway. The Draft EIS/EIR and associated documents primarily focus on an analysis of impacts and proposed mitigation measures for the immediate area of the airport. The Draft EIS/EIR is inadequate and inaccurate as an informational document based on but not limited to the following issues:

**Response:**

Comment noted. Please see Responses to Comment Letter AL00018 for individual responses to each of the concerns raised in the City's letter, Resolution No. 2001-R068, and Exhibit A.

#### PC02399-5

**Comment:**

- Aircraft Overflight Noise: There are potential aircraft overflight noise impacts from two new arrival paths and a new departure path. A major problem with the Draft EIS/EIR regarding aircraft noise is the lack of key data and detailed analysis of the overflight noise impact to Culver City and other communities in close proximity. The degree of impact cannot be determined because noise levels and flight frequency information for aircraft overflights is not provided in the Draft EIS/EIR.

**Response:**

Projected noise levels in Culver City would be below the levels of significance defined by the Federal and State regulations. Federal Aviation Regulations define compatible land use impacts based on noise from aviation activities, using the 65 dB Community Noise Equivalent Level (CNEL), or a 1.5 CNEL increase in existing areas of 65 CNEL, as the impact thresholds for noise sensitive uses. For California evaluations, the Caltrans Airport Land Use Planning Handbook, provides noise and safety compatibility criteria for review of development near airports. The suggested noise compatibility criteria calls for no new residential development to be located within the 65 CNEL contour. Culver City is not located in the 65 CNEL for existing conditions, or any of the identified future build or no project/no action alternatives. Noise levels at locations outside the 65 CNEL contours south of Culver City were further addressed in Section 5.1 Locations of Significant Impact in Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR, Appendix S-C1, Supplemental Aircraft Noise Technical and S-1, Supplemental Land Use Technical Report of the Supplement to the Draft EIS/EIR. Therefore, no further noise impacts analysis was necessary. Please see Response to Comment SAL00020-8.

#### PC02399-6

**Comment:**

- Traffic: The Draft EIS/EIR is totally inadequate in evaluating traffic impacts in the City of Culver City. Only one intersection in Culver City was analyzed. The analysis should have included other intersections within the radius of influence of the Airport Expansion, to determine at which point in Culver City, the impacts can be mitigated to a level of insignificance, if possible. Assessment of additional significant intersections should have been included, all of which currently are operating at unacceptable levels of service. Not only is there a lack of acceptable analysis, the failure to address

these issues results in a failure to address potential mitigation measures which might have the effect of reducing the levels of adverse impacts.

**Response:**

Please see Response to Comment AL00018-9.

**PC02399-7**

**Comment:**

- Air Pollution: The Draft EIS/EIR totally fails to evaluate localized air pollution impacts on Culver City.

**Response:**

This comment is identical to Comment AL00018-10. Please see Response to Comment AL00018-10.

**PC02399-8**

**Comment:**

No mitigation measures are proposed for Culver City from increased air and mobile sources from auto traffic, aircraft operations, construction, and in particular from freight, and cargo operations.

**Response:**

The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality mitigation measures in Section 4.6.8, Mitigation Measures, with supporting technical data and analyses provided in Appendix G of the Draft EIS/EIR and Appendix S-E of the Supplement to the Draft EIS/EIR. Please note that mitigation measures would effect the air quality for the entire area surrounding LAX, including Culver City.

**PC02399-9**

**Comment:**

Without this critical analysis, the Draft EIS/EIR fails to comply with the minimum requirements of the CEQA and NEPA.

**Response:**

Comment noted.

**PC02399-10**

**Comment:**

- LAX Expressway Traffic: It is anticipated that there will be more congestion on Culver City arterial streets and creation of "congestion nodes" on the I-405 resulting from anticipated traffic friction, as well as weaving impacts on the I-405 immediately north of SR-90 freeway as a result of the proposed Expressway location. However, an assessment of these impacts is completely absent from the Draft EIS/EIR.

**Response:**

Please see Response to Comment AL00018-13.

**PC02399-11**

**Comment:**

LAX Expressway Traffic Noise: There are potential adverse impacts due to increased noise from vehicular traffic within residential, park, and school properties located near Coolidge Avenue and Culver Park Place. These noise-sensitive sites are located abutting or adjacent to the alignment of the

### **3. Comments and Responses**

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proposed Expressway. However, no noise analysis, no noise measurements, and no mitigation measures or sound barriers are proposed for these noise-sensitive uses in Culver City.

**Response:**

Please see Responses to Comments AL00018-13, AL00018-68, AL00018-116, AL00018-123, and AL00018-69.

**PC02399-12**

**Comment:**

- LAX Expressway Construction Activities: Construction of the Expressway is anticipated in Phase II of the Master Plan. The duration of the construction will be 10 years, from 2005 to 2015. The document fails to analyze any cumulative construction impact on Culver City from both the I-405 widening project and the Proposed LAX Expressway. Despite the long duration of the construction period, there is inadequate analysis and no construction mitigation measures proposed for the affected areas in Culver City.

**Response:**

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

**PC02399-13**

**Comment:**

- LAX Expressway Land Use: Based on evaluation of the proposed LAX Expressway, there are potential land use impacts to residential, business, school, and park uses. The Draft EIS/EIR fails to demonstrate that the proposed Expressway will be compatible with certain sensitive receptor uses due to the lack of analysis and noise mitigations proposed for areas in Culver City.

**Response:**

This comment is identical to comment AL00018-16; please see Response to Comment AL00018-16. Please also see Responses to Comments AL00018-13, AL00018-68, AL00018-69, AL00018-116, and AL00018-123.

**PC02399-14**

**Comment:**

Also, it is apparent from Figure 3.1-7 of Appendix K of the EIS/EIR, that some areas in Culver City will require property acquisition with Expressway Alternative No. 3, particularly on the east side of the I-405 Freeway, north of the SR-90/I405 freeway interchange. However, the Draft EIS/EIR fails to provide analysis, mitigation measures, and proper disclosure of such a procedure.

**Response:**

Please see Response to Comment AL00018-17.

**PC02399-15**

**Comment:**

Furthermore, there is also potential visual/shade & shadow/aesthetics impacts from the placement of the elevated Expressway and column supports in Culver City but no analysis or mitigation measures are provided in the document.

**Response:**

Please see Response to Comment AL00018-18.

**PC02399-16****Comment:**

- Cumulative Impacts: The Draft EIS/EIR fails to adequately analyze the cumulative impacts of other projects, which will be under construction during the same time period as the proposed expansion of LAX such as Playa Vista.

**Response:**

Please see Response to Comment AL00018-19 regarding the evaluation of cumulative impacts in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

**PC02399-17****Comment:**

For example, the cumulative impacts of the LAX expansion along with the Playa Vista project, including their cumulative construction impacts, will result in significant adverse impacts to the I-405, Sepulveda Boulevard, and other arterials, resulting in adverse impacts to local circulation and air emissions.

**Response:**

This comment is similar to comment PC00148-2. Please see Response to Comment PC00148-2. Cumulative transportation impacts were analyzed in Section 4.3.2.8 of the Draft EIS/EIR. Cumulative construction impacts were analyzed following the requirements of NEPA and CEQA, and are discussed in Section 4.20.7. These sections include the identification of adverse impacts and mitigation measures.

**PC02399-18****Comment:**

- Regional Context: The Draft EIS/EIR presumes that a vast majority of the region's growth in air passenger and air cargo demand will be directed to LAX. A number of commercially viable airports in the Southern California area currently exist and are underutilized relative to their capacity and Culver City believes that a fully regional solution to this air passenger and air cargo capacity has not been adequately addressed in the Draft EIS/EIR.

**Response:**

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

**PC02399-19****Comment:**

- NOP/NOI Comment Letter: Culver City's NOP/NOI comment letter is not contained in Appendix A of the Draft EIS/EIR, where copies of written comments from affected agencies are contained.

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**Response:**

Please see Response to Comment AL00018-22 regarding the subject comment letter.

**PC02399-20**

**Comment:**

The magnitude of omissions in the Draft EIS/EIR is so extensive that attached as "Exhibit A" of Resolution 2001-Rxxx, are significant additional comments which detail the failure of the lead agencies to adequately address the complete array of adverse environmental impacts this project is anticipated to have on Culver City.

Staff has prepared Resolution No. 2001-Rxxx (Attachment No. 1) for Council's consideration tonight which will transmit the City's technical comments concerning the LAX Master Plan Draft EIS/EIR, and reiterates the City position in favor of a regional solution as expressed in the City Council Resolution No 98-R087.

**Response:**

Comment noted. Please see Response to Comment PC02399-23 below.

**PC02399-21**

**Comment:**

**FISCAL ANALYSIS:**

City staff and the noise and traffic consultants spent a significant amount of time and effort in analyzing the Draft EIS/EIR. The estimated cost to the City for both the services of a traffic consultant and a noise consultant is approximately \$12,000. The estimated total City staff time invested in analyzing the Draft EIS/EIR is approximately 880 hours. This amount time is based on a City staff team comprised of fifteen members from various City Departments that on average spent approximately 40 hours total to review and comment on the Draft EIS/EIR. A Planning staff member, responsible for facilitating the LAX project spent additional hours, averaging 40 hours per month since the release of the Draft EIS/EIR in January 2001.

**Response:**

Comment noted.

**PC02399-22**

**Comment:**

Unmitigated impacts from expansion of LAX as proposed in the Master Plan could result in significant costs to the City and its residents in the future. The types of fiscal impacts that the City can expect if the airport project is implemented include but are not limited to: street infrastructure maintenance, additional transit and emergency facilities/personnel, and potential decreased property tax revenues. The specific amount in regards to fiscal impacts to the City from the proposed expansion cannot be determined at this time.

**Response:**

Pursuant to NEPA and CEQA, the purpose of the EIS/EIR is to fully disclose the environmental consequences of building and operating a major capital investment at LAX in advance of any decisions to commit substantial financial or other resources toward its implementation. NEPA and CEQA require a broad environmental impact statement disclosing the effects on the environment that could result from the proposed action. The EIS/EIR explores the extent to which study alternatives and options result in environmental impacts. In Section 4.4, the Draft EIS/EIR and Supplement to the Draft EIS/EIR, addressed socio-economic impacts, but NEPA and CEQA do not require a detailed fiscal assessment of the impact of the proposed LAX Master Plan facilities on the internal finances of the City of Los Angeles or the local municipalities neighboring the airport.

**PC02399-23**

**Comment:**

ATTACHMENTS:

1. Resolution No. 2001-Rxxx.
2. Culver City's comment letter dated July 31, 1997, on the NOI/NOP to prepare the Draft EIS/EIR on the LAX Master Plan.
3. City Council Resolution No. 98-R087, "A Resolution of the City Council of the City of Culver City, California, calling for a Regional Airport Plan for Southern California".

MOTION:

That the City Council adopt Resolution No. 2001-Rxxx, recommending that the lead agencies find the Draft Environmental Impact Statement / Environmental Impact Report for the proposed LAX Master Plan inadequate for certification because it fails to comply with the requirements of both the California Environmental Quality Act and the National Environmental Policy Act.

**Response:**

The subject attachments were not included with the submittal of Comment Letter PC02399; however, Resolution Nos. 2001- R068 and 98 - R087 were attached to letter AL00018. Please see Responses to Comments AL00018-25 through AL00018-113 relative to Resolution No. 2001 - R068, and Response to Comment AL00018-114 relative to Resolution No. 98-R087.

**PC02400**

**Madden, Robert**

**None Provided**

**6/11/2001**

**PC02400-1**

**Comment:**

FIRST I WOULD LIKE TO THANK YOU FOR ALL OF YOUR HELP AND IN KEEPING US INFORMED IN THE PRASS AND HOPE THAT YOU WILL KEEP UP THE FIGHT IN THE FUTURE.

ALL THE MEETINGS IN THE FUTURE I MAY ATTEND WILL NOT MAKE AN IMPACK WITHOUT THE SUPPORT FROM YOU, ALL THE OTHER COUNSEL MEMBERS AND MOST INPORTANT THE NEW MAYOR.IF HE MEANS WHAT HE SAID IN HIS MARCH CAMPAIN SPEECH.

AS FAR AS THE LAX MEETING LAST SATURDAY (WHICH 5 VOTING MEMBERS OF MY FAMILY CAME TO) THEIR BRAIN WASHING TACTICS WERE INSULTING TO OUR INTELLEGENGE. MANY OF OUR NEIGHBORS DID NOT EVEN KNOW OF THE MEETING. HOPEFULLY THAT WAS NOT A PLOY TO SAY THE COMMUNITY WAS NOT INTERESTED?

I'M GRATEFUL FOR YOUR SUPPORT.

**Response:**

A major component of the LAX Master Plan EIS/EIR work program is public participation and outreach. LAWA has had press releases, newsletters, neighborhood info packets, public workshops, and a web site in order to communicate with neighbors and interested parties. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review. Also, please visit the web site, [www.laxmasterplan.org](http://www.laxmasterplan.org).

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#### **PC02401      No Author Identified,      Los Angeles Intl. Airport Area Advisory Committee**

##### **PC02401-1**

**Comment:**

The Los Angeles International Airport Area Advisory Committee (LAXAAC) would like to thank you for making available to us the 'Executive Summary' of the Draft Environmental Impact Statement/Environmental Impact Report and the EIS/EIR compact disks. The majority of our members have computers but several do not have computers. Hard copies were placed in many libraries and the 'Proud Bird Restaurant'. It is nice to say that they are available but not too realistic to say someone could afford the time to digest all 12,000 pages of the documents at these locations.

We also appreciate the 180 day comment period you created to allow the opportunity to better evaluate the EIS/EIR and the Master Plan.

**Response:**

The content of this comment is essentially the same as comment PC01881-1; please refer to Response to Comment PC01881-1.

##### **PC02401-2**

**Comment:**

While we understand you desire to improve the regional airports development we feel that these documents did not make a fair presentation of the issues at hand. It is almost impossible to see what the true impact of the proposals because the EIS/EIR lacks a true environmental baseline for comparison. The dates used do not satisfy the baseline for comparison to be as of the time that the EIS/EIR was submitted. Your baselines, in most part, were outdated at the time you completed the EIS/EIR on Nov. 7, 2000 and released on Jan 18, 2001.

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

##### **PC02401-3**

**Comment:**

The Los Angeles International Airport Area Advisory Committee has reviewed the proposed Alternatives A, B, C, and the No Action/No Project plans and many of the plans that were not finally selected for the expansion of LAX as contained in the draft EIR/EIS. As representatives of the residents of our communities we must oppose the expansion plans as proposed. We feel the Master Plan - EIS/EIR is fatally flawed.

**Response:**

The comment is the same as Comment PC01881-5. Please see Response to Comment PC01881-5

##### **PC02401-4**

**Comment:**

We agree with you that a regional approach to airline accommodation is needed. We also feel the expansion of LAX will hinder the regional approach.

**Response:**

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



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

#### PC02401-5

**Comment:**

There are unavoidable adverse impacts on our communities as your Executive Summary indicates.

**Response:**

Comment noted.

#### PC02401-6

**Comment:**

During our attempts to study the materials provided by LAWA we had many difficulties. In many cases the two documents were not in sync. Accordingly cross comparisons were impossible. This was also true when we were comparing the appendices to other chapters. At the least this might be considered sloppy and at the worst an overt attempt to stifle (refer to Archie Bunker) analytical evaluation. Confusing organization and presentation and inaccessibility; thus the document is inadequate and does not meet requirements for public dissemination.

**Response:**

Comment noted. The EIS/EIR is carefully organized by topic, contains a clear description of the proposed project, provides an appropriate description of the environmental impacts, and includes sufficient detail to be understandable. Additional information is included in appendices and supporting documents

#### PC02401-7

**Comment:**

Tables and figures are not near the references in the text. The colors used on many figures did not reproduce clearly when copies were printed off the net. It was particularly difficult to distinguish between the shades of color. More attention should have been paid to display by using techniques that would reproduce clearly. Technical reports and appendices were not available for review or downloading on the net. Some tables were reduced to illegibility, such as Table 4.3.1-5, when there was no need to make them so small.

**Response:**

Comment noted. Please see Response to Comment AL00033-255 regarding availability of the Draft EIS/EIR and Supplement to the Draft EIS/EIR for public review.

#### PC02401-8

**Comment:**

Since Alternative C is the LAWA "preferred" plan, then information that was shared with Alternatives A and B should have appeared in the C section. Reviewers of Alternate C were constantly referred to A and/or B to obtain information. The impression was clearly one of trying to obscure information, not disseminate it.

**Response:**

The cross-referencing of information pertaining to Alternative A or B when addressing the impacts of Alternative C was intended to avoid repeating the same previous discussions and avoid further enlargement of the document.

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#### PC02401-9

**Comment:**

Any capacity figures that have been used in these documents or any other documents are not valid. We have learned from the 1978 EIR to expand LAX UNTIL 40 MAP was reached was a deceptive figure. The capacity numbers for all four proposals are also deceptive numbers. What plans do you have to stop the growth of the airport in terms of cargo and passengers?

Fifteen years have passed since LAX surpassed the EIR of 1978 which limited the growth of LAX along with the development of Palmdale. What plans did you have to limit the passenger utilization of LAX to 40 MAP?

**Response:**

This comment is identical to comment PC01881-17; please see Response to Comment PC01881-17.

#### PC02401-10

**Comment:**

A SHORT CHRONOLOGICAL REVIEW OF THE 'MASTER PLAN' FOR LAX

1. After two years of public meetings and discussions the BOAC adopted, in 1978, the EIR placing a limit of 40 MAP for LAX along with the development on Palmdale Airport.
2. Approximately 14 national, state, and local policies, programs, and plans included 40 MAP as a basis for their plans and operations.
3. In December of 1986 40 MAP was exceeded by LAX.
4. In January of 1988 the BOAC published their EIR 2000 to allow an increase of MAP to 65 MAP by the year 2000.
5. Shortly thereafter the City Council of L.A. requested that any LAX plan be included as part of the master plan of the City of Los Angeles.
6. In March of 1989 the L.A. City Council approved that proposal.
7. In June of 1990 the L.A. Council approved the Planning Depts. LAX Master Plan work program.
8. In January of 1992 three public forums were held in 1. Westchester, 2. L.A. Chamber of Commerce, 3. The San Fernando Valley.
  - A. 60 to 70 local residents plus a few aviation related individuals and government agencies attended the Westchester meeting.
  - B. Many prospective consultants and business people attended the chamber meeting.
  - C. About 5 citizens attended the valley meeting
9. After a few years of almost no action on the part of the LA. Planning Department the Department of Airports took over the financing and operation of the LAX Master Plan in 93-94,94-95.(?)
  - A. Several consultants were hired to gather information about traffic, noise, air pollution, urban design, parking, new terminals, satellite terminals, runway expansion, people mover, etc., etc., etc.....
  - B. Four concepts were suggested for the expansion of LAX
  - C. A public meeting was held in Westchester, Inglewood, Lennox, and I believe El Segundo. In 1995 these concepts were presented to the public.
10. In July 1997 a 'Scoping' process took place at the Proud Bird Restaurant (Alternative C and No action/ No Project were not included in the scoping process.)
11. Two of those concepts were deleted and eventually two more concepts (oops sorry, alternatives 1,2,3, plus No Action/no project) were added. Alternative three was never involved in the 'scoping' process.
12. Today we know these as No Action/No Project, Alternatives A, B, C.
13. WE HAVE TRAVELED FOR 15 YEARS PAST THE 40 MAP LIMITATION AND LAX IN THE YEAR 2000 HANDLED 67,600,000 PASSENGERS plus marked increase in cargo without an EIR/EIS. Is this Draft EIS/EIR representative of the concerns of LAWA to meet the environmental requirements of federal and state law? We assume so and are very disappointed.

**Response:**

Comment noted. Please see Topical Response TR-GEN-3 regarding the issue of 40 MAP at LAX

#### PC02401-11

**Comment:**

There can not be any legitimate evaluation of noise or air quality impact until the FAA delineates flight paths for all the alternatives. This EIS/EIR does not supply complete or adequate information for these analyses.

The FAA information must include flight paths, climb- out/landing angles and speeds, and minimum and maximum altitudes at specific points along the flight paths (at least every 100 feet from the end of the runway) for both easterly and westerly field operations, for day and nighttime operations, and for different weather conditions.

**Response:**

Section 4.1, Noise, and Appendix D, Aircraft Technical Noise Report, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR were completed under FAA Orders 5050.4A and 1050.1D. Modeling aircraft operations for every known or potential flight situation would be burdensome and impractical. Hence, average annual conditions were used. For additional information on flight track utilization, noise screening of track changes above 3000 feet, and location impact analysis please see Appendix D, Aircraft Noise Technical Report, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

#### PC02401-12

**Comment:**

Information on individual noise footprints for each aircraft (as has been done at SFO) is necessary for complete public review and would serve to pinpoint impact areas. These noise footprints must be listed for all weather conditions (such as inversion layers), rates of ascent/descent (e.g., power climb-outs), and at all altitudes.

**Response:**

The content of this comment is identical to comment PC01835-15; please refer to Response to Comment PC01835-15.

#### PC02401-13

**Comment:**

Escape corridors for aborted landings must be clearly defined for all conceivable conditions. Of particular concern is allowing sufficient space for aircraft (probably the heaviest, least maneuverable) which must be waived off from 24R/6L and 25L/7R these runways are currently the outboard runways, but become "middle" runways if additional runways are added. As pressure is put on airlines and the tower for increased through-put, more aircraft will be unable to keep up with the "rammin-and-jammin" and have to use escape corridors after being waived off. Because most of these (if not all) escape corridors would be over residential areas, they need to be studied, evaluated, and mitigation measures for the negative impacts included in the EIR/EIS study.

**Response:**

The content of this comment is identical to comment PC1881-21; please refer to Response to Comment PC1881-21.

#### PC02401-14

**Comment:**

LAWA's claims that noise would be reduced although operations would increase, may be due, in part, to LAWA's hoped for "scatter" pattern for flight paths; i.e., aircraft would approach/take off over many portions of the surrounding communities, thus spreading the noise impact over the entire communities at a 63 or 64 dB CNEL level, instead of over a specific, narrow area at 65 or above dB. This scatter

### **3. Comments and Responses**

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approach is curiously out of sync with current technology (such as the GPS system) which can define and guide aircraft to stay within much narrower flight paths than previously possible.

**Response:**

The content of this comment is identical to comment PC1881-22; please refer to Response to Comment PC1881-22.

**PC02401-15**

**Comment:**

Alternatives A, B, and C would impose undue economic, environmental, and health burdens on the areas surrounding LAX, especially on the Westchester, El Segundo, Lennox, and Inglewood areas.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed economic impacts in Section 4.4.1, Employment/Socioeconomics, and health and safety impacts in Section 4.24, Human Health and Safety, with supporting technical data and analyses provided in Technical Reports 5 and 14 of the Draft EIS/EIR and Technical Reports S-3 and S-9 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-LU-2 regarding potential effects of Master Plan alternatives on the community of Westchester. It should be noted that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative.

**PC02401-16**

**Comment:**

The Westchester Central Business District has only recently recovered from the customer-base loss created by the LAX land/residential homes acquisition in the 1970s. There would not be enough room in LAX Northside to relocate all the businesses that would be demolished by the ring road and its proposed connections. Additionally, since there has been no construction in the LAX Northside area (although an EIR was approved for development in the 1980s), no accommodations would be ready for relocating businesses.

**Response:**

The Master Plan is considered separate from growth and expansion that has occurred at LAX in the past. Please see Response to Comment AL00018-1 regarding commercial property acquisition within the Westchester Business District. Also see Response to Comment AL00033-123 and Response to Comment PC00013-5 regarding phasing of and development within LAX Northside/Westchester Southside. It should be noted that, in contrast to the other build alternatives, Alternative D would not involve acquisition within the Westchester Business District.

**PC02401-17**

**Comment:**

Playa del Rey and El Segundo suffer from early turns during over-ocean operations with the present airport configuration and level of traffic. With the extensions of runways, the probable increase in early turns, whether tower or pilot initiated, would cause severe noise impacts in the communities adjacent to LAX. By lengthening runways, the smaller aircraft will be even more tempted to make early turns. Moving 24R/6L 350 feet north would entice commuter aircraft to cut across east Westchester. Early turns on take-off and landing need to be studied, evaluated, and regulations with fees and penalties for violations need to be included in the EIR/EIS study.

**Response:**

The content of this comment is identical to comment PC1881-25; please refer to Response to Comment PC1881-25.

**PC02401-18****Comment:**

Lennox, Inglewood, and east Westchester would be subjected to much higher levels of noise and air pollution due to the extension of runways to the east. This would mean that aircraft would be much lower in altitude in approaches from and take-offs to the east. These impacts would cause an undue environmental burden on these areas.

**Response:**

Please see Response to Comment PC01881-26.

**PC02401-19****Comment:**

LAWA officials have stated that there would not be any mid-runway take-offs/landings (in effect having two operations per runway at the same or almost same time) even if/when the runways are extended. Is there any guarantee in the EIS/EIR that the communities would have this protection? This seems to be an FAA decision; therefore, the proposals can not be legitimately evaluated until the FAA comes forth with this information.

By extending runways to the east, aircraft would be lower altitudes when landing/taking off from/to the east. This will cause even more noise impact in east Westchester, Inglewood, and Lennox. Again, without FAA's delineation of flight paths, the noise and air quality impacts can not be legitimately evaluated.

**Response:**

The content of this comment is identical to comment PC1881-27; please refer to Response to Comment PC1881-27.

**PC02401-20****Comment:**

Safety for air passengers, air transport and airport employees, and people living and working near the airport or under the flight paths, should be of prime concern. This must include regulations protecting the health of these people from noise, traffic, and air pollution impacts and setting limits (with fees and penalties for violations) for exceeding the regulations.

**Response:**

Comment noted. Human health risk and aviation safety were addressed in Section 4.24, Human Health and Safety, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR. In addition, the Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relevant to nighttime awakenings in homes and classroom disruption in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. The Draft EIS/EIR also addressed the health effects of noise in Section 4.24.2, Health Effects of Noise, with supporting information in Technical Report 14b. Surface transportation impacts were addressed in Section 4.3, Surface Transportation, of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, with supporting technical data and analyses provided in Technical Reports 2 and 3 of the Draft EIS/EIR and Technical Reports S-2a and S-2b of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-N-7 regarding noise abatement measures and enforcement and Topical Response TR-HRA-3 regarding human health impacts.

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#### **PC02401-21**

**Comment:**

Although the EIS/EIR pays lip service to a regional approach to air traffic demand, there is very little or nothing included in the document to foster a regional approach.

**Response:**

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

#### **PC02401-22**

**Comment:**

The assumptions that all projected air traffic demand must be met and that LAX must be expanded to meet projected demand are incorrect. Much of the projected growth and demand comes from other areas, especially Orange County, the Inland Empire and northern L.A. County.

**Response:**

Comment noted. Please see Response to Comment PC02401-21. The City of Los Angeles and LAWA can only control the development of LAX, Ontario, Palmdale, and Van Nuys Airports. The decision to develop any airport is the responsibility of local government.

#### **PC02401-23**

**Comment:**

Since the airlines would be the major benefactors of meeting this supposed air demand, the airlines should shoulder responsibility for meeting the demand by working with other communities to develop and/or expand their own airports. Airlines should also voluntarily accept a system of fines and restrictions for violating noise, air pollution, and traffic regulations at LAX.

**Response:**

Please see Topical Response TR-RC-2 regarding airline response to market demand and regulation.

#### **PC02401-24**

**Comment:**

The EIS/EIR should include airline participation in expanding airports in other areas and participation in redress for violations of regulations.

**Response:**

Please see Topical Response TR-RC-2 regarding airline response to market demand and regulation.

**PC02401-25****Comment:**

Shifting 24R/6L 350 feet closer to the Westchester community (as outlined in Alternative C) places an undue burden on the community and is not necessary to accommodate wider wingspan aircraft. Judicious phasing of arrivals and departures throughout the daylight hours could accommodate the aircraft.

**Response:**

The content of this comment is identical to the comment PC01835-23. Please see Response to Comment PC01835-23.

**PC02401-26****Comment:**

Concentrating air service at one large airport has severe safety drawbacks. In the event of a catastrophic natural event, such as an earthquake, all air service for Southern California, including emergency and relief efforts, could be severely damaged. It was recently revealed that a terrorist had targeted LAX for a bombing attack. Again, all air service for Southern California, including emergency services and federal policing efforts, could be severely damaged.

**Response:**

Comment noted. This comment is identical to comment PC01881-31; please see Response to Comment PC01881-31.

**PC02401-27****Comment:**

The EIS/EIR must contain a complete analysis of the environmental impacts of the ring road. Ingress and egress intersections must be defined and analyzed. If there is an access that would allow traffic to flow from Vista del Mar and/or Culver Blvd in Playa del Rey, there would be profound and irreparable damage to the coastal road and wetlands. Similarly, traffic flow from Vista del Mar and/or Imperial would encourage airport traffic onto those streets. Access from these points would create immediate traffic gridlock coming north from the South Bay cities and south from the Westside to access LAX. It would create a tremendous traffic impact on roads not equipped to handle the level of traffic currently on them. If the access points remain at Falmouth and Loyola Blvds, the impact would also increase at those points. The Ring Road would not mitigate traffic, it would shift it to areas and roadways not able to withstand the impact. The Ring Road would not function as advertised to reduce traffic. Without specific information on the design of the road, no analysis of its impact or mitigation capabilities can be legitimately performed. The EIS/EIR is inadequate and incomplete in this area.

**Response:**

This comment is similar to comment PC01835-30. Please see Response to Comment PC01835-30.

**PC02401-28****Comment:**

The economic impact the ring road and its connections would cause for communities and businesses along Arbor Vitae and in the Westchester Central Business District constitute an undue economic burden. It may also divert business from the airport-related commercial businesses along Century Blvd.

**Response:**

Comment noted. Please see Response to Comment PC01835-31 regarding the ring road.

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#### PC02401-29

**Comment:**

Description of Fully Evaluated Alternatives, Summary of Activity, Comparison of Alternatives (page ES-9):

The difference in level of activity (comparing No Action/No Project to Alternative C) is very slight; in fact, often the NA/NP is close to, or better than, c. The slight differences do not warrant the expenditure of funds and impact to the local communities that Alternative C would entail. The increase in MAP seems to be based on the assumption that airlines would purchase and operate larger-capacity aircraft; a circumstance entirely outside LAWA's control.

Total aircraft operations show less than a 2% increase between NA/NP and C. All weather peak hour operations would be 144 for NA/NP and only 145 for C. Three-hour average operations would be 140 from NA/NP and (a loss of 2!) only 138 for C. Total MAP is projected as 78.7 for NA/NP and 89.6 for C, a difference of 13.85%; while passengers per departure are projected as 127.47 for NA/NP vs. 145.09 for C, a difference of 13.82%.

**Response:**

Please refer to Response to Comment PC01881-34.

#### PC02401-30

**Comment:**

Description of Fully Evaluated Alternatives, Summary of Features. Comparison of Alternatives (pages ES-9 to -11).

Total public parking stalls as compared to MAP are unrealistic: There is a projected increase of almost 55% (31.6 MAP) in passengers between the baseline and Alt . C, yet an increase of only 16.4% (5,565) in public parking stalls. It also shows an increase in public parking of 10.89% (3,879) from NA/NP to C, yet there is a projected increase of 13.9% (10.9) in MAP between NA/NP and C. This is a total of 39,491 public parking stalls for 89.6 MAP in Alt. C; compared to a total of 35,612 public parking stalls for 78.7 MAP in the NA/NP, and a total of 33,926 public parking stalls for 58.0 MAP in the baseline.

**Response:**

Please see Response to Comment PC01835-36.

#### PC02401-31

**Comment:**

How many passengers does LAWA expect to use the Green Line? Other airport communities have found that passenger usage of train service is difficult to create and that takes a long time to build confidence in train availability and dependability. When is the Green Line expected to be completed? How is it going to be funded?

**Response:**

The percent of air passengers forecast to use the Metro Green Line extension was kept conservatively low in the technical analysis for the LAX Master Plan. This comment is similar to Comment AL00017-26 regarding funding. Please see Response to Comment AL00017-26. Also, please see Topical Response TR-ST-5 regarding the rail and transit plan for more information.

#### PC02401-32

**Comment:**

Other transit methods are mentioned in the EIS/EIR, but no specifics are listed as to location, routes, or capacity. Is LAWA expecting the non-parking passengers to use non-existent transit? How many more



parking stalls should there be for this level of MAP? How many cars will be spilling into the surrounding communities searching for parking?

**Response:**

This comment is similar to comment PC01835-38. See Response to Comment PC01835-38.

**PC02401-33**

**Comment:**

Employee parking stalls, however, increase by 111% comparing the NA/NP and baseline to C. This is out of proportion; LAWA has had active ride-sharing, van service, and 9-80 work plans to reduce employee parking needs. Is LAWA planning on discontinuing these efforts? Is there no expectation that employees would utilize the Green Line?

**Response:**

Please see Response to Comment PC01881-38.

**PC02401-34**

**Comment:**

Airline Administration and Maintenance are almost 76.8% (295 acres) of the total of 384 ancillary acres in the baseline and NA/NP, yet only 25.5% (24 acres) of total acreage in C (94 acres). Airline administration is certainly a usage that could mainly be moved off-airport under the NA/NP.

**Response:**

Please refer to Response to Comment PC01881-39.

**PC02401-35**

**Comment:**

Land acquisition:

Because both Manchester Square and the Belford Area are listed as vacant and because land acquisition is currently ongoing in those areas, the acreage should be included in both the baseline and NA/NP columns.

**Response:**

The content of this comment is identical to comment PC01881-40; please refer to Response to Comment PC01881-40.

**PC02401-36**

**Comment:**

Why is existing Parking lot C not included for remote parking in the baseline and NA/NP columns?

**Response:**

The 8,147 parking stalls in Parking lot C were included in both the environmental baseline and No Action/No Project Alternative capacities.

**PC02401-37**

**Comment:**

The Unconstrained Forecast needs to be defined. On what projections are these figures based? This column does not add any information to the EIS/EIR and seems to be here just to confuse and shock reviewers.

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**Response:**

A discussion of the methodology and data used to develop the unconstrained forecast can be found in the Draft LAX Master Plan, Chapter III. Please see Chapter IV of the Draft LAX Master Plan for a discussion of the unconstrained activity levels and the design day activity levels.

**PC02401-38**

**Comment:**

No Action/N Project Alternative (page ES-11) : "I' ...current plans. ..." "...continuation of existing plans. ..." and "Improvements that are currently approved, in the planning states, or underway. ..." must be completely defined and listed.

On-Airport Surface Transportation (page ES-23):

There is no reason measures such as consolidating shuttle services could not be done now at LAX; therefore, the traffic congestion under NA/NP would be much less.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and results, in particular Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs.

**PC02401-39**

**Comment:**

Off-Airport Surface Transportation (page ES-24): Even though there would be more available land for development in the LAX Northside area under NA/NP, it does not have to be as densely developed as the EIS/EIR suggests.

**Response:**

Please see Topical Response TR-ST-7 regarding Westchester Southside.

**PC02401-40**

**Comment:**

4.3 SURFACE TRANSPORTATION i 4.3.1 Overview On-Airport Surface Transportation.  
Overview

Key Conclusions; Dispersal of Congested Traffic: Constructing a West Terminal and Ring Road would merely create a new location for the same congestion of traffic. The lack of adequate near- by short- and long-term parking would create panic in car drivers, with the distinct possibility that drivers would recirculate the loop looking for parking and/or cars would be abandoned in traffic lanes. The West Terminal and Ring Road have not been demonstrated to be traffic mitigators.

**Response:**

This comment is similar to comment PC01835-46. Please see Response to Comment PC01835-46.

**PC02401-41**

**Comment:**

Key Conclusions; Effect of Master Plan Improvements and On- Airport Parking: The number of parking stalls for Alternative C does not seem adequate; while MAP increases by 13.9% (from NA/NP to C), the number of parking stalls increases only 10.9%.

**Response:**

Please see Response to Comment PC01835-47.

**PC02401-42****Comment:**

Key Conclusions, Consolidated Rental Car Facility/Reduced Shuttles: Consolidating rental car facilities could be explored in the existing airport configuration -there are possible areas where cargo buildings have been proposed or in the area bounded by Sepulveda on the east, the Century entrance on the south, the 96th st. exit on the west and north (currently a commercial parking area). The shuttle vans should have been consolidated long ago into a common bus service and could certainly be done now in the NA/NP plan -which would lower the trip generation figures for NA/NP.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and results, in particular Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs. Also, a new consolidated rental car facility would constitute a new project, and could not occur under the No Action/No Project Alternative. Therefore, a No Action/No Project Alternative with projects such as a new consolidated rental car facility was not evaluated.

**PC02401-43****Comment:**

4.3.1 .2 General Approach and Methodology:

It is unclear what year the on-airport surface transportation analysis was conducted (only "August" is indicated) .Technical Report 3a, "On-Airport Ground Transportation Report" was not available on the net. It is very difficult to analyze data; some is from 1995, some 1996, and some from 1997.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology and results, in particular Subtopical Response TR-ST-2.2.

**PC02401-44****Comment:**

4.3.1.2 Roadways and Curbfront:

On what basis was the 25% increase in constant hourly curb demand used to determine the peak hour demand? Table 4.3.1-1, Roadway Capacity and corresponding Free Flow Speeds, indicates the designed capacity, but there is no table showing a comparison between all the alternatives indicating projected traffic.

**Response:**

The 25 percent figure was used to increase the peak hour demand to account for peaking within the peak hour, as often occurs when the passengers on several large jets exit simultaneously. This figure was used based on past experience at LAX and other airports. A comparison table for project traffic is provided as Table 4.3.1-5 in Section 4.3.1 of the Draft EIS/EIR.

**PC02401-45****Comment:**

4.3.1.2 Parking:

The figures here do not seem to correlate to the information in the Executive Summary, Comparison of Alternatives (page ES-10). This needs to be clarified.

**Response:**

Please see Response to Comment PC01835-51.

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#### PC02401-46

**Comment:**

4.3.1.2 Transit Systems:

Given the length of time and cost of this EIS/EIR, a more current survey on LAX air passengers should have been included. The 1993 study is 8 years out of date.

**Response:**

Please see Topical Response TR-ST-2 regarding surface transportation analysis methodology, in particular Subtopical Response TR-ST-2.2 regarding the definition of baseline scenarios and incorporation of local/regional plans and programs. A discussion of the conditions under an updated baseline scenario was included in the Supplement to the Draft EIS/EIR.

#### PC02401-47

**Comment:**

4.3.1.2 Pedestrians/Inter-Terminal Circulation:

An automated people mover system should have been installed years ago and certainly could be done with the present airport configuration.

**Response:**

A people mover system has been evaluated in the past, but to retrofit the existing terminals with a new people mover would be cost-prohibitive. It is much more cost-effective and would result in less impacts to the existing terminal operations to continue operating a shuttle service.

#### PC02401-48

**Comment:**

4.3.1.3 Affected Environment/Environmental Baseline:

CTA congestion could be alleviated now by emphasizing systems such as the Van Nuys FlyAway, with the added advantage of remote baggage check-in. This feature would greatly enhance the attractiveness of transit systems. It is noted that CTA traffic is compounded by passengers being dropped off and picked up by a non-passenger (making two trips into the airport). If curbside checkin and baggage return were faster and more efficient, there would be less congestion in front of terminals.

**Response:**

Please see Response to Comment PC01835-54.

#### PC02401-49

**Comment:**

4.3.1.6 Environmental Consequences, 4.3.1.6.1 No Action/No Project  
Roadways

There could be more improvement in timing of traffic lights, both on- and off-airport. Since airlines wish to increase air traffic, they should be encouraged to stagger arrivals and departures, thus alleviating peak travel hours with the present airport configuration.

Signage could be greatly improved. As people approach the airport, they need to have more information about what lanes to be in and the locations of airlines. Several people have commented that the pylons of color along Century leading into LAX may be attractive, but they do not provide airport information -and that is what drivers entering the CTA want.

**Response:**

Staggering of airplane arrivals and departures is already assumed in the analysis, as described in Technical Report 3a. Coordination of traffic signals is an important part of the mitigation program for

LAX, with both ATSAC and ATCS signal control systems being recommended. Signage plans would be developed during the design stage after the LAX Master Plan is approved. Please also see Response to Comment PC01835-55.

#### PC02401-50

**Comment:**

Curbfront

Much of the congestion is due to slow baggage checkin for departing passengers and much slower baggage delivery for arriving passengers. Why was improving these services not explored? While this is mainly an airline responsibility, was any kind of incentive/ standard/fee system explored for getting them to improve?

Was any consideration given to triple-decking the existing CTA? If not, why not?

Remote baggage checkin for new transit systems (similar to the Van Nuys FlyAway) would also alleviate curbfront congestion and could be done with the existing LAX configuration. What systems were examined, in what locations. If none were, why not? New approaches to transit could and would reduce curbfront and CTA congestion and reduce trip generation.

**Response:**

Please see Response to Comment PC01835-54 regarding baggage check-in. Also, triple-decking the existing CTA was not considered due to capacity limitations of the on-ramps and off-ramps entering and exiting the CTA. The alternatives studied reduce the demand on the CTA roads and curbs by spreading the traffic to the proposed new West Terminal, or to the Ground Transportation Center (GTC) in Alternative D.

Remote check-in locations such as the Van Nuys FlyAway were given emphasis within the LAX Master Plan Draft EIS/EIR.

#### PC02401-51

**Comment:**

Public Parking: The NA/NP parking would be adequate especially by adding parking structures to increase capacity in locations such as Lot C. Was this considered in the EIS/EIR? If not, why not?

**Response:**

New parking structures were included in the project alternatives. By definition, any new parking structures would constitute a project, and could not occur under the No Action/No Project Alternative. Therefore, a No Action/No Project Alternative with projects such as new parking structures was not evaluated.

#### PC02401-52

**Comment:**

Employee Parking (Table 4.3.1-8)

The number of daily employees in Table 4.3.1-8 is listed as 60,400 for NA/NP and for all three build alternatives for 2005. The daily employees for 2015 for NA/NP and all three build alternatives is listed as 71,360. These figures appear to be grossly inflated for NA/NP.

According to Table 4.3.1-8, under the Environmental Baseline there were 51,700 employees and 8,990 parking spaces - and the capacity met the demand.

Compared to the baseline, for NA/NP and all three build alternatives, 60,400 employees are projected for 2005 an increase of 16.82%. However, the projected number of needed parking spaces increases by 26.52%.

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Compared to the baseline, for NA/NP and all three build alternatives, 71,360 employees are projected for 2015 an increase of 38.02%. However, the projected number of needed parking spaces increases by 58.67%.

This is completely out of proportion; LAWA has had active ride-sharing, van service, and 9-80 work plan to reduce employee parking needs. Why is there an apparent expectation that the new employees would not participate in these programs? Is LAWA planning on discontinuing these efforts? Is there no expectation that employees would utilize the Green Line?

Is there any consideration of adding parking structures to employee parking lots? If not, why not?

**Response:**

Please see Response to Comment PC01835-58.

**PC02401-53**

**Comment:**

Pedestrian/Inter-Terminal Circulation:  
A pedestrian conveyance system could and should be added to the present airport configuration.

**Response:**

This comment is identical to comment PC01835-59. Please see Response to Comment PC01835-59.

**PC02401-54**

**Comment:**

4.3.1.6 Environmental Consequences; 4.3.1.6.4 Alternative C:  
The numbers used in tables for number of passengers and parking spaces are exaggerated for NA/NP and grossly underestimated for all the build alternatives. The estimates of curbfront congestion are far too high for NA/NP and far too low for the build alternatives. The economic and environmental burdens and LOS impact for the West Terminal and Ring Road are enormously underestimated. They must be revised.

**Response:**

This comment is similar to comment PC00248-3. Please see Response to Comment PC00248-3. Also, the curbfront analysis and economic and environmental analyses of the west terminal and ring road were fully detailed in the Draft EIS/EIR and Supplement to the Draft EIS/EIR, Section 4.3.1.6. Please note that Alternative D does not include the Ring Road.

**PC02401-55**

**Comment:**

Roadways  
All the traffic and transportation computations and forecasts must be redone to reflect the corrected number of employee trips for NA/NP and corrected parking impact for the build alternatives.

**Response:**

The employee trips and parking impacts are correct, as explained in Draft EIS/EIR and Supplement to the Draft EIS/EIR, Section 4.3, Surface Transportation.

**PC02401-56**

**Comment:**

The assumption is made that the Green Line extension would be in place by 2015. However, there is no information given as to how this would be accomplished. Would LAWA fund it? What process would be required to obtain state authorizations? Is all of the extension planned on airport property?

**Response:**

The extension would be both on airport property and within the right of way of Imperial Highway. Please note that Alternative D would connect the people mover to the Green Line without a Green Line extension. Please see Response to Comment AL00017-26 regarding funding. Also, see Topical Response TR-ST-5 regarding the rail and transit plan.

**PC02401-57**

**Comment:**

What trip numbers were used to arrive at the LOS levels given in Table 4.3.1-5? Why are so few intersections listed? The airport traffic impacts a very large part of the area, especially in Westchester, Inglewood, and El Segundo.

The Ring Road and West Terminal would create LOS F at many Playa del Rey intersections -why is this not evaluated?

**Response:**

This comment is identical to comment 1835-63. Please see Response to Comment PC01835-63.

**PC02401-58**

**Comment:**

Public Parking (Table 4.3.1-7)

The NA/NP and all three build alternatives are listed as having the same number of Originating Daily Passengers (84,847) for 2005, which is too high for NA/NP.

However, even though NA/NP and Alternates A, B, and C all have the same number of Originating Daily Passengers for 2005, the Daily Demand for NA/NP is listed as 29,600 vs. 29,288 for A, B, and C -yet the main change in demand for spaces seems to be the Green Line, which would not be operational in 2005.

In 2015, the projected number of Originating Daily Passengers for NA/NP is 87,280 and daily demand is 36,600. For A, B, and C, the 2015 projected Originating Daily Passengers number is over 108,000, yet the daily demand is only 36 spaces more than for NA/NP. This is a difference of 24% in passengers and 0.09% in spaces. The assumption is apparently that over 20,000 people will use the Green Line which would probably not yet be installed: this is blatantly overly optimistic.

Employee Parking

The number of daily employees in Table 4.3.1-8 is listed as 60,400 for NA/NP and for all three build alternatives for 2005. The daily employees for 2015 for NA/NP and all three build alternatives is listed as 71,360. These figures are grossly inflated for NA/NP.

According to Table 4.3.1-8, under the Environmental Baseline there were 51,700 employees and 8,990 parking spaces -and the capacity met the demand.

Compared to the baseline, for NA/NP and all three build alternatives, 60,400 employees are projected for 2005 an increase of 16.82%. However, the projected number of needed parking spaces increases by 26.52%.

Compared to the baseline, for NA/NP and all three build alternatives, 71,360 employees are projected for 2015 an increase of 38.02%. However, the projected number of needed parking spaces increases by 58.67%.

This is completely out of proportion; LAWA has had active ride-sharing, van service, and 9-80 work plan to reduce employee parking needs. Why is there an apparent expectation that the new employees would not participate in these programs? Is LAWA planning on discontinuing these efforts? Is there no expectation that employees would utilize the Green Line?

### **3. Comments and Responses**

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**Response:**

This comment is similar to comments PC00248-3 and PC01835-58. Please see Response to Comment PC00248-3 regarding No Action/No Project public parking demand. Also, please see Response to Comment PC01835-58 regarding employee parking.

**PC02401-59**

**Comment:**

LAX under the No Action/No Project option is projected to serve 78.7 MAP. With 165 gates, this equates to 477,000 passengers/year/gate on average. Currently some gates at LAX serve over 800,000 passengers/year. If all current gates could handles this passenger volume, LAX would be serving 132 MAP. Granted, the existing roads, runways and support services may not be capable of handling 800,000 passengers/gate/year, and the terminals won't have the space to accommodate these passengers. However, in all options the terminal square footage increases by nearly double or up to 2.5 times the existing square footage. Therefore, with a ring road, remote terminals, rail access, and new gates in larger terminals, LAX is likely to serve close to 800,000 passengers/gate/year. Thus the LAX estimate, under option C, that ONLY 89.6 MAP would or could use LAX is a gross understatement.

**Response:**

The content of this comment is similar to comment AL00027-5. Please see Response to Comment AL00027-5 regarding the passenger capacity of gates. The ring road, West Terminal, rail access, and additional terminal square footage improve the level of service for the passengers while at and getting to the airport; they do not increase the capacity of the airport. The airport is only as capacious as its least capacious component. In the cast of Alternative D, the least capacious component would be the number of and configuration of the aircraft gates. Regardless of the capacity of other airport components, such as the landside or airfield, the gates would continue to constrain the total annual passenger levels.

**PC02401-60**

**Comment:**

With no controls on the number of passengers served, LAX will soon exceed 89 MAP just as it has exceeded the 40 MAP estimated in the previous EIR. LAX is currently accommodating 50% more passengers than that previous estimate. If allowed to proceed in constructing option C, (or A or B) LAX will soon be over 100 MAP. Therefore, the EIR does not adequately address the transportation loads on our streets, nor the pollution loads placed upon our land, water and air. We urge LAX to be more realistic in their estimates and revise the EIR/EIS accordingly.

**Response:**

This comment is essentially the same as comment PC01881-17; please see Response to Comment PC01881-17.

**PC02401-61**

**Comment:**

The impact of the ring road on the city of El Segundo is not thoroughly examined. The closure of Pershing Drive to north/south traffic will have a significant impact upon the other north/south streets, such as Vista Del Mar, Sepulveda, and Aviation. The ring road will also impact the access to the community from Main St. and California St. It is unclear as to how the ring road will provide access to the northern portion of El Segundo.

**Response:**

Please see Response to Comment PC01881-72.



**PC02401-62**

**Comment:**

Also, the increased pollution and noise from more traffic along Imperial Hwy. will definitely have significant impacts. This includes the schools and residences along the northern border of El Segundo.

**Response:**

Comment noted. The Draft EIS/EIR and Supplement to the Draft EIS/EIR addressed air quality in Section 4.6, Air Quality; noise impacts in Section 4.1, Noise, and Section 4.2, Land Use; and traffic impacts in Section 4.3, Surface Transportation. Supporting technical data and analyses are provided in Appendix D, Appendix G, and Technical Reports 1, 2, 3, and 4 of the Draft EIS/EIR and Appendix S-C, Appendix S-E, and Technical Reports S-1, S-2a, S-2b, and S-4 of the Supplement to the Draft EIS/EIR. In addition, please see Topical Response TR-AQ-3 regarding air pollution increase and Topical Response TR-N-6 regarding noise increase.

**PC02401-63**

**Comment:**

The EIR/EIS does not provide any details as to how the airport will collect and treat the storm water runoff under option C, as is required by National Pollution Discharge Elimination System (NPDES) and the state and local agencies which implement these regulations.

**Response:**

Please see Section 4.7, Hydrology and Water Quality (subsection 4.7.5), of the Supplement to the Draft EIS/EIR regarding Master Plan Commitment HWQ-1, which will be implemented for the selected alternative. Also, please see TR-HWQ-2 for additional information regarding Master Plan Commitment HWQ-1.

**PC02401-64**

**Comment:**

Taking advantage of reduced noise from newer airplanes, i.e. using 1996 as the baseline, is misleading. The noise reduction from these technological advances would be realized anyway. Therefore, the overall noise increase is greater than depicted in the EIR/EIS.

**Response:**

Please see Topical Response TR-N-1 regarding the noise modeling approach, in particular Subtopical Response TR-N-1.3 regarding the use of 1996 baseline noise levels from which to measure increases associated with proposed alternatives. Also, please see Topical Response TR-GEN-1 regarding baseline issues.

**PC02401-65**

**Comment:**

Why do the 'Design Day Operations' divided into the 'Design Day Passengers':(pages ES-5 & 3-15)

a. In the Environmental Baseline = 83.45 passengers instead of 90.76 passengers per departure?									
b. In the Unconstrained Forecast = 111.74	"	"	"	122.98	"	"	"	"	?
c. In the NoAction/NoProject = 115.11	"	"	"	127.47	"	"	"	"	?
d. In alternatives A & B = 120.02	"	"	"	133.09	"	"	"	"	?
e. I alternative C = 128.76	"	"	"	145.09	"	"	"	"	?

**Response:**

The content of this comment is identical to Comment PC01881-76. Please see Response to Comment PC01881-76 regarding passengers per departure ratios.

### 3. Comments and Responses

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#### PC02401-66

**Comment:**

Why don't 'Design Day Passengers' times 365 days equal:\*\*\*

- a. In the Environmental Baseline=68.07 MAP instead of 58 MAP as stated in the charts?
- b. In the Unconstrained Forecast = 119.13 MAP instead of 97.9 MAP as stated in the charts?
- c. In the No Action/NoProject = 95.75 MAP instead of 78.7 MAP as stated in the charts?
- d. In alternatives A & B = 119.11 MAP instead of 97.9 MAP as stated in the charts?
- e. In alternative C = 108.98 MAP instead of 89.6 MAP as stated in the charts?

**Response:**

The content of this comment is identical to Comment PC01881-77. Please see Response to Comment PC01881-77 regarding design day to annual ratios.

#### PC02401-67

**Comment:**

Why don't the total MAPs for the year divided by 365 days\*\*\*

- a. In the Environmental Baseline =158,904 instead table 3-2 figure of 186,512 passengers perday?
- b. In the Unconstrained Forecast =268,219 instead table 3-2 figure of 326,329 passengers perday?
- c. In the NoAction/NoProject =215,616 instead table 3-2 figure of 262,329 passengers perday?
- d. In Alternatives A & B =268,219 instead table 3-2 figure of 326,329 passengers perday?
- e. In Alternative C =245,479 instead table 3-2 figure of 298,588 passengers perday?

**Response:**

The content of this comment is similar to Comment PC01881-77. Please see Response to Comment PC01881-77 regarding the design day to annual passenger ratio.

#### PC02401-68

**Comment:**

Why don't the Total Annual Aircraft Operations divided by 365 days

- a. In the Environmental Baseline = 2093 Design Day Operations instead of 2235?
- b. In the Unconstrained Forecast = 2752 Design Day Operations instead of 2921?
- c. In the NoAction/NoProject = 2146 Design Day Operations instead of 2279?
- d. In Alternatives A & B = 2562 Design Day Operations instead of 2719?
- e. In Alternative C = 2184 Design Day Operations instead of 2319?

Why don't Design Day Operations times 365 days

- a. In the Environmental Baseline = 815,775 Total Annual Operations instead of 763,866?
- b. In the Unconstrained Forecast = 1,006,165 Total Annual Operations instead of 1,004,591?
- c. In the NoAction/NoProject =831,835 Total Annual Operations instead of 783,430?
- d. In Alternatives A & B = 992,435 Total Annual Operations instead of 935,140?
- e. In Alternative C = 846,435 Total Annual Operations instead of 979,249?

Your figures are either inaccurate or you used a different basis for summarizing a Design Day Operation from an average day operation. If it is the latter, you have intentionally or mistakenly deceived the general public with your summary. At a minimum your Design Day Operation figure should match up with your Design Day Passenger and you passenger per departure figures.

**Response:**

The content of this comment is similar to Comment PC01881-79. Please see Response to Comment PC01881-79 regarding the design day to annual operations ratio.

**PC02401-69****Comment:**

You should be able to take any of the following. 1. MAP, 2. Design Day passengers, 3. Design Day Operations, 4. Total Annual Operations and be able to divide or multiply by 365 to get a consistent answer for each category to match another category. Why didn't you do it so (EX. if you were multiply 2279 by 365 it would equal 831,835 instead of 783,430) anyone could comprehend the Executive Summary page of Table 3-2?

**Response:**

The content of this comment is similar to Comments PC01881-77 and PC01881-79. Please see Responses to Comments PC01881-77 and PC01881-79 regarding the use of design day to annual passenger and operation ratios.

**PC02401-70****Comment:**

Frank Sweeney, from the FAA Control Tower at LAX indicated at a LAX Roundtable meeting on December 13, 2000 and May 9, 2001 that LAX has over 2200 average operations a day in 1999 or 68,200 operations for the month. The LAX Air Traffic Control Tower Traffic Count Worksheets for December 1999 indicated LAX had 2374 average operations a day or 73,594 operations for the month. The Los Angeles World Airports Traffic Comparison (TCOM) for LAX indicates there were 2166 average operations a day for December 67,155 operation for the month. Here are three reliable sources with each having a different number of operations for the month of December, 1999. Did you use any of these sources to determine your estimates for number of operations of any of the four alternatives for the LAX Master Plan? Which figures are correct?

**Response:**

The content of this comment is identical to Comment PC01881-83. Please see Response to Comment PC01881-83 regarding the number of operations per day for the Master Plan alternatives.

**PC02401-71****Comment:**

Some additional or repetitive concerns of the LAX Area Advisory Committee about the LAX Master Plan.

**Response:**

Please see Responses to Comments below.

**PC02401-72****Comment:**

Air space Gridlock - airspace gridlock is a real and present danger. To enable the public to review the different plans proposed for the LAX Master Plan, the following items need to be fully delineated and cover all runways on all plans for both east-to-west and west-to-east operations.

**Response:**

The content of this comment is similar to Comment PC01881-85. Please see Response to Comment PC01881-85 regarding the airspace capacity of the Master Plan alternatives.

### **3. Comments and Responses**

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#### **PC02401-73**

**Comment:**

Noise contours. The increase in air traffic will, inevitably, lead to more noise. LAX led the nation in the fight to convert to stage 3 engine aircraft, and this change did reduce the noise temporarily. With the proposed Alternative C and the realignment of runways and increase in air traffic, the noise contours will again expand. The noise impact from realigned and/or new runways in areas such as Lennox must be fully investigated. Individual noise footprints for each aircraft (as has been done at SFO) would serve to impact areas.

**Response:**

The content of this comment is identical to comment PC01881-86; please refer to Response to Comment PC01881-86.

#### **PC02401-74**

**Comment:**

Specific flight paths with elevations and rate/angles or ascent/descent Of special concern are the approach and take off flight paths for the proposed new runways. For instance, approach/take off paths for the commuter runway proposed in Concept 1(now alt A) adjacent to Playa del Rey residential area would be fairly low over Westchester/ Playa del Rey.

**Response:**

The content of this comment is identical to Comment PC01881-87. Please see Response to Comment PC01881-87 regarding specific flight paths for each of the Master Plan alternatives.

#### **PC02401-75**

**Comment:**

Escape corridors. Escape paths for aborted landings or take offs may have to go over residential areas. These paths must be clearly defined for all conceivable conditions.

**Response:**

Please see Response to Comment PC01881-21 and Topical Response TR-N-3.

#### **PC02401-76**

**Comment:**

Early turns. There continues to be numerous early turns, primarily by commuter aircraft, especially on the south side of the airport. The commuter airline runway being proposed for the north side of the airport in three of the four concepts would be located very close to the Playa del Rey residential area. Therefore, early turns must be addressed as part of the discussion on the plans.

**Response:**

Please see Subtopical Response TR-N-3.2 regarding early turns over areas north and south of the airport.

#### **PC02401-77**

**Comment:**

We have many questions and comments pertaining to the DRAFT EIR/EIS. Some of these questions might be answered in the full document. We were unable to find the answers for what ever the reason.

### 3. Comments and Responses

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Please do not respond to a comment or question by just saying it is in the Draft EIR/EIS. Please give as much information as possible i.e. volume number, page number, etc.

**Response:**

Comment noted. Responses to comments provided on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR are individually tailored to address the issue(s) raised in the comment, including necessary information and analysis.

**PC02401-78**

**Comment:**

The LAX EIR/EIS answers many questions about the proposed expansion. It also avoids the necessary information to acquire a substantial understanding of the particulars of the expansion.

**Response:**

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

**PC02401-79**

**Comment:**

The following is a direct quote from page 55 of the 4.1 noise element of the EIS/EIR LAX Master plan web site. However it is page 4-71 of the hard copy. This is not an isolated case of confusing page numbers

"By 2015, Alternative C would relocate Runway 6R/24L northward by 500 feet from its current centerline. Other redevelopment plans call for a southward shift in the centerline of Runway 7R/25L by 50 feet. Existing Runway 7L/25R would not be relocated. To continue the noise abatement techniques assumed for the year 2005, new/replacement procedures are assumed for westerly departures from each relocated runway end to ensure that aircraft reach the coastline before making turns. No additional operational measures that would reduce noise levels while maintaining operational efficiency were found."

**Response:**

Comment noted.

**PC02401-80**

**Comment:**

Pages D-318, 4-71

We found two instances where it stated that "by 2015, Alternative C would relocate Runway 6R/24L northward by 500 feet from its current centerline." just as it stated in the first line of the above paragraph. (We know it must be a mistake but...) Please explain this inconsistency with other parts of the Draft EIS/IER.

### 3. Comments and Responses

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**Response:**

The typographical error is noted. In response, Section 4.1, Noise, of the Final EIS/EIR incorporates the corrected text and Appendix F-C, Errata to the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, of this Final EIS/EIR reflects the correct information for Appendix D.

**PC02401-81**

**Comment:**

A major problem left a great deal of room for improvement in defining the word 'significant'. The definition given by the California Environmental Quality Act is a lawyers dream. The definition given in Chp. 7 of 'significant' uses a synonym, 'substantial' to define the meaning of the word 'significant'.

"Significant Impact - As defined by the California Environmental Quality Act, "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Pursuant to CEQA, an economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

**Response:**

Please see Response to Comment PC01835-10 regarding an explanation of thresholds of significance and where thresholds of significance were identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

**PC02401-82**

**Comment:**

Example page ES 21 4.1 Aircraft Noise 1. "Total population/dwellings exposed to aircraft noise above 65 CNEL .....".How much population is significant? How many dwellings are significant? The term used"significant and unavoidable" but doesn't say anything other than it is "substantial".

**Response:**

The content of this comment is identical to comment PC01881-186; please refer to Response to Comment PC01881-186.

**PC02401-83**

**Comment:**

(Page ES-39)

Summary Comparison of Environmental Impacts From Alternatives A, B, and C

"Following is a comprehensive summary of potential impacts associated with the build alternatives. This table is inclusive of all disciplines addressed in Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of this Draft EIS/EIR. The table identifies all potential impacts prior to mitigation, including those that would be adverse but not significant, as well as those that would be significant. Master Plan commitments and Mitigation Measures that would reduce or avoid potential impacts are listed. The level of significance after mitigation is also identified. Where pre-mitigation impacts would be adverse but not significant, the level of significance after mitigation is noted as "less than significant." Where pre-mitigation impacts would be potentially significant, but Mitigation Measures would reduce those impacts to a less than significant level, the level of significance after mitigation is noted as "less than significant with mitigation." Impacts that would be beneficial or significant and unavoidable after mitigation are also identified."

In order to examine the potential impacts of the four alternatives, (Alternative NoAction/NoProject, Alternatives A, B, and C) it is extremely important to know the definition and interpretation of words that are used in the document One of the more important words the public needs to understand is the word 'significant'.

The word 'significant' is used throughout the EIR/EIS Master Plan for LAX. We have come to the conclusion, after making several inquiries about the definition of the word 'significant' to high level Deputy Executive Directors of LAWA, there is no one definition capable of applying to all instances of its use. Chapter 4, Affected Environment, Consequences, and Mitigation Measures, of this Draft EIS/EIR does not address the definition of 'significant'.

Therefore it is necessary to ask the same question about similar but different statements included in the Draft EIS/EIR (California State Clearinghouse No. 1997061047) Los Angeles International Airport proposed Master Plan Improvements. Please refer to the Executive Summary volume for titles and page numbers of the Executive Summary Tables. Please do not use words that are synonymous with 'significant' to explain, define, and interpret the word 'significant'. Some of the words to avoid in explaining the definition are; important, meaningful, weighty, notable, profound, pivotal, serious, momentous, substantial and other synonyms of this type. Facts, figures, and comparisons would be greatly appreciated.

#### 4.1 Noise

##### Aircraft Noise

Page ES 41

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section. (Page ES 42)

##### Section

4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### Roadway Noise

Page ES 42

##### Section

6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### Construction Noise

Page ES 43

##### Section

8. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.2 Land use

Page ES 43

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section. Page ES 44

##### Section

3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
8. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
9. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.3 Surface Transportation

##### 4.3.1 On-Airport

Page ES 44

##### Section

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 45

##### Section

4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
8. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

### 3. Comments and Responses

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#### 4.3.2 Off-Airport Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.4 Social Impacts (page ES 45)

##### 4.4.2 Relocation of Residences and Businesses Section

1. Please define, explain, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, and interpret the word 'significant' as it is used in this section.

Page ES 46

##### 4.4.4 Community Disruption from Alteration of Surface Transportation Patterns Section

1. Please define, explain, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, and interpret the word 'significant' as it is used in this section.

##### 4.5 Induced Socio-Economic Impacts (Growth Inducement) Section

1. Please define, explain, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, and interpret the word 'significant' as it is used in this section.

##### 4.6 Air Quality Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 4.7 Hydrology and Water Quality Page ES 47 Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 4.9 Historic, Architectural, Archaeological/Cultural Resources Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 48

##### Section

6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 4.9.2 Paleontological Resources (CEQA) Section

1. Please define, explain, and interpret the word 'significant' as it is used in this section.

##### 4.10 Biotic Communities (Including both Flora and Fauna) Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 49



Section

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
9. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
12. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.11 Endangered and Threatened Species of Flora and Fauna

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 50

Section

3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.12 Wetlands

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.13 Floodplains

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.14 Coastal Resources

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 51

4.17 Energy Supply and Natural Resources

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.17.2 Natural Resources

Section

3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.18 Light Emissions

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 52

Section

4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4.19 Solid Waste

Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

### 3. Comments and Responses

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#### 4.21 Design Art and Architectural Application/Aesthetics

##### Section

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 53

##### Section

3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section

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5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

6. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.22 Earth/Geology (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

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7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section

Page ES 54

##### Section

8. Please define, explain, quantify, and interpret the word 'signifcant' as it is used in this section.

#### 4.23 Hazardous Materials

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

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9. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.24 Human Health and Safety

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 55

##### Section

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section

#### 4.24.2 Health Effects of Noise (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.24.3 Safety (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

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#### 4.25 Public Utilities

#### 4.25.1 Water Use

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

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#### 4.25.2 Wastewater (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
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#### 4.26 Public Services (CEQA)

##### 4.26.1 Fire protection

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES 57

##### Section

2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
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7. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 2.26.2 Law Enforcement (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
  2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
- Page ES 58
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
  4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
  5. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 4.26.3 Parks and Recreation (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

##### 4.26.4 Libraries (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

#### 4.27 Schools (CEQA)

##### Section

1. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
2. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
3. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.
4. Please define, explain, quantify, and interpret the word 'significant' as it is used in this section.

Page ES-23 line 11-

Please define, explain, quantify, and interpret the word 'significantly' as it is used in this section.

#### Response:

Please see Response to Comment PC01835-10 regarding an explanation of thresholds of significance and where thresholds of significance were identified in the Draft EIS/EIR and Supplement to the Draft EIS/EIR.

### **3. Comments and Responses**

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#### **PC02401-84**

**Comment:**

Page ES-25 First Paragraph under Employment/ Socio-economics. Why is it that every economic analysis of the importance of LAX neglects to include in the analysis the negative economic impacts of LAX? It must include the negative economic impacts in order for it to be a more accurate report.

**Response:**

This comment is identical to Comment PC01881-95; please see Response to Comment PC01881-95.

#### **PC02401-85**

**Comment:**

Page ES-26 "Over 2500 houses and apartments in the Manchester Square and Belford residential areas may be acquired....." No Action/No project and Alternative A maps show that land as vacant. Many of those residences may not be acquired. What then?

**Response:**

Please see Response to Comment PC02401-106 regarding Manchester Square and Airport/Belford Areas.

#### **PC02401-86**

**Comment:**

Page ES-27 The 'Acquisition and Relocation Overview Comparing the Alternatives'

First of all the No Action/No Project alternative is not listed. Second of all The Alternative C dwelling units list that number as 84 whereas the total number of dwelling units in Alternative C on page ES-10 combines 57 single dwelling units with 89 multifamily dwelling units for a combined amount of 146. Why the discrepancy?

**Response:**

The content of this comment is identical to Comment PC01881-97; please refer to Response to Comment PC01881-97.

#### **PC02401-87**

**Comment:**

Page ES-28 First paragraph.

Why do you wait until after the fact to fully inform those people to be relocated? Should they be informed before the fact of any of the alternatives?

**Response:**

This comment is essentially the same as Comment PC01881-98; please see Response to Comment PC01881-98.

#### **PC02401-88**

**Comment:**

Page ES-28 Environmental Justice -

Public Involvement - Why wasn't the LAX Area Advisory Committee, an official advisory body to Lax included in the participation process?

Page ES-29 Same question for the Environmental Justice Task Force?

**Response:**

The content of this comment is identical to comment PC01881-99; please refer to Response to Comment PC01881-99.

**PC02401-89**

**Comment:**

Page ES-31 - On-Airport Emissions

"Under any of the alternatives, the three Master Plan alternatives and the No Action/No Project Alternative, activity levels would increase due to the projected increased demand for aviation services and the resulting increased activity at the airport."

Page ES-31 Environmental Action Plan (same page)

"The three Master Plan build alternatives include features(?) That would substantially ( Please define, explain, quantify, and interpret the word 'substantially' as it is used in this section.) reduce potential air pollutant emissions due to increased airport activity levels." Which is it 'reduce or increase'?

**Response:**

The long-term potential emissions from on-airport operations associated with any of the build alternatives would, in general, be less than those associated with the No Action/No Project Alternative. This is due to the design improvements of the build alternatives which would decrease delays and congestion both on the airfield and on airport and nearby roadways, promoting reduced emissions when compared to not making the improvements (the No Action/No Project Alternative). Also, please see Topical Response TR-AQ-3 regarding increased air pollution. The new Enhanced Safety and Security Plan, Alternative D, analyzed in the Supplement to the Draft EIS/EIR, has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to the No Action/No Project Alternative. Air quality impacts associated with Alternative D were provided in Section 4.6, Air Quality, of the Supplement to the Draft EIS/EIR.

**PC02401-90**

**Comment:**

Page ES-32 Some methods to control emissions from sources within LAWA'S control include nine items that could be implemented regardless of which of the four alternatives may be implemented. Is that true?

One of the methods states, " Create incentives for airlines to replace older aircraft engines with cleaner ones." This is a wonderful idea. How are you going to do it? Preface page 1 - " .....individual airlines have been responsible for determining which airports and routes to serve." "Under federal law, neither the city nor the State of California may restrict the operation of most commercial aircraft without FAA approval" How are you going to do it?

**Response:**

Please see Response to Comment PC01881-101.

**PC02401-91**

**Comment:**

ES Preface - Page 2 - "The Draft EIS/EIR ia an overall program-level document, and is intended to serve as the environmental document for all actions associated with the LAX Master Plan development."

The EIS/EIR fails to comply with the cornerstone element of California Environmental Quality Act (CEQA) -that an EIS/EIR must describe a reasonable range of Alternatives that would feasibly meet most objectives, but would avoid or lessen significant effects of the project. In terms of ability to reduce significant effects for key impact categories such as noise, land use, environmental justice, and air

### **3. Comments and Responses**

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quality, there is no substantive difference among the Alternatives. The stated project identifies only three expansion alternatives for the Master Plan, which is unusually limited for a project of this scale. The objectives omit any mention of environmental goals, such as enhanced access, or improved quality of life.

**Response:**

Please see Topical Response TR-ALT-1 regarding the range of alternatives analyzed in the Draft EIS/EIR and Response to Comment AL00022-3 regarding the comparative impacts of the Master Plan build alternatives and environmental goals of the Master Plan.

**PC02401-92**

**Comment:**

Most significantly, the preferred Project Alternative C has more significant unavoidable adverse effects than either of the other two Alternatives yet fails to meet the projected demand, as do the other Alternatives. In effect, LAWA is recommending approval of the Alternative that would cause the greatest number of serious impacts, while meeting the fewest number of project objectives. A full discussion of how and why Alternative C became the preferred Alternative, recognizing that it offers fewer benefits than the remaining Alternatives without any substantive reduction in adverse impacts, is necessary to justify its utility as the Preferred Project Alternative.

**Response:**

This comment is similar to comment AL00022-4; please see Response to Comment AL00022-4.

**PC02401-93**

**Comment:**

ES Preface - Page 2 - " ..... Lax is bordered by the community of Westchester....." How can you be bordered by a community of which you are a part?

**Response:**

Comment noted.

**PC02401-94**

**Comment:**

ES Preface - Page 5 - "These were completed in the anticipation of the 1984 Summer Olympics in Los Angeles and were the last major improvements undertaken at LAX" How did LAX grow to 67.6 MAP if the cumulative improvements didn't allow it past 40 MAP? Please list the minor improvements that took place to allow this growth?

**Response:**

Please see Response to Comment AL00017-121 regarding the mitigation of impacts to the community from activities at LAX, and Topical Response TR-GEN-3 regarding growth in activity levels at LAX.

**PC02401-95**

**Comment:**

ES Preface Page 6 - "The Lax Master Plan and EIS/EIR Study was initiated by the Board Of Airport Commissioner in 1995....." Doesn't the law require you to have an EIR before any expansion takes place? What happened between 1986 when 40 MAP was reached and 1995 when LAX assumed the work for the Draft EIS/EIR?

**Response:**

Comment noted. Please see Topical Response TR-GEN-3 regarding growth in activity levels at LAX and Response to Comment AL00018-19 regarding LAWA's assessment of the project's impacts in conjunction with past, present, and probable future projects in the area.

**PC02401-96**

**Comment:**

Why did it take five+ years for your consultants to complete the documents? How accurate is the information in the documents if many of your base years are five years old?

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

**PC02401-97**

**Comment:**

What do we do if the response to our comments are not incorporated in the Final EIS/EIR? What will we have to pay for the volume(s) of the comment/ responses?

**Response:**

In accordance with the provisions of NEPA and CEQA, FAA and LAWA have prepared written responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR. These responses are provided herein as part of this Final EIS/EIR. The Final EIS/EIR, including responses to all comments received on the Draft EIS/EIR and the Supplement to the Draft EIS/EIR, has been made available for public review at FAA and LAWA and through distribution to public libraries throughout the area, and is available electronically at [www.laxmasterplan.org](http://www.laxmasterplan.org). The purchase price for the Final EIS/EIR is also provided on the LAX Master Plan Website.

**PC02401-98**

**Comment:**

Appendix D. Aircraft Noise Technical Report

ALL ITEMS IN BOLD PRINT ARE OUR COMMENTS AND QUESTIONS

"At LAX, noise berms or walls would be largely ineffective for attenuation of aircraft overflight noise. However, given the location of the residential areas immediately adjacent to the runways in El Segundo, and to a lesser extent to the north in Westchester, noise walls or berms may be effective at reducing noise from ground operations and from aircraft takeoff roll. Because noise levels at LAX are so dominated by the noise of aircraft in flight, the reductions of ground noise single-events by berms is not considered effective for noise abatement."

(Refer above)

LAWA should not eliminate berms as a tool to reduce noise. Didn't the berms and wall built on 88th street west of Emerson Ave. reduce the noise equivalent to the houses that were removed between the residences and the old LAX boundaries?

**Response:**

The content of this comment is identical to comment PC01881-108; please refer to Response to Comment PC01881-108.

**PC02401-99**

**Comment:**

7.2.1 No Action/No Project Alternative

"Several noise abatement actions are expected to be put in place during the next decade, regardless of the disposition of the master plan alternatives. (What noise abatement actions?) These include the

### **3. Comments and Responses**

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continuation of existing procedures and the development of additional measures that carry forward the intent of current procedures, although applied to other runways.

**Response:**

The content of this comment is identical to comment PC01881-109; please refer to Response to Comment PC01881-109.

**PC02401-100**

**Comment:**

Current mitigating flight and air traffic control procedures include mandated over-ocean operation of aircraft arrivals and aircraft departures during the sensitive late night hours from 11 :00 PM to 6:30 AM;" (Shouldn't the time be from 12:AM to 6:30 AM?) preferred use of inboard runways at night between the hours of 10:00PM to 7:00AM; and aircraft climb-out on runway headings after departure to the west until beyond the coastline before turning on course to their destinations.

**Response:**

The commentor is correct in that the time of application for over-ocean procedures is midnight to 6:30 a.m. which is stated on page 4-37 of the Draft EIS/EIR; however, these procedures are not mandatory. They are generally used when practicable, but not at the expense of safety. LAWA will be pursuing Federal approval of a restriction to alleviate that situation by making over-ocean procedures mandatory when they are in effect between midnight and 6:30 a.m. Please see Mitigation Measure MM-N-5. For further information on this topic, please see Topical Response TR-N-7.

**PC02401-101**

**Comment:**

These current operational mitigation actions will continue and have been incorporated into the assessments of noise contours and location analyses presented in this EIR/EIS. (Is our assumption correct that the FAA and not LAWA, is going to enforce these measures? How do we get the FAA to enforce these rules and regulations?)

**Response:**

Please see Response to Comment PC01881-111.

**PC02401-102**

**Comment:**

The proposed project includes no noise mitigation recommendations. While LAWA has an ongoing noise mitigation program, it is not clear why the proposed project does not address any new noise mitigation programs. Several are discussed but not recommended.

**Response:**

Comment noted. Please see Topical Response TR-LU-5 and TR-N-4 regarding noise mitigation. Aircraft noise mitigation was described in Section 4.2.8 of the Draft EIS/EIR beginning on page 4-216. Mitigation measures for road traffic, construction equipment, and automated people mover noise were provided in Section 4.1.8 of the Supplement to the Draft EIS/EIR beginning on page 4-78. The Supplement to the Draft EIS/EIR also provided mitigation measures for aircraft noise in Sections 4.1.8 and 4.2.8.

**PC02401-103**

**Comment:**

In addition, the expansion of the sound insulation program to homes within 60 CNEL contour should be given consideration. Because community concerns about the impact of aircraft noise goes so far beyond the boundary of the 65 CNEL contour, consideration of expanding the program should be given



a thorough evaluation in the EIS/EIR. Such a program may not qualify for traditional Federal funding but other opportunities may exist.

**Response:**

The content of this comment is identical to comment PC01881-113; please refer to Response to Comment PC01881-113.

**PC02401-104**

**Comment:**

Operating procedures are continually reviewed in light of changing technology to identify opportunities for improvement. Use of definitive departure procedures, which specify climb gradients and power settings are precluded by federal action in the establishment of AC-91-53A noise abatement departure procedures, are already incorporated into the noise model. (Is our assumption correct that the FAA and not LAWA, is going to enforce these measures?) What do the citizens do if the FAA doesn't enforce these procedures?(They have a history of doing that on occasion.)

**Response:**

Please see Response to Comment PC01881-114.

**PC02401-105**

**Comment:**

"As part of its good neighbor policy, the Airport, in conjunction with the FAA and the airlines, formed the Southern California Task Force in 1998 to address the impacts of current airport operations on the community and to work with community representatives to develop and implement new air traffic control procedures to further mitigate aircraft overflights. A key element of the Task Force effort, the LAX Fly Quiet Program, was aimed at delineating LAX specific procedures and creating an awareness about these flight mitigation procedures with the pilots and air traffic controllers who implement them in day-to-day operations at LAX."

"While air traffic actions that might accomplish mitigation of the 65 CNEL noise impacts associated with the full development of the alternatives are limited in close proximity to the airport, new procedures implemented under the LAX Fly Quiet Program-include the following:

"To eliminate the impacts of early turns of departing aircraft over El Segundo and Playa Del Rey, a new "Angel 2 " departure procedure for jet aircraft leaving LAX to the west was implemented. This is a very accurate departure route over the ocean that allows pilots with new computer technology in their aircraft to precisely follow the procedure and avoid early turns over El Segundo and Playa del Rey."

As you are reading this comment today there will be aircraft flying over El Segundo and Playa del Rey. How can this take place if it is such an accurate departure system? Are the pilots and/or the air traffic controllers not observing the LAX Fly Quiet Program and the new "Angel 2' departure procedures? What happens to the pilot and/or the air traffic controller that violate the Fly Quiet Program? How will LAX be able to control the Fly Quiet Program if it is under the jurisdiction of the FAA? How effective will the Fly Quiet Program be in Alt. A, Alt B, or Alt. C and the No/action/No Project proposals? The aircraft must have the new 'computer technology' for this to be effective. How many aircraft that use the "Angel 2" departure procedure have the new computer technology and how many use it?

**Response:**

Please see Response to Comment PC01881-115.

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#### PC02401-106

**Comment:**

How can you show 'Manchester Square' as vacant on the two pages following ES 12, NA/NP, Alt. A, when Manchester Square is not vacant? Two pages before ES 21 Alt. B and Alt. C has the Manchester Square area used for air cargo.

Why isn't Manchester Square listed as acreage required for expansion? Don't you plan to use Eminent Domain as a tool to take the properties that the owners are not willing to voluntarily sell to LAWA?

The Westchester Southside is a misnomer because it is not located in the southside of Westchester. LAX Northside begins 1.7 miles from the northern boundary of Westchester at Centinella and Sepulveda. From Imperial Ave. and Sepulveda, the southern most boundary of Westchester, it is 1.9 miles to the end of 'Westchester Southside'. Don't you think these measurements would constitute a name of either LAX Northside or Westchester Central? Isn't it very misleading to call it 'Westchester Southside'?

LAX Northside EIR has 340 acres. 'Westchester Southside' has 260 acres. Wouldn't the 30 acres difference benefit potential uses of the Northside development? Wouldn't the NA/NP concept allow for a greater utilization of the 340 acres?

**Response:**

Please see Response to Comment PC01881-40 regarding Manchester Square, Westchester Southside, and LAX Northside.

#### PC02401-107

**Comment:**

Noise 4-11

What is the base year you used to determine there would be a reduced noise exposure level in Alt. A and C? Is the base year 1996, 1997, or 2000? LAWA indicated that the base year they had to use was 1996. However for various statements it was obvious by reading the EIR/EIS that data was assimilated from 1996, 1997, as well as 1994. Please explain.

The EIR/EIS was made public on January 18, 2001. By January 1, 2000 all aircraft over 75,000 pounds were Stage 3 certified aircraft that operated at LAX. If you used the base year of 2000 would there be a reduction of total noise exposure? Would it be significant or less than significant if the base year was 2000? Please quantify, define, and explain?

**Response:**

The content of this comment is identical to comment PC01881-117; please refer to Response to Comment PC01881-117.

#### PC02401-108

**Comment:**

How have the recent population changes reflected in the 2000 census impacted the Master Plan assumptions?

Specifically, how has 69.5% growth in Palmdale affected the assumptions about the Palmdale airport in the Master Plan?

Where is the "evidence from other regions and nations [that] indicates that attempts to relocate activity from an established airport to new facilities may result in failure and a loss of millions of dollars?" (P.2.2)

**Response:**

The Supplement to the Draft EIS/EIR incorporated 2000 Census data. Please see Topical Response TR-RC-5 regarding the transfer of LAX operations to Palmdale Airport.

**PC02401-109**

**Comment:**

NOISE

Page 4-36.

4.1.5 Master Plan Commitments

"The airport has a long history of addressing the problems of aircraft noise. Many of these were dealt with in the airport's adopted Part 150 Noise Compatibility Program of 1985. The program includes 28 measures approved by the FAA. Of these, seven are directly related to the abatement of aircraft noise levels. The remaining 21 measures relate to the implementation of a program to monitor flight operations; provide for programs to mitigate noise in residences and other noise-sensitive uses; propose land use management measures to enhance compatibility; and call for further study of funding mechanisms or airfield modifications. This section addresses only those measures that are directly related to the" abatement of aircraft noise through operation or source noise control. Mitigation of impacts at the land uses is discussed in Section 4.2, Land Use. The airport also has implemented noise Mitigation Measures that pre-date the 1985 Part 150 program. The operational elements of the current noise abatement program are:

**Response:**

The comment is a verbatim restatement of the last paragraph on page 4-36 of the Draft EIS/EIR. Comment noted.

**PC02401-110**

**Comment:**

Page 4-37

1. Use preferred inboard runways for departures and arrivals and interior parallel Taxiways K and U during the hours between 10:00 p.m. and 7:00 a.m. This measure is intended to move nighttime noise to the interior of the airfield and away from noise-sensitive areas adjacent to the airport to the north and south. WHAT ARE THE EXCEPTIONS TO THESE RULES? WHAT WILL BE THE EXCEPTION TO THESE RULES?

**Response:**

Please see Response to Comment PC01881-120.

**PC02401-111**

**Comment:**

2. Weather permitting, between the hours of midnight and 6:30 a.m., use over-ocean procedures. These procedures call for arrivals to be made from the west and departures to the west over Santa Monica Bay during the most sensitive night hours. WHAT ARE THE EXCEPTIONS TO THESE RULES? WHAT WILL BE THE EXCEPTION TO THESE RULES?

**Response:**

Please see Response to Comment PC01881-121.

**PC02401-112**

**Comment:**

3. Conduct departures to the west along the runway heading until reaching the coastline. In the environmental baseline, this measure was implemented by the assignment of headings and visual determination that the coastline was crossed before turns were initiated. The measure has been the

### **3. Comments and Responses**

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subject of continuing concern to assure better compliance to achieve the desired effect- WHAT ARE THE EXCEPTIONS TO THESE RULES? WHAT WILL BE THE EXCEPTION TO THESE RULES?

**Response:**

Please see Response to Comment PC01881-122.

**PC02401-113**

**Comment:**

4. Ban the use of SuperSonic Transport (SST) aircraft at the airport. This measure was originally adopted to eliminate the potential use of the airport by the Concorde and other proposed SST aircraft- THIS WAS DONE LONG BEFORE THE 1985 PART 150 PROGRAM.

**Response:**

Please see Response to Comment PC01881-123.

**PC02401-114**

**Comment:**

4 -Restrict run-up activity between 11:00 p.m. and 6:00 a.m. unless specific approval is granted by airport management. WE THOUGHT THERE WOULD BE NO RUN-UP ACTIVITY. PLEASE EXPLAIN? THIS IS ONE OF THE FEW NOISE ABATEMENT PROGRAMS YOU HAVE THE AUTHORITY TO ENFORCE. WHY DON'T YOU DO IT?

**Response:**

Please see Response to Comment PC01881-124.

**PC02401-115**

**Comment:**

5. Allow the use of reduced thrust departures during west flow operations. Reduced thrust departures are takeoffs conducted with less than maximum power settings during the takeoff roll and initial climb portion of the operation (until the aircraft reaches approximately 1,000 feet altitude). The intent of this measure is largely one of reducing the noise of aircraft to the sides of the airport while the aircraft is on the ground or in the first stage of climb. THERE IS NOTHING WRONG WITH THE INTENT OF THIS MEASURE IT IS THE APPLICATION THAT IS LACKING. ISN'T THIS THE RESPONSIBILITY OF THE FAA?

**Response:**

Please see Response to Comment PC01881-125.

**PC02401-116**

**Comment:**

6. Discourage (HOW?) the use of reduced thrust departures during east flow operations. Encourage (HOW?) the use of departure cutback procedures in accordance with FM Advisory Circular 91-53 (now 91-53A). Thrust cutback procedures are techniques that initiate thrust reductions from takeoff power to a lower level (maximum climb thrust or less) during the climb between 1,000 and 3,000 feet of altitude. The intent of the measure is to reduce the loudness of aircraft in the off-airport areas most severely affected by aircraft noise. THIS IS JUST ONE OF MANY ITEMS IN THE PART 150 NOISE COMPATIBILITY PROGRAM OF 1985 THAT LAX HAS NO AUTHORITY TO ENFORCE. IS THIS STATEMENT CORRECT?

**Response:**

Please see Response to Comment PC01881-126.

**PC02401-117****Comment:**

7.Continue the use of tug and tow procedures in the Imperial Terminal area. The Imperial Terminal is a small area west of Sepulveda Boulevard, north of Imperial Highway. The use of engine-off procedures are expected to be continued under all future alternatives where applicable.HOW MANY FLIGHTS ORIGINATE AT THE IMPERIAL TERMINAL IN AN AVERAGE DAY?

**Response:**

The content of this comment is identical to comment PC01881-127; please refer to Response to Comment PC01881-127.

**PC02401-118****Comment:**

8.Retain acoustical barrier along the north side of the airfield adjacent to 88th Street in the Emerson Manor community. DOES THIS MEAN YOU ARE NOT GOING TO TEAR IT DOWN OR REMODEL THE BARRIER? THIS WAS BUILT BEFORE THE 1985 PART 150.

**Response:**

Please see Response to Comment PC01881-108 regarding the Westchester Wall. At this time LAWA staff is not aware of any plans to remodel the barrier. If so, this would be purely a beautification project, and not a noise issue.

**PC02401-119****Comment:**

The FAA and every other responsible aircraft, airline, airport industry says a Part 150 Program should be revised every 5 to 7 years. The State Noise Variance negotiators requested this to be done in the 1990-1993 negotiations without success. Your Part 150 Program is 16 years old and obviously outdated. WHY?

**Response:**

The content of this comment is identical to comment PC01881-129; please refer to Response to Comment PC01881-129.

**PC02401-120****Comment:**

All of these ongoing noise abatement measures would be continued with the Master Plan. Therefore, the following commitment would be adopted for noise:

.N-1. Maintenance of Applicable Elements (What are the applicable elements) of Existing Aircraft Noise Abatement Program.

All components (What are these components?) of the current airport noise abatement program that pertain to aircraft noise would be maintained. Your noise abatement program has been, is and will be basically controlled by the FAA. Therefore, how can you enforce your own Noise Compatibility Program??

(ES-4-2

**Response:**

The content of this comment is identical to comment PC01881-130; please refer to Response to Comment PC01881-130.

### 3. Comments and Responses

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#### PC02401-121

**Comment:**

How much of the reduction in total population exposed to noise above 65 CNEL of approximately 4500-4600 (or 1500-1600 more than no action) people is due to the acquisition of 84 dwelling units? (Using environmental baseline as benchmark)

**Response:**

The content of this comment is identical to comment PC01881-131; please refer to Response to Comment PC01881-131.

#### PC02401-122

**Comment:**

(p. 4.2)  
What is the cost of the Aircraft Noise Mitigation Program expansion expected under Alternative C for the people newly exposed to noise above 65 CNEL?-

**Response:**

The content of this comment is identical to comment PC01881-132; please refer to Response to Comment PC01881-132.

#### PC02401-123

**Comment:**

What people (residences) will be exposed to the 1.5 decibel or greater increase in noise levels under Alternative C?  
How much greater?

**Response:**

The content of this comment is identical to comment PC01881-133; please refer to Response to Comment PC01881-133.

#### PC02401-124

**Comment:**

(p. 4.5)  
"Some number of noise sensitive uses would be newly exposed to noise levels >65 CNEL." The chart on p. ES-22 shows population exposed above 65 CNEL, but does not show how much above 65 that will be. How much will that be?

**Response:**

The content of this comment is identical to comment PC01881-134; please refer to Response to Comment PC01881-134.

#### PC02401-125

**Comment:**

Overviews -4. Noise  
(p. 4.2)  
Why would Alternative C have greater impacts in the short term in terms of population exposed to 1.5 CNEL than Alternatives A or B?  
What would that impact be?

Define short term.?

**Response:**

The content of this comment is identical to comment PC01881-135; please refer to Response to Comment PC01881-135.

**PC02401-126**

**Comment:**

(4.6)

Why would the No Action Alternative result in the exposure of new areas to high noise levels?  
How much greater?

**Response:**

The content of this comment is identical to comment PC01881-136; please refer to Response to Comment PC01881-136.

**PC02401-127**

**Comment:**

Appendix D -Noise Technical Report  
p. 12

Given the dramatic change in ground run-up activity between 1994 and 1997 (decline of 36%), what validity is there to using 1997 data in 2001 ? Has the ground run-up activity changed yet again?

**Response:**

The content of this comment is identical to comment PC01881-137; please refer to Response to Comment PC01881-137.

**PC02401-128**

**Comment:**

p. 15

Given that INM noise contours do not include aircraft ground noise or noise generated by military aircraft, to what extent are results generated using INM noise, contours understated?

**Response:**

The content of this comment is identical to comment PC01881-138; please refer to Response to Comment PC01881-138.

**PC02401-129**

**Comment:**

p.55

Why is it assumed that under Alternative C heavy jets will comprise 5% more of the mix than under No Action (38% v. 33%).?

**Response:**

The content of this comment is similar to Comments PC00599-7 and PC00593-1. Please see Responses to Comments PC00599-7 and PC00593-1 for a discussion on the fleet mix assumptions and operational levels used in the Master Plan Alternatives.

### 3. Comments and Responses

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#### PC02401-130

**Comment:**

p.277  
Tables A5.10,A5,11, A5,12 do not appear to be included in the Appendix.

**Response:**

The content of this comment is identical to comment PC01881-140; please refer to Response to Comment PC01881-140.

#### PC02401-131

**Comment:**

p. 280  
What are the locations - other than the beach west of the airport - that are exposed to Lmax levels in excess of 100+or decibels?

**Response:**

The content of this comment is identical to comment PC01881-141; please refer to Response to Comment PC01881-141.

#### PC02401-132

**Comment:**

(4.7)  
Where are the outdoor areas exposed to noise levels of 75 CNEL or greater?  
  
How much greater?

**Response:**

The content of this comment is identical to comment PC01881-142; please refer to Response to Comment PC01881-142.

#### PC02401-133

**Comment:**

FUEL FARM  
Alternate 2 (The LAWA proposal for relocating LAX fuel form)  
On-Site Utilities -electrical utilities (7.1.8)  
The proposed concept dual 34.5 kilovolt ("kV") feeders are a desirable approach from a reliability standpoint. However, with each substation sized to supply only half the load, when one feed is lost, to continue operation of the fuel farm, power will have to be shut off to some operations, with load shedding and reduced operation instigated in order to operate. It would be preferable to size both 34.5 kV feeders and both substations to supply the entire load. The substations should be connected with a tie-breaker that would be closed in the event of the loss of one feeder, main switch gear or transformer. The fuel system could thus operate at maximum capacity. Doing so would raise the cost, by approximately \$40,000. What is your opinion?

**Response:**

The content of this comment is identical to comment PC01881-143, please refer to Response to Comment PC01881-143.



**PC02401-134****Comment:**

Cost Estimate (7.2)

The statement that the total cost is \$201,330,000 is misleading. The cost estimate summary denotes several items that are not included. Most notably, significant costs would include the issue pipeline from Imperial into LAX and the rerouting of the existing oil company pipelines. If we assume that each of these line items would be similar to the cost of the issue pipeline from Scattergood to Imperial, these items would add over \$48,000,000 in construction cost. Considering additional engineering costs, this will bring the cost to more than \$250,000,000.

What is your opinion?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR or Supplement to the Draft EIS/EIR.

**PC02401-135****Comment:**

Additionally, the estimate does not include inflation. The cost estimate is dated March 1998. The schedule portion of the report estimates one year for engineering and two years for construction. This means that if it were started today, the construction would not be complete for another three years. Assuming an inflation rate of 3% (19.4% compounded over the six years), inflation will add another \$48,500,000, bringing the total cost to almost \$300,000,000. What is your opinion?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR or Supplement to the Draft EIS/EIR.

**PC02401-136****Comment:**

The \$300,000,000 still does not include the construction cost for the refueller at South on LAX and at North on LAX and the concrete utilidor for the pipelines. It does not include financing costs, or associated environmental costs. It also does not include work on the LAX property such as hydrant systems, valve vaults, leak detection. All of these are significant. What is your reply?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR or Supplement to the Draft EIS/EIR.

**PC02401-137****Comment:**

(6.1.8) On-Site Utilities

The energy costs to operate the new fueling system are estimated to be larger than the current cost, but are not estimated. Why?

**Response:**

This is not a comment on the contents of the Draft EIS/EIR or Supplement to the Draft EIS/EIR.

**PC02401-138****Comment:**

4.3 Surface Transportation

4.3.1 On Airport Surface Transportation

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Key Conclusions - 3rd paragraph - last line

"By contrast, under the No action/No Project Alternative, the number of peak hour trips in the CTA would increase by 22%"

How can this be if your statements in other parts of the EIR/EIS are correct that state the CTA 'traffic is virtually' at its limit? What statistics do you have to support this statement?

**Response:**

This comment is similar to comment PC01881-148. Please see Response to Comment PC01881-148.

**PC02401-139**

**Comment:**

Air Quality Modeling Data and assumptions are missing from the EIR/EIS. The public must have access to this data to appropriately review the accuracy of the EIR/EIS. When will the data be provided and how long will the public comment period be extended to allow for public review of this data?

**Response:**

The Draft EIS/EIR addressed air quality impacts in and around the airport in Section 4.6, Appendix G, and Technical Report 4, and the Supplement to the Draft EIS/EIR addressed air quality impacts in and around the airport in Section 4.6, Appendix S-E, and Technical Report S-4.

**PC02401-140**

**Comment:**

Removal of the Pershing traffic route for commuters will cause a significant impact to residents in the adjacent communities. How will the additional traffic be addressed on Vista Del Mar and Sepulveda Blvd.s?

**Response:**

Please see Response to Comment PC01881-150.

**PC02401-141**

**Comment:**

We are concerned about the proposed "on and off ramps" for the north and south 405 freeway. Several important items to consider include the following:

1. Entering the 405 freeway going north is approximately one mile to the Manchester Avenue on ramp;
2. Going south on the 405 freeway and exiting the freeway from Florence Boulevard is approximately four-tenths of a mile to the on ramp, just past Manchester Avenue;
3. Going south from the on ramp to Arbor Vitae Boulevard is approximately four-tenths of a mile;
4. and Going south to Century Boulevard from the proposed on ramp is approximately three-tenths of a mile.

Therefore, do you consider it prudent to have an "on or off-ramp" at the planned location?

**Response:**

This comment is identical to comment PC01881-151. Please see Response to Comment PC01881-151.

**PC02401-142**

**Comment:**

Consequently, We would very much like to know what agency will pay the costs associated with the construction of the ramps, especially since it is our understanding that CalTrans is experiencing financial uncertainties at this time.

In addition, We are curious to know who will be responsible for the costs incurred for enlarging Arbor Vitae Boulevard (from Prairie Avenue in Inglewood to Sepulvada Boulevard in Westchester).

It is our opinion that several crucial factors have been overlooked. Accordingly, please consider the cumulative effect of the ramp at this location.

How can LAWA pay for the road work from the Arbor Vitae off-ramp to airport property if Federal money can only be used for airport only related services?

**Response:**

Please see Response to Comment AL00008-6 regarding funding.

**PC02401-143**

**Comment:**

The manner in which Environmental Justice is addressed, we believe, is completely inadequate. Requirements to mitigate Environmental Justice are not firmly stated, rather the approach is that it is an issue to be handled later. Therefore, it is impossible to determine whether or not Environmental Justice mitigation is adequate.

**Response:**

Extensive mitigation measures were provided in the Draft EIS/EIR, as found throughout Chapter 4, Affected Environment, Consequences, and Mitigation Measures, and as provided in the Executive Summary, and in Chapter 5, Environmental Action Plan. Many of these measures apply to minority and low-income communities, as well as other potentially effected communities. While a number of these mitigation measures were accounted for and discussed in Section 4.4.3, Environmental Justice, of the Draft EIS/EIR, the reason the section did not include a program with mitigation measures and benefits fully reflective of community input, was because the preliminary findings on environmental justice were not known until the document was finalized. It was appropriate, and a clearly stated intent in Section 4.4.3, Environmental Justice (page 4-433), that the Environmental Justice Program would be further developed and implemented in coordination with affected minority and low-income communities and their representatives in order to ensure that their unique issues and needs would be fully accounted for.

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

**PC02401-144**

**Comment:**

Furthermore, there is no comparison between the options presented and an alternative for the development of regionalized expansion of areas throughout the Los Angeles basin. This is a glaring flaw in the document because the regionalized airport approach should be presented as an alternative

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for discussion, and should also be evaluated relative to the comparative impact on Environmental Justice.

**Response:**

All LAX Master Plan alternatives were selected in accordance with the requirements identified in the California Environmental Quality Act (CEQA) regulations, and the National Environmental Policy Act (NEPA). Please see Chapter 3, Alternatives, of the Draft EIS/EIR and the Supplement to the Draft EIS/EIR for a detailed discussion of the alternative selection process.

Please see pages 1-3 of Appendix S-D of the Supplement to the Draft EIS/EIR for a discussion of regional environmental justice issues as analyzed in the Southern California Association of Governments (SCAG) Regional Transportation Plan and Regional Aviation Plan, including issues associated with airport improvement projects and LAX. These documents indicate that limiting expansion at LAX is the best possible outcome from an environmental justice perspective given the high concentration of minority and low-income populations in the LAX vicinity. Alternative D was added to the Supplement to the Draft EIS/EIR as a build alternative designed to serve a level of future (2015) activity comparable to the No Action/No Project Alternative. Alternative D is consistent with the policy framework of the SCAG 2001 RTP, which calls for no expansion of LAX, and instead, shifting the accommodation of future aviation demand to other airports in the region.

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

#### PC02401-145

**Comment:**

Additionally, in terms of Environmental Justice, there should be an analysis of the degree of usage of LAX by Lennox residents, as well as the surrounding communities, to determine the degree to which use of the airport is serving the needs of its most immediate neighbors, as opposed to meeting the needs of others who do not feel the impact of the environmental concerns associated with the airport.

**Response:**

LAX is a public use airport. Rates and charges are imposed to cover the cost of maintaining and upgrading the facility for public use. LAX is a public entity not a "for profit" entity. It is an agency of the City and any "economic gain" in the form of increased revenue must be utilized for airport purposes. Although benefits may be taken into account in making findings regarding a projects potential for disproportionately high and adverse environmental and health effects pursuant to U.S. Department of Transportation Order 5610.2, there is no legal requirement under NEPA or CEQA for economic benefits, or for benefits to be proportionate to environmental burdens. The primary focus of the EIS/EIR under NEPA and CEQA is to disclose and mitigate physical impacts on the environment. Accepting that the project would result in disproportionately high and adverse effects on minority and low-income communities, a benefits program has been developed with public input. Please see Section 4.4.4, Environmental Justice (subsection 4.4.3.7), of this Final EIS/EIR, and Topical Response TR-EJ-2.

#### PC02401-146

**Comment:**

On a different topic related to the issue of noise, we were not able to find in the report any analysis of single-flight noise, and only the average calculation of CNEL noise effects is utilized. This, once again, is a glaring error in that single-flight noise levels do have a tremendous impact on Lennox residents and students within the Lennox School District. This analysis should be a part of the Draft Report.

**Response:**

The Lmax of Single Event Levels in Table A5-5 are located in Appendix D of the Draft EIS/EIR. Tables A5-6 through A5-9 provided information related to the duration of time that each noise sensitive facility in the airport environs would be exposed to single event noise above 65, 75, 85, and 95 decibels on an average annual day. The Supplement to the Draft EIS/EIR prepared for this project extensively

addressed the effects of single aircraft events on nighttime awakenings and on school disruption (see Appendix D and Section 4.1 of the Supplement to the Draft EIS/EIR).

#### PC02401-147

**Comment:**

Why do you shorten runway 24L, on the western end 1185' in Alt. C but lengthen 24R 500'?

**Response:**

Please see Response to Comment PC01881-154.

#### PC02401-148

**Comment:**

Why doesn't your No action /No Project Alternative have as its base year 1986 or 1987? That was the time that last 40 MAP EIR was surpassed.

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.

#### PC02401-149

**Comment:**

Will you construct Flyaway locations throughout the region? If so, where will they be located? Will you be able to purchase airline tickets at those location? Will you be able to check your luggage at those locations? Would there be adequate parking at these locations? Remember, it took a long time before the Van Nuys flyaway became a profitable service. Wouldn't this type of a program, ( Flyaway locations, construction, parking, financing) markedly reduce surface traffic at LAX?

**Response:**

Please see Response to Comment AL00050-6 regarding Flyaway service. The services offered at these remote locations have not been determined yet. However, it is LAWA's intent to provide as many amenities as feasible at these locations. Adequate parking would be provided, in order for the FlyAway services to meet their potential.

#### PC02401-150

**Comment:**

Your listing of the potential businesses removal should be updated for greater accuracy. We feel there are approximately 400+ businesses that will be displaced or replaced. What businesses will be moved into Southside, Northside for any of the proposals? The business community agrees with our estimate.

**Response:**

This comment is similar to Comment PC01881-156; please see Response to Comment PC01881-156.

#### PC02401-151

**Comment:**

Will the elimination of 'avigation easements' be part of your mitigation program to reduce noise in the impacted communities?

**Response:**

Please see Subtopical Response TR-LU-3.13 regarding avigation easements.

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#### **PC02401-152**

**Comment:**

What will be the estimated cost for each major element of any and all alternatives?

What percentage of the costs do you anticipate the Federal Government will contribute?

What percentage of the costs do you anticipate the Passenger Facility Charges will contribute?

What percentage of the costs do you anticipate "bonds" will contribute?

What percentage of the cost do you anticipate the airline business will contribute?

**Response:**

Please see Response to Comment PC01881-158.

#### **PC02401-153**

**Comment:**

Don't many of the delays attributed to LAX in the Draft EIS/EIR originate at other airports or other regions because of weather related problems? How many delays of flights are actually caused by problems at LAX alone and are not connected with other airfields or weather problems?

**Response:**

The content of this comment is identical to Comment PC01881-159. Please see Response to Comment PC01881-159.

#### **PC02401-154**

**Comment:**

What are the access and egress roads, streets, etc to the ring road from the Arbor Vitae off ramp around the ring road to Sepulveda and the 105?

**Response:**

This comment is similar to comment PC01881-160. Please see Response to Comment PC01881-160.

#### **PC02401-155**

**Comment:**

Will the Green line cars have space to store luggage? Will there be off airport parking for green line customers to park their cars at various locations? Will MTA finance the extension to the west end or will LAWA finance it?

**Response:**

This comment is similar to comment PC01881-161. Please see Response to Comment PC01881-161.

#### **PC02401-156**

**Comment:**

Schools

How do you mitigate learning hazards such as noise and air pollution. In reality they can be called man made learning disabilities. Students study at home as well as at school. Homework is an integral part of the educational process. Noise and air pollution doesn't stop when the school day is over. Test scores are hampered by noise and air pollution which we feel will increase if LAX expands. How do you

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mitigate the financial cost to the school district when they are denied additional financial aid because of poor test scores. The 65 CNEL is considered an unhealthy noise level for many land uses that include residential dwellings, schools, and outdoor recreation.

**Response:**

Comment noted. The Supplement to the Draft EIS/EIR addressed the effects of single event aircraft noise relative to nighttime awakenings and school disruption associated with the No Action/No Project Alternative and all four build alternatives in Section 4.1, Noise, and Section 4.2, Land Use, with supporting technical data and analyses provided in Appendix S-C1 and Technical Report S-1. In addition, please see Topical Response TR-LU-4 regarding outdoor noise levels and Topical Response TR-HRA-3 regarding human health impacts associated with air pollution.

**PC02401-157**

**Comment:**

The impact of pollution on the health and academic achievement of students in the area is only now coming into clear focus. For the past eight years, the UCLA School of Medicine has conducted Health Fairs at several schools. During this time, medical professionals have screened more than 3,500 students and adults. One consistent finding has been a high incidence of children demonstrating asthma and allergy symptoms. The medical evidence clearly suggests aberrations in the immune system.

**Response:**

The content of this comment is essentially the same as comment AF00001-36; please refer to Response to Comment AF00001-36.

**PC02401-158**

**Comment:**

The Executive Summary of the Draft EIR, on page ES-28, recognizes the necessity to have the impact of Environmental Justice adequately addressed, report indicates that the FAA will make the final determination as to whether the Master Plan has a disproportionately high and adverse human health or environmental effect on minority or low-income populations. This is abundantly obvious in areas east of LAX.

**Response:**

Comment noted.

**PC02401-159**

**Comment:**

However, in contradiction, on page 4-67 the report indicates that some of the schools would be exposed to outdoor noise levels that would remain significant after mitigation; yet, no mitigation measures are required since "enrollment impacts are considered less than significant." This analysis is logically flawed and totally unacceptable. What type of enrollment does a school need for it to be significantly impacted?

**Response:**

The content of this comment is identical to comment PC01881-165; please refer to Response to Comment PC01881-165.

**PC02401-160**

**Comment:**

Although schools have implemented a sound attenuation program of its school buildings that process does not fully mitigate against negative impacts. Students residing in these areas are compelled to

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attend the 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 over-flights and near over-flights interrupt instruction and activities.

**Response:**

The content of this comment is identical to comment PC01881-166; please refer to Response to Comment PC01881-166.

**PC02401-161**

**Comment:**

A recent 1997 study published in the Journal of Environment and Behavior, Gary w. Evans and Lorraine Maxwell, Cornell University, found that children who attend schools that are beset by frequent airport noise do not learn to read as well as children who attend quiet schools.

A major study at Cornell University shows over 10-million American Schoolchildren are harmed by aircraft noise.

Some district staff members, such as physical education teachers 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

In summary of these problems, how do you plan to respond and mitigate these problems of the schools?

**Response:**

Please see Response to Comment PC01881-167.

**PC02401-162**

**Comment:**

In your Executive summary of the Master Plan- 2nd paragraph - it states

"To ensure that Los Angeles' air transportation infrastructure continues to facilitate the region's economic needs over the next 15 years, Los Angeles World Airports (LA W A) is developing a new long-range strategic master plan; such a plan has not been updated since 1981. The last major improvements at LAX were completed prior to the 1984 Olympics . . . . ."

LAX should not facilitate the region's economic needs. Th region should facilitate those needs. Here it appears to me that LAWA is once again playing with words when you say the last major improvement was completed prior to 1984. You must have had a great many minor improvements to allow this airport to grow from 40 MAP in 1986 to 67.6 MAP IN 2000. PLEASE INFORM THE PUBLIC OF ALL THE IMPROVEMENTS THAT WERE MADE IN THE LAST FIFTEEN YEARS at LAX.

**Response:**

Please see Response to Comment AL00017-121 and Topical Response TR-GEN-3 regarding the mitigation of impacts to the community from activities at LAX. Please also see Topical Response TR-LU-1 regarding impacts on quality of life and Topical Response TR-LU-2 regarding impacts to the community of Westchester.



#### PC02401-163

**Comment:**

One of your Guiding Principles, Goals and Objectives (on page 1) states. "Balance LAX modernization plans with local community concerns. In particular, potential environmental impacts such as aircraft noise."

These are just words that in reality have little value. You are saying that more operations will not increase noise. Please keep in mind that LAX already has 100% compliance with the Airport Noise and Capacity Act. How are more operations going maintain or reduce the noise occurrences?

**Response:**

The content of this comment is identical to comment PC01881-169; please refer to Response to Comment PC01881-169.

#### PC02401-164

**Comment:**

Another goal of yours is "Operate LAX in an environmentally sensitive, responsible manner. Please explain how you are going to operate LAX in an environmental sensitive and responsible manner when all aspects of noise and air pollution will increase with any and all proposals submitted in this report.

As you well know, the type of criticism we have brought forth in these two instances could be made many times throughout the Master Plan, EIS/EIR.

**Response:**

This comment is similar to Comment PC01881-170; please see Response to Comment PC01881-170.

#### PC02401-165

**Comment:**

ES 1-8

Your report list the four basic elements that determine demand for commercial air transportation. One of these (ES 1-13) states the following. The bold italic print are our comments.

1.2.1.4 Airport Facilities

The type and condition of facilities at an airport affect its ability to accommodate both passengers and air service. An airport's ability to accommodate existing and projected demand may be constrained by one or more of the following conditions: Can't it also be partially restrained by not going overseas to encourage other countries to use our facilities?

**Response:**

Please see Topical Response TR-RC-2 regarding the role of deregulation in aviation planning regarding bilateral agreement between countries.

#### PC02401-166

**Comment:**

Airport Infrastructure-the size and condition of the airfield, terminal, ground access facilities, cargo facilities, federal inspection services, freight forwarding facilities, fueling systems, and other physical infrastructure elements - Will they continue to come if you don't expand? At what point will they stop coming?

.Policy -the airport owner's policies regarding future airport development and the utilization of existing facilities Will they continue to come if you don't expand? At what point will they stop coming?

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**Response:**

The No Action/No Project Alternative represents what would happen at LAX if the airport is not expanded. The Master Plan analysis determined that the existing airport could accommodate 78.7 million annual passengers (MAP) under the No Action/No Project Alternative.

**PC02401-167**

**Comment:**

Policy -the airport owner's policies regarding future airport development and the utilization of existing facilities Will they continue to come if you don't expand? At what point will they stop coming?

**Response:**

The No Action/No Project Alternative represents what would happen at LAX if the airport is not expanded. The Master Plan analysis determined that the existing airport could accommodate 78.7 million annual passengers (MAP) under the No Action/No Project Alternative. Also, please note that Alternative D has been added to provide a build alternative designed to serve a level of future (2015) airport activity comparable to that of the No Action/No Project Alternative, and to make the airport safer and more secure, convenient, and efficient.

**PC02401-168**

**Comment:**

.Environmental -significant environmental considerations that may limit airport activity or future development Will they continue to come if you don't expand? At what point will they stop coming? How bad would the environmental considerations have to be before you stopped expansion?

**Response:**

The No Action/No Project Alternative represents what would happen at LAX if the airport is not expanded. The Master Plan analysis determined that the existing airport could accommodate 78.7 million annual passengers (MAP) under the No Action/No Project Alternative.

Following the publication of the Draft EIS/EIR, LAWA developed a new alternative that, consistent with public comments calling for a regional approach alternative, is designed to accommodate passenger and cargo activity at LAX that would approximate those of the No Action/No Project Alternative, has fewer environmental impacts, and improves airport safety and security.

**PC02401-169**

**Comment:**

Airspace -airspace limitations due to terrain or interactions with other airports Would airspace limitations be more severe at LAX if other airports would increase their facilities?

**Response:**

The LAX Master Plan examined the factors constraining the Los Angeles basin airspace and the analysis was presented in Section 2.2.3, Factors Constraining the Los Angeles Basin Airspace, of the Draft LAX Master Plan Chapter II. The airside capacity at LAX could be constrained if air traffic growth at other Los Angeles basin airports imposed additional restrictions on LAX air traffic. Until that point there would not be any additional limitations at LAX if other airports within Los Angeles basin expanded their facilities.

**PC02401-170**

**Comment:**

In a multi-airport system where passengers, cargo operators, and airlines have alternatives, these conditions may result in certain airports failing to capture their potential market share. " Why would an airline choose to go some where else if everything they want is at LAX?

**Response:**

Comment noted. Please see Response to Comment PC01881-176 regarding multi-airport markets, airline economics and passenger choice.

**PC02401-171**

**Comment:**

ES 1-14

"Since passage of the federal Airline Deregulation Act of 1978 ..... the airlines, and not government, make the decision about which airports they will serve" Why would an airline choose to go some where else if everything they want is at LAX? Will they continue to come if you don't expand? At what point will they stop coming?

**Response:**

Please see Response to Comment PC01881-173.

**PC02401-172**

**Comment:**

ES2-4

"Total annual passengers 1997-60,142,588 -2005-74,196,000" (increase =14,053,412)

"Annual O&D passengers 34,813,554 50,839,000" (increase =16,025,446)

How did you determine that approximately 57% of passengers in 1997 were O&D passengers and 68% of the passengers in 2005 were O&D passengers? You have a greater increase in O&D passengers than you do for the total increase in passengers. Please explain.

**Response:**

The content of the this comment is identical to Comment PC01881-178. Please see Response to Comment PC01881-178 regarding increases in annual passengers and O&D passengers.

**PC02401-173**

**Comment:**

What and where are the access and egress locations on the proposed ring road for alternatives A, B, and C?

**Response:**

The Ring Road was presented in detail in Section 3.3, Final Iteration Alternative Development and Refinement, of the Master Plan, which was part of the Draft EIS/EIR documentation. Please note that Alternative D does not include the LAX Expressway or Ring Road.

**PC02401-174**

**Comment:**

Did you plan to extend Falmouth down to Culber Blvd.?

**Response:**

This comment is identical to comment PC01881-180. Please see Response to Comment PC01881-180.

### **3. Comments and Responses**

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#### **PC02401-175**

**Comment:**

Why wouldn't there be as many regional jobs created through out the region if you had a regional airport system instead of a LAX expansion system?

**Response:**

Please see Response to Comment PC01881-181.

#### **PC02401-176**

**Comment:**

Why didn't your summary of Environmental impacts in the Executive summary include the No Action/No Project scenario? There will certainly be some environmental impacts if the No Action/No Project Plan is the one adopted.

**Response:**

The Executive Summary Overviews, which summarized the key findings of the Draft EIS/EIR and Supplement to the Draft EIS/EIR, included the No Action/No Project Alternative's impacts in comparison to those of the build alternatives.

#### **PC02401-177**

**Comment:**

It is almost impossible to see what the true impact of the proposals because the EIS/EIR lacks a true environmental baseline for comparison. The dates used do not satisfy the baseline for comparison to be as of the time that the EIS/EIR was submitted. Your baselines, in most part, were outdated at the time you completed the EIS/EIR on Nov. 7, 2000 and released on Jan. 18, 2001.

**Response:**

Please see Topical Response TR-GEN-1 regarding baseline issues.