

LAX Master Plan Stakeholder Committee Comment Form

Date: September 10, 2005

Title of Project: South Airfield Improvement Project Draft
Environmental Impact Report Review

GROUP 2

Participants in this group represented the following committees and have been designated the appropriate codes: Community/Neighborhood Groups and Residents (CG).

General Comments:

<p>GP 2-1. POOR READABILITY Not user friendly. Too many acronyms used with deficient referencing. Referenced documents not provided. Should have footnotes with pertinent information. Too many assumptions. Someone's expectation should not determine whether or not something is worthy of evaluation. CG</p>
<p>GP 2-2. (P. I-9, 1.3.3.1.2) Statements made are often incorrect. : "Although lead (Pb) is a criteria pollutant, it was not evaluated in this EIR, because the construction of the SAIP and ongoing airport operations are expected to have a negligible impact on lead emissions in the South Coast Air Basin." CG</p>
<p>GP 2-3. The EIR fails to evaluate in any detail, the impacts from rerouting air patterns on three (3) already over-used runways. Merely referencing that noise contours may change fails to discharge environmental evaluation obligations. CG</p>
<p>GP 2-4. Because this EIR is "tiered", the justifications referenced from the main document must be specifically identified. CG</p>
<p>GP 2-5. How will the stakeholder process be able to influence the SAIP if, in fact, the contracts have already been signed? CG</p>
<p>GP 2-6. How can a contractor bid on a job if the scope has not been set?</p>
<p>GP 2-7. This EIR should have addressed the long range impacts of the project on the affected communities. CG</p>
<p>GP 2-8. Why doesn't the EIR address noise impacts north of the Airport up to Santa Monica city limits? CG</p>
<p>GP 2-9. From where are additional change-order funds coming? CG</p>
<p>GP 2-10. Throughout EIR, the terms "significant" and "unavoidable" or, "unknown" are used. At what point does "unavoidable" become unacceptable? CG</p>
<p>GP 2-11. There must be a discussion of alternative solutions to runway incursions (better radio communications, minimizing of human error, more visible hold & stop bars) CG</p>
<p>GP 2-12. What avenue can the community and individuals take to reply to the EIR's responses to their comments? CG</p>
<p>GP 2-13. Aircraft fuel dumping was not addressed in the EIR. CG</p>
<p>GP 2-14. Once there is a finding of a significant and/or unavoidable impact, the project should not proceed. CG</p>
<p>GP 2-15. The SAIP does not further the objectives of a more regional solution. CG</p>
<p>GP 2-16. This document does not fulfill LAWA's responsibility to analyze the full and true impacts of the SAIP. It is reasonable to assume that a program smaller than, and different from, Alt D will be implemented by the sponsor. If we assume that the SAIP is not only the first, but the only Master Plan project to be implemented, there is a complete absence in the environmental documentation of the long term impacts from this project in isolation. CG</p>
<p>GP 2-17. Post-construction noise and environmental exposure in this EIR assumes completion of all Alt D. There are specific impacts related to this project that assume aircraft mix and other factors that could change. CG</p>
<p>GP 2-18. The EIR should more specifically describe the aircraft taxi traffic flow during and post-construction. CG</p>

GP 2-19. With imminent oil crises, what plans for sustainable designs are being addressed in airport construction, and airline operation? CG
GP 2-20. I agree that the report is a disciplined analysis, although still not complete. LAWA is not operating efficiently to benefit local, regional, and state environments. CG
GP 2-21. LAWA is not compatible with the demands for protecting surrounding communities. CG
GP 2-22. Los Angeles will need the highways to mitigate neighborhood traffic impacts. CG
GP 2-23. LAWA's goal should be to balance between LAX operations and environmental, social, and land use issues. This has not been addressed in this current EIR. CG
GP 2-24. In light of the fact that 2/3 of the residents impacted, (according to Table 4.5-17) of which roughly 65% are Hispanic, it is unfortunate LAWA chose not to publish the SAIP in language specific to the Spanish speaking population. Only recently, has translation been made available to those attending meetings. CG
GP 2-25. The separation of Committee Groups by language flies in the face of Brown vs. Board of Education. There is no guarantee that the exact same information was disclosed, which would impact responses. CG
GP 2-26. When planning this project, concern should be more for human life rather than mechanical devices. CG

Chapter I.

Introduction:

GP 2-27. Who has authority to evaluate, propose, implement additional mitigation measures? And, will the Committees' comments be incorporated? CG
GP 2-28. You should provide complete protocol for the study, including disclosure of study responsibility, that involves community and stakeholder participations. CG
GP 2-29. A properly labeled grid map should be included. CG
GP 2-30. What will be the resolution to findings of Air Quality studies? Should negative impacts be identified? CG
GP 2-31. What are the California and national ambient air quality standards? CG
GP 2-32. These following pollutants: Sulfur Dioxide (SO ₂), Nitrogen Dioxide (NO ₂), Particular matters (PM), Ozone (O ₃), Lead, Carbon Monoxide (CO ₂), are not negligible and their full impact to quality of life should be included in the study. CG
GP 2-33. How will increased cargo traffic impact the neighboring communities? CG
GP 2-34. What is the domain of the impacted area? CG
GP 2-35. Where is the comparison of how many high speed aircraft are used on the Runways vs. the Center taxiway? CG
GP 2-36. How many aircraft can be accommodated in the center taxiway at one time? CG
GP 2-37. You say that no substantial/significant drainage will occur. How much is "significant?" CG
GP 2-38. Will airport pay if there is damage to the Dominguez Water Channel? CG
GP 2-39. (P. 1-3, 1.1.3) What is the public resources code section 21094(b)? CG
GP 2-40. (P. 1-7 1.3.2.2, C-1) How do you enforce delivery times? What is the schedule of penalties? CG
GP 2-41. (P. 1-7 1.3.2.2, C-1) How do you "encourage" night time truck deliveries? CG
GP 2-42. (P. 1-1, 1.1.1) Please list the improvements from 1984 until now that was not classified as MAJOR. CG
GP 2-43. (P. 1-3, 1.1.3) You refer to the LAX MP Final EIR as a final document. Throughout the SAIP EIR, why do you refer to documents you assume we know? CG
GP 2-44. (P. 1-5, 1.3.1.1) No significant drainage impacts would occur. How much is 'substantial'? CG
GP 2-45. Why has LAWA accepted Bids on the SAIP prior to the completion of the EIR process? CG
GP 2-46. How will the Stakeholder's program be able to change or alter SAIP if the contracts have been signed to do the work? CG
GP 2-47. What is the purpose of the SAIP if the EIR has indicated there shall be 'significant' and unavoidable impacts? CG
GP 2-48. What happens if 3.1 tons of cargo is exceeded? CG
GP 2-49. (P. 1-7 1.3.2.2, C-1) "Every effort" will not be made. Use the word "reasonable" before the use of "every effort". CG
GP 2-50. If net airport peak hours trips exceed 8236 or 78.9 MAP or 3.1 of Cargo, what form would the re-study take and would you adjust the maximum allowable figures? CG

**Chapter I.
1.1 Background and Project History:**

NO COMMENT

**Chapter I.
1.2 Summary of Proposed Project:**

NO COMMENT

**Chapter I.
1.3 Summary of Project-Specific Environmental Analysis:**

GP 2-51. (P. 1-12, 1.3.5.1.3) This DEIR for SAIP deals only with the SAIP. What would be the aircraft exposure level on a cumulative basis when and if there are other runway closures? CG
GP 2-52. (P. 1-11, 1.3.4.2) AQ 2 – School air filters “air filtration at ‘qualifying’ public schools”...Why not qualifying private schools? CG
GP 2-53. (P. 1-13, 1.3.5.2) Who determines “as far as possible?” (MM-N-8) Who determines what equipment emits the least “possible” noise? (MM-N-9) Who determines what is technically and economically feasible? (MM-N-9) Who determines what is necessary during these sensitive times? (MM-N-10) Who will determine that “every effort” will be made? (ST-16) CG

**Chapter I.
1.4 Areas of Known Controversy:**

NO COMMENT

Chapter I.
**1.5 Summary of Potential Environmental Impacts Related to the
South Airfield Improvement Project:**

GP 2-54. Which specific libraries will be closed due to the impacts of the project? CG

Chapter I.
**1.6 Summary of Potentially Significant and Unavoidable
Impacts:**

NO COMMENT

Chapter II.

Project Description

Chapter II.

2.1 LAX Master Plan's South Airfield Improvement Project:

GP 2-55. The document is deficient because it fails to consider other reasonable alternatives. A potential cost effective alternative would be to fully staff the LAX Control Tower. Other examples would be improving equipment, such as radio transmissions and/or hold or guard bars on the runways and retraining to minimize human error. CG
GP 2-56. SAIP is not a safety measure but an expansion measure to accommodate the new large aircraft and additional operations. CG
GP 2-57. How will LAWA "encourage" other airports to assume a greater air traffic load; What incentives, fees, or other methods would be instituted; How would they be funded and monitored? CG
GP 2-58. What would be the impact on runway incursions of moving the hold bars 20 or 30 feet further south on taxiways approaching 25R? CG
GP 2-59. The listing of category "A" runway incursions (RI) as justification for this project was erroneous. CG
GP 2-60. There is no good project description. CG

Chapter II.

2.2 Airfield Design Alternatives Evaluated in the LAX Master Plan:

NO COMMENT

Chapter II.

2.3 New Information:

NO COMMENT

Chapter II.

2.4 Proposed Project:

NO COMMENT

Chapter II.
**2.5 Airport Operational Characteristics Before and After
Completion of Construction:**

NO COMMENT

Chapter II.
2.6 Project Alternatives:

NO COMMENT

Chapter II.
2.7 Federal, State, and Local Actions and Required Permits:

NO COMMENT

Chapter III.

Overview of Project Setting

**Chapter III.
3.1 Los Angeles Regional Airport System:**

GP 2-61. What is the impact of the A380 on the runways? CG
GP 2-62. Since the MP is calling for the removal of the remote gates, why are they being renovated at this time? CG

**Chapter III.
3.2 Existing Land Uses in the Project Area:**

NO COMMENT

**Chapter III.
3.3 Airport Facilities:**

NO COMMENT

**Chapter III.
3.4 Public Roadway Access and Circulation:**

NO COMMENT

**Chapter III.
3.5 LAX and Non-LAX Development:**

NO COMMENT

**Chapter III.
3.6 Aviation Activity:**

NO COMMENT

Chapter IV. Setting, Environmental Impacts, and Mitigation Measures

**Chapter IV.
4.1 Hydrology and Water Quality:**

GP 2-63. LAWA should secure a binding agreement with the appropriate County agencies regarding the potential significant and unavoidable impacts to the Dominguez Channel Watershed before proceeding. CG

**Chapter IV.
4.2 Off-Airport Surface Transportation:**

GP 2-64. All of the traffic analyses use the assumption that the construction related traffic will be during non-peak hours. Therefore, given that the 405 traffic is already bumper to bumper, that is not a reasonable assumption. CG
GP 2-65. Technical Report 3b³ Off Airport Ground Access Impact and Mitigation Measures, January, 2001 was not given but is referenced. Please supply the referenced document. CG

**Chapter IV.
4.3 Air Quality:**

GP 2-66. Once the negative impacts are identified, how will they be mitigated? How will the liability for addressing specific, individual health impacts be dealt with? CG
GP 2-67. Additional pollutants caused by brakes, tires, and engine exhaust, while stopping, starting and idling when accessing and leaving the center taxiway should be further studied. CG
GP 2-68. Environmental impacts of increased idling time attributed to the new taxiway configuration should be studied and mitigated. CG
GP 2-69. All of the traffic analyses use the assumption that the construction related traffic will be during non-peak hours. Therefore, given that the 405 traffic is already bumper to bumper, that is not a reasonable assumption. How will this be mitigated?
GP 2-70. Where is the impact on air quality discussed? CG
GP 2-71. Gaussian Concentration Distribution is used but not explained. Please explain. CG
GP 2-72. OLM Methodology employed in the Technical Report S-4, Attachment P is not included in this report. CG

Chapter IV. 4.4 Human Health Risk Assessment:

GP 2-73. The mitigation should include dispensing of portable air filtration units to residents and schools. CG
GP 2-74. Lack of permanent monitoring stations should not preclude study of TAC's. CG
GP 2-75. The human health impact assessment is speculative and unreliable. It relies on unsubstantiated assumptions. Primarily it assumes the implementation of an MPAQ, which does not yet exist. The SAIP should not proceed until the MPAQ is complete and can be assessed. CG

Chapter IV. 4.5 Noise:

GP 2-76. How was it determined that heavy equipment operations would not increase existing ambient exterior noise levels by 5 dba or more; Will monitoring occur and if assessment is incorrect, will additional mitigation be required? CG
GP 2-77. In relation to the runway construction period, additional runway mitigation measures need to be considered and implemented, such as: -Close down 1/4 of the gates -Temporarily change the flight paths CG
GP 2-78. Does anyone anywhere believe that noise in a classroom does not hinder the educational process; What could possibly be a replacement threshold other than "no learning disruptions"; What school districts will be your study area? CG
GP 2-79. Section 4.1 and appendix S-C1 of LAX Master Plan Final EIR, or evolution of specific thresholds of significance for single event noise levels should be included. Copies of the draft of the CEQA Thresholds Guide should be included. Also not included are the 1985 Part I Noise Compatibility Program Copy. Also not included are the 28 abatement measures as approved by the FAA. CG
GP 2-80. There are seven (7) measures already approved but aren't being implemented. Since they're not being fully implemented, the base line used for your noise contours is completely inaccurate. CG
GP 2-81. The base line assumptions for night awakenings are FALSE. Therefore, everything related to that study must be restudied. CG
GP 2-82. It is offensive that only churches are studied and not all faith based organizations. In addition, all churches are not even included. CG
GP 2-83. How do you justify that certain homes, residences and schools that are not currently experiencing 65 CNEL or greater noise levels will be impacted by the new plan; what measures are being taken to address that issue? CG
GP 2-84. Specific noise studies that include "single event" and "time above" level impacts should be included and mitigated for both runways and center taxiway, to include topography and transmission details at all frequencies. CG

Chapter IV.
4.6 Biotic Communities:

<p>GP 2-85. Ballona West Bluff is superior to El Toro for habitat restoration. The Bluff is far closer to the airport than El Toro and thus shares the same climate and soil and other environment attributes as the airport site. Furthermore, the Bluff possesses significant restoration value, and ensures the survivability of sensitive and threatened species found on airport property. CG</p>
<p>GP 2-86. In light of the intense development planned for EL Toro, it will imperil endangered and threatened species to transfer them to properties which may soon be commercially developed. CG</p>

Chapter V.

Other Environmental Resources

**Chapter V.
5.1 Land Use:**

NO COMMENT

**Chapter V.
5.2 Population, Housing, Employment and Growth-Inducement:**

NO COMMENT

**Chapter V.
5.3 Cultural Resources:**

NO COMMENT

**Chapter V.
5.4 Endangered and Threatened Species of Flora and Fauna:**

NO COMMENT

**Chapter V.
5.5 Wetlands:**

NO COMMENT

**Chapter V.
5.6 Energy Supply and Natural Resources:**

NO COMMENT

**Chapter V.
5.7 Solid Waste:**

NO COMMENT

**Chapter V.
5.8 Aesthetics:**

NO COMMENT

**Chapter V.
5.9 Earth and Geology:**

NO COMMENT

**Chapter V.
5.10 Hazards and Hazardous Materials:**

GP 2-87. LAX was built prior to the establishment of the FAA current design standards for airports serving large commercial jets. For this reason, not all the safety areas and safety zones surrounding the 4 LAX runways, meet today's recommended dimensions for airport development. CG
GP 2-88. The SAIP specifically violates the Runway Protection Zone as established by the FAA, by now enclosing residences within the SAIP RPZ. CG

**Chapter V.
5.11 Public Utilities:**

NO COMMENT

**Chapter V.
5.12 Public Services:**

NO COMMENT

**Chapter V.
5.13 Schools:**

GP 2-89. Does anyone anywhere believe that noise in a classroom does not hinder the educational process? What could possibly be a replacement threshold other than no learning disruptions? What school districts will be your study area? What mitigation measures will be implemented? CG
GP 2-90. More studies and mitigation measures must be implemented related to impacts on schools during school hours. CG