

March 15, 2021

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
Los Angeles International Airport  
1 World Way  
Los Angeles, CA 90045

**SUBJECT: Comments to the Draft Environmental Impact Report for the LAX Airfield & Terminal Modernization Project**

Dear Ms. Quintanilla,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR). The City of Rancho Palos Verdes, herein the City, is a quiet coastal town on the Palos Verdes Peninsula, approximately 11 miles south of the Los Angeles International Airport (LAX), but near eastbound aircraft pathways departing from LAX. In review of the DEIR for the LAX Airfield & Terminal Modernization Project (ATMP), the City wishes to express the primary concern that the ATMP will result in an increase in aircraft noise pollution caused by eastbound passenger jets overflying the airspace above the Palos Verdes Peninsula.

As you may know, this community and the rest of the Palos Verdes Peninsula has a long history of expressing concerns to Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) regarding noise impacts associated with departing passenger aircraft from LAX. The City is an active participant on the LAX Roundtable and has made exhaustive requests to the FAA to curb passenger jet aircrafts being vectored by FAA air traffic controllers (ATC) over the Peninsula. Despite these repeated requests to simply adhere to the approved flight paths, the Peninsula continues to suffer from noisy passenger jet overflights originating from LAX.

**General Comments**

1. In general, the City is concerned that the ATMP will induce more passenger flights departing from LAX, thus, increasing the likelihood that air traffic controllers will “cut the corner” and improperly and against FAA procedures (OSHNN8), vector additional aircraft at low altitudes over the Palos Verdes Peninsula’s airspace. This has been, and continues to be an issue, additional flight will only exacerbate the issue and increase its likelihood.
2. The City also shares the concerns that have been expressed in separate correspondence by partner cities and the South Bay Cities Council of Governments (SBCCOG). We share the concern that LAWA needs to prioritize efforts to disperse

air traffic to their other regional airports. Without a coordinated plan to disperse infrastructure improvements to other local airports, LAX is guaranteed to see an accelerated growth of air traffic activity. This increase in air traffic activity will inevitably result in noisy air traffic near and over the Peninsula, increased traffic congestion, additional local air pollution concentrations and other negative unintended consequences.

### **Specific Comments**

1. In reference to Section 2.3.1.2, the City questions the DEIR's projected air traffic passenger growth data, since the LAWA's study was done prior to the outset of the COVID-19 pandemic. LAWA should reconsider the projected growth in light of changes to pandemic-induced passenger travel behavior and reconsider the projected growth at other airports and those airports' ability to handle the projected growth.
2. In reference to Section 4.4, the City encourages LAWA to consider expanding the scope of study for greenhouse gas emissions based on projected aircraft departures from LAX under known aircraft dispersal patterns. Specifically, air pollutants should be studied, which are emitted from passenger jets vectored over the Palos Verdes Peninsula. The toxic air contaminants of concern should be studied over exposed populations based on the quantity and altitudes of passenger jet with Peninsula overflights. LAWA should consider a range of mitigation measures available to lessen passenger jet air pollution over Peninsula residents, including effective communication with TRACON air traffic controllers to vector passenger jets over the ocean east of the HOLTZ waypoint.
3. Specific to Section 4.7.1 of the DEIR and only specific to the construction phase of the project, the City is concerned that the proposed improvements to Runway 6L-24R will cause significant aircraft departure delays and disruptions. Disrupted and inefficient aircraft movement on the ground has the potential of causing FAA departure controllers to rush departures, resulting in congested air traffic between LAX and the Peninsula. We have witnessed that congested air traffic increases the likelihood of vectoring aircraft from the published offshore flight path (OSHNN8) towards the Peninsula because of the FAA's requirement to maintain aircraft separation for safety purposes or because of the pressure placed on air traffic controllers to make up time for departure delays. In addition, given the projected length of the proposed runway construction from 2021 to 2025 and due to the length of runway closures occurring in 4.5-month duration periods, the City is especially concerned that these runway closures may result in disturbing aircraft noise impacts to the community for lengthy periods of time.
4. Section 4.7.1.5.1.1 of the DEIR does not adequately address the foreseen airspace congestion impacts attributed to temporary airfield construction described above nor does the DEIR adequately address or provide mitigation measures for aircraft noise impacts to communities, such as the City of Rancho Palos Verdes, outside of LAWA's Noise Exposure Map. Although the City is not adjacent to LAX, where the Noise Exposure Map illustrates elevated noise disturbances, the City considers

itself a noise-sensitive community due to the low ambient noise levels enjoyed by its visitors and residents.

5. In reference to Section 4.8 of the DEIR, the City, along with the SBCCOG, believes that the DEIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. The City encourages LAWA to work with stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.
6. In reference to Section 4.8.3.2.1 of the DEIR, the City supports LAWA's proposal to eliminate permanent access from Sepulveda Boulevard to Terminal 9. However, we share the same traffic concerns as that of the SBCCOG about opening the new Terminal 9 before the aerial roadway system is complete. We also believe that temporary access from Sepulveda Boulevard is unwise. There will already be access to Terminal 9 via Century Boulevard and the new Jet Way street, which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda Boulevard, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Boulevard at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda Boulevard. If a third means of access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

The City supports the concept of continued evolution and a more efficient, modernized LAX. However, it is difficult to support the ATMP without first addressing some of the current vexing issues, such as FAA improper routing of low flying aircraft, local air space congestion, and environmental sustainability. We must have confidence that LAWA is effectively communicating aircraft noise concerns to the FAA and the two agencies are working together to solve this ongoing issue. The City expects LAWA to champion the concerns of those communities affected by aircraft noise pollution and use their resources to influence the FAA, particularly the FAA's air traffic controllers, to adopt more enforceable, reliable, meaningful and measurable aircraft noise mitigation measures than those described in DEIR.

We appreciate your attention to the City's concerns as LAWA finalizes the environmental review. We hope the provided comments, as well as those comments from affected communities, will translate into implementing amicable measures that will mitigate project related impacts to those affected communities, including the City of Rancho Palos Verdes.

City of Rancho Palos Verdes Comments to DEIR  
March 15, 2021

If you have any questions regarding this letter, please contact me at 310-544-5202 or via email at [aram@rpvca.gov](mailto:aram@rpvca.gov).

Sincerely,

A handwritten signature in blue ink, consisting of a large loop followed by a stylized 'M' and a trailing line.

Ara Michael Mihranian, AICP  
City Manager

- c. Mayor Alegria and Rancho Palos Verdes City Council  
William Wynder, City Attorney  
June Ailin, City Prosecutor  
Jacki Bachrach, Executive Director of the SBCCOG  
Rolling Hills City Council and City Manager Elaine Jeng, P.E.  
Rolling Hills Estates City Council and City Manager, Greg Grammar  
Palos Verdes Estates City Council and City Manager, Laura Guglielmo  
Joe Buscaino, Councilman, 15<sup>th</sup> District, City of Los Angeles  
Jacob Haik, Deputy Chief of Staff, Office of Councilman Buscaino  
Lomita City Council and City Manager, Ryan Smoot  
Redondo Beach City Council and City Manager, Joe Hoefgen  
Hermosa Beach City Council and City Manager, Suja Lowenthal  
Manhattan Beach City Council and City Manager, Bruce Moe  
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