

Attachment 6

**Comment Letters Received Following
the Close of the Public Review Period
for the Supplement to the Draft EIS/EIR**

David T. Strait
'El Tigre'
1977 S. Rice Rd.,
Ojai, CA
93023

Nov 3, '03

Mr. Jim Ritche
City of Los Angeles
Los Angeles World Airports
LAX Master Plan Office
P. O. 92216
Los Angeles, CA
90009-2216

Gentlemen:

I was out of town on a medical emergency, and my wife misunderstood that this had to get in the mail last Friday. I hope that it is not too late to get on the list of ideas and options. Cc will go, in any case, as indicated.

Thanking you for the possibility of this consideration, in the interests of considering all of the very best possible options for what is best for the Airport and this whole area, I am

Respectfully yours,

Dave Strait
RE 19480

'El Tigre'



1. Attached is material, perhaps sufficiently articulated out and accounted for, without further adieu.
2. The rest of the cc's are going to Insurance Co's: cause if there's accident and vital, aggressive, intensive action isn't/wasn't taken on the most urgent, by any and all entities involved in whatever way, - who's in position of - you might put it - . . . lead vulnerability -
3. It be real good to hear from you, . . . and for you all, seemingly wisest, certainly vis-à-vis what's so terribly dominant, ((eg. also, incidentally, out on the tarmac there, LAX)) - The:-

S a f e s t

David Strait
1377 S Rice Rd.
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10 - 08 - 03

From: El Tigre

To: Bd. of Airport Commissioners, L.A. City. Planning Comm., L.A. City. Council/Carriers, and, AND I - their Carriers, . . . maybe -

Subject: As articulated . . .



In possible coordination with one, particular planned LAX up-grading (- see cc of the news article excerpt, next pg. 'b', immediately ff., - regarding these present plans), an entirely/separate L A X Upgrading offer, distinct, possibly spectacular pps. c, d, & 1 thru 10 ff, is, herewith, submitted.

The fundamental imperative, however, for this submittal here at hand, again pps. c, d & 1-10 ff., was not in response to the present planned upgrading, but other really more basic urgencies, conceived of, long before I ever heard of and/or read about present plans. Whereas the best of luck is wished present plans; not hampered in any way, and are ones I, personally view as overall positive/impressive, - obviously contributive; - I do, nevertheless, submit the attached from the direction of a possible overall, ultimate critique, because -

Because

If Investing Billions you do not, . . .

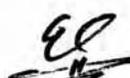
Not ! hit the optimum possible --

I should have submitted this long ago, but simply was unable to for a variety of prior exigencies, which always took priority, although, as it did happen, I was already well underway with, had, in fact, essentially completed, all of my part of the submittal, here attached. (again pps. c, d, & 1 thru 10 ff.), - before ever receiving, or having any knowledge of the article/report out of the City Employees News Letter " Alive ", the first pg. only, of which article, is, again, pg. 'b', herein, . . . so far as, and regarding present plans. Sorry about all of that, but I'm not submitting this here, as an apology.

I do appreciate the apparent genuine request for responses, and accept it at face value, because I simply have to tell you/report, that from a whole/entire lifetime, I've experienced American Management, from many years now in Public and Private, civilian and Military, executive/professional/otherwise, notoriously unresponsive, even mass produced indolence, deadheaded-ism, close to totally so, vis-à-vis anything, of and/or related to suggestions, intelligence, new ideas etc., etc., . . . clear all the way on over to sheer utter boredom to anything progressive, - even vis-à-vis some ideas which would have made some, tremendously rich ! Further, the 'higher' up you go the worse and worse it gets. Se la vie -

Important ! - See concluding pg., for where cc of all this is forwarded. Because if powers/authorities responsible don't respond, then the carriers', carriers' responsibility, eg. vis-à-vis accident, - is what?

El Tigre



This Communication,

. . . To be brief, is an offer to make a study to resolve all LAX' problems as much as possible; to attain the optimum balance, in the arena of the finite, for the best overall balance of problem resolution, as long, of course, as our civilization's burdened/saddled with these damned noisy/polluting jets; which as mentioned later on, will be for a while, yet. In fact, it will, within scopes of finite human time, be forever, - certainly, at least, vis-à-vis trans-oceanic. (Especially so, across the vastness/depths of the Pacific, in order to effect, to reach all around the population hordes of its ' Rim ', which, mentioned several times, ff., - is home, transportation-wise: Is The Access - to earth's overwhelming majority of peoples.)

Because, to date, every evolution, 'improvement', @ L A X, seems/proves out to be really more degenerations, - more and more then, of the same old thing. 'Improvements', revisions, expansions, ad infinitum, which invariably, then, seem to turn out, creating problems ever short, failing eternally, from the ideal optimum; if, indeed, even increasing abuse/danger, to surrounding communities; ever shuffling from one non-optimum to the next, . . . more than accomplishing the most rational and therefore valid, trade-offs possible for all exigencies extant. Thus these/they fall ever short of attaining this ultimate best balance possible; if indeed in the longest of runs, perpetrate, - ever perpetuate - eternally escalating risk/abuse, shuffling around and around, of kind of just trading one for another, maybe/especially vis-à-vis residences/communities impacted in the overall/surrounding vicinity. Keep in Touch

El Tigre



to the Club Scholarship was in July. "She comes recommended highly," said Art Johnson in introducing Jennifer, Johnson, a former Club board member, was the chairman of the scholarship search committee. "She has clearly achieved so much. And we can't wait to congratulate her again when she graduates. We know she will."

"This scholarship is a blessing for her, but she is a blessing for us, too. She is going to succeed. I just know it."

"Thank you all so much," Jennifer said humbly in accepting the scholarship. Nervously, she added, "I've never seen my name next to this much money."

"We think it's very important to give back to the community," said John Hawkins, Club Chief Operating Officer, in beginning the Scholarship Presentation. See Scholarship, Page 3

review and comment period for the Supplement to the Draft Environmental Impact Statement/Environmental Report for the LAX Master Plan for a total of 120 days and the scheduling of three additional public hearings. The comment period will now end on November 7, 2003.

See the end of this article for the locations of the three final public hearings, and the

See LAX Expansion, Page 24

David Strait
1977 S. Rice Rd.
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09 26 03
To: Administrators/Engins. LAX, in particular + Insurance Cos.
From: El Tigre
Subject: As evolved below - ((Recipient/Reader, skip parents, - makes it a bit easier !))

This is a proposal, being submitted herewith to powers that be, vis-a-vis LAX, in the direction of accomplishing its **Overall Optimum Possible Overhaul Solution**, . . .

... as long as humanity's burdened with these damned noisy, polluting jets, for the best which can be done, before the day, when we'll all be able to replace them all with transportation vehicles, at least over land, which can more properly be considered, in some sense, rapid, even with respect to the still, rather slowpoke, supersonics -)

... which particular solution popped into my mind one day, when I was working there, sweeping, at that moment, as a matter of fact, with a broom, some miniature pebbles & sand up, on the now, most Easterly, cross runway. ((The place, LAX, is really huge, especially when you're out on the tarmac, deep in the fog, one night, in the middle of the airport, where we were working, when out of the mists some foreigner who could only speak broken English wandered, really stumbled in from out of the shrouding mists and darkness to the particular site, totally lost. Had no idea where he was and had gotten there; and not being able to understand one another, it was hopeless to it get out of him, how in God's earth he had gotten there thru securities -))

((However, so far as getting back again to LAX's overall solution, and ultimate destiny, even under the most optimistic projections, there's not even anything in sight, which could possibly accomplish, what could be called true vehicles of rapidity, vis-a-vis the rather polky supersonic, at least, certainly there's not anything in sight to possibly effect what today, we can call truly high speed, across the vast expanses of the Pacific, - whose Rim, and its routes, connect locations of earth's most massive population concentrations. So that, and therefore, whatever could be accomplished in the very most optimistic projection of foreseeable lifetimes, - no matter how far out you go with them - of something callable rapid transit, ie. something truly rapid - the very limited suggestions herein, are entirely viewed, confined to the arenas of only: - across land masses, as eg. Canada, U.S.A. inter the S. Americas, etc. So that, then, further, this, admittedly critical arena, - trans Atlantic, and for us on the W. Coast, trans-Pacific, it's not even discussed, or in any way the object herein, at all; as the subject of this particular submittal, at hand, is what to do with LAX, as long as humanity is going to be burdened with the damned plane, and plagues, if indeed not often attacked, with these even more damnable, violently polluting/simely, catastrophically noisy jets. - Again, unavoidable under any possibility of the wildest projections, vis-a-vis the issue of crossing the Pacific, even if we're entirely successful of ridding the American skies of the damned polluting jets, ie. by, once again, RTD, over land-based.))

((By way of nothing, but a simple reminder, I'm the guy who wrote the airport, re. - the absurdity of its protection fence, before those there delinquents on its condition, got to work and built the 'new' one. - Also I'm the guy who, among other things, complained how wrong the compacted procedures/specifications were for the total foundational 'Structural Section' of all the runways construction, vis-a-vis the right, or at least proper, or, anyway, in any case, certainly for better way, to accomplish this aspect of construction; to be brief, right here, dynamically instead of Civil Engineering's dedication, if not passionate marriage to, in fact, fidelity to statics alone: - till death doth us part, - pure to the core, and simple, even simplistic. I never did get any responses from these comments, per the totally entranced coexistence with the notorious lethargy, if not utter delinquency, of American Management, at large, across the board, sometimes home to us via herds as anywhere, dedicated to Deadheadism, not exempting LAX hierarchies, and not exempting even as sloth within American Civil Engineering 'Professionals', - probably even, nation-wide, though, acknowledgedly, there are rare exceptions. So I guess I'd say, don't feel too bad, LAX Management, you're in excellent, company maybe even slavish lock step, at the point of that one experience anyway, why for too much, sadly, of 'Institutional American Management', clear across the length and breadth of this, our great nation - Good company?? - at least lots and lots of it.))

- This solution to all, - as much as is finally possible - of the main problems to the final



Inside: Details of the Master Plan. Where to send your comments. Info on final public hearings.

Proposed plan to guide LAX well into the future is open to comments, but only until Nov. 7. Make your voice heard.

City employees—and everyone with an opinion to share on the proposed master plan to expand LAX—now have until Nov. 7 to make their comments known, so don't wait if you have something to say.

The Federal Aviation Administration (FAA) approved a 75-day extension of the public



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Inside: Details of the Master Plan. Where to send your comments. Info on final public hearings.

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Your Letters
Public Forum
One Year Old
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Synopsis II

This, as articulated/detailed immediately following is a submittal of a proposal to make an analysis for the complete resolution of all problems, vis-a-vis LAX, from the perspective of the optimum possible vis-a-vis the three dominant ones: **Sound, Noise and Pollution.**

Obviously it cannot be easy, cheap, especially vis-a-vis \$s, so relatively worthless, now, anyway, especially compared to ones when I was young, not to mention my parents day, or the day of old man B. F. - at least 100, maybe more truthfully, accurately, about 1,000 to one - as touched on, later.

But, the major study I envision, itself doesn't have to be that expensive, especially in light of the huge/massive sums the airport already spends, seemingly on everything and in every direction there is and or has been, every one, that is except, - as seemingly, eternally apparent, the right one. . . . Not for a total elimination of these problems/others, - that cannot be done - but for the **optimum resolution possible**, vis-a-vis all exigencies extant.

The immediate costs will be for me, and 'staff', on Salary, - Not Per Hr., spelt: **S-a-l-a-r-y**, however accounting manages/process it, a secure office ^{with} area/supplies/furniture/computer of adequate capacity, availability of someone ^{who} knows how to run the damned things, access to airport plan files, with at least **availability of someone who knows how to access them, thoroughly**, at least one/two engineers, (incl. time for research, on/off site), ones of **my own, unilateral, selection**, all mileage, incl. to/from LAX, a Secy., maybe Carol, if still there, + minimum furniture etc. . . . And the **biggest, cost, by far, - Big/Huge!** - is for the **idea/solution itself** - however to be worked out, presumably over time -

Keep in touch
El Tigre
cc To various, maybe, eg. Insurance Co.'s

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09 26 03
To: Administrators/Engins. LAX, in particular + Insurance Cos.
From: El Tigre
Subject: As evolved below - ((Recipient/Reader, skip parents, - makes it a bit easier !))

optimum that's possible - of all, **A L L ! - LAX's** core problems, not to get too tiresome, is easy in concept and perfectly plausible, physically, and though not, Not ! - at all cheap; **It is still perfectly handle-able for the size of the US economy.** But it requires LAX leadership/Ex's, and others, to address it seriously; not, for one, to throw up hands in dismissal despair, of solutions before ever beginning, even the remotest evaluation and study, like **seemingly's always done:** ((. . . have to get home to mamma, maybe, and/or quick stick collective heads in the sand, - because even the dumbest of birds know that that particular posture leaves waving around in the air, up there . . . and/or otherwise, seeming a favorite alternative, simply refuse, obstinate to the end, to seriously examine/analyze suggestions, at all, - all crunched there/hiding under desks, quivering for concerns of job safety/security, instead. Really makes you want to burst out singing ' - what so proudly we hail, . . . from sea to shining sea. ' . . . huh?))

((See, one of the most basic of problems with the terminals there at LAX, is, believe it or not, they're designed and built, not recognizing that airplanes cannot back up like a car or truck, and whereas it may be understandable that when aviation first started, they didn't worry about that particular design problem, because they were utterly swamped out with other priority problems, still in the very many years since, - 'many' technologically, - the existing terminals, continued on and on in the same vein, and never changed to accommodate this fact, again that planes can't reverse and apparently were/are destined to continue to be locked in that inability, to 'taxi' in reverse. So that now, the whole of the airport is locked into that problem - although one of the things my insight and suggestions would accomplish is for the **Terminal Designs** to have the possibility to be freed from this serious handicap! However that's only a side asset of what may be an advantage of my contribution to LAX, airport design.))

Anyway, back again to the problems of American Management's propensity, with occasional rare exceptions, to rush away from, or otherwise, quick bury problems, - or as mentioned, maybe duck heads in the sand, instead ((This reaction, disease? seems rampant throughout the infinite mental constipations of irresponsible Management, endemic across the board of this: 'My country tis of thee'.))

((- true, fears/indolences, like- 'Going to lose my job if . . . ' - are valid enough emotions, maybe, but mentally constricting, highly destructive when they're allowed to transcend/substitute for thought/analysis, on the part, . . . of 'Managers' of 'Engineers'. Perhaps it's so simple that - possibly the most important of all suggestions, certainly at LAX, but even nation wide, is the suggestion that a requirement be executed, if you'll pardon the expression, for Leadership, to knife, kill, annihilating the sometimes wide-spread Managerial cowardship, seemingly endemic throughout far too much of America so called, institutions, of "Management" per se. Clean these out and get America moving again, not only at LAX, but elsewhere/throughout: - a more serious problem than Al Qaeda's going to be, ever -))

((And we all remember very well don't we, about that executive there at LAX, who was very creative and 'hollowed' out and removed all the drawers on one side of his desk so that, although the front looked like it was a set of drawers, it wasn't at all, but was a single panel on hinges so that it could open up, and it could crawl up, in a crouch, inside the now empty space, close the panel, the door, and hide, whenever a decision came that required thought or analysis, until his secretary could field the emergency. Then when the crises had passed, she'd let him out again.))

((. . . who, - the secretary, that is, - very well could have been Carol, an airport secretary; but I don't really know that. She was a Black, but had really beautiful, sparkling, I'd say even dazzling, eyes, especially in the subdued lights of a dimmed bar -))

((Anyway, then remember about that one day, when she, the secretary, if it wasn't Carol, was so busy, she forgot about him, locked up there, and at quitting time, went on home. A little later that evening sitting at the table eating dinner with her family, she suddenly screamed before all her children, cause I don't think she had a husband, though I'm really not sure of that, but she literally shrieked " Oh my God! I forgot to let Jake out ! " -))

((Maybe the story's apocryphal, but was certainly wide-spread throughout LAX, everywhere, when I was there, heard it repeatedly, at every one of all the many different places.))

OK, OK, A-OK, then back again to matters even more serious . . . Take exhaust, and/or radiation, including sound **Pollution Problems**, singly or collectively, for example. It's impossible to totally eliminate them, but they can be **dramatically reduced, to an optimum minimum, which is far from what is happening to these problem zones, there now.** It's as if LAX, seems to make no really ardent, substantive effort to accomplish real material advance.

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The optimum best possible there; certainly it wasn't then, obviously isn't, from the last time I drove by, a few months ago, which was long after I'd been working there; from obvious appearances, - relative to the whole, overall problem: A seeming mental stagnation, whether there and/or, civic halls/offices, somewhere - ((plus various reports as some in the press, etc., don't seem to reflect application of anything more than pedestrian inspirations, ie. vis-à-vis really break-through ideas. - But, Don't feel too bad, overall Congress is basically a disgust, so far as major/dramatic effort/commitment to thoroughly resolve practically any American problem; and they've a hell of a lot more money, . . . but that issue will simply have to await another day.))

((Consider, however, just the sound pollution problem. Everyone should, ought to have the opportunity to 'stand behind' one of those Westinghouse engines, when the pilots slam-dunk the throttles, - hot rodded to full power, take off mode. Instantly you get, to feel, to I.D., every single organ in your entire body, even your spleen. Though, what I 'sprinted' more was, on occasions, being close to the big jets, especially the cargo ones when they land. You should hear the shriek of their tires when they hit the tar mat, and witness the clouds of rubber they lay. Talk about any high school boy's wildest of dreams come true. It sometimes seemed to me that the cockpit jockeys of those particular vehicles, - cause there's probably only a very sparse crew aboard - may even have had competitions, to see just how much rubber each could lay; but, of course, I don't know that. I am not. Not 'accusing them of that. I think they were all good safe pilots. And besides, in addition to a sparse crew aboard, - no passengers. Then, again, maybe it's all, just that I'm not as far out of High School boyhood, as I always thought of my self to be -))

My total, optimum solution to all LAX's problems, possible, shouldn't be all that expensive. I'd say within an outside 50 B's. ((One thing's for sure, right there: That would send in hell put a lot of people back to work again. It would be an enormous boost to the present desperate economy, urgently needed right now!))

((Remember the Great Depression? I thought a dumb child, then, sure in hell do! It was the massive spending of WW II, to build vast piles of war materials, which simply turned out to be essentially dumped, which pulled us out of it. But however built the building of what came to be, total dumped waste, - does seem the most ridiculous of all ways to do it, doesn't it. - yet fact is that it did do it, and that, had as all recessions are, we've never, even begun to slip back into that particular morass, all these many years since. . . . Yup! ever again since -))

((So, This, 50 big B's - sounds like a lot, but it isn't really all. Because Presently, the, now world-wide, famous: E's - worth, very, very sadly, struggles as hard as it can, to rise, or maybe more accurately survive above what was practically, absolutely nothing more than a damn penny's worth, of my very own youth, and certainly is totally helpless, cannot at all, rise even to that miserable worth, as the era of the youth of my own parents, where it, a damn penny was, in fact, worth, even more! - than today's dollar, you understand, right her/now. - And, from the day of that spectacular old man Ben F. ? - Yup, - even less! So how the hell much is a billion dollars? In real worth? About a hundred million? - Or more realistically, truthfully, only about ten, and/or even a paltry million, only. - Only I - at the most - most of the time? - Real dollars, real live ones, - you understand. So see, how much in the damned hell are you, we, us, saying, all this is? - . . . Really costs!))

So that, then getting back to what we're talking about, this business of getting into the cost of projects in the multi-billions range, of today's pretty much, totally wasted, completely trashed out dollar; the 50 B's figure, above, is not really, at all the unreasonable amount, it at first appears, for the complete, Complete! solution, - not the present, possibly desperate, seemingly panicky one, and/or even hi/miss ones - which seems to come across, more as more of the same, maybe even badly miss-oriented, as the very many before, . . . in order to be able to resolve, - to lay claim to the optimum possible, for a solution:- To the optimum possible of all, All! LAX's Main problems, - And/Or/Otherwise, spelt:-

To Them A L L !

Plus, as mentioned, this could be a real, even a fantastic trigger, to start the whole of the

present economy's recovery back again from its present frighten-ly/desperate woes. Which, current situation, in comparison to the great generations of our parents' economies, vis-a-vis our present, infinitely timid responses to it, - must make us, indeed, currently, be the living, timid - cowards/incompetents of all God's Earth -

((At this juncture, don't forget to Remember, as we just said before, that the massive deficit spending of WW II period, - in comparative \$'s, greater than anything before and/or since - but still a total deficit spending - was precisely what catapulted the USA out, clear all the way out of its very worst of all depressions, by far, with no comparisons before and/or since: - actually over 25%, One Quarter, of all families out of work, for months/years! And, furthermore, however bad it's been since, it has never ever, begun, not even to have been that bad since! - Nope, not until, approaching this very day we're all in now. And the big asset in comparison to WW II's expenditure waste, is that the huge expenditure on LAX, proposed, wouldn't, like expenditures of WW II, be just so much waste dumped, as it was in the ocean; but continuing, wealth producing asset!))

Back again to the issue of LAX, - these considerations, at hand here, the total, overall optimum resolution of all, A L L, LAX's problems, are not in any way pie in the sky, but all/entirely well within limits of the finite, of human time/history, what we can do, of course, if: - I F, only we'll all want to badly enough. They're the very maximum best of what can be done; but it still can be, and done right where we live, breathe and have our being, - again, for one, at none other than LAX -

((One day when I was there, LAX, a foreign, Chinese, I believe, 747 was taxiing down the runway towards an area where there was a construction water truck right in its path. The driver a woman, - yea, a woman construction stiff! tried repeatedly, but couldn't get the damned, worn out GC's water truck started, to get it out of the way. Frantically she dashed out and tried to signal the plane to stop, flailing her arms wildly, all over the place. But nope, those pilots are excellent, well trained, even slavishly, and the opinion of what to do when there's obviously a multi ton construction water truck smack in your way, - and the frantic driver is in a desperate panic, trying to signal you to stop - didn't, apparently, ever happen to be one of those lessons, of theirs, tattooed into their rose memories, of what, in that 'option' to do, vis-à-vis construction Watering Trucks, stalled smack in your way, so on they came. Desperately, and very bravely, incidentally, she dashed back to the truck, and in the nick of time managed to start it and literally plunge it into a construction depression, instants before the huge wing of the plane, full of thousands of gallons of gas, just barely grazed over the top of the truck. - I kid you not - and one of the huge engine nacelles, shattering the massive, multi million dollar jet engine, brushed the side of the truck. Talk about them all being lucky, but most of all talk about a very brave construction stiff, - and a woman! - Cause I can tell you, that if I'd been in the place of that driver and saw that the huge craft, heaviest wheeled vehicle in the world, with many thousands of pounds and gallons of gas in it, wasn't all that much of a mind to stop, I'd have been across every runway and over the fence, leaving all those long legged LAX jack rabbits behind. Yup, and be long gone, forever after.))

Actually, there's really only three most urgent problems at LAX, then, which is the optimum resolution of the combination of:-

Safety,

Noise,

Pollution,

. . . within the limits of the finite, of course, cause that's where we live, breathe and have our

being; - within the realm of the possible, of this human thing. The best, not only for each, but in the end, the optimum balance, of the combined of all the above listed three, of course. We all recognize that. Ms Safety there, at LAX, is really beautiful, I guess I had a crush on her; but what she had on me, I've no idea, though, when she smiled at me, I only prayed, Oh, dear Lord, in heaven above, let it be, let it be -

((Some might combine Noise and Pollution, as essentially one problem only. In which case the entire solution of the optimum best for LAX, derives down to solving the best relative zone of/between two, TFWO, problem areas. - Only! Like I say, I was always most partial to Ms Safety. Maybe it was just because her smile was so damn seductive -))

- Because, here's a problem, maybe another one which must be weighed much more carefully:- All the persons in the vicinity of LAX might/could start massive suits against the airport; demanding to get all their communities there, back again - not only territorially, but vis-à-vis, livability, get rid of the damned noise, smell, et al, so that, other communities in the vicinity, too, might rise up, in response to their native, American, inalienable rights, - get together/respond, you understand, and successfully pressure LAX, and whoever/whatever institutional hierarchy's above them, to abandon their present expansionist proclivities and/or huge dangers of their dominant approach path, Noise, or whatever else, etc., ad infinitum, and at least this much, restructure in the most rational directions. I'd then sure in damn hell, consider some of these optimum alternatives, spelt massive suits, if I were one of them; if it was me, - wouldn't you??

((Cause too, talking about possible legal suits, and all that kind of stuff, we all remember, don't we, I sure as in hell do, about that day: - Yup, right smack on terra firma of none other than mainland, - I was on-the-ground in 3-D, full dress, LAX' reality. Cause, on that particular day, wandering all over the terminals, there, of none other than LAX, here I was/ found myself with a live gun in a paper bag. Yup, you got it; I sure as in Hell was! - a pistol to be precise. And then when I walked up to a police officer outside the big terminal there, who was leaning, seemingly nervously/tensioned, up against his patrol squad car, and I said to him, I have a gun here, in this bag. . . . thinking of asking him what the damn hell shall I do with it, . . . but hardly had I the chance to get the very first words of my quarry out of my mouth, when he said excitedly, 'Don't bother me! Don't bother me!' repeating it again, and again: Saying: 'I'm waiting for some very V.I.P.'s' (Actually V.I.P. already means 'very'; however I didn't get, or want to, - into that particular discussion with him, at least not right then.) - So then I thought, OK, and kind of wandered off, wondering what the hell to do now; and - why in the damndest of all helms, is it me, - am I finding myself, here at night/ LAX, in this damnable predicament! - wandering all around its grounds and terminals, here and there, with a paper bag, full of nothing other than a pistol, which I seemingly cannot, - you might articulate it, - and/or? - Sure 'an in the Damndest of Helms, don't want to go through that experience again, would you? Ever -))

Well, never mind, not to get distracted all the time and get back again to work, another problem at LAX, is Second Level, there. Because, just like every one of the later-years-built overpasses and interchanges here throughout the South Land, and CA, - these, in fact, giant, monumental/colossal structures, possibly some of the whole world's biggest, yea, on all earth; have, as a matter of fact, long since, and now continue to all be built out of reinforced concrete. This, reinforced steel and concrete, is indeed a marvelous building substance, but it does have one weakness, - the one, single, only one I know of, which is, it's rigid, brittle and subject to being a shatter-able substance, - under shock. (In fact, when you want to remove and destroy an existing concrete structure, then you hit it with shock, as with a jack hammer. It's how

you demolish it, if it's what wanted.) . . .

Now where the problem is, as everyone knows/can see, that all these great structures, as 2nd level, erected, as I say, now, in the zone of earth's most dangerous shock area! - are all constructed out of shatter-able concrete. Cause, all that's wrong with even the best of reinforced concrete structures, - not to get too tiresome on this point, is their one and only single weakness. It's they are subject to shattering under shock. Because see, 'originally, in the old day' these giant of all structures, as 'second level' and especially ones concentrated throughout S. Cal, - ie, here, - right here - . . . would have been, - in fact were, all built in two phases. The main frame was built out of much more shock resistant steel framing, whereas the concrete material was used only for the secondary part of the structure assembly, phases, roadways, etc. So that, all these were then all built that way. You might say, at this particular juncture, the application of a little sanity, was used, applied to the problem, - nothing more than already well known in as early as Freshman years, Engineering curriculum; which, also those of us who matriculated out of CA's grade schools learned even so very much earlier, well/thoroughly, - covering there, terrified, under our desks in grade school earth quake drills, - Remember ?

Further, using the steel for the main frame, and the reinforced concrete for the secondary structures, is the way highway overpasses are now built, all the way across the rest of the States, still, now today! Yup, in the non-heavy shock areas, where the imperative to build them correctly, is not so urgent; - Guess what, they got it right! Yet right here in the earth's huge-est of all quake zones, where they are most subject to be shattered from earth's heaviest of all shocks, - they are now-a-days, built all wrong! . . . out of shatter-able concrete. Yea! No longer built the safest way they should be, out of the right substance! - for the main frames, anyway - Called professional? - Engineering???

So it is likewise, with LAX's impressive and very efficient, Second Level highway access and egress structure. The damn thing's completely built out of a shatterable substance! I mean talk about utter lutzery, - idioy! ((See the picture attached below, of a sample of what's being discussed here. Cause it is a little hard to get your finger on it, isn't it. - And that picture's, just from a relatively pissy-ass quake of 6.7, - very far from a Richter 8, which on a logarithmic scale, is very, much heavier, far, far greater shock force/energy.))

((As a matter of personal fact, I started out on that 2nd level project working for a 'sub', - not referencing here, when, earlier, I did in fact work literally, 'sub', (- abbreviation, also for 'submarine' design, at Mare ls, in specific, Vallejo, CA. - But, what's being referenced at this immediate juncture, is something quite different, it was when I worked for a 'sub', that is a subcontractor, to the General on the building of 2nd Level' right there, LAX, CA. . . . Yes, and did point out to the General at that time, the weakness of employing shatter-able reinforced concrete design/construction selection, vis-à-vis steel beams for the main frame/columns of Second Level. For example, for one, the most spectacular of all collapses from natural causes in the whole USA of the reinforced concrete, of the double level, elevated freeway structure around the generally westerly boundary of the city of Oakland, CA. Essentially the whole damn thing tumbled completely down, with a lot of injuries and serious loss of life, for miles, from about, only a Richter 6+, - range tremor, - vastly less than an 8; and whose epicenter was about 60 miles away! But, soon, quite soon after, I, for one, did, but articulated my anxieties, - getting back, now, to 2nd Level, LAX: . . . mysteriously, I was, in fact, 'transferred' far, far away, clear all the way off that job, the project, to eventually the LA Sewage Disposal Plant's major overhaul job. But that's a story for another day.))

((Though I did get the inspiration working there, at LA's Sewage Disposal Plant, some years later, again biggest, World Wide - that if it is possible to overhaul the whole of LA's Sewage Disposal Plant, which incidentally is right there adjacent to LAX, without ever stopping the giant flow of all LA's sewage, why wouldn't it also be possible to completely overhaul the Congress of the United States of America, completely, with out stopping its 'expedition' of our national flow of political business. But then maybe it is not a good idea to compare the Congress of mighty USA, and its flow of political business, to the functioning of the Biggest Sewage Disposal Plant, in the whole world. Then again, comparing Congress to a Sewage Disposal Plant, considering performances, may, in fact, not be all that bad an analogy. But, then, my present efforts to do just that, not turn Congress here into a Sewage

Commissioners
Harold V. Helsley, *Chair*
Leslie G. Boliamy, *Vice Chair*
Wayne Rew
Pat Modugno
Esther L. Valadez

November 6, 2003

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

Dear Mr. Ritchie:

SUBJECT: LOS ANGELES COUNTY AIRPORT LAND USE COMMISSION COMMENTS ON THE LAX MASTER PLAN DRAFT SUPPLEMENTAL EIS/EIR

Thank you for sending the LAX Master Plan Draft Supplemental Environmental Impact Statement/Environmental Impact Report dated July, 2003 to the Los Angeles County Airport Land Use Commission (ALUC). The County of Los Angeles has reviewed the EIS/EIR and comments were transmitted to your office by the Board of Supervisors on November 3, 2002. As you know, the Master Plan must also be submitted to the Regional Planning Commission in its capacity as the ALUC for review and consideration, as mandated by the California Public Utilities Code (PUC), Section 21676(c).

As part of the ALUC review process, the Commission will conduct at least one advertised public meeting where interested parties will have an opportunity to present testimony to the ALUC. The ALUC's determination should be made prior to approval of the Master Plan by the Los Angeles City Council.

For further information regarding project referral to the ALUC, please contact me or Mark Child at (213) 974-6425 Monday through Thursday between 7:30 a.m. and 6:00 p.m. Our Offices are closed on Fridays. Thank you for the opportunity to comment on this project.

Very Truly Yours,

DEPARTMENT OF REGIONAL PLANNING
James E. Harri, AICP
Director of Planning



Sorini Alexanian
Supervising Regional Planner

SA:mc
c: Airport Land Use Commission

Director of Planning
Dept. of Regional Planning

Rosie O. Ruiz
Secretary to the Commission

320 West Temple Street, Los Angeles, California 90012 Telephone (213) 974-6409 or TDD (213) 617-2292



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November 7, 2003

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

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

Re: Opposition to Supplement to Draft EIS/EIR Master Plan

Dear Mr. Kessler and Mr. Ritchie:

The City of Monterey Park is gravely disappointed with the Supplement to the draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) Los Angeles International Airport (LAX) Master Plan. The Supplement EIS/EIR document shares the same deficiency as the January 18, 2001 draft EIS/EIR document that proposed the first three Alternatives: A, B, and C. Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) have once again failed to address impacts to the Western San Gabriel Valley communities that are currently suffering from severe negative impacts from LAX operations. The City had submitted comments to the January 18, 2001 draft EIS/EIR LAX Master Plan and voiced our concerns about absence of analysis on impact to outlying areas. To date, we have yet to receive a response to this dated document. (This document has been attached.)

Our elected officials have addressed some of the communities' concerns at the August 13, 2003 public hearing that was held at Luminarias Restaurant, Monterey Park. We would like to note that the City of Monterey Park is a member of the Los Angeles Airport/Community Noise Roundtable and have participated in the formation of the comments that they have submitted. We also note that we concur with findings submitted by the County of Los Angeles Board of Supervisors.

Pride in the Past • Faith in the Future

Comments to Draft EIS/EIR Master Plan
November 7, 2003
Page 2 of 3

In regards to Alternative D, the City is alarmed with the proposed changes to the airport that would accommodate and encourage the use of larger aircraft (the *New Large Aircraft*) and increase the number of approaches to the north runway complex, specifically at night, (Section 4.1.3.1.2.1). In addition, we concur with the County of Los Angeles' concern that certain proposed facilities - namely the Ground Transportation Center and the Intermodal Transportation Center - are designed for a much larger capacity than 78.9 MAP. The proposed reconfiguration of the gates will also allow for a much larger number of carriers than 78.9 MAP.

- 1) The City appreciates LAWA's efforts to reduce the number of aircraft operations by encouraging the use of larger wide-body aircraft. However, the louder noise associated with the larger aircraft will not offset the benefit of less traffic. Our communities cannot tolerate the current noise levels generated by LAX aircraft operations that have been measured at 81 dbA: How are we expected to live with an estimated dbA of 91 or even higher noise levels?
- 2) LAWA's proposal to designate the north complex for arrivals in an effort to increase safety and efficiency through airfield facility modifications will have a significant impact on our community. The draft EIS/EIR attests that the noise contours would be "longer (further east) along the approach to the north runways as a result of projected increases in arrivals to that complex." Currently, due to the physical topography of many housing tracts in Monterey Park, Montebello and Alhambra the planes arriving into the north complex are flying less than 1,900 feet directly above our homes. The diversion of flights that are currently arriving into the southern complex to the northern complex compounded with the increase in flights in LAX (i.e., 67 MAP to 78.9 MAP) will create a continuous stream of low-flying aircraft over our communities.

In LAWA's noise study of our community dated May 1998, they provided several facts that indicate that Alternative D could result in a 65 db CNEL for our community. Namely, the measured noise level of a wide-bodied jet flying over our community is 76 dB (or 80 SEL), and the frequency of overflights for a "heavy overflight day" is every two minutes. Given that Alternative D proposes (1) a predominance of wide bodied jets and even larger planes at LAX and (2) the designation of the northern runway for all arrivals, the daily average noise level based on these two factors can conceivably create for our community a CNEL of 65 dB or likely higher, which the State of California defines as significant noise.

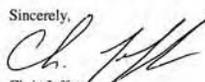
- 3) LAWA has included a noise analysis using the single event noise level that can better describe the impact of aircraft noise. However, threshold of significance is set at 94 dbA, which is equivalent to standing in near proximity to a jet taking off, or next to a train blowing its horn. In fact, the National Institute on Deafness reports that noise levels above 90 dbA causes hearing damage. The Los Angeles Airport/Community Noise Roundtable's has extensive comments in the area of single event noise level thresholds that should be addressed

Comments to Draft EIS/EIR Master Plan
November 7, 2003
Page 3 of 3

- 4) The Master Plan fails to provide any mitigation to increased truck traffic despite a 64 percent increase in cargo activity. Off airport surface transportation measures are confined to air passenger travel and within the immediate airport area (e.g., on-ramp/off-ramp junctions). The Southern California Association of Governments (SCAG) projects that drivers will be traveling at less than 16 miles per hour (from 27 miles per hour) during peak hour and that 32 percent (from 17%) of the average driver's mileage will be spent driving in "stop and go" congested conditions in the regional freeways such as the San Bernandino/Santa Monica, Long Beach, and Santa Ana. It is very likely that LAX cargo traffic alone will cause significant problems to the regional surface transportation infrastructure as it merges with the heavy truck traffic from the recently completed Alameda Corridor improvements that end at the Ports of Los Angeles and Long Beach.
- 5) We would like to reiterate a concern that was mentioned in our November 2001 comments to the January 2001 draft EIS/EIR: Air Quality. The proposed increases in both MAP and cargo activity will increase aircraft emissions of criteria air pollutants over the San Gabriel Valley. "Criteria air pollutants exacerbate respiratory and cardiovascular conditions in young and old members of our communities, while the long-term and cumulative risks posed by the emissions of toxic air pollutants (TAP) to the citizens living and working in the communities under the flight paths are currently unknown."

The City of Monterey Park recognizes that the Supplemental Master Plan proposes an alternative that has the lowest capacity of all four alternatives, and in fact assumes that other airports in the region will accommodate their fair share of increase in air traffic. We whole-heartedly support the *Regional Airport Approach* and believe that all communities in the region should share both the benefits and disadvantages of regional airport activity. However, there needs to be some assurance to LAX impacted communities that LAX airport activity will be restrained regardless of the outcome of regional airport development. In addition to working with State and Federal officials to expand airport activity in Orange County, LAWA needs to implement measures to require or encourage use of its other regional airports in the Southern California basin - Ontario, Palmdale and Ventura - to alleviate demand on LAX. Specifically, LAWA should focus on moving air cargo activity to these outlying airports where goods distribution facilities are established.

Please contact me, or our Transportation Manager, Amy Ho, should you have any questions.

Sincerely,

Chris Jeffers
City Manager

Attachment - November 8, 2001 Comments to Draft EIS/EIR Master Plan



City Council
Francisco Alonso
Fred Balderrama
David Liu
Benjamin "Frank" Venti
City Clerk
David Barron
City Treasurer
Markell Ing

Mr. David B. Kessler, AICP
U.S. Department of Transportation
Federal Aviation Administration
AWP-611.2
P.O. Box 92007
Los Angeles, CA 90009-2007

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

Re: Comments to Draft Master Plan Draft EIR/EIS

Dear Mr. Kessler and Mr. Ritchie:

The City of Monterey Park has worked jointly with the City of Montebello to prepare comments to the Draft Master Plan Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Los Angeles International Airport.

We believe that the draft Master Plan Draft EIR/EIS is "fatally flawed" and that the only viable conclusion is to start the process over again.

Please contact Mr. Chris Jeffers, City Manager, at (626) 307-1257 if you have any questions. We look forward to your response to our concerns as addressed in the attached report.

Francisco Alonso
Francisco Alonso
Mayor

Fred Balderrama
Fred Balderrama
Mayor Pro Tem

David Liu
David Liu
Council Member

Benjamin "Frank" Venti
Benjamin "Frank" Venti
Council Member

c: Congress Woman Hilda Solis
Senator Gloria Romero
Assembly Woman Judy Chu, Ph.D.
Prick in the Past • Faith in the Future

Comments on the Draft EIS/EIR regarding impacts of the proposed LAX expansion.

The Cities of Monterey Park, Montebello and Communities of the Western San Gabriel Valley
November 7, 2001

1. Introduction

This is the official comment document of the City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley on the proposed Los Angeles International Airport (LAX) Master Plan and the Draft Environmental Impact Statement/Environmental Impact Report (draft EIS/EIR)¹. The Cities appreciate the opportunity provided by Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) to comment on these documents.

The Cities of Monterey Park, Montebello and the communities of the Western San Gabriel Valley are located within 12 air miles to the east of the Los Angeles International Airport. These communities are located directly under the flight paths of aircraft arriving from the north landing at LAX, and currently are affected by the noise, air emissions, as well as safety related issues from these "over flights." These communities are especially affected under high air traffic congestion, or poor visibility conditions. Under these conditions, more distance is required between aircraft arriving at LAX, and flights have to be routed further east for their approach, further exacerbating the over flight conditions.

These Cities also have a unique topographical feature in that certain portions within their territories are located at elevations of up to 900 feet above sea level. In an area where approaching flights are supposed to fly at an altitude of 2,500 feet, this means these portions of the communities are exposed as much to aircraft noise and emissions as communities located directly adjacent to the airport. In addition, these Cities are also home to a high proportion of minority and/or low-income population. According to the 2000 US census information, the City of Montebello is approximately 75 percent Hispanic, and the City of Monterey Park is approximately 57 percent Asian and 29 percent Hispanic. In fact, the racial makeup of the Monterey Park community is nearly 80 percent minority.

¹ Prepared by Ecos Consulting, Portland, Oregon.

The City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley have grave concerns in regards to the proposed expansion plans presented in the LAX Master Plan and draft EIS/EIR documents. We believe the proposed plans are deeply flawed, and contain numerous omissions, and ambiguous or misleading information. In addition, they contain a number of incorrect assumptions - the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although alternatives with far less community impacts exist, including a regional transportation system. The Cities are particularly concerned by the omission of any analysis of the effects of the proposed expansion on their residents, especially on the topic of air safety.

Specifically, the Cities object to the plan proposed by the draft EIS/EIR and the LAX Master Plan because of the following factors:

- ♦ **Air Quality Impacts:** The air quality for the citizens living and working in the Cities of Monterey Park, Montebello and the Western San Gabriel Valley will be severely affected as over flight emissions increase, as projected by the draft EIS/EIR. Furthermore, the draft EIS/EIR has not provided impact analysis for the exposed communities under the airport flight path. As the current operations at LAX already constitute the largest single source of air pollution in this nation's worst air quality region, any proposed expansion will further decrease the air quality in the Los Angeles Basin and the affected communities.
- ♦ **Noise Impacts:** An increase in airport operations will significantly increase the noise levels in communities directly under the flight path, thereby reducing the quality of life of the people living there. Scientific studies have shown that noise from departing and arriving aircraft overhead can be a constant source of distress to community members (especially noise from round-the-clock cargo operations). Aircraft noise disturbance range from interfering with normal speech to interrupting sleep, and can disrupt a wide range of activities. Studies also show there is a relationship between noise and the health of community residents - high noise levels can be a factor in hypertension and cardiovascular disorders. The draft EIS/EIR also does not contain noise impact analysis beyond the communities adjacent to airport boundaries.
- ♦ **Human Health Impacts:** Implementation of the draft EIS/EIR's proposed build alternatives will result in increased aircraft emissions of criteria air pollutants - components of urban air pollution and precursors of smog, as well as emissions of toxic air pollutants (TAP) over the Western San Gabriel Valley. Criteria air pollutants exacerbate respiratory and cardiovascular conditions in young and old members of our communities, while the long-term and cumulative risks posed by the emissions of TAPs to the citizens living and working in the communities under the flight paths are currently unknown.

- ♦ **Traffic Impacts:** The draft EIS/EIR projects a significant increase in cargo volume at LAX, which will have the potential to affect traffic through the Western San Gabriel communities. Currently, truck traffic to and from the ports of Los Angeles heading east to the Inland Empire and points east pass through these communities. An increase in cargo traffic to and from LAX will add to the current high volume, significantly affecting local traffic patterns and as well as regional arterials to access our communities.
- ♦ **General Concerns:** The draft EIS/EIR lacks sufficient health studies, relies too heavily on models for impact analysis, and omits analysis of significant impacts to outlying areas. While the proposed expansion plans have the potential to affect the whole Los Angeles region and our communities on a number of aspects, most of the draft EIS/EIR's impact analysis was narrowly focused. LAWA and the FAA need to complete a more thorough investigation and analysis of the effects, including safety issues, of the increased operations on communities directly under the flight path, as well as the Los Angeles region.
- ♦ **Outreach Concerns:** The draft EIS/EIR and LAX Master Plan combine to present a prohibitive document. It is over 12,000 pages long, available to the general public only at limited locations or via the Internet, and costs approximately \$3,300 to purchase a hard copy. The document is written by experts, and contains many complex technical details. Due to its limited availability, the technical details, and the costs associated with purchasing a copy of the draft EIS/EIR, it is very difficult for the average citizen, and even small communities and institutions to fully gain an understanding of the impacts of the proposed expansion of LAX. In addition, LAWA and the FAA have not done a credible effort to inform or elicit input from the affected communities.
- ♦ **Regional Transportation Strategy:** The draft EIS/EIR and the proposed Master Plan do not reflect long-term regional transportation strategy of the greater Los Angeles Region. The proposed expansion only focuses on operations at LAX. It does not adequately assess the viability of a region-wide transportation system.
- ♦ **Environmental Justice:** The draft EIS/EIR analysis of impacts focuses narrowly and does not look beyond the communities immediately adjacent to LAX. Communities directly under the flight path are also affected by operations at the airport, and will be subjected to severe air and noise pollution impacts as operations at LAX increase. These communities are not considered for any mitigation measures by LAWA and the FAA. These communities, including the Cities of Monterey Park, Montebello and the Western San Gabriel Valley, are comprised mostly of minority residents.

These residents are unfairly bearing the burdens of LAX operations and any future expansions, without any of the projected benefits.

- **Security and Safety Factors:** The events of September 11, 2001 have created unforeseen circumstances that drastically affect current and future US air travel as well as the growth pressure at LAX. Due to these events, the Cities of Monterey Park, Montebello and the communities of the Western San Gabriel Valley request that LAWA revise the Master Plan and the draft EIS/EIR to include analyses pertaining to security and safety conditions at LAX. These revised impact analyses by LAWA should take into account the near and long-term revised passenger and cargo forecasts based on the September 11 events' impacts to the economy, airlines, security and safety, and air travel in general.

Given the public outcry against the draft EIS/EIR and Master Plan, and the changes in the industry due to the events of September 11, LAWA has the unique opportunity to revisit the document and incorporate the feedback already received. At the very least, LAWA needs to update the Master Plan based on the changes in the industry. These changes are discussed in more detail below.

In summary, the Cities of the Western San Gabriel Valley submit that the draft EIS/EIR documents provided by LAWA and the FAA are currently insufficient. At a minimum, they must be revised to acknowledge the significance of current impacts and the potential for additional impacts in the future.

We request that LAWA and the FAA conduct additional studies and provide analyses of impacts on communities directly under the flight path, and especially those located below the 3,000 feet operating ceiling. In addition, LAWA and the FAA need to also consider the following:

- A study of toxic air pollutants from aircraft and their long-term, cumulative impacts on the exposed population.
- A study of aircraft noise impacts on the communities under the flight path.
- The viability and safety of increased LAX operations over the Los Angeles Region's already constrained airspace.
- Economic (cost-benefit), and origin and destination analyses for affected communities.

In terms of proposed mitigation strategies, we ask that LAWA and the FAA provide the affected communities, including those under the flight path with more defined and realistic mitigation strategies that will actually reduce LAX's current and future operational impacts, including:

- Noise reduction or noise limitation plans for the affected neighborhoods, including restricted flight hours and ceilings.

- An air quality improvement plan to minimize the effects of toxic and criteria air pollutant on the affected communities, including education and outreach efforts to the affected population.
- Active mitigation strategies that monitor impacts to the affected communities and respond whenever impact levels exceed acceptable limits.
- A concrete, step-by-step plan to address environmental justice issues, including commitments to recognize and address the imbalance of the environmental, noise and health burdens of the airport's operations and expansion currently borne by low income and minority populations under the flight path.

LAWA and the FAA need to carefully consider a more regional transport system that will better serve the Los Angeles Basin. A regional approach to meeting the Los Angeles Region's transportation needs will help to reduce impacts and pollution in communities under the LAX flight path. This approach will better serve the region's future growth, and will provide a more fair distribution of the economic gains to the LA region. We believe that this region has the potential of setting the standard for a world-class regional transportation strategy.

2. Impacts

2a. Air Quality Impacts to Communities Under the Flight Path

Any expansion of LAX operations will further decrease the air quality in the communities directly under the airport's flight path, including the communities of Western San Gabriel Valley. According to the US EPA, aircraft emissions from about 500 to 3,300 feet altitude are essentially the same as emissions at ground level². Thus, the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley are exposed to the same air pollutants as communities closer to LAX, due to the fact that these Cities are directly under the flight path and are located within the 2,500 feet operating "ceiling." As operations from LAX increase, we believe that the air quality for the citizens living and working in the Cities of Monterey Park, Montebello, and the Western San Gabriel communities will further worsen.³

"Significant and unavoidable" air quality impacts

The draft EIS/EIR lists six "significant and unavoidable" air-quality related impacts to the communities surrounding LAX, at least two of which will also significantly impact communities under the flight path.

² "Control of Air Pollution from Aircraft and Aircraft Engines." Regulatory Support Document, US Environmental Protection Agency, Washington DC, 1997.

³ LAX Technical Appendix G. "Air Quality Impact Analysis," from "Draft EIS/EIR, Los Angeles International Airport Proposed Master Plan Improvements," US Department of Transportation, Federal Aviation Administration.

- The draft EIS/EIR concludes that increased traffic and activity levels will result in increase emissions of all five "criteria pollutants" (the five EPA-classified main components of urban air pollution) in all expansion scenarios.
- The draft EIS/EIR concludes that people living, working, recreating, or attending schools in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants (TAP).

Increased criteria pollutant emissions and an increase in their ambient air pollution concentrations will lead to adverse health effects on the residents of the local communities. Emissions of other compounds from aircraft operations will also increase (along with these five criteria pollutants) as LAX operations and over flights increase. These compounds include toxic and carcinogenic air pollutants (TAPs) whose effects are just beginning to be investigated, and their cumulative effects on the general populace are far from fully understood.

The draft EIS/EIR acknowledges that people living, working, recreating, or attending schools in communities near the airport may experience increased incremental cancer risks from exposure to toxic air pollutants. However, we ask that LAWA and the FAA thoroughly investigate these risks, and address ways to mitigate these risks. Air pollutants also harm trees and other plant life in the same way they affect humans: by reducing their respiration capacity and increasing their susceptibility to diseases and insect attacks. All of these factors will act to reduce the quality of life for all of its citizens.

2b. Noise Impacts to Communities under the Flight Path

The proposed LAX expansion would result in an increase in airport and aircraft activities. Increases in over flights and their frequency can significantly increase the noise levels in communities under its flight path, thereby reducing the quality of life of the people living there. In fact, the City of Los Angeles has identified noise generated by LAX as the primary unresolved noise issue facing the City.

The current operations at LAX already subject thousands of people living and working in the Western San Gabriel Valley neighborhoods under the flight path to constant aircraft noise. Current FAA regulations allow for communities experiencing noise levels of 65 dB community noise equivalent level (CNEL) or above to qualify for mitigation measures.

However, for the Cities of Monterey Park, Montebello, and the Western San Gabriel Valley communities, the 65 dB CNEL does not adequately capture the loud noise instances of over flights, which belong in the "single event" category. The 65 dB CNEL measurement only extends to an area that covers less than a mile to the east of the airport. While some measurements were taken in our communities, these did not avail the communities under the flight path to any available mitigation measure. The effects of increased aircraft noise intensity on

the citizens of the Western San Gabriel Valley can be as harmful as the impacts on the communities directly adjacent to LAX.

"Significant and unavoidable" noise impacts

The draft EIS/EIR lists seven "significant and unavoidable" noise-related impacts to the communities surrounding LAX, at least three of which can also significantly impact communities under the flight path.

- The draft EIS/EIR concludes that total population/dwellings exposed to aircraft noise above 65 dB CNEL would increase under the three proposed build alternatives, and decrease under the No Action/No Project Alternative.
- The draft EIS/EIR concludes that sensitive uses exposed to aircraft noise above 65 dB CNEL would increase under the three proposed build alternatives, and decrease under the No Action/No Project Alternative.
- The draft EIS/EIR concludes that there are noise-sensitive parcels previously exposed to 65 CNEL or higher noise level that will be exposed to increases in noise levels of 1.5 CNEL or greater under the proposed expansion plans.

Under the "preferred build alternative," more sensitive use areas such as schools, churches, and other institutions in communities surrounding LAX will be exposed to higher noise levels in 2015, with the phasing in of larger aircraft and cargo flights. This includes sensitive areas in the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley. High noise levels on communities are not only a constant source of distress, but can disrupt learning abilities in children.⁴

Many members of the nearby communities, and communities under the flight paths are already exposed to excessive noise levels under the current LAX operational structure. We believe the proposed expansion plans will result in an increase in the numbers of the population in the Western San Gabriel Valley exposed to high noise levels and further reduce their quality of life.

Due to the elevation, and the location, the LAX over flights subject the Cities of Monterey Park and Montebello to unacceptable noise levels. According to FAA guidelines, an increase in 1.5 CNEL constitutes a "significant" noise level increase. Currently the communities in the Western San Gabriel Valley have no way of determining whether their residences, schools, and parks currently exposed to excessive aircraft noise levels will be exposed to even higher levels of noise under the proposed expansion plans. Furthermore, none of the mitigation strategies proposed by the draft EIS/EIR to mitigate noise from airport

⁴ See, for example, Bullinger, Monika; Hygge, Steffan; 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.

operations will result in reduced noise impacts to the communities under the flight path, including the proposed "least impact" expansion scenario.

While the draft EIS/EIR projects that there will be significant increases in noise levels as well as increases in the noise intensity due to increased operations, it discounts how these increases may affect communities under the flight path, or their environment. Children are particularly susceptible to the effects of high noise levels in their home and learning environments.

Furthermore, scientific studies conducted on the effects of high noise levels on communities have shown that there is a relationship between noise and the health of community residents. Scientific studies have also shown that noise from departing and arriving aircraft is a constant source of distress to the affected communities, interfering with normal speech, interrupting sleep, and can disrupt a wide range of activities, and individuals' sense of well-being. A major effect of chronic exposure to elevated noise levels among adults living near airports or on the flight path is the feeling of helplessness: most people who are annoyed by airplane noise report feeling unable or helpless to alter the situation.⁵ High noise levels have also been linked to hypertension and cardiovascular disorders.⁶

The proposed increase in operations outlined in the draft EIS/EIR will subject noise sensitive areas such as schools, churches, and other places of gathering, including parks and other recreation venues to excessive noise levels. Studies have documented that children chronically exposed to aircraft noise have poorer reading skills when compared to children living in quiet neighborhoods. In addition, studies have suggested that children in high noise areas may develop poor persistence on challenging tasks.⁷ All members of our communities will be severely affected, especially ones with less mobility, as they will have no escape from airport-related noise, either in their homes, or at any other near-by location in the communities where they choose to go for recreation or social gathering.

Finally, the draft EIS/EIR's expansion plans include proposals for increase in LAX's cargo handling capacity from the current 1.9 million annual tons to 4.2 million annual tons. This increase will result in more round-the-clock cargo flights and other operations, potentially increasing nighttime noise levels. Studies have found that intermittent and impulsive noises, such as aircraft noise overhead, are more disturbing to sleep than continuous noise sources. Furthermore, the quality of sleep and sleep disturbance are directly related to aircraft noise exposure in these studies.⁸

⁵ Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," *Sound and Vibration*, December 1976.

⁶ See, for example, Bronzal, 1998; or Cohen et al., 1981.

⁷ Cohen, Sheldon; Evans, Gary W.; Krantz, David S.; Stokols, Daniel, "Physiological, Motivational, and Cognitive Effects of Aircraft Noise on Children", *American Psychologist*, Vol. 35, No. 3, March 1980.

⁸ Borsky, Paul N., "Sleep Interference and Annoyance by Aircraft Noise," *Sound and Vibration*, December 1976.

2c. Surface Traffic Impacts to Communities on the LAX Cargo and Traffic Corridors

The Master Plan's proposed expansion of LAX operations, especially the increase in LAX cargo capacity, will have the potential to significantly alter the traffic flow through the Cities of Monterey Park, Montebello, and other surrounding communities in the Western San Gabriel Valley. These communities are located on the LAX traffic and cargo corridors (which include I-5, I-10, I-105, I-605, I-710, US-60, and US-91).

The draft EIS/EIR concludes that construction activities from any of the proposed build alternatives will result in increased traffic congestion, potentially affecting the local communities during the next fifteen years of construction and beyond. It further states that these traffic impacts to the citizens living and working in the communities surrounding the airport will be "significant and unavoidable." These "significant and unavoidable" impacts may well extend to other communities beyond the draft EIS/EIR's analyses, especially communities that are on the LAX traffic and cargo routes.

Proposed expansion's impacts on surface traffic

The draft EIS/EIR's evaluation of surface traffic impacts by the expansion plans concluded that:

- ◆ Construction-related traffic, lane closures, and detours would temporarily impede access to community services and other amenities from some portions of adjacent communities.
- ◆ Inbound, upper level ramps traffic in the central terminal area (CTA) would increase.
- ◆ Change in vehicle demand through various intersections.
- ◆ Construction traffic would disrupt normal roadway operations.
- ◆ Disruption of adjacent communities due to temporary changes in circulation patterns (on airport) during construction.

We believe that additional analyses are needed to evaluate impacts to communities such as the Cities of Monterey Park, Montebello, and others. In particular, LAWA needs to conduct a traffic study that includes the major freeways (I-405, I-10) and the impacts on the increased traffic on these roads from the expansion.

3. Flawed Assumptions and/or Omissions by the Draft EIS/EIR

3a. General Document

In examining the draft EIS/EIR, we believe that the conclusions regarding the proposed expansion's impacts on the affected communities, especially communities under the flight path, are not entirely accurate or reliable, and are understated or flawed. Below are a number of factors that we have identified that may affect the draft EIS/EIR's overall assessment of impacts.

- ◆ The draft EIS/EIR conclusion that the preferred alternative – alternative C or "No Additional Runway" – will have the least negative impacts to the communities and the region is a result of certain questionable assumptions, if not downright advocacy. The preferred alternative, which results in projected improvements in traffic flows and the least delays, compared to the "no action" scenario, inevitably has fewer emissions and noise impacts at LAX. However, the communities under the flight path will not reap any of these benefits, and will be subjected to additional over flights, emissions, and noise.
- ◆ The use of the "no action" comparison by the draft EIS/EIR is also extremely misleading to the general public, as the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although less burdensome alternatives exist.
- ◆ The assumptions underlying the impact analyses ignore the possibility that airport improvements may result in more passengers or more flight operations, sooner. If the airport increases its airside efficiency and reduces delays, it is plausible that airlines will choose to increase flights to LAX as opposed to using other regional airports, and resulting in increased community impacts, including impacts to the Western San Gabriel Valley communities.
- ◆ The draft EIS/EIR's air quality and noise impact assessments and conclusions use estimates that are based only on models and simulations. The draft EIS/EIR only offers one scenario result for each proposed expansion plan, rather than a range in which future emission inventories or noise impacts may fall. These impact assessments neglect to include analysis for communities under the flight paths.
- ◆ The impact analyses for each of the planning horizon year uses only one possible composition of the future aircraft fleet using LAX. We believe the assumptions for the fleet projection to be overly optimistic, with the adoption of larger aircraft classes by airlines and cargo carriers alike running counter to SCAG's Regional Transportation Plan projections. We believe additional analysis is needed using lower adoption rates by airlines and cargo carriers. More realistic adoption rates have the potential to increase expansion impacts to local communities and communities under the flight path.

- ◆ The draft EIS/EIR's projection of aircraft fleet mix does not count foreign-owned and operated aircraft. Sufficient information is available to tell us that emissions from this category may be another significant contributor to the overall airport air quality impacts. Given the importance of LAX as an international hub, foreign flights are expected to account for at least 7% of traffic, if not more.⁹ It is also likely that activities by foreign-owned aircraft will increase in the near future, like other air transport activities. If so, their contribution to the air emissions and noise impacts will also increase.

- ◆ Airspace/Flight Path analysis: the draft EIS/EIR used inaccurate and outdated sources to calculate delays (OAG and ACARS) that do not report all aspects of flight operations. In addition, the use of these outdated and inaccurate information source poses a clear safety threat to the communities located under the flight path and the Los Angeles Basin.

- ◆ The draft EIS/EIR fails to depict routes that are in conformance with stated airport and FAA policy, as flight paths are not provided in the reports. The absence of flight path information cannot allow for an adequate analysis of the impact of the proposed expansion plans.

3b. Air Quality Impacts Assessment

- ◆ The draft EIS/EIR's analysis of air quality impacts on affected communities has completely neglected to take into account the impacts of air pollutant emissions on communities under the flight path, including the Cities of Monterey Park, Montebello, and other communities in the Western San Gabriel Valley. As these communities are within the 2,500 feet flight ceiling of arrivals at LAX, any increase in flight operations will expose them to the same air pollutants, and potentially the same air quality impacts as the communities surrounding LAX. Unlike the communities surrounding LAX, the communities under the flight path will not benefit from any proposed air pollution mitigation measures.

- ◆ In discussing the impact of toxic air pollutants (TAP) associated with current airport operations, the EIS/EIR notes that LAWA is initiating an "independent" study of air quality in the area around LAX for the purpose of examining impacts. Given that the results are necessary to establish the baseline setting, the draft EIS/EIR needs to include consideration of toxic air pollutants associated with current airport operations. LAWA also needs to conduct an assessment of long-term health risks from TAP, their potential effects on the communities under LAX's flight path.

⁹ *Flying Off Course. Environmental Impacts of America's Airports.* Natural Resources Defense Council, New York, NY, October 1996.

- ♦ The draft EIS/EIR analysis of airside improvements discounted gate delays and as a result, does not accurately depict arrival and departure flows. This oversight can affect the determination of arrivals to LAX, and thus over flight patterns over the communities in Western San Gabriel Valley. This can significantly affect the noise and air quality impacts analyses as well.
- ♦ The draft EIS/EIR emissions inventory were compiled using emission factors for existing aircraft engines and is missing particulate emission factors for a large number of new engines. Thus, the draft EIS/EIR's assessment of future particulate emissions and impacts is missing an important component.
- ♦ The draft EIS/EIR does not address how the increase in air pollution from LAX operations affects the State Implementation Plan (SIP), and what steps will be taken to help the State meet the goals and objectives of the SIP. Increased air pollution as a result of increased LAX operations will affect all communities in the Los Angeles Basin.
- ♦ The analytic basis for the community impacts is insufficient, since critical demographic and other relevant health data are missing. The Cities of Monterey Park and Montebello have been excluded in the analysis. Moreover, the draft EIS/EIR does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the project's impacts.

3c. Noise Impacts Assessment

- ♦ The draft EIS/EIR does not analyze noise in communities located beyond the immediately adjacent neighborhoods to the airport.
- ♦ The EIS/EIR indicates significant noise reductions with the transition to Stage III aircraft. However, Stage III aircraft will provide little to no relief for our communities, as landing aircraft noise is not adequately addressed by Stage III measures.
- ♦ The draft EIS/EIR proposed noise mitigation strategies consist mostly of measures involving land acquisition and insulation – all are passive measures and are available only for communities adjacent to LAX. No mitigation measures are proposed for those under the flight path. These measures will only be effective if the noise impact estimates provided by the draft EIS/EIR are correct. If future noise levels and intensity exceed predicted levels, these proposed mitigation measures will not be able to address these higher levels, especially if airport improvements result in increased airport operations above the levels forecasted by the draft EIS/EIR.
- ♦ The communities of the Western San Gabriel Valley have unique geography that not only places them under the flight path of landing aircraft, but also put them at as much as 1,000 feet closer to aircraft in an area where air

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operations are expected to have a 2,500 foot ceiling. LAWA and the FAA have not taken these conditions into account during their analysis and planning.

- ♦ The draft EIS/EIR's use of 1996 and earlier noise data as the base year for noise impact analysis is not appropriate, as it does not represent existing conditions (the transition to quieter Stage III aircraft was completed in 1999), and may minimize the relative noise impacts from the "preferred alternative."
- ♦ Because of the substantial growth in operations projected, the draft EIS/EIR shows no significant improvements in noise reduction under any of the proposed expansion plans. Increases in aircraft operations projected in the draft EIS/EIR will result in additional aircraft operations and noise generation, offsetting any of the anticipated benefits of quieter Stage III aircraft and other mitigating measures. The increased noise levels will seriously affect communities under LAX's flight path.
- ♦ The draft EIS/EIR does not offer any provisions for in-situ noise monitoring in the affected communities. According to the US EPA, in-situ noise monitoring results at Boston's Logan airport suggested that computer modeling tended to underestimate actual noise levels, at least in some neighborhoods. The draft EIS/EIR does not take this into account in its analysis, and thus does not adequately represent the actual noise impacts on the surrounding, or the effectiveness of its proposed mitigation measures.
- ♦ The draft EIS/EIR does not offer any provisions to address the very high noise levels, especially from the projected new "large" aircraft in the projected future fleet mix used in its models. Very high noise levels occur each time aircraft fly over or by neighborhoods, yet these high intensity noise occurrences are underrepresented in CNEL estimation methodology. Communities such as Monterey Park and Montebello are more affected by over flight noise, due to their location and topography.
- ♦ The affected communities have raised serious concerns about the ability of the computer modeling relied upon in the draft EIS/EIR to accurately reflect noise levels associated with LAX operations. Yet, the draft EIS/EIR does not adequately address this issue, nor do the mitigation strategies reflect these communities' concerns.

3d. Traffic Impacts Assessment

- ♦ The draft EIS/EIR failed to consider the impact of increased cargo and passenger traffic patterns in areas outside of the airport boundaries. All of the major approaches to the airport will be affected by the projected increases in cargo and passenger traffic. Yet, the draft EIS/EIR used SCAG data as a proxy for its traffic study, which projects a much lower annual passenger

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traffic and cargo volume than that of the draft EIS/EIR. Increased traffic on local freeways, including I-605, I-5, I-710, I-405, I-10, and US-60 have the potential to create increased traffic flow in the Cities of Monterey Park, Montebello and the Western San Gabriel Valley.

- ♦ The draft EIS/EIR's use of different base years for traffic impact analysis is not appropriate, as it does not represent existing conditions, and may minimize the relative impacts from the "preferred alternative." In addition, existing traffic studies for regions in the cargo and traffic corridors (such as the San Gabriel Valley Council of Government's Truck Study) have not been utilized or incorporated.
- ♦ The assumptions used in estimating traffic growth by the draft EIS/EIR used a mixture of 1994 data and forecasts from the 2010 Air Quality Management Plan. The model results can seriously underestimate the amount of future traffic, as the 1994 data may not reflect current conditions, and the 2010 AQMP assumed that the City and the LA region would meet trip reduction targets.¹⁰

4. Environmental Justice Impacts

The draft EIS/EIR clearly recognizes that the environmental, noise and health burdens of the airport's operations and expansion are, and will be, borne by low income and minority populations living in the communities directly adjacent to the airport. However, LAWA and the FAA should not discount impacts to communities located farther from the airport in their analysis.

The communities of Monterey Park, Montebello and others in the Western San Gabriel Valley are located directly under the flight paths, are within the 2,500 foot operational ceiling of most aircraft landing at LAX, and yet, no impact assessment or analysis were conducted for them. These communities, specifically the Cities of Montebello and Monterey Park, are predominately minority based. According to the 2000 US Census information, the City of Montebello is approximately 75 percent Hispanic and Monterey Park is approximately 80 percent minority, 57 percent Asian and 29 percent Hispanic.

The draft EIS/EIR proposes the creation of an Environmental Justice Task Force to work with the affected communities and LAWA to explore the appropriate formulation of specific Master Plan Commitments related to environmental justice. The Cities of Monterey Park and Montebello, among others located under the flight path, are not included in the environmental justice plan because we do not fall within the 65 dB CNEL contour. It is necessary that we be able to participate in order to assist in the formulation of LAWA's proposed mitigation strategies and to communicate this information to our citizens.

¹⁰ Ibid.

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Any proposed expansion of LAX will place greater environmental and health burdens on citizens living and working in the Cities of Monterey Park, Montebello, and the communities of Western San Gabriel Valley. Yet, we cannot determine from the details provided by the draft EIS/EIR how LAWA and the FAA plan to recognize and address the unfair burdens currently placed on these affected communities. Furthermore, the draft EIS/EIR does not detail ways to offset the additional burdens placed on these communities from the proposed expansion plans, which is in contrary to the requirements of CEQA.

Finally, the discussion in the draft EIS/EIR regarding environmental justice issues also contains a number of flaws and omissions. Specifically, the draft EIS/EIR is missing the following important components:

- ♦ **Affected communities:** The draft EIS/EIR includes a thorough analysis of the demographics of the citizens living in the areas surrounding the airport; however, it needs to also consider the demographics of other affected communities, including communities under the LAX flight path. Those living under the flight path, especially those at higher elevations, are potentially affected by the over flights as much as those living adjacent to the airport. The lack of analyses for other affected communities highlights an area where LAWA failed to perform the needed analysis and instead chose to rely on a wait and see approach.
- ♦ **Origin and destination study:** Also lacking in the draft EIS/EIR is an analysis of the use of the airport by the communities in the Los Angeles Basin. The document does not provide an analysis of whether those bearing the largest burden of the airport will benefit from the proposed expansion.
- ♦ **Environmental justice mitigation plans:** The draft EIS/EIR fails to detail plans for mitigation of the proposed expansion's noise, air quality, traffic, safety and health impacts in terms of environmental justice. The only mitigation plans proposed by the draft EIS/EIR involve either noise abatement through soundproofing or relocation. Neither of these is adequate mitigation in terms of environmental justice, nor are they applicable to the communities of the Western San Gabriel Valley.
- ♦ **Health Impacts:** The draft EIS/EIR does not address the fact that the minority populations living and working in our communities may be more severely affected by any increase in criteria pollutant emissions as well as other air pollutants. Members of these communities, especially the young and the elderly, will be more severely affected because they may be more susceptible to asthma and other chronic respiratory illnesses.¹¹

¹¹ "Asthma: A Concern for Minority Populations," National Institute of Allergy and Infectious Diseases, January 1997.

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- ♦ **Lack of minority outreach:** Minority populations may also be less informed of the risks posed by the proposed airport expansion, and have less access to adequate healthcare to help them deal with these respiratory problems.¹²

5. Changing Security and Safety Factors

Since the events of September 11, Los Angeles International Airport, like other airports around the nation, has implemented additional security measures to improve airport and passenger security. Because LAX is one of the "super hubs" responsible for a major portion of domestic as well as international flights on the West Coast, the implementation of additional security measures at LAX are a much needed action. However, these measures, such as the elimination of curbside passenger pick-up and drop-off, and changes the routing of international passengers, will have the potential to affect the passenger and vehicle traffic volumes and patterns at LAX. These changes to the traffic and passenger patterns have not been considered by the current version of the Draft EIS/EIR.

In addition, the safety conditions at LAX, especially the close frequency and distance between aircraft movements at LAX both in the air and on the ground, have been a major concern by the communities surrounding the airport and communities under the flight paths. These concerns by the communities have not been adequately addressed by the proposed changes in the Draft EIS/EIR. These issues have taken on a new urgency in light of recent events, since human error will not be the only factor affecting aircraft and passenger security.

The Cities of Monterey Park, Montebello, and the communities of the Western San Gabriel Valley have identified a number of additional security and safety issues and concerns for consideration by LAWA. These have arisen as a result of the recent changes to airport security routines, as well as unresolved concerns regarding the safety issues at LAX. These issues are summarized below:

- ♦ **Increase in airport traffic means an increase in security and safety issues:** In simple statistical terms, an increase in passenger and aircraft traffic as proposed by the draft EIS/EIR will have the potential to impact safety and security issues.
- ♦ **Focus on increasing passenger security and safety rather than increasing flights:** The current Draft EIS/EIR already identifies serious safety issues associated with arrival and departing aircraft routed over populated areas, as well as safety issues on the ground. With the current heightened safety and security considerations, LAWA should conduct a more thorough analysis of the current flight patterns to increase the safety and security of passengers and communities under the flight paths.

¹² Ibid.

- ♦ **New ground traffic patterns need to be considered for impacts:** The current security requirements for passenger drop-off and pick-up will require a rerouting of CTA traffic. This will affect the traffic patterns around LAX, and set up new choke points, requiring new analyses.

- ♦ **New security requirements need to be considered for impacts:** The current security measures may be in effect for the foreseeable future. These measures will affect the traffic arriving and departing at the new terminal area, and can affect the traffic patterns for the "ring road" proposed in the "preferred alternative."

- ♦ **Passenger volumes need to be considered for security and safety:** The current design for the passenger arrival and departure areas will need to be re-designed to accommodate greater security checks and longer passenger waiting times. These measures will have the potential to limit overall passenger volumes considered in the Draft EIS/EIR.

- ♦ **Cargo volumes need to be considered for security:** Additional security measures will also be needed for the cargo volume moving through LAX, which will also affect any potential increases in LAX cargo volume as proposed by the Draft EIS/EIR.

6. Changing Economic Factors

The events of September 11, 2001 have impacted the US and global economy, and may have exacerbated the economic slowdown that was taking place. This will have the potential to affect air travel in the US in general, and passenger traffic at LAX in particular.

Of significance are the economic conditions that the commercial airlines are operating under, especially the airlines with major hubs at LAX. Most of the airlines serving LAX have implemented schedule and flight reductions, as well as personnel reductions in response to the decrease in demand. United Airlines, for example, has carried out a 20 percent reduction in its nation-wide work force, and at least a 10 percent reduction in flight service schedules. American Airlines, Delta Airlines, and Continental Airlines, all with major hubs at LAX, have implemented similar reductions in service and personnel. These actions by the airlines will have major long-term impacts on the future passenger and cargo volumes at LAX.

While the nation's economic down-turns have affected passenger and airline traffic in the past, these conditions were temporary, and have not affected the overall growth in US air travel. However, the recent events have the potential to significantly affect air travel growth in the long-term, and also affect the projected growth at LAX, and the proposed expansions, requiring new planning, analyses, and new solutions, as outlined below:

- ♦ **New passenger growth projections are needed:** Air travel in the US has experienced a marked decrease in passenger volume since September, about 15% less than a year ago. This reduction in passenger volume will have the potential to affect the projected passenger growth predictions at LAX.
- ♦ **Current airport capacity is no longer at a maximum:** For 2001 alone, a 15% reduction in passenger volume translates into a reduction of about 182,000 passengers per day, and over 16 million passengers for the rest of 2001 (based on the current airport operations level of 78 million annual passengers).
- ♦ **New cargo growth projections are needed:** While estimates of air cargo volumes are not yet available, airlines are forecasting about a 10% reduction in flight operations. This reduction in flights may translate into a similar reduction in cargo volume, or about five thousand tons per day, and over 440 thousand tons for the rest of 2001.
- ♦ **New ground traffic projections are needed:** LAX should also expect a similar reduction in vehicle traffic going into and out of the airport, based on a 10% reduction in overall air operations.
- ♦ **Re-evaluation of Draft EIS/EIR assumptions:** Even if the economy and air traffic operations recover from the current slowdown in the near future, the 2% annual passenger growth that was used to estimate and develop the growth scenarios in the Draft EIS/EIR needs to be re-examined.

7. Conclusions

To summarize, the City of Monterey Park, the City of Montebello and the communities of the Western San Gabriel Valley are extremely concerned by the environmental, health, and safety issues presented in the draft EIS/EIR. We believe the proposed plans are deeply flawed, contain numerous omissions, ambiguous or misleading information. In addition, they contain a number of incorrect assumptions - the documents only presented alternatives that have worse impacts than LAWA and the FAA's preferred options, although alternatives with far less community impacts exist. The Cities are also concerned by the omission of any analysis of the effects of the proposed expansion on their residents.

Furthermore, the draft EIS/EIR continually refers to the economic benefit that will be obtained by the entire LA region with the proposed expansion of the airport. However, it does not put forth a plan for the entire region to share in the projected economic benefit. The collective health and environmental burden

heavily impacts only those communities that surround the airport and those located under the flight path. Thus, the few are supporting the whole.

LAWA states that it would take a minimum of eight years, on average, to plan, approve and construct new aviation facilities. For this reason, the draft EIS/EIR claims, that the region will lose the economic benefits generated by LAX, while waiting for other airports to be built. However, the timeline for completion of the proposed LAX Master Plan is fifteen years. Thus it will take the other regional airports approximately the same amount of time, if not less, to build up to capacity as it would take LAX to expand.

Taken as a whole, the current economic and safety conditions call into question the validity of some of the assumptions in LAWA's projection of future growth in airport and passenger operations used in the draft EIS/EIR. The City of Los Angeles Mayor's office has recently recommended that LAWA consider keeping the current level of airport services at 78 million annual passengers while determining ways to improve the operations of the airport. Additionally, the current Master Plan and Draft EIS/EIR are not well supported by those in the greater Los Angeles basin. In any case, the reasons behind the need for airport expansion have changed in terms of their immediacy, and LAWA may consider using this opportunity to evaluate a more regional approach to meet the region's and the nation's transportation needs.

From the onset of the Master Plan, LAWA dismisses the idea of supporting a regional airport system. The draft EIS/EIR claims that failure to expand LAX would cost the Los Angeles region in both dollars and jobs. However, with LAX assuming the responsibility for all of the air transportation growth in the region, it is denying the right of other portions of the region to grow and benefit from air services. While LAX will continue to be a major hub in a regional system, the other eleven commercial airports should be allowed to grow and expand, as most of the population growth in the region is occurring in the outlying areas adjacent to the other airports. Not only is LAWA imposing additional burdens of noise, safety, health problems and air pollution on the surrounding communities, but its plan also deprives other communities their opportunity for economic benefits of air commerce.



Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
Interim Director

November 10, 2003

Jim Ritchie
City of Los Angeles
P.O. Box 92216
Los Angeles, CA 90009-2216

Subject: LAX Master Plan Addendum and Supplement to the DEIR/EIS
SCH#: 1997061047

Dear Jim Ritchie:

The State Clearinghouse submitted the above named Joint Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 7, 2003, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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Document Details Report
State Clearinghouse Data Base

SCH# 1997061047

Project Title LAX Master Plan Addendum and Supplement to the DEIR/EIS

Lead Agency Los Angeles, City of

Type JD Joint Document

Description The Joint Draft EIS/EIR provides complete descriptions of the environmental conditions, in and around LAX, the potential environmental impacts of the improvements associated with each alternative, mitigation measures to address potential impacts, and other information required by NEPA and CEQA.

Lead Agency Contact

Name Jim Ritchie
Agency City of Los Angeles
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email
Address P.O. Box 92216
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Project Location

County Los Angeles
City Los Angeles, City of
Region

Cross Streets Imperial and Sepulveda

Parcel No.
Township Range Section Base

Proximity to:

Highways I-405/I-105
Airports LAX & Hawthorne Municipal
Railways MTA Green Line and BNSF
Waterways Pacific Ocean
Schools
Land Use M2 (Q) and M3

Project Issues Air Quality; Archaeologic-Historic; Coastal Zone; Economics/Jobs; Forest Land/Fire Hazard; Flood Plain/Flooding; Drainage/Absorption; Geologic/Seismic; Job Generation; Housing; Noise; Public Services; Schools/Universities; Sewer Capacity; Social; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Caltrans, Division of Transportation Planning; Department of Housing and Community Development; Air Resources Board, Airport Projects; Air Resources Board, Transportation Projects; Integrated Waste Management Board; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; California Energy Commission; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 07/10/2003 Start of Review 07/10/2003 End of Review 11/07/2003

Note: Blanks in data fields result from insufficient information provided by lead agency.

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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS MS 40

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November 7, 2003

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

Dear Mr. Ritchie:

Re: Los Angeles International Airport Master Plan, Alternative D
Supplement to the Draft Environmental Impact Statement / Environmental Impact Report
SCH# 1997061047

Thank you for including the California Department of Transportation (Department), Division of Aeronautics in the environmental review process for the above-referenced project. We have reviewed the proposed Master Plan and its Draft Supplemental Environmental Impact Statement / Environmental Impact Report (EIS / EIR) pursuant to the California Environmental Quality Act (CEQA). For your consideration, we offer the following comments relative to aviation system planning, environmental planning for the proposed projects through the Master Plan, and airport land use compatibility. The following comments include our perspectives on both the proposed Airport Master Plan and its Draft Supplemental EIS / EIR.

- The project is the integration of Alternative D, the Enhanced Safety and Security Plan, into the existing environmental review process for the Los Angeles International Airport (LAX) Master Plan. The EIS / EIR also serves to present certain supplemental information and environmental analyses that apply to all of the five alternatives to the project. The alternatives evaluated in the original EIS / EIR and this supplemental EIS / EIR are the results of eight years of master planning process, ongoing scientific study, several hundred information community meetings, and an extensive formal public comment period for the identification of project issues for environmental analysis. In addition to the No Action / No Project Alternative, the original EIS / EIR and this supplemental environmental document analyze four build alternatives. However, this supplemental EIS / EIR is focused on the new Alternative D, which is also the CEQA Preferred Alternative.
- The California Department of Transportation, Division of Aeronautics' stated mission is to foster and promote the development of a safe, efficient, dependable, and environmentally compatible air transportation system." The Division is a permitting agency for public-use airports, and therefore a Responsible Agency under CEQA.

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Mr. Jim Ritchie
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- We have attended various project development meetings, technical advisory consultations facilitated by the California Office of Planning and Research, a simulation for air traffic control and airfield operations at the National Aeronautical and Space Administration's Ames Research Center. We appreciate the intergovernmental coordination and public participation efforts undertaken by the City of Los Angeles and the Federal Aviation Administration.
- In the technical advisory consultations and the simulation at the Ames Research Center, we have observed that the proposed physical changes to the airport taxiways, runways, and the construction planned for aircraft parking and terminal facilities have undergone extensive scrutiny and systematic testing in the operational and environmental analyses for Alternative D. The operational testing was observed and participants were interviewed by the Department in conjunction with our analyses of the various project components. In our opinion, the new large aircraft requirements, for the Airbus Industries A-380 and Boeing 777 type aircraft, necessitate most of the proposed changes, as well as the physical constraints of the existing facilities. The high-speed taxiway exits from the outer Runways 25L on the south complex, and 24R on the north complex of the airport have generated most of the surface incidents and runway incursions at the airport. The operational changes for the air traffic control procedures, user awareness programs, and pilot training have apparently reduced the number of incidents and their frequency since their implementation. Therefore, we think that alternatives to eliminate the high-speed exits by physical removal, such as their conversion to slower-speed exits are not extensively evaluated or presented in the environmental document. The center taxiways between both north and south parallel runways are a key feature to alleviate the problems due to the operations of the high-speed exits. However, we would like to review your operational research to establish the nexus between the operation of the center taxiways and runway incursions. The Master Plan and its environmental document do not conclusively explain this relationship or refer to a technical study regarding this issue. The Department does not object to the center taxiway conceptual design as long as it is operationally and financially justified. Airport delay related to the new flow patterns were also not evaluated in the analyses.
- Where feasible, the Department encourages airports to meet or exceed minimum design safety standards outlined in the FAA Advisory Circular 150/5300-13 Change 7, the Airport Design Guide (ADG), when making design changes. In many instances, runway and taxiway dimensional criteria are difficult or impossible to achieve within the given space available for LAX today. Nevertheless, any substandard runway and taxiway separation specifications in airport design will require approved design exceptions from the FAA. The Department has incorporated excerpts the ADG as State airport design standards for runways and taxiways in accordance with the California Code of Regulations Title 21, Section 3526(c). We recommend an FAA-approved Airport Layout Plan depicting the proposed changes become effective in conjunction with the adoption of the Master Plan.
- Higher weight bearing runways and taxiways are strongly recommended in advance of any consideration to accommodate the new large aircraft. This design should meet or exceed FAA's current design specifications. To this end, Caltrans District 7 has also proposed structural improvements for the tunnel on State Route 1 (Sepulveda Boulevard), which goes under LAX. These structural improvements will include the placement of a new deck on the top of the original structure, capable of supporting the proposed aircraft design load. These structures are owned and maintained by the Los Angeles Department of Public Works. However, the Department's oversight involvement with

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this project is necessary given that the proposed improvements are within the Caltrans right-of-way. Through the Project Study Report / Project Report process, the Department will also propose a Traffic Management Plan in case of an emergency situation which could require the full closure of the Sepulveda Subway. The construction of Sepulveda Subway project is expected to start by June 2004 and be completed by June 2005. Runway closures and potentially significant airport capacity impacts should be anticipated during construction.

- 7. Terminal gate facilities designed for older aircraft prohibit new large aircraft and large aircraft such as the Boeing 747 from typical self-ingress and egress from terminal rows in many locations. Frequently, aircraft must shut down and stop in a taxi lane or taxiway traffic area(s), and be towed into tightly engineered gate spaces. Departing fully-loaded aircraft are typically towed out from these constrained locations and block the active movement areas until started and ready for taxi. Therefore, terminal and existing gate facilities must be expanded to accommodate the typical fleet of aircraft using the airport today and those new large aircraft planned to arrive in the coming years.
- 8. The Alternatives A, B, and C all propose the relocation and the reconfiguration of the LAX Fuel Storage Facility. As technical studies, the Chevron Fuel Farm Relocation Feasibility Study and the Scattergood Fuel Farm Relocation Feasibility Study were included in the original environmental study, whose scope did not include Alternative D. On the other hand, Alternative D calls for a reconfiguration of the fuel farm during the last phase (Phase III) of the proposed activities, but does not propose relocation. From a physical security standpoint, we recommend that the EIS / EIR clearly assess and disclose the risks and opportunity costs of the decision to have the fuel farm remain in its place. We recommend your interagency coordination with the Transportation Security Agency, the California Highway Patrol, and local law enforcement agencies to technically assess the physical security problems associated with the LAX Fuel Storage Facility.
- 9. From an airport land use compatibility planning standpoint and in accordance with the California Environmental Quality Act, Public Resources Code Section 21096, the Department's California Airport Land Use Compatibility Handbook (Handbook) must be utilized as a resource for projects at the airport and for projects within the boundaries of an airport land use compatibility plan, or if such a plan has not been adopted, within two nautical miles of the airport. For your reference, the Handbook is published on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/landuse.html>. In specific, the Public Utilities Code Sections 21676(c), 21664.5, and 21661.5 require that proposed airport master plans, expansion of an existing airport, and plans for construction of a new airport must be submitted to the Airport Land Use Commission for review. We also recommend that the growth-inducing impacts of the decision to restrict the growth of LAX be considered from a region-wide perspective. The Department's California Aviation System Plan and its policies can also be used as a resource in these analyses. In this context, we recommend that a preferred plan for the regional distribution of commercial air service and its associated benefits and adverse impacts be included in the environmental analyses. These analyses should be supported by impacted communities and stakeholders, namely regional airports, commercial airlines, and general aviation. Lacking sufficient support, we are concerned that the desired regional aviation system left to evolve on its own will not materialize as described in the LAX Master Plan, Alternative D.

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10. On page 11 of "S-I, Supplemental Land Use Technical Report," line 4 states that "This suspension of aviation easement requirements has been granted by Caltrans." This is not the case. The Department of Transportation has not suspended any of the requirements of the Noise Standards found in the California Code of Regulations, Title 21, Section 5000 *et seq.*

This bullet further implies that notifying homeowners "regarding the existence and significance of such noise impacts" is sufficient to meet the requirements of the Noise Standards. Such notification is not sufficient. For a residence within LAX's 65dB CNEL aircraft noise contour to be excluded from calculations to determine the size of the airport's noise impact area, the residence must meet one of the descriptions in Section 5014(a) of the Noise Standards.

11. This Supplemental EIS / EIR is for an Airport Master Plan Future project-specific environmental studies can be tiered from this environmental study during the subsequent phases of the proposed development, and the Department encourages tiering as an environmental streamlining technique. However, tiering should be subject to the time and scope limitations mentioned in the CEQA Guidelines Sections 15152 and 15153, and the instructions in the Airport Environmental Handbook (FAA Order 5050.4A), Chapter 10.

12. The projects proposed through this Master Plan will require multiple amendments to the State Airport Permit for LAX. Please coordinate with our Aviation Safety Officer Mr. Kurt Haukoel for the processing of these requests at (916) 654-5284.

These comments reflect the areas of concern to the Department's Division of Aeronautics. We advise you to contact Caltrans District 07 office regarding surface transportation issues.

The need for environmentally compatible airport operations is a local, regional, statewide, and federal issue. We strongly feel the both the protection of aviation facilities from the encroachment of incompatible land uses and the calculation of all environmental costs and benefits in the development of airport projects will contribute significantly to the safety of airport operations, to the well-being of the communities surrounding aviation facilities, and to California's economic future.

We appreciate the opportunity to review and comment on this project. If you have any questions, please call me at (916) 654-5253.

Sincerely,

D. Cohen

DAVID COHEN
Associate Environmental Planner

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cc: David B. Kessler, FAA AWP-611.2
Los Angeles International Airport
Los Angeles County Airport Land Use Commission

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State of California - The Resources Agency

GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>
4949 Viewridge Avenue
San Diego, CA 92123
(859) 487-4201



November 6, 2003

Mr. Jim Ritchie
City of Los Angeles
Los Angeles World Airports
Master Plan Office
P O. Box 92216
Los Angeles, California 90009-2216

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Los Angeles International Airport (LAX) Draft Master Plan Supplement to the Draft Environmental Impact Statement/Environmental Impact Report
State Clearinghouse Number 1997061047

Dear Mr. Ritchie:

The Department of Fish and Game (Department) has reviewed the above-referenced Supplement to the Environmental Impact Statement/Environmental Impact Report (SEIS/EIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386).

The Department has provided comments for the previous SEIS/EIR which considered Alternatives A, B, and C. Our letter, dated September 21, 2001, is attached.

Under Alternative D (Enhanced Safety and Security Plan), the number of runways would stay the same at four. Two existing runways would be moved, two runways would be lengthened, and all runways further separated from one another to improve operational efficiency and safety. Alternative D would encourage a long-term regional approach to serving air traffic demand in the Los Angeles basin by designing facilities at LAX to accommodate passenger and cargo activity levels equivalent to the No Action/No Project Alternative activity level, but would be designed to allow air carriers to emphasize international routes at LAX. Alternative D would enhance security by limiting access by private vehicles to the main airport infrastructure to reduce the risk to airport users. The public parking structures in the CTA would be relocated and would be replaced by new centralized passenger terminals. The existing Terminals 1 through 11 would be

Mr. Jim Riche
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reconfigured. The Tom Bradley International Terminal (TBIT) would be reconfigured with the addition of a new North/South Linear Concourse. A West Satellite Concourse would be built west of the TBIT.

A new Ground Transportation Center (GTC) and an Intermodal Transportation Center (ITC) would be constructed east of Aviation Boulevard and would be the primary access points for all passenger drop-off and pick-up and vehicle parking. Passengers and employees would access the CTA via an Automated People Mover (APM) system from new GTC, ITC and consolidated Rental Car (RAC) facilities. Intersection improvements would be made to the off-airport transportation network to accommodate the shift in traffic patterns from the CTA to the GTC and ITC areas. Some cargo facilities would be modified under Alternative D, with the overall square footage being equivalent to the No Action/No Project Alternative.

Alternative D would require the acquisition of approximately 77 acres of property, the least amount of land acquisition of all the proposed build alternatives. The 340-acre, LAX Northside project described in the No Action/No Project Alternative that is currently recognized within the City's current General Plan and Zoning for 4.5 million square feet of development, would be developed for Alternative D; however, under Alternative D, the existing trip cap that exists for LAX Northside would be reduced to limit vehicle trips to a level comparable to that associated with the 2.6-million-square-foot Westchester Southside development proposed under Alternatives A, B, and C.

The Department offers the following comments and recommendations:

The precipitous decline of species associated with open grasslands within the Los Angeles Basin is well documented, with LAX likely supporting the largest population of loggerhead shrike (*Lanius ludovicianus*) in the Los Angeles Basin based on an estimate of five to eight sites remaining in the Basin and San Gabriel/San Fernando Valleys¹. The project site supports one of only three known occurrences of San Diego black tailed jackrabbit (*Lepus californianus hesperettii*), within the Los Angeles Basin. Similarly, western spadefoot toad (*Scaphiopus hammondi*) is known from no more than five occurrences within the Los Angeles Basin. Federally threatened and endangered species that would be impacted by the project include the endangered El Segundo blue butterfly (*Enphitotes batoides allyni*) and Riverside fairy shrimp (*Streptocephalus woottoni*).

Although the impacts associated with Alternative D differ from other alternatives discussed in the previous EIS/EIR, the basic points of our letter addressing the inadequacies of the previous EIS/EIR apply in this case as well. Our most serious concerns remain the inadequate and inappropriate methodologies used for biologic baseline documentation, impact assessment, and mitigation calculations. For this reason we request an opportunity to meet with the applicant,

¹ Kimball Garrett, Ornithology Collections Manager, Natural History Museum of Los Angeles County; personal communication via electronic mail, November 5, 2003.

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the Federal Aviation Administration (FAA), and the City of Los Angeles to address our concerns prior to final certification action. The U.S. Fish and Wildlife Service should also be invited to participate.

At issue is the use of a "modified Habitat Evaluation Procedure" (re-named "Mitigation Land Evaluation Procedure - MLEP" for the SEIS/EIR). As stated in our previous letter this procedure does not accurately represent the current biologic conditions or the impacts of the project alternatives, nor does it provide for mitigation that is proportional to the impacts. The current application of the MLEP is therefore inadequate to meet the basic requirements of CEQA. In our extensive experience with land use planning and CEQA in southern California, this radical departure from accepted impact analysis methods has no precedence or justification.

The Department has determined that all of the four alternatives as currently proposed would have significant, unmitigated impacts on sensitive biological resources. Specifically, the actions will substantially reduce the habitat of sensitive wildlife species, reduce the numbers of endangered, threatened or rare species, and result in significant impacts in light of past habitat losses and the small amount of remaining habitat to support sensitive species in western Los Angeles County. Suggested mitigation measures are provided in our previous comment letter.

Questions regarding this letter and further coordination on these issues should be directed to Brad Henderson at (310) 214-9950.

Sincerely,

William E. Tippets
William E. Tippets
Environmental Program Manager

cc: Pam Emerson, California Coastal Commission
Ken Corey, U.S. Fish and Wildlife Service
Brad Henderson, Department of Fish and Game
File

State of California—Business, Transportation and Housing Agency

GRAY DAVIS, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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September 17, 2003

File No.: 565.12974.12898

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To whom it may concern:

The West Los Angeles Area office of the California Highway Patrol (CHP) has reviewed the Notice of Completion and Environmental Document (NOC) for the Los Angeles International Airport (LAX) Master Plan Addendum and Supplement to be constructed in West Los Angeles (SCH #1997061047). Our review determined the project will have an impact on traffic congestion patterns and personnel resource demands for the West Los Angeles CHP Area.

The project location and mitigation measures will have a direct effect on the I-405 (San Diego Freeway), the I-105 (Glenn Anderson Freeway) and unincorporated roadways managed by the West Los Angeles CHP Area east of LAX. The I-405 and I-105 freeways, along with several unincorporated roadways in the vicinity of LAX serve as main and alternative arteries of access to LAX. In addition, Sepulveda Blvd., Manchester Blvd., and La Tijera Avenue are major access routes which are not under CHP jurisdiction. Access to the LAX area via these routes from the I-405 and I-105 freeways currently result in significant congestion. Project construction and the completed project will worsen this existing condition.

As referenced in the NOC for the project in chapter 4.3.2, traffic on the surrounding roadways during peak periods are currently rated an "F" in Level of Service (LOS), which represents forced flow with stoppages of long duration, at many of these locations and related intersections. These conditions result in extremely delayed response times for service calls by CHP personnel, increased opportunities for vehicle accidents, and possible injuries. As a result, resource demands for these areas are high and create a significant drain on CHP resources.

The I-405 freeway access route into the project location is identified as a traffic "Choke Point," due to the fluctuation in the number of lanes available for vehicular travel in this area. Vehicle traffic on this freeway along the LAX access route exceeds the capacity for the roadway. The conditions already result in significant travel delays, calls for service and increased



response time by CHP personnel. This area requires focused patrol and enforcement to ensure traffic movement is maintained. Peak periods of traffic through these areas are also substantially longer than traditional peak hour traffic conditions. The peak periods for this area can last up to four (4) hours.

The development of the LAX Master Plan project will involve the introduction of a significant number of vehicles into the area for project construction, which will peak in year 2008. After completion of the project, and in conjunction with anticipated growth and expansion of LAX use by both commercial and commuter travelers, vehicular traffic concerns on the affected roadways around LAX will worsen. This growth and expansion will add to the use of roadways managed by the CHP to access the project location on a daily basis. It is clear the addition of the added vehicle trips into the area generated by the completed project will negatively impact traffic congestion and calls for service in CHP jurisdiction.

The future projections for the developments impact on traffic conditions in the NOC clearly indicate a significant negative impact on traffic, even with full implementation of traffic mitigation measures. The mitigation alternatives suggested will also add additional freeway lane miles, and a possible airport access interchange from the I-405, which would fall under CHP jurisdiction. LOS rates will be negatively effected in CHP jurisdictions impacted by the project. The size and scope of the project will introduce increased traffic volume and calls for service demands on the CHP, and will require five (5) additional officer/equipment positions and the allocation of two (2) vehicles to maintain an acceptable level of service to the access roadways for the LAX Master Plan development.

Your consideration of these concerns for the development of this project would be greatly appreciated. If you have any questions regarding this response, you may contact the West Los Angeles Area office at (310) 642-3926.

Sincerely,

C. D. Aubrey
C. D. AUBREY, Captain
Commander
West Los Angeles Area

cc: Southern Division
Special Projects Section



City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, California 90254-3885

November 14, 2003

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

Mr. David B. Kessler, AICP
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

Subject: Supplements to the Draft EIS/EIR for LAX Proposed Master Plan Improvements

Gentlemen:

By order of the City Council, the City of Hermosa Beach would like to make the following comments regarding the subject EIS/EIR Supplement.

The City Of Hermosa Beach is in agreement with the South Bay Council of Governments regarding the LAX Master Plan Improvements. As other South Bay cities, we have concerns about a variety of issues in the environmental document. Our conclusion is that the EIR/EIS is inadequate to understanding the full scope of impacts to ground access surrounding the airport, to the adjacent communities to the airport and in the flight path and to demonstrating enhanced safety and security. Additionally, the City supports a cap on airport growth at 78 million passengers per year as described in Alternative D in the EIR/EIS.

We believe that the Responses to Comments section of the Final EIS/EIR should address the above matters and the following specific issues:

1. There is a lack of analysis of traffic impacts on communities south of the airport, such as Hermosa Beach. For example, Sepulveda and Aviation Boulevards are direct links to the airport. These arterials run through the middle of Hermosa Beach (Sepulveda is named "Pacific Coast Highway" through Hermosa). It is likely that a substantial amount of airport traffic from Redondo and Hermosa Beach uses these arterials to get to the airport rather than diverting to the 405 Freeway. There should be some analysis of whether the new proposed Ground Transportation Center (GTC) will increase or decrease airport-oriented traffic on these roads.
2. In addition to the above, Caltrans recently completed a synchronization of traffic signals on PCH/Sepulveda to facilitate airport-oriented traffic. A more comprehensive approach

synchronization on traffic on this arterial further south than the intersections addressed in the Supplement (i.e. the analysis appears to extend no further south than Rosecrans Avenue).

3. The descriptions of runway modifications and noise impacts in the EIS/EIR seem to indicate that there will be no increase in air traffic over the City Of Hermosa Beach. However, we could find no section in the EIS/EIR that specifically addressed this concern. Therefore, this issue should be addressed in the Response to Comments section of the Final EIS/EIR. I wish to emphasize here that the City's support for Alternative D is predicated on the understanding that this Alternative does not result in such an increase in air traffic over the City.

The City Of Hermosa Beach thanks Los Angeles World Airports for the opportunity to comment on the EIS/EIR Supplement.

Sincerely,

Stephen R. Burrell
City Manager

cc: City Council

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