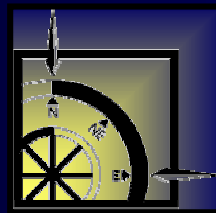


Los Angeles County Board of Supervisors

Preliminary Comments on the EIS/EIR for Proposed Master Plan Improvements at LAX

Presented by



A.C. Lazzaretto & Associates

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Background

- Existing LAX Master Plan Anticipated 40 Million Annual Passengers (MAP)
 - Currently Operating at 67 MAP
- FAA/LAWA Prepared EIS/EIR for Master Plan Improvements
- Three Alternatives Proposed
 - Alternatives A & B Each Propose New Runway
 - Alternative C Proposes Relocation & Extension of North Runway
- Preferred Project Alternative C Proposes 89 MAP

Contract Consultants Obtained by LA County CAO

A.C. Lazzaretto & Associates

Project Management

Michael Brandman Associates

NEPA & CEQA Issues,
Environmental Justice

Bauer Environmental Services

NEPA & CEQA Issues

Mestre Greve Associates

Noise & Air Quality

Austin-Foust Associates

Traffic

Preliminary Findings

- LAX Is Vitally Important to the Region & in Need of Improvements
- Draft EIS/EIR Is “Fatally Flawed” With Problems That Are Serious, Pervasive, & Systemic
- Only Appropriate Action Is for LAWA to Issue an Entirely New EIS/EIR With Appropriate Alternatives & Mitigation Measures

General Issues

- Inconsistencies Throughout the Document
- Lack of Required Mitigation Measures & Monitoring Programs
- Use of 1996 Baseline Fails to Comply With Intent of CEQA & Is Inconsistent in Definition
- Appearance of Advocacy Undermines Confidence in Objectivity

Alternatives

- Project Alternatives
 - Unusually Limited
 - 22 of 25 Significant Impacts Are in All 3 Alternatives
 - The Preferred Alternative Contains the Most Significant Impacts Yet Meets the Least Number of Objectives Set Forth in the EIS/EIR
- No Project Alternative
 - Poorly Serves the Goals of CEQA/NEPA
 - Provides an Excessively Narrow Definition of Improvements That May Occur at LAX

Regional Alternative

- EIS/EIR Concludes That the Development of a Regional Alternative Is Unreasonable
 - Does Not Provide Any Justification for This Conclusion
- EIS/EIR Assumes That Unmet Demand Will Be Absorbed Elsewhere, Yet Fails to Provide Commitment to Ensure Demand Is Met
 - FAA, As EIS Lead Agency, Has Some Control
 - LAWA Owns Several Regional Airports & Has Some Control

Scoping

- Scoping Did Not Include Outreach to Los Angeles County or Public at Large Regarding Preferred Project Alternative C
- Scoping Did Not Include a Single Agency Within San Bernardino, Orange, Riverside, or Ventura County
 - Yet the EIS/EIR Identifies the Importance of LAX in the Region As a Whole

Phasing

- Project Phasing Program Is Outdated & Problematic
 - Programs Will Not Be Completed by the Horizon Year of 2015
 - 16 Years to Complete Build
 - Transportation Improvements Are Phased After Terminal/Runway Improvements
 - Should be Reversed

Environmental Justice

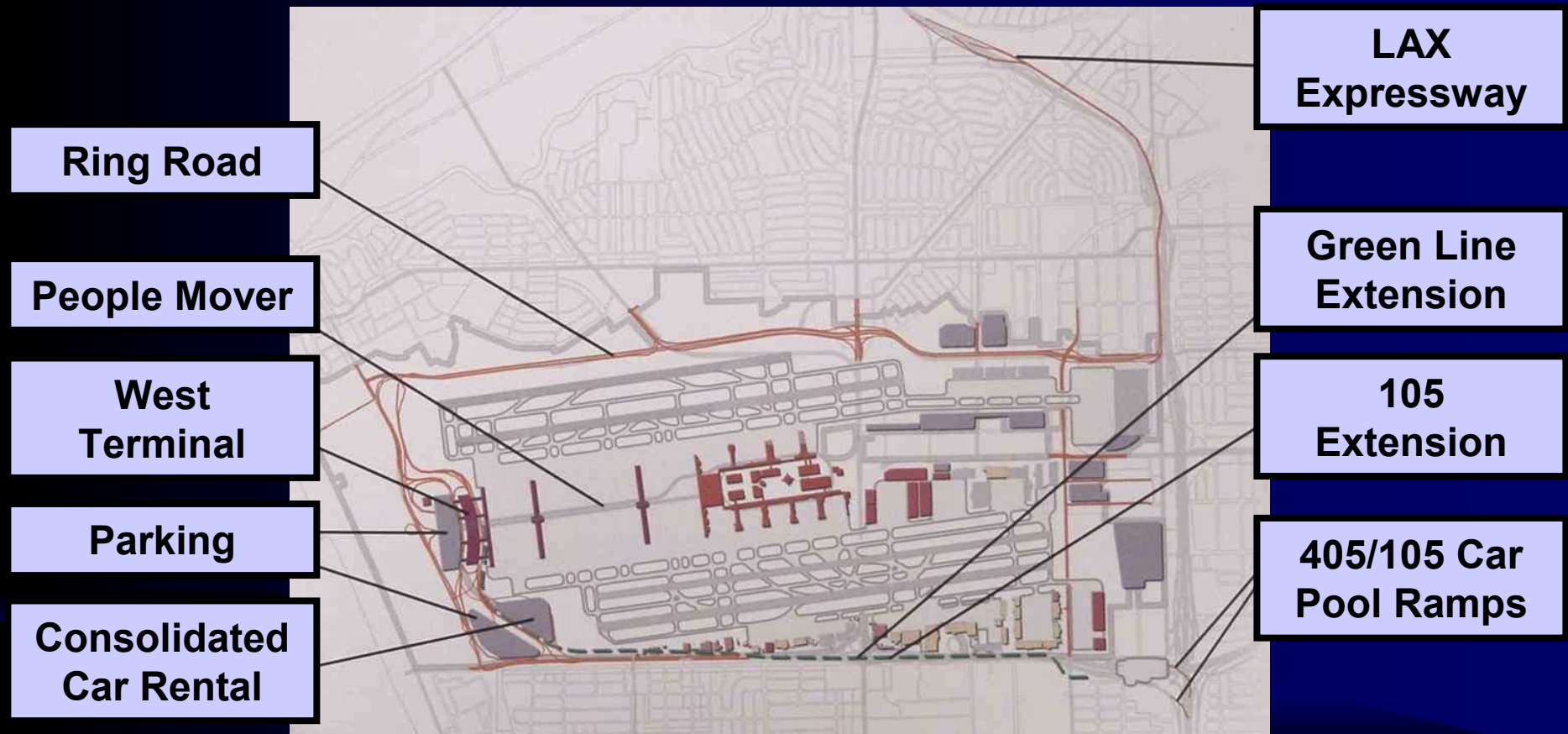
- Analysis Fails to Comply With NEPA Requirements
 - Impacts Are Not Quantified or Analyzed
 - No Mitigation Measures
 - The Document Asserts That Information is ‘Not Available’
- No Regional Analysis Was Provided
- As Currently Written, Valid Review Is Not Possible

Traffic

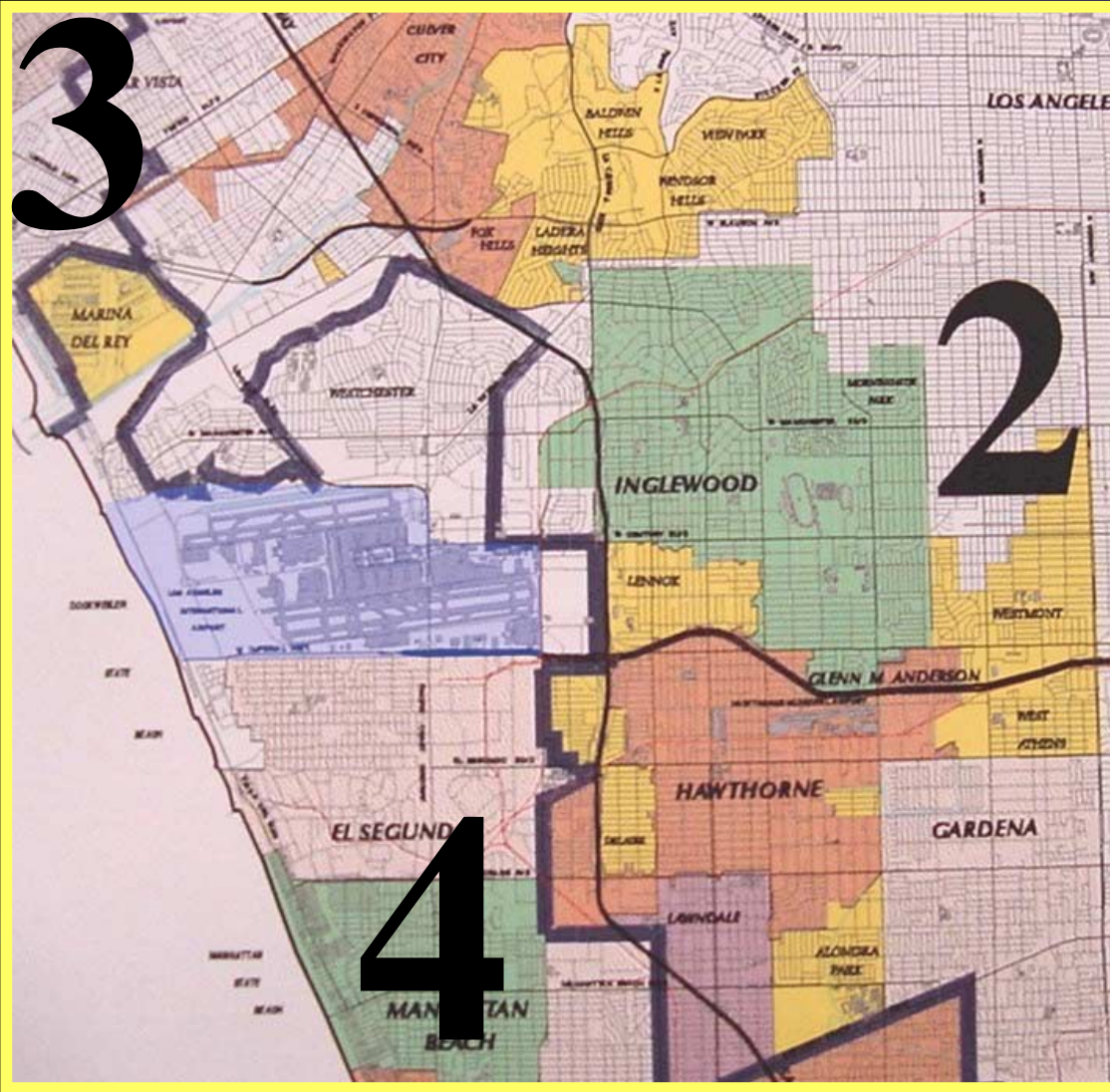
- Onsite Traffic Analysis Does Not Coincide With Trip Generation Assumptions in Offsite Discussion
- Transportation Section Does Not Include the No Project/No Action Alternative for Comparison
- Ring Road Would Provide Sufficient Access to LAX & Reduce Traffic on I-105
 - However, Impacts on Nearby Unincorporated Areas Are in Need of Further Study

Access Improvements

- Impact & Feasibility of These Items Need to Be Studied



Unincorporated Areas in the Vicinity of LAX



- County Intersections/Roadways That May Be Impacted Were Not Analyzed
 - Athens
 - Baldwin Hills
 - Del Aire
 - El Camino Village
 - Ladera Heights
 - Lennox
 - Marina Del Rey

Noise

- There Is a Significant Discrepancy in the Number of Dwelling Units & Population Impacted by Noise

	Dwellings	Population
LAWA 1996 4 th Quarter Report	31,968	85,907
EIR/EIS Table 4.1-2 4 th Quarter 1996	16,900	49,000
Difference	15,068	36,907

Noise

- EIS/EIR Includes Operational Assumptions That Are Unreasonable Making Analysis of Noise Impacts Speculative & Lower Than What Might Occur
- Noise Modeling Data Misrepresents Actual Noise Contours in the Lennox/Inglewood Areas
- There are No Noise Mitigation Measures in the Document

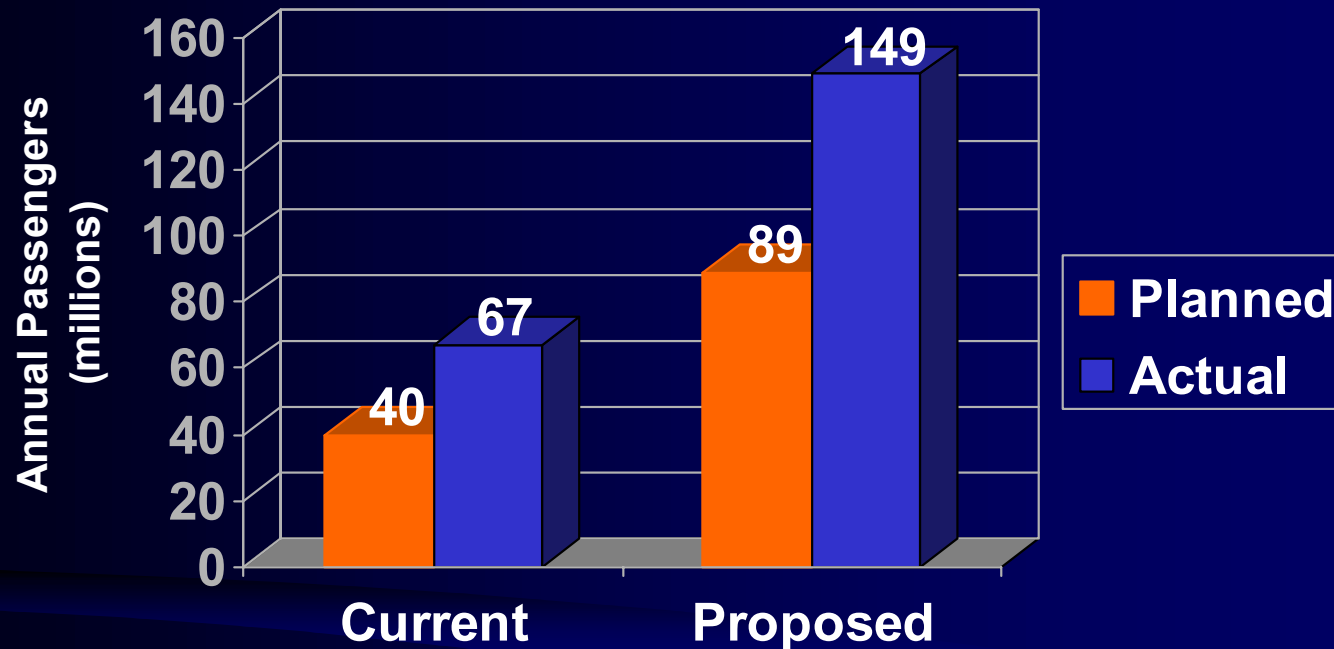
Air Quality

- Carbon Monoxide (CO) Concentrations From On-Airport Sources Are Predicted to Increase As Much As 400%
- Nitrogen Dioxide Concentrations Are Forecast to Increase by As Much As 1,000%
- Mitigated CO Concentrations Were Not Analyzed at Off-Airport Intersections & Hourly Wind Data Is Questionable

Other Areas of Concern

- The Airport Is Currently Operating Far Beyond (67.5%) the Capacity Anticipated in the Previous Master Plan

Potential for Uncontrolled Growth



Other Areas of Concern

- EIS/EIR Does Not Provide Analysis of a “Worst Case” Scenario
 - e.g., Potential Impacts if Regional Demand is Not Absorbed at Other Airports
- EIS/EIR Assumes That Future Cargo Facilities Will Not Be Any More Efficient Than Existing Facilities
 - Underestimates Potential Impact
- Several Mitigation Measure Decisions are Deferred until Final Action
 - Compromises Public Comment Process & Fails to Meet CEQA/NEPA Requirements

Other Areas of Concern

- Social Impacts, Hydrology & Water Quality, & Human Health & Safety Sections Do Not Meet CEQA/NEPA Requirements
- Improvements Only Project a Minimal Increase in Passengers for \$12 Billion in Improvements
 - Proposed Ground Improvements Lay the Foundation for Future Runway Expansion
 - The New Terminal Could Readily Accommodate More Gates in the Future
 - Improvements in “Airside” Technology Could Result in Increased Operations

Conclusions

- Baselines Are Inconsistent & Inappropriate Throughout EIS/EIR
- The Preferred Alternative Fails to Meet the Stated Project Objectives
- Alternatives Do Not Meet CEQA/NEPA Mitigation Requirements
- Depth of Analysis Is Not Sufficient to Support Adoption of the Master Plan