

# **Final Environmental Impact Report (Final EIR)**

[State Clearinghouse No. 1997061047]

for

**Los Angeles International Airport (LAX)  
Specific Plan Amendment Study**

**Part II**

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## **Errata to Responses to Comments**

City of Los Angeles  
Los Angeles City File No. AD 007-08

January 25, 2013



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## ERRATA TO RESPONSES TO COMMENTS IN PART II OF SPAS FINAL EIR

### Introduction

The following corrections are hereby made to the text of Part II of the LAX Specific Plan Amendment Study (SPAS) Final EIR. Changes in text are signified by strikeouts where text is removed and by italics where text is added, unless otherwise noted.

1. Response to Comment SPAS-PC00096-4 on pages 4-375 and 4-376 of Part II of the SPAS Final EIR has been revised to correct the cross-reference in the response from Response to Comment SPAS-PC00130-68 to Response to Comment SPAS-PC00130-168, as follows:

#### **SPAS-PC00096-4**

##### **Comment:**

We favor a combination of Alternatives 2 and 9, which we believe would modernize the airport and improve the airfield and ground transportation without unduly harming Westchester and other nearby communities. Alternative 2 is recognized as the "environmentally superior alternative" (page 1-103). It also appears to us, particularly when combined with Alternative 9, to be the most affordable option.

We support the airfield improvements in Alternative 2, which does not relocate the north runways, but instead lengthens Runway 6R/ 24L, and modifies and improves taxiways. Alternative 2 is preferable given that the DEIR shows that larger Group 5 and 6 aircraft can be acceptably handled by these modifications to the airfield with no additional runway spacing (pages 4-514-515). A 2010 North Runway Safety Study (NASS) conducted by an expert panel under the auspices of the North Airfield Safety Advisory Committee unanimously concluded that the North Runway Complex is extremely safe, even with future projected traffic levels (pages 4-505). The NASS also recommended the taxiway realignment that is included in Alternative 2.

##### **Response:**

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00089-1 for an explanation of why Alternative 2 coupled with the ground access components of Alternative 9 is not the environmentally superior alternative. Please see Response to Comment SPAS-PC00130-730 regarding the treatment of economic impacts in an EIR. As noted in that response, CEQA does not require an analysis of cost or project funding. (State CEQA Guidelines Section 15131; Pub. Resources Code Section 21068.) Nevertheless, Chapter 8 of the Preliminary LAX SPAS Report provides a financial analysis of each alternative. As identified in Table 8-2 of the Preliminary LAX SPAS Report, the combination of Alternatives 2 and 9 is not the lowest cost alternative.

Table 4.7.2-16 in Section 4.7.2 of the SPAS Draft EIR provides a summary of how each alternative relates to safety and efficiency enhancements to the north airfield. Please also see Responses to Comments SPAS-PC00130-3 and SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety.

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2. Response to Comment SPAS-PC00143-1 on page 4-1123 of Part II of the SPAS Final EIR has been revised to correct the cross-reference in the response from Response to Comment SPAS-PC00130-68 to Response to Comment SPAS-PC00130-168, as follows:

### **SPAS-PC00143-1**

#### **Comment:**

I support SPAS Alternatives 2 and 9, although with some reservations. I am very much opposed to moving runway 24R north. The 2010 NASA study affirmed that the north airfield is already safe. Taxiway improvements and runway status lights will further improve safety and efficiency.

#### **Response:**

The commentor's support for Alternatives 2 and 9 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety.

3. Response to Comment SPAS-PC00149-2 on pages 4-1134 and 4-1135 of Part II of the SPAS Final EIR has been revised to include text that was inadvertently omitted:

### **SPAS-PC00149-2**

#### **Comment:**

Why are Runways Even on the Drawing Board?

At the outset of these comments we feel compelled to put into perspective how we have come to be here today. The general public and policy makers alike were both told that there was a compelling safety reason that necessitated reconfiguring the North runways at LAX. Dissatisfied with the "highly suspect" peer reviews that were produced many in the same weekend, the LA City Council took the unprecedented step of delaying this DEIR for two years so that we could get a true unbiased and thorough study done to determine whether safety was truly an issue. Without a safety need, runways would not move. The NASA Study definitively concluded there was simply no safety reason for moving the runways.

It is a universally accepted fact that it is impossible to move these runways further North and make them longer without having an unavoidable environmental impact on the communities to the North - most significantly in the form of increased noise and as a consequence of growth, traffic.

Yet, a Coalition has been formed to ignore the facts and press forward anyway. But without safety as a reason for moving the runway, no policy maker can reasonably conclude that it makes good public policy to subject its population to severe environmental impacts.

Amazingly, of the 1800+ pages of the DEIR only 6 pages are given to summarizing what are described as seven independent assessments. Of these, the only actual comprehensive study done over a period of two years and at an expense of two million dollars and at the express behest of the Los Angeles City Council is given nothing more than a summary (inaccurate at that) and a total of two paragraphs and 16 lines of text.

For the policy maker reviewing this document, this should be a giant red flag as it amounts to a massive and intentional failure to disclose relevant information critical to the core reason that the policy maker is being asked to consider alternative with substantial impacts many of which cannot be mitigated. And to the extent the policy maker reading this is a member of the Los Angeles City Council, the DEIR flies right in the face of what the City Council asked for in demanding the NASA Study take place; to wit, the complete NASA Study and its Addendum are nowhere to be found in the DEIR.

Ironically, scant days before the findings of the NASA Study were released, most of the key players now pushing for the runways to move North (including the Los Angeles Area Chamber of Commerce, Los Angeles Economic Development Corporation (LAEDC), Central City Association (CCA) and Valley Industry and Commerce Association (VICA)) released a joint communique to the press<sup>2</sup> insisting that this study was the one we should all accept as the dispositive final word on the subject. We call on all the signatories to the February 17, 2010 communique to honor their word. They said that the NASA Study "should be the final study that LAWA and the City of Los Angeles conducts to ascertain how to maximize passenger safety at the LAX North Airfield" and that we should all "embrace the results of the study." We agree.

We also call on Mayor Villaraigosa to stand by the statements in his letter dated February 19, 2010 after the NASA Study came out.<sup>3</sup> He wrote that:

"Barring other findings that would indicate safety issues, we are not moving the runway."

There have been no "other findings." As the Coalition members above suggested, the NASA Study was the final study. There has been NO STUDY which has contradicted the NASA Study findings that the North runways are safe since it's completion in February 2010 - in fact there have been no further safety studies at all. As Mayor Villaraigosa added:

"the report concludes definitively that the north runways are 'extremely safe under the current configuration' and that is very good news for the millions of travelers who use LAX every year."

Since there is no present safety rationale, the LAX Coastal Area Chamber of Commerce logically declines to support any runway reconfiguration proposal until such time as there is a simple proven need to move the runways. That day has not yet arrived.

1 Los Angeles City Council Resolution number 07-1782 Adopted on June 20, 2007 (attached as Exhibit C).

2 See attached Exhibit "A".

3 See attached Exhibit "B".

### Response:

*Section 2.2 of the SPAS Draft EIR present the objectives associated with SPAS, including those associated with the need for improvements to the north airfield. Potential risks related to safety are only one category of problems associated with the outdated design of the existing north airfield. Other problems include the fact that: LAX, in general, does not have an airfield that is fully designed for the largest aircraft types currently in service (ADG V and VI aircraft); the existing north airfield configuration requires non-standard operating procedures; the primary north airfield departure runway (6R/24L) is too short for certain larger aircraft (e.g., fully-loaded Boeing 747-400) on long-haul flights, requiring those aircraft to taxi to the south airfield, resulting in less efficient operations and disproportionate environmental impacts; the north airfield high-speed taxiways are not in compliance with FAA Engineering Brief No. 75; and, the north airfield does not provide sufficient areas at the end of the runways for holding arriving flights and sequencing departing aircraft. In short, there are a number of needs and reasons for evaluating potential options for reconfiguring the north airfield.*

*The North Airfield Safety Study (NASS) did not "definitely conclude that there was simply no safety reason for moving the runways." As indicated on page 4-505 of the SPAS Draft EIR, the NASS had several main conclusions including, but not limited to: the LAX north airfield is extremely safe under the current configuration for the projected 2020 activity forecast; and, certain improvements to, and reconfiguration of, the north airfield would substantially increase airfield safety (i.e., reduce the risk of a fatal runway collision). The NASS academic panel concluded that, based on safety grounds alone, it would be hard to argue for reconfiguring the north airfield (i.e., given that the baseline level of risk is so low, reducing the risk of a fatal runway collision by a substantial level is of "limited practical importance"). The academic panel's opinion, which represents a subjective value judgment on the importance of reducing the risk of a fatal runway collision, is not shared by the Federal Aviation Administration, the federal agency responsible for the safety of civil aviation.*

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*The SPAS Draft EIR addresses the environmental impacts associated with the various north airfield improvements proposed in Alternatives 1 through 7, including impacts to the surrounding communities. While it is true that those alternatives involving the relocation of Runway 6L/24R northward (i.e., Alternatives 1, 5, and 6) would result in increased aircraft noise impacts to areas immediately north and northeast of the airport, there would be an accompanying decrease in aircraft noise impacts to areas east, southeast, and south of the airport. As indicated in Sections 4.9, Land Use and Planning, and 4.10.1, Aircraft Noise, and summarized in Tables 1-16 and 1-17 of the SPAS Draft EIR, there would, in general, be fewer residential units exposed to 65 CNEL by moving Runway 6L/24R northward (Alternatives 1, 5, and 6) than would occur in moving 6R/24L southward (Alternatives 3 and 7) or not moving either runway (Alternatives 2 and 4), and the total residential population newly exposed to 65 CNEL would be lowest under Alternative 5 (i.e., relocate Runway 6L/24R 350 feet northward) than under any other alternative. Relative to a 1.5 CNEL increase above 65 CNEL, which includes areas currently exposed to >65 CNEL, the total residential units and residential population exposed to such an increase is consistently higher for alternatives that move Runway 6R/24L southward (Alternatives 3 and 7) or do not move the runways (Alternatives 2 and 4). These differences in the numbers of homes and people being exposed to aircraft noise impacts--specifically, that total overall aircraft noise impacts would be lower with alternatives that move Runway 6L/24R northward--are due to the fact that the land use/development intensities in areas to the east, southeast, and south are higher than in the areas north of the airport. That is, although more homes to the north of the airport would be impacted by noise with a northward move of Runway 6L/24R, an even greater number of homes to the east, southeast, and south of the airport would no longer be impacted by noise, resulting in an overall decrease in the numbers of homes and people exposed to aircraft noise impacts.*

*Regarding the summary of the safety studies completed for the north airfield that is presented in Section 4.7.2 of the SPAS Draft EIR, the length and content of the summary are intended to convey the main points and findings of each study, as relevant to SPAS, without adding substantially to the overall size of the SPAS Draft EIR. For each study summarized, the SPAS Draft EIR includes a citation to the complete study. In the case of the NASS, the Final NASS Report is provided in its entirety as Appendix H-6 of the Preliminary LAX SPAS Report, which was distributed along with the SPAS Draft EIR.*

The commentor presents no evidence that the SPAS Draft EIR's summary of the NASS is inaccurate.

*The commentor's summary of the letter to Alan Rothenberg, the then President of the LAWA Board of Airport Commissioners, from various business organizations issued on February 17, 2010, prior to release of the NASS, is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Such is also the case relative to the commentor's summary of Mayor Villaraigosa's Press Release of February 19, 2010, issued prior to the Mayor's Office review of the complete NASS report.*

4. Response to Comment SPAS-PH300012-1 on pages 4-1329 and 4-1330 of Part II of the SPAS Final EIR has been revised to correct the cross-reference in the response from Response to Comment SPAS-PC00130-68 to Response to Comment SPAS-PC00130-168, as follows:

### **SPAS-PH300012-1**

#### **Comment:**

I'm Denny Schneider, President of ARSAC. I have spoken before, and I've continued to say, there are only four things that need to be fixed at LAX; getting to it, getting around it, getting between the terminals, and getting out of it.

Now, with that said, Alternative 2 is our preferred, because it's the least costly. It is the superior environmental, and it also the most efficient on the airfield.

Now, some of my friends would like to see the airfield changed, and I would question whether it's a safety issue at this time. They can handle those planes adequately now. The safety study from NASA was from the top academic experts in the country, handpicked by LAWA. And that is not the issue that we are faced with right now.

The issue that we're faced with is we have an airport that's falling apart. And it needs to be fixed. Everybody agrees to that, that it needs to be done now, not yesterday.

So in order to get that done, we don't have an unlimited supply of money. Regardless of whether most of it comes from the Airport itself, through various sources of income, or whether it comes from the community, which it is impacting as a general rule, the fact is that we have to set our priorities.

And if you don't fix the Airport land side first, you're not going to have any money left to do that. And you're going to lose out on all the jobs. And you're going to be telling the people who come here that they don't matter. So you need to fix that first.

Thank you.

**Response:**

The commentor's support for Alternative 2 is noted and is hereby part of the Final EIR, and will be forwarded to the decision-makers for their consideration prior to taking any action on the SPAS project. Please see Chapter 2 of this Final EIR regarding the LAWA Staff-Recommended Alternative, which couples the airfield and terminal improvements associated with Alternative 1 with the ground access components associated with Alternative 9, including a discussion of the rationale behind the selection of these alternatives over the other alternatives evaluated in the SPAS Draft EIR. Please see Response to Comment SPAS-PC00089-1 regarding efficiency associated with Alternative 2 compared to other airfield alternatives.

Please see Response to Comment SPAS-PC00130-168 regarding conclusions of the NASS relative to north airfield safety. Please see Response to Comment SPAS-PC00130-725 regarding the economic benefits of terminal improvements versus runway improvements.

## ***Errata to Responses to Comments***

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