

December 20, 2005

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Boulevard
Long Beach, California 90802

Sent by fax to (562) 570-6012

Dear Ms. Reynolds:

Subject: Draft EIR Comments for the Long Beach Area Terminal Improvement Project

We strongly oppose the terminal improvements proposed at the Long Beach Airport and support the No Project Alternative as described in the Draft Environmental Impact Report (DEIR) for the following reasons:

Long-Term Growth Implications: Although the DEIR repeatedly states the proposed terminal improvements would not result in an increase in flights and would accommodate the minimum permitted flights under the City's Airport Noise Compatibility Ordinance and passengers associated with those flights, history has shown that improvements result in increased usage of the airport which equals airport growth. This is clearly outlined in the DEIR proposed project summary which shows that in 1941, the airport terminal building was built to serve approximately 25,000 annual commercial airlines passengers. In 1984, a new concourse area and pre-boarding lounge were added to accommodate passengers estimated at 1.1 million. In 2002 and 2003, temporary facilities including holdrooms, a remote parking lot, and baggage claim area were added for the increased passengers estimated at 3 million. Now in 2005, more terminal improvements are being proposed to accommodate the future estimated 4.2 million passengers. Again, providing improvements at the airport will only pave the way for increased usage which will lead to growth and more flights. Even though additional flights may occur at the airport without any of the proposed improvements, adding new facilities and improvements will only make it easier and more appealing for increased air travel at the airport. By maintaining the existing facilities, growth and usage are limited and discouraged.

1

Airline Gates and Aircraft Parking Positions: The proposed project would increase aircraft gates for boarding from eight to 11. Aircraft parking positions would also be increased from 10 to as many as 14. These improvements are yet another indication of not only providing facilities to accommodate the existing number of flights but also increased flights that are expected at the airport. The growth-inducing analysis in the DEIR states that an increase in flights would result from regional air transportation demand and not because of the availability of specific terminal area facilities. However,

2

without providing the needed infrastructure like more airline gates and parking positions, the airport would reach a point where it would not be able to physically accommodate more aircraft and flights. Therefore, one can argue that increased flights, regardless of whether allowed under the noise ordinance, is a reasonably foreseeable consequence because the needed infrastructure (proposed project) would now exist to better accommodate and serve this growth. Again, maintaining the existing facilities as proposed under the No Project Alternative would limit and discourage growth at the airport.

A recent example of this is a landmark plan to end litigation over the modernization of LAX. This plan, as highlighted in the Los Angeles Daily News on November 30, 2005, would limit growth at LAX by shutting down two gates a year for the next five years. The article mentions that the FAA does not allow airports to cap the number of passengers but airport operators can limit growth through infrastructure like reducing aircraft gates. The proposed project would do just the opposite by providing modern and improved infrastructure so that growth is easily accommodated. To this end, the proposed project is in fact growth-inducing, even under the optimized flights scenario.

2 cont.

Expansion: Under the proposed project and the build alternatives considered, facilities would be expanded from 56,320 square feet up to 102,850 square feet. Expansion happens for a reason: to accommodate existing and projected future growth. Municipalities like the City of Long Beach do not invest millions of dollars in infrastructure and improvements to only serve an existing need. Growth is always a factor in the design of improvements that are supposed to last 50 plus years. It's hard to believe that the objective of the proposed project is to provide facilities for the minimum permitted number of flights at the airport as stated in the DEIR, especially if the airport as it exists today is already practically accommodating the minimum flights permitted. The airport should be maintained as it currently exists and should not be expanded.

3

We strongly urge the Long Beach City Council to approve the No Project Alternative and make only minor improvements that would aid in security measures for the airport.

Sincerely,

Evan and Lisa Ochsner

Evan and Lisa Ochsner
3628 Cerritos Avenue
Long Beach, California 90807

Hard copy of email sent 12-21-05

Dodge, Theresa

From: Dodge, Theresa
Sent: Wednesday, December 21, 2005 11:41 AM
To: 'AirportEIR@longbeach.gov.'
Cc: Dodge, Theresa
Subject: Comments on the draft EIR for Long Beach Airport

Public Comments on the Long Beach Airport Terminal Area Improvement Project Draft Environmental Impact Report No. 37-03 November 2005

The draft EIR Section 3.6 Noise does not adequately address the potentially significant health and safety effects of sleep disturbance and resulting loss of sleep. The information presented in the Section is incomplete. The proposed project noise level during sleeping hours is not indicated (Optimized Scenario). The existing airport activity noise levels are not characterized in the Section for comparison purposes. As a result no assessment of project impacts or the need for any mitigation measures associated with the project is even discussed. } 1

Section 3.6 Noise discusses sleep interference as an annoyance and generally discusses various studies on the recommended values for sound levels during the assumed sleeping hours of 10 p.m. -7 am. Finding differing opinions in a literature review does not eliminate the requirement to assess the impacts of a project which should include the potentially significant health impact of loss of sleep. The percentage of awakenings and loss of sleep associated with the existing conditions needs to accurately established as well as a clear delineation of the evaluation criteria (acceptable noise level), the subsequent differential associated additional flights under the Optimized Scenario can then be evaluated and assessed as significant or not. } 2

Exhibit 3.6-3 is referenced as indication that aircraft noise was only a minor contributor to the awakening response. The source of this information is not clear from the Exhibit. The document reviewer does not know if the information is project specific, the duration of the study, study criteria or analysis methods utilized. Without an established existing condition, no comparison or assessment of the project impacts can be made. } 3

There are no exhibits such as Exhibits 6.6 -10 plus that indicate the anticipated project noise contours down to levels that impact sleep. Again nighttime project levels are not indicated but studies indicating impacts to sleep as low as 25 dBA are described. } 4

Table 3.6-5 lists night air carrier and cargo operations for 2004 presumably as the existing conditions but do not indicate the associated noise and any impacts to sleep as a result. No nighttime noise data for the existing condition is included in this Section of the EIR. Exhibits showing the resulting noise contours from existing conditions and the project conditions would provide a readily comparable data set for evaluation and public comment. } 5

Section 3.6 Noise of the draft EIR does not clearly inform the public of 1) the existing conditions associated with night time airport activities as they relate to noise or impacts on sleep, 2) the project target noise levels during sleeping hours, and 3) the anticipated impact of the project on sleep. For these reasons and those listed above, this draft EIR does not adequately assess the potentially significant health and safety impacts of sleep disturbance associated with this project. } 6

A literature review and referencing regulations are not a complete or adequate assessment of the nighttime noise related impacts to the local public. A project specific assessment of the potentially significant impact on health and safety of the local residential population as a result of noise disruption of sleep and resulting loss of sleep is needed including, but not limited to, a project specific determination of 1) existing conditions, 2) acceptable nighttime noise levels, 3) projected project conditions, 4) assessment of impacts and 5) determination of appropriate mitigation measures. } 7

Theresa Dodge
3012 Chatwin Avenue
Long Beach, CA 90808

Theresa Dodge 12-21-05

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MoLAA

Museum of Latin American Art

December 21, 2005

Angela Reynolds
Environmental Officer
City of Long Beach
Planning and Building Dept.
333 West Ocean Blvd.
Long Beach, CA 90803

Reference: The Long Beach Airport

Dear Ms. Reynolds:

It is time to stop this charade against expanding the services at the Long Beach Airport.

We already have the traffic in the airport coming in that is allowed by law, but we are not giving them adequate service. The airport as it is, is a very poor advertisement for the city– the worse possible impression for arriving passengers. It needs to be fixed and it needs to be fixed right away! It has been chewed on and chewed on by special interests to no avail. The people who live around the airport knew they were moving into the airport space when they moved there and probably they got their houses for less money. This airport is not a recent phenomena– it's been there since World War II.

Cities of similar size or even smaller have better airports than Long Beach. Take Fresno or Cabo San Lucas. They both have gotten the message; you can't have a thriving city that is expanding without an efficient and effective airport.

Long Beach should consider itself lucky to have a large airport. Long Beach, the second largest city in Los Angeles County, has an excellent airport with good landing strips and now it just needs a presentable airport facility worthy of the city it is growing to be.

1

Angela Reynolds
Environmental Officer
City of Long Beach
Planning and Building Dept.
December 21, 2005
Page 2

As Chairman of the Museum of Latin American Art, I would like to see a presentable airport for the people who will be coming in to visit the only museum of contemporary Latin American fine art in the country. How can we build an excellent museum and present ourselves with a shabby and dysfunctional airport?

1 cont.

Sincerely,



Robert Gumbiner
Chairman
Museum of Latin American Art

RG/ks
WP/LBAP.122105

To: Angela Reynolds, Environmental Officer, City of Long Beach

I SUPPORT LONG BEACH AIRPORT IMPROVEMENTS!

Yes, I would like to see the Long Beach Airport Terminal improved to include:

- Larger waiting rooms
- More counters and check-in space
- Better concessions and a larger coffee shop
- Cleaner, larger more accessible bathrooms
- Modern baggage inspection and handling equipment
- More and closer parking spaces.

I appreciate the unique historic characteristics of the building architecture and understand the building facade and historical attributes will remain. But please replace the temporary trailers, tented and chain-linked fenced facilities with permanent and professional facilities.

The Airport Terminal Improvement Draft Environmental Impact Report (DEIR) states:

“The key project objective is to provide Airport facilities to accommodate the minimum permitted number of flights at the Airport (i.e. 41 commercial flights and 25 commuter flights) and the associated number of passengers served on those flights...”

After exhaustive study, the DEIR concluded: “The proposed project (102,980 square foot terminal and not less than 14 aircraft parking positions) is the environmentally superior alternative.”

The Long Beach City Council needs to hear from airport users that it is time to move forward with the proposed improvements to enhance the travel experience and the image of the City of Long Beach.

Name: Ashley Durin Address: 3249 Driftwood Dr
 City: _____ State & Zip: Lafayette CA 94549
 Date: 12/19/15 Sincerely: Ashley Durin

Please add my name to the list of supporters for the remodeling and improvement of the Long Beach Airport (names and contact information will not be used for any other purpose).

For more information visit: www.longbeachalliance.org
View the Draft EIR at: www.longbeach.gov and www.lgb.org
E-mail your comments to: AirportEIR@longbeach.gov

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To: Angela Reynolds, Environmental Officer, City of Long Beach

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Name: Brittany F. DVORN Address: 5050 E. Garford #129
 City: Long Beach State & Zip: Long Beach, Calif.
 Date: Dec. 28, 2005 Sincerely: Brittany DVORN

Please add my name to the list of supporters for the remodeling and improvement of the Long Beach Airport (names and contact information will not be used for any other purpose).

For more information visit: www.longbeachalliance.org
 View the Draft EIR at: www.longbeach.gov and www.lgb.org
 E-mail your comments to: AirportEIR@longbeach.gov

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Name: Fannie Dvorin

City: _____

Date: Dec. 28, 2005

Address: 3049 Driftwood Drive

State & Zip: Lafayette, Ca. 94549

Sincerely: Fannie Dvorin

Please add my name to the list of supporters for the remodeling and improvement of the Long Beach Airport (names and contact information will not be used for any other purpose).

For more information visit: www.longbeachalliance.org
 View the Draft EIR at: www.longbeach.gov and www.lgb.org
 E-mail your comments to: AirportEIR@longbeach.gov

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"Karens"
 <karens@rgumbiner.com>

To: <Airport.EIR@longbeach.gov>
 cc:
 Subject: LB Airport Expansion

12/29/2005 02:41 PM

It is time to stop this charade against expanding the services at the Long Beach Airport.

We already have the traffic in the airport coming in that is allowed by law, but we are not giving them adequate service. The airport as it is, is a very poor advertisement for the city- the worse possible impression for arriving passengers. It needs to be fixed and it needs to be fixed right away! It has been chewed on and chewed on by special interests to no avail. The people who live around the airport knew they were moving into the airport space when they moved there and probably they got their houses for less money. This airport is not a recent phenomena- it's been there since World War II.

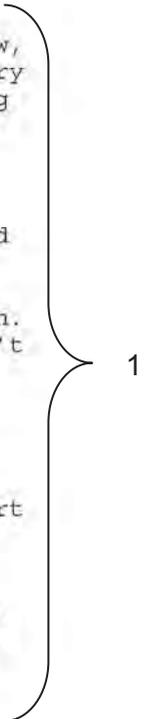
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Long Beach should consider itself lucky to have a large airport. Long Beach, the second largest city in Los Angeles County, has an excellent airport with good landing strips and now it just needs a presentable airport facility worthy of the city it is growing to be.

As Chairman of the Museum of Latin American Art, I would like to see a presentable airport for the people who will be coming in to visit the only museum of contemporary Latin American fine art in the country. How can we build an excellent museum and present ourselves with a shabby and dysfunctional airport?

Sincerely,

Robert Gumbiner
 Chairman
 Museum of Latin American Art



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"Stewart, Jeff"
<JStewart@SSTINTL.C
OM>

To: <AirportEIR@longbeach.gov>
cc:
Subject: Concession stand at Long Beach Airport

12/30/2005 12:17 PM

Quick question, what restaurants do you have on stand by or when will you
start taking considerations for restaurants?

} 1

Thank you,

Jeff Stewart
310-748-9013

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CHRISTOPHER R. POOK
347,BLUE CAVERN POINT
LONG BEACH
Ca.90803
E-mail:crp78c@aol.com

December 30th.2005

Ms. Angela Reynolds
Environmental Planning Officer
Department of Planning and Building
The City of Long Beach
333, West Ocean Boulevard
Long Beach, Ca. 90802

RE: Long Beach Airport
Renovation

Dear Ms. Reynolds:

In response to the current EIR document on the renovation and modernization of The Long Beach Airport, we believe there are two critical issues:

- 1) It is imperative that sufficient 'Parking Pads' – at a minimum 14 – be constructed with supporting GPU stations in order to eliminate aircraft parking on the taxiways with engines running thus emitting fumes.
- 2) It is critical that at a very minimum the new Terminal be built at +/- 104,000 sq.ft. and that the maximum space possible be devoted to Holding Rooms, Security Check Points and Concession Space. Office space needs can well be accommodated off-site in already existing buildings.

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Kindly place these comments in the EIR comment file.

Thank you.



Christopher R. & Ellen L. Pook

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Dec 2002

Why are our city officials so anxious to enlarge our airport. Our airport is a target landing facility, if a plane comes down before it reaches the landing strip it is going to kill a lot of Long Beach residents !!!! AND every day we read about a plane having to abort its flight. The city has given us a lot of statistics but not once have I heard anyone give us the risk factor on a flight being aborted. In Long Beach no matter what the flight plans are for a flight, landing or taking off, there is no open spaces for them to come down in. So the residents are put in jeopardy with every flight going over them !!! Yet our elected officials are constantly pushing for "airport expansion". Any one who gives this expansion any thought knows that if we enlarge this facility there will be more pressure to bring more flights into Long Beach, thereby , increasing the risk factor of a plane coming down in one of our residential areas. This risk factor should not be ignored.

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Over and above the risk factor, which the the EIR has never addressed. The EIR has bombarded us with figures on the risk factor of health problems resulting from the pollution and the noise brought on with the already existing number of flights. I refer to the health concerns at just one school Minnie Gant. Yet the EIR informs us that the contamination from airplanes is no threat to the health of the citizens living under the flights. If this intrusion into the lives of the residents continues who will wish to build or live and raise a family in such a dangerous environment. I beg the city council to not expend any more city resources into airport expansion. There are so many places in our city that need improvement, have you tried to drive down a city alley way, tried to have a tree trimmed, lets open up our libraries and our nature center.

} 2

St. Mary's hospital is asking residents to donate money to assist them in the development of a regional disaster center. They state that Long Beach in one of 120 cities most at risk of terrorist attacks Now as a citizen of Long Beach I ask all of the other citizens which would you like to see our city fathers spend our tax dollars on. expanding an airport with its risks and health hazards or using our tax dollars to make our city a better place to live and bring up a family.

} 3

Clair Brogan
 5848 Monte St
 90815
 562-596-6823

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"Kamran Dadsetan" <kamrandadsetan@hotmail.com>
 01/04/2006 07:35 AM

To: district1@longbeach.gov, kdadsetan@jetblue.com, district2@longbeach.gov,
district3@longbeach.gov, district4@longbeach.gov, district5@longbeach.gov,
district6@longbeach.gov, district7@longbeach.gov, district8@longbeach.gov,
district9@longbeach.gov, Mayor@longbeach.gov, Angela_Reynolds@longbeach.gov,
AirportEIR@longbeach.gov

cc:

Subject: Long Beach Airport

Date: 1/3/06

Re: Support for 102,850 Square Foot Long Beach Airport Terminal Remodel

Dear Mayor, Council Members and EIR members

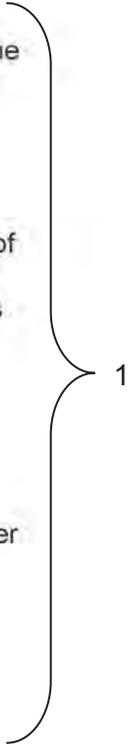
I had the worst experience during recent weather related delays on January 2, 2006. The airport terminal was packed with people. No place to seat for hours, long lines at the bathrooms and the so called food concession. This is not only an unhealthy environment, but god forbid if there was a fire or need for evacuation, there would have been a disaster. I am surprised the city fire marshall did not cite the airport for overcapacity at the passenger holding facility.

Long Beach airport is fast becoming a popular airport. I am sure it is bringing a wealth of cash to the city. Maybe the city does not need the money. I live 10 minutes from the John Wayne airport, but I rather use the Long Beach airport as it offers me direct flights to east coast. I love the small airport environment, however there is a certain need to provide more passenger facilities.

I support an improved airport terminal project that will provide adequate terminal space and parking while reducing air pollution and traffic congestion. I agree with the Long Beach Alliance position that the 102,850 square foot terminal with 14 airplane parking positions is the minimum size needed to accommodate the current and future passenger loads.

It is my hope that the City Council actively supports the current Environmental Impact Report (EIR) timeline and avoids further delays. It is time push forward the plan for an improved terminal building at the EIR recommended size of 102,850 square feet.

Sincerely,
 Kamran Dadsetan
 4304 Apricot
 Irvine, CA 92618
 Kamran Dadsetan



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"David Thompson"
<tolleffsen85@msn.com>

To: AirportEIR@longbeach.gov
cc:
Subject: Airport Expansion

01/04/2006 04:28 PM

Is the airport expanding flights at Long Beach airport?
Commercial flights are the loudest, as I was just blasted a few minutes ago.

If you are going to be making money by expanding the flights at the airport, then I do believe, as Gerrie Schipske is saying, then the city can soundproof our homes. Why would you let our home prices go down because of the noise of the airport?

Please do something about this.

Thank You,

Debby Thompson

Los Altos Neighborhood

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} 2

Don't just search. Find. Check out the new MSN Search!
<http://search.msn.click-url.com/go/onm00200636ave/direct/01/>

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DSDT2@cs.com

01/05/2006 10:37 AM

To: EIR@longbeach.gov

cc:

Subject: COMMENT ON THE SOUNDPROOFING IDEA - ANGELA REYNOLDS

ANGELA

I DO NOT RECOMMEND THE CITY EVER ACCEPT OR TAKE ACTION TO SOUNDPROOF ANY PRIVATE PROPERTY DUE TO HEARSAY NOISE POLLUTION. NO HOME IN OR AROUND THE AIRPORT IS SO POLLUTED AS TO BE UNINHABITABLE WITH THE TRAFFIC LEVEL OF THE AIRPORT.

I HAVE LIVED JUST SOUTH OF THE 405 AT LAKEWOOD BLVD. FOR 22 YRS AND DO NOT "SUFFER" FROM THE AIRPORT. I KEEP MY DOORS AND WINDOWS OPEN MOST DAYS AND FEEL THE 405 TO BE THE WORST OF OFFENDERS FOR TIRE DUST AND NOISE AT ALL TIMES. ON SANTA ANA DAYS SOME OF THE DEPARTURE JETS SOUND LIKE THEY ARE IN MY LIVING ROOM BUT ARE SOON GONE. NOT THE 405.

IF someone DOES NOT LIKE THE CHANGES HAPPENING AROUND THEM THEN LET THEM PRACTICE OUR FREEDOM OF CAPITALISM AND SELL OUT AND MOVE ON AND DON'T LET THEIR SHIRT TAIL HIT THEM IN THE ASS ON THEIR WAY OUT OF TOWN. THIS CITY HAS NO BUSINESS PAYING TO IMPROVE ANYONE'S PERSONAL PROPERTY.

THANKS

DON THOMPSON

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January 6, 2006

Airport ^{EIR} Comment

To Whom it May Concern:

In 2004 I completed a Master's Thesis entitled "The Architecture and Art of the Long Beach Administration Building." For this reason, I have been asked by Long Beach Heritage to submit a brief comment on the Administration Building in regards to information that I included in my thesis about plans for airport expansion.

I found one reference indicating that the subtle arc shape of the Administration Building, a "segment of a wagon wheel," would lend itself well to expansion from either end. That information is in, "Air Terminal for Small West Coast Field Follows Best Prewar Pattern, Allows for Expansion," Architectural Forum 85 (October 1946): 94. Theoretically the ends of the terminal, or Administration Building, if continued in the arc shape, would terminate at Lakewood Boulevard, the intersecting thoroughfare to the airport's east. However, Lakewood Boulevard has been relocated since the conception of this plan.

Also, the Long Beach Airport has a photograph of a 1967 drawing for a completely new terminal building, or at least a completely transformed building. This 1967 plan bears no resemblance to Austin and Wing's rather standard, horizontal terminal building, which in fact, was not an uncommon prewar airport terminal design. The terminal buildings at Houston and Newark Airports are similar in shape.

Respectfully submitted,

Laurel D. Howat

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Mark Christoffels
01/18/2006 05:26 PM

To: airporteir@longbeach.gov
cc:
Subject: Airport Expansion EIR: Response to Comments

----- Forwarded by Mark Christoffels/PW/CLB on 01/18/2006 05:26 PM -----

----- Forwarded by Angela Reynolds/CH/CLB on 01/18/2006 03:46 PM -----

Josephine Peterson

01/17/2006 02:44 PM

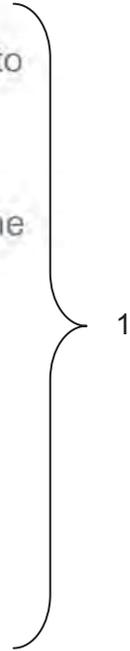
To: Angela Reynolds/CH/CLB@CLB
cc:
Subject: Airport Expansion EIR: Response to Comments

Hi Angela,

The following message is for the Airport Expansion EIR Response to Comments submitted via phone by Karen Haack.

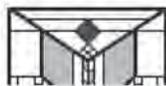
Ms. Haack does not agree with the Airport Expansion because of the following concerns:

- #1 Noise Level
- #2 Air Quality
- #3 Possible Future Neighborhood Breakdown
- #4 City Officials' Lack of Accountability



Karyn Haack
4638 Pepperwood Avenue
Long Beach CA 90808
562.425.4193

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Mark Christoffels
01/18/2006 05:27 PM

To: airpoteir@longbeach.gov
cc:
Subject: Airport noise

----- Forwarded by Mark Christoffels/PW/CLB on 01/18/2006 05:26 PM -----

----- Forwarded by Angela Reynolds/CH/CLB on 01/18/2006 04:15 PM -----

Leslie Marek <lesliecna1980@yahoo.com>

To: Angela_Reynolds@longbeach.gov
cc:
Subject: Airport noise

01/17/2006 04:05 PM

Dear Ms. Reynolds,

I am writing to voice my concerns and complaints about the excessive noise at the Long Beach Airport and my fears for the proposed expansion making my quality of life even worse than it is now.

Because of the loud roar from the jet engines, we can no longer keep our windows open for fresh air, as the noise drowns out the TV, conversations with people on the phone, etc. Closing the windows does little to quiet things, even though I have double paned windows.

Some planes are so loud they actually rattle items in my house. I know the airport is not equipped to launch the Space Shuttle but sometimes it sound like it's happening.

If the airport is set on expanding the number of flights, then I think they should compensate those of us who are affected by the noise.

I'd also like to ask that they do something about monitoring the air quality.

The wind shifts and blows to the East after 3pm. Let me just say that jet exhaust does not smell good, and it's not helping my asthma any either.

Some compromise will have to be met by the residents and the airport, or things will probably be tied up for years in court battles. It seems easier if the airport will sound-proof the houses affected, and work on the air quality issues.

Your response would be greatly appreciated.

Sincerely,

Leslie Marek
5200 E. Canton St.
Long Beach, CA. 90815
562 429-9635

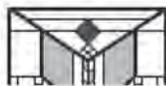
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Leslie

Yahoo! Photos – Showcase holiday pictures in hardcover Photo Books. You design it and we'll bind it!

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Mark Christoffels
01/18/2006 05:27 PM

To: airporteir@longbeach.gov
cc:
Subject: Airport

----- Forwarded by Mark Christoffels/PW/CLB on 01/18/2006 05:27 PM -----

----- Forwarded by Angela Reynolds/CH/CLB on 01/18/2006 04:18 PM -----

brwn2@aol.com

01/18/2006 12:55 PM

To: Angela_Reynolds@longbeach.gov
cc:
Subject: Airport

I would like clarification regarding the idea of improvement verses expansion, and their relation to the proposed development of the Airport Terminal. Wouldn't an improvement be to remodel the tents and outside baggage areas into a newly designed hard structure at the current size of 56,000 square feet, (hard structure plus tents and outside baggage areas), and an expansion be to build something larger than this? Am I understanding this correctly? If I am I think this difference should be made clear so we can choose what to do based on a clear understanding of all options.

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Linda Brown
7049 El Paseo St
Long Beach, CA 90815

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"Gillian Stormont"
 <gillianinlongbeach@verizon.net>

01/18/2006 08:13 PM

To: <EIR@longbeach.gov>
 cc: <kell@longbeach.gov>, "Jackie Kell" <kell@ci.long-beach.ca.us>, <mayor@longbeach.gov>, <citymanager@longbeach.gov>
 Subject: Long Beach Airport

I am a resident of Long Beach since 1987, first living in North Long Beach (9th District) and, since 1991 living in Northeast Long Beach (5th District). I shop at the Los Altos shopping center directly under the approach flight path to Long Beach Airport. I attended the first of the airport terminal improvement hearings on Tuesday, November 29 at The Grand on Willow in Long Beach.

I fly in and out of Long Beach, for pleasure, mostly on JetBlue but occasionally on America West. I LOVE Long Beach Airport, it is a huge asset to the city, and I will only fly from LAX when forced, e.g. to fly internationally (to Europe). I love the small-town old-fashioned feel of Long Beach Airport, which reminds me of Burbank Airport back in the 70s. In the summer of 2005, when repairs were being made to the runways and flights were diverted to an east-west approach on the weekends (Runway 30?), I feared the worst. There was so much advance publicity about noise, I thought it was going to be a nightmare. Instead, I barely noticed the jets coming in for a landing. Much worse to me is the daily assault from commuter planes and the horrendous Sheriff's (and other) helicopters. They are much louder, and the noise continues for much longer, than any quiet JetBlue plane. I have stood in the parking lot outside Sears and Bristol Farms in the Los Altos shopping center under the flight path – **WHAT'S THE BIG DEAL!**

And, no, I don't like noise and, yes, I am in favor of quiet planes ...and a nighttime curfew.

Bottom line, I love Long Beach Airport but the terminal definitely needs improvement. I traveled to NY as recently as this past Christmas. The terminal was jammed, and the baggage claim area is pitiful. I am absolutely in favor of terminal improvement but **PLEASE DO NOT ALLOW THE ORIGINAL TERMINAL WITH ITS ART DECO ARCHITECTURE TO BE DESTROYED. I WOULD LIKE TO SEE MORE SPECIFIC EXAMPLES OF WHAT THE NEW TERMINAL WILL LOOK LIKE – THE INFORMATION PROVIDED AT THE AIRPORT HEARING IN NOVEMBER WAS SKETCHY.** This is an opportunity for Long Beach Airport to make a significant architectural contribution to the city, not just another "any old" airport, but a contribution to the city's heritage even as we move into the 21st Century. Please select an architect who can deliver the goods. **AND LET'S MOVE FORWARD!** Thank you.

Gillian Stormont
 5534 Flagstone Street
 Long Beach, CA 90808

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LONG BEACH HERITAGE



POST OFFICE BOX 92521 LONG BEACH CA 90809

562.493.7019 LBHERITAGE.ORG

January 20, 2006

Ms. Angela Reynolds
Advance Planning
Community & Environmental Planning Officer
City of Long Beach
333 West Ocean Blvd., 7th Floor
Long Beach CA 90802

Dear Ms. Reynolds,

RE: Long Beach Airport EIR - Comment

Long Beach Heritage is a non-profit education and advocacy group promoting public knowledge and preservation of significant historic and architectural resources, neighborhoods and the cultural heritage of Long Beach.

The following comment regarding any physical changes to the historic Long Beach Airport was made on behalf of Long Beach Heritage by long-time member, Laurel Howat.

"In 2004 I completed a Master's Thesis entitled "The Architecture and Art of the Long Beach Administration Building." For this reason, I have been asked by Long Beach Heritage to submit a brief comment on the Administration Building in regards to information that I included in my thesis about plans for airport expansion.

"I found one reference indicating that the subtle arc shape of the Administration Building, a "segment of a wagon wheel," would lend itself well to expansion from either end. That information is in, "Air Terminal for Small West Coast Field Follows Best Prewar Pattern, Allows for Expansion," Architectural Forum 85 (October 1946): 94. Theoretically the ends of the terminal, or Administration Building, if continued in the arc shape, would terminate at Lakewood Boulevard, the intersecting thoroughfare to the airport's east. However, Lakewood Boulevard has been relocated since the conception of this plan.

"Also, the Long Beach Airport has a photograph of a 1967 drawing for a completely new terminal building, or at least a completely transformed building. This 1967 plan bears no resemblance to Austin and Wing's rather standard, horizontal terminal building, which in fact, was not an uncommon prewar airport terminal design. The terminal buildings at Houston and Newark Airports are similar in shape."

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1

Long Beach Heritage requests that we be included in significant design discussions regarding any changes or expansion to the Administration Building or ancillary buildings which would affect the integrity of the historic structure.

Respectfully submitted,

} 2

Stanley Poe
Stanley Poe
President

Laurel Howat
Laurel D. Howat
For Long Beach Heritage



"Lou Anna Denison"
<lannd4animals@chart
er.net>

To: <AirportEIR@longbeach.gov>
cc:
Subject: Long Beach Airport EIR

01/21/2006 01:59 PM
Please respond to
lannd4animals

January 21, 2006

RE: Airport EIR

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Boulevard
Long Beach, CA 90802

Dear Ms. Reynolds:

We live on East 11Th Street near Studebaker Road and Anaheim Street (under the landing pattern of airplanes landing at the Long Beach Airport). We are already heavily impacted by severe noise and air pollution. It troubles us that the phrase " associated with an Optimized Flights Scenario" is used so often in the EIR. Although we have been reassured that there wouldn't be any more flights unless the noise ordinance is enforced, building such a huge, unneeded facility would be inviting ever more airplanes! We can remember that when, years ago, we were to vote on whether to allow that diagonal runway to be built, we were promised that the runway would be used just for Douglas Aircraft to build and test their larger planes--and that it would NEVER be used for commercial flights! So much for promises by the city!

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While we agree that the airport needs reasonable expansion and remodeling, none of the alternatives addressed the choice of doing this remodeling with an expansion of less than 79,745 square feet--other than "NO PROJECT--meaning 0 expansion. In other words, there needs to be an alternative that allows for remodeling, but would add less than 79,725 square feet to the existing terminal.

2

The EIR states that "A component of the proposed Project is the provision of a new parking structure that would accommodate 4,000 vehicles." Has a study been done that shows that there is a *need* for parking for that many vehicles? Has there been a study regarding how many passengers are dropped off at the airport to avoid paying the expensive parking fees?

3

The one thing that is really needed at the airport--jetways to accommodate handicapped and elderly passengers--is missing in the plan. Is there a *valid* reason for exclusion of such a vital amenity?

4

The EIR states that: "Under the Optimized Flights Scenario, operations at the Airport would result in potential impacts to air quality, land use and transportation and circulation.....Air quality impacts would remain significant and unavoidable."

5

This is unacceptable for those many of us Long Beach residents who are already heavily impacted by unhealthy air!"The *voluntary* noise attenuation program recommended in the DEIR would provide beneficial effects to residences *within the 65 CNEL contour and schools within the 60 CNEL contour*" What provision is made for the rest of us who are already heavily and negatively impacted by the aircraft noise?

6

The EIR states" "Optimized Flights is the estimated maximum *expected* flights under the Airport Noise Compatibility Ordinance and *is not dependent on Terminal area improvements*. But nowhere is it stated that this would NOT be an invitation for many additional flights! A huge number of residents feel that "if we build it, they WILL come!

7

Mr. & Mrs. James L. Denison
6931 E. 11th St.
Long Beach, CA 90815

January 24, 2006

5310 Las Lomas Street

Long Beach, CA 90815

Angela Reynolds
Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Avenue
Long Beach, CA 90802

Dear Ms. Reynolds:

Please include the enclosed questions and comments in
the Long Beach Airport Environmental Impact Report.

Thank you.

A handwritten signature in black ink, appearing to read "Jeff Huso".

Jeff Huso

The EIR begins by assuming we are going to have the maximum number of flights allowable under the noise ordinance. Airport Manager Chris Kunze was given instructions by the city council to market slots for flights with the objective of maximizing the number of flights under the noise ordinance. Why is the city council seeking to maximize the number of flights when affected residents have shown up in numbers on more than one occasion to let it be known they are unhappy with noise from present flights?

1

The report goes on to propose that since we will have maximum flights by council instruction we should then build larger facilities and designate 40% more aircraft parking spaces to accomodate the maximum number of flights (and noise). It posits that Alternative A which increases the spaces by 4 to 14 must be "environmentally" superior to Alternative C which leaves the spaces at 10. The authors theorize that more spaces on the ground might translate into jets turning their engines off sooner. They do not mention that it is the noise from engines overhead which projects further and is more obnoxious to residents more often.

2

And the report does not adequately consider the likely increased number of flights accompanying adverse developments

3

to our noise ordinance anytime going forward. In the case that our ordinance is successfully challenged our current facilities and number of spaces could be a second line of defense. Assistant City Attorney Mike Mais said that the reverse of this is not true; that keeping the facilities and aircraft parking spaces as is will not jeopardize the noise ordinance. Why doesn't the EIR suggest that only Alternative 3 can not encourage more flights and noise under all circumstances?

3
cont.

Why does the report direct our attention to thresholds of cardio-vascular damage from noise? Are we mere animals in a lab experiment? Is this not a quality of life issue? With large airports twenty miles in either direction which offer a full range of flights to anywhere in the world why are we compromising the liveability of Long Beach for resident voters? Is it for the personal financial interests of relatively few? Is it for the convenience of others too lazy and inconsiderate to get a ride to LAX or John Wayne when the flight they want isn't flying overhead here in our local Los Angeles metropolitan suburb? Don't be so provincial to think Southland cities haven't blended together. If businesses need to be next to a large airport why didn't they locate near John Wayne or LAX? And ditto for residents who want to be very close to one.

4

Environmental Impact Report Appendix F-15 states:

"Annoyance and sleep/interference have been acknowledged... other observed psychophysiological effects, immunological indicators, and gastrointestinal disturbances are too inconsistent for conclusions to be drawn about the influence of noise pollution," (Quoting a World Health Organization Report). "In other words," the EIR writers conclude for us, "the World Health Organization believes that health effects do not occur at noise levels less than 65 CNEL." Isn't it a violation of Logic 101 to say from inconclusiveness a conclusion can be drawn?

5

With residents complaining about noise from flights in the air now, with 10 parking spaces, why is the city council considering Alternative A adding 40% more spaces? The EIR writers say all three alternatives will result in the same "optimal" (note the bias), meaning maximum under the noise ordinance, number of flights. However they provide no substantive evidence that Alternative A, with 14 spaces, would not, under future circumstances, encourage and facilitate more flights than Alternative C which maintains our current 10 parking spaces. The writers assume that our noise ordinance will never be successfully challenged in order to conclude that 40% larger Alternative A will never attract more flights.

6

Isn't a faulty assumption used to try to erase the obvious advantage of Alternative C?

The writers of the EIR fail to mention, under "1.33 Regulatory Setting," that an older, predecessor noise ordinance was lost due, apparently, to neglect or malfeasance on the part of the then sitting city council here in Long Beach. That ordinance allowed far fewer than the current 41 minimum flights. It was successfully challenged by the airlines pursuant to FAA regulation owing to a technicality violated; the airlines were not properly notified of the ordinance. When the council became aware of the proper corrective action to take in order to notify the airlines legally, the council never took the action until the time to do so had expired. The council was then in a position, by design or neglect, of having to compromise with the airlines resulting in our present much larger number of flights allowed despite the will of the residents against this. Yet the writers of the EIR don't mention this and say that 14 parking spaces under Alternative A are no more likely than 10 aircraft parking spaces under Alternative C to result in additional flights and noise overhead under a future sitting city council. Such council openly or secretly might favor an airline lobbyist or other political constituent over affected residents.

6
cont.

"There are sensitive land uses within the 65 CNEL contour under both existing and 'Optimal Flights scenario," say the writers. "Within 24 months of the certification of the EIR the Airport Manager shall develop a land use compatibility program addressing existing and future aviation noise levels. The program shall be voluntary." But then they go on to say the residents and schools will be required to give the City a "noise easement" over their properties in exchange for "sound insulation treatment." Question: Was the idea that schools and residents should have to give the City a "noise easement" over their properties thought up as a "helpful suggestion" by the EIR writers drawing upon their experience helping get airport expansions approved?

7

Isn't the EIR, as it sits, just another legal requirement to protect the City from lawsuits by disaffected resident voters? After all, how many Kangaroo Rats did anyone expect to find at the airport? And "environmental" has such a nice ring to it when, in fact, the report is not even primarily concerned with the quality of life of real people and their real environmental well-being.

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I recommend that the city council rescind its policy of maximizing the number of flights at the airport within the noise ordinance. Many residents have, over time, shown up at meetings to let it be known that if the Council respects

them and their communities it will work to protect the noise ordinance but stop doing things to get more planes and noise in the air.

Keep the facilities and the number of aircraft parking spaces the same. This is a necessary bricks and mortar second line of defense to the noise ordinance.

8
cont.

Sincerely,



Jeff Huso

5310 Las Lomas Street

Long Beach, CA 90815

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LONG BEACH AIRPORT ASSOCIATION

JANUARY 25, 2006

Ms. Angela Reynolds
Environmental Officer
Planning and Building
City of Long Beach
333 W. Ocean Boulevard
Long Beach, Ca. 90802

Dear Ms. Reynolds:

Our association has commented several times regarding the environmental study for the Long Beach Airport Terminal Improvement Project, including the initial scoping in the fall of 2003, the various Airport Advisory Commission study sessions throughout 2004, the many public hearings, including April and May, 2005 second round of scoping meetings, etc., both verbally and in written form. It is now time (in fact, way past time!) to move this EIR forward into a building project.

We find the EIR to be quite adequate in its analysis of the proposed project, and feel it verifies the need for the largest of the scenarios studied in the EIR process, of approximately 103,000 sq.ft.

In the post-9/11 world, the first concern is the adequacy of space for the TSA, to conduct pre-flight security screening of passengers. This element cannot be compromised!

Commercial concession area - an adequate variety of services for dining and pre-flight shopping - is expected in today's airports and also provides a huge source of revenue to the City. (the dining aspect is especially important since airline meals are practically a thing of the past).

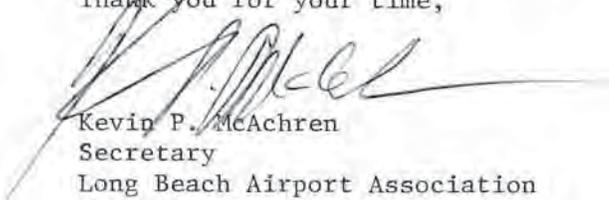
While it is obvious that adequate space needs to be provided for ticketing and airline operations, a bigger concern is the space "rampside" of the terminal. We feel that no less than 14 aircraft parking positions for aircraft be provided. At the present, inadequate, "tent and trailer" facility, we often observe aircraft waiting for a place to park to discharge passengers and baggage, with only 10 positions, and that is occurring with only a handful of the authorized 25 commuter flights operating! Where are we going to park the additional twenty or so commuter flights when they become operational? Aircraft waiting for parking need to have engines and/or onboard auxiliary power units running, which needlessly contributes to air pollution, not to mention inconveniencing passengers, and friends, families, and associates awaiting their arrival. Also, delay-inbound flights causes delayed outbound flights, a concern any time but especially in the late evening hours when flights face our curfew.

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In conclusion, we feel strongly that the proposed project of approximately 103,000 sq. ft., in total, should be certified by the Planning Commission as presented in the EIR released in November, 2005. We hope that your office will respond to the EIR responses in an expeditious manner, so that this critical project to the Airport and the Long Beach community can move forward and become a reality.

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cont.

Thank you for your time,



Kevin P. McAchren
Secretary
Long Beach Airport Association
(For the LBAA Board)

c/o AIRSERV
4137 Donald Douglas Drive
Long Beach, California 90808
(PH) 562 - 429-8062
(FAX) 562 - 421-2858

KPM/km

Jan 26, 06

Angela Reynolds -

We are writing to you in regard to airport expansion. As you can see by the address, we live in East Long Beach and have for 47 years. We are very much in favor of the expansion.

We need to be proud of our airport and with its present condition, we are not! We have waited in the rain for our baggage & my friend had some of her clothes stained from the rain on her bag.

Thank you -

Sincerely,

Dick & Pat Bernick

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Camille Marie Sears

502 W. Lomita Ave., Ojai, CA 93023

Tel: (805) 646-2588 Fax: (805) 646-6024

e-mail: clouds@rain.org

January 26, 2006

Angela Reynolds, Environmental Planning Officer
City of Long Beach
Dept. of Planning & Building
333 Ocean, 7th Floor
Long Beach, CA 90802

Re: Long Beach Airport DEIR Comments

Dear Ms. Reynolds,

I have reviewed and prepared comments on the Long Beach Airport Terminal Area Improvement Project Draft Environmental Impact Report (DEIR), dated November 2005. In particular, I focused on Section 3.2 (Air Quality and Human Health Risk Assessment) and Appendix C to the DEIR, prepared by Camp, Dresser, and McKee, dated November 2, 2005. While the DEIR includes a lengthy analysis of air quality and health risk impacts, the results and conclusions are based on unreliable data. Further, key emission and exposure scenarios are omitted entirely. The DEIR air quality and health risk analyses are inadequate and do not provide decision makers with the necessary information for identifying significant impacts and the effectiveness of mitigation measures.

My detailed comments on the DEIR air quality and health risk assessment analyses and conclusions are presented below. My primary concern is that the DEIR is based on inadequate meteorological data, rendering the air quality impact analysis and human health risk assessment completely unreliable. In addition, the DEIR neglected acrolein acute hazard indices for passengers and prepared an inadequate analysis for on-airport workers. Atmospheric re-entrainment of particulate deposition on runways was also ignored in the DEIR, even though the Long Beach Airport is in an area with very high diesel and other small particulate emissions.

My comments are based on 25 years of professional experience performing air quality and toxics exposure analyses. I was the senior air quality modeler and air toxics program coordinator for the Santa Barbara County Air Pollution Control District, where I worked for approximately nine years. For the past 14 years I have been a private consultant, specializing in regulatory agency and litigation support. My clients include the California Attorney General's Office, the Los Angeles County District Attorney's Office, the California Office of Environmental Health Hazard Assessment, various air pollution control agencies, the California Air Pollution Control Officer's Association, and many private firms. I have prepared over 300 complete air toxics health risk assessments and over 1,000 air dispersion modeling analyses. I have successfully provided expert testimony in numerous Federal and State Court cases. My curriculum vitae is attached.

Following are my comments on the DEIR air quality and human health risk analyses:

I. The Long Beach Airport Meteorological Data are Unacceptable for Air Dispersion Modeling with AERMOD

The DEIR assesses compliance with the CAAQS, NAAQS, local significance thresholds, and human health impacts using one year of meteorological data from the Long Beach Airport (1985).¹ The quality of these airport data quality are not acceptable for air dispersion modeling, particularly for a refined air dispersion model such as AERMOD. The DEIR, which relies on these data for air modeling, is therefore flawed.

For air dispersion modeling purposes, airport data are among the least desirable. Problems with data collection frequency, location of the meteorological sensors, and general quality of data are the primary concerns. The USEPA, in their Meteorological Monitoring Guidance for Regulatory Modeling Applications, summarizes these concerns about using airport data:

For practical purposes, because airport data were readily available, most regulatory modeling was initially performed using these data; however, one should be ware that airport data, in general do not meet this guidance.²

The Long Beach Airport is comprised of concrete runways, parking lots, passenger terminals, and other structures associated with air travel activities. These surface and building characteristics in turn affect the boundary layer meteorology present at the airport.³ In addition, landings, takeoffs, and idling of airplanes affect the site-specific conditions at the airport such that the meteorological conditions are not representative of the area surrounding the airport. The air model used in the DEIR, AERMOD, relies on the meteorological conditions from the airport to characterize downwind dispersion. Since these measurements are biased due to the airport activities, the offsite air concentration predictions are likewise biased.

The primary issue, however, is the quality of the meteorological data collected at Long Beach Airport. It is important to remember that the airport data are not collected with the thought of air dispersion modeling in mind. For example, Long Beach Airport conditions in 1985 were reported once per hour, based on a single observation (usually) taken in the last ten minutes of each hour. The USEPA recommends that sampling rates of 60 to 360 per hour, at a minimum, be used to calculate hourly-averaged meteorological data.⁴ Air dispersion modeling requires hourly-averaged data, which represents the entire hour being modeled, and not only a snapshot taken in one moment during the hour.

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¹ Local significance thresholds are from SCAQMD Rule 1303, Table A-2.

² USEPA, Meteorological Monitoring Guidance for Regulatory Modeling Applications, EPA-454/R-99-05, February 2000, p. 1-1.

³ Oke T.R., Boundary Layer Climates, Halsted Press, 1978, pp. 240-241.

⁴ USEPA, p. 4-2.

In addition, data collected at Long Beach Airport are not subject to the system accuracies required for meteorological data collected for air dispersion modeling. The USEPA recommends that meteorological monitoring for dispersion modeling use equipment that are sensitive enough to measure all conditions necessary for verifying compliance with the NAAQS and CCAQS. For example, low wind speeds (down to 1.0 meter per second) are usually associated with peak air quality impacts – this is because modeled impacts are *inversely* proportional to wind speed. Following USEPA guidance, wind speed measuring devices (anemometers) should have a starting threshold of 0.5 meter per second or less.⁵ And the wind speed measurements should be accurate to within plus or minus 0.2 meter per second, with a measurement resolution of 0.1 meter per second.⁶

The Long Beach Airport data used by the DEIR, rather than being measured in 0.1 meter per second increments, is based on wind speed observations that are reported in whole knots. This is evidenced by examining the meteorological data files used in the DEIR modeling analyses.⁷ Every modeled hourly wind speed is a factor of 0.51 or 0.52 meter per second (the units required for input to the air dispersion model), which exists because one knot equals 0.51479 meter per second. The once-per-hour observations at Long Beach Airport (in whole knots, no fractions or decimals) were converted to meters per second and can therefore be back-converted to the whole knot measurements originally reported by the airport. Every once-per-hour observation in the 1985 Long Beach Airport meteorological data set was reported in whole knots.

To further exemplify the problem of using the airport data, the lowest wind speed included in the meteorological data files used in the DEIR modeling analyses is 1.54 meters per second. This equals three knots, which is the lowest wind speed reported by the airport. Any winds lower than three knots are reported as calms, and are thus excluded from the modeling analyses. There are 1,020 such calm hours in the 1985 meteorological data file used in the DEIR (there are also 460 missing hours in the data set). In no uncertain terms, the conditions most crucial for verifying compliance with the CAAQS, NAAQS, local significance thresholds, and human health significance criteria (low wind speeds) are being excluded from the DEIR analysis because of the choice to use the Long Beach Airport data.

Sensitive and accurate measurements of wind speeds are necessary for measuring winds down to 0.5 meter per second (about one knot), which can then be used as 1.0 meter per second in the air dispersion modeling analyses. There would be no need to label such low wind speed hours as calm, which will greatly increase the number of hours included in the modeling analyses. Again, it is these low wind speed hours which must be included in the modeling data set to verify compliance with the CAAQS, NAAQS, local significance thresholds, and significant human health impacts. The meteorological data used in the DEIR modeling includes no wind speed below 1.54 meters per second, and to compound the problem, lists the lowest wind speed observations as calms, which are then excluded from the model calculations.

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cont.

⁵ Id., p. 5-2.

⁶ Id., p. 5-1.

⁷ I obtained the 1982 through 1985 Long Beach Airport (in SAMSON format) and converted the data into modeling format using PCRAMMET.

The exclusion of wind speeds less than 1.54 meters per second is exemplified in the artificially increased annual-average wind speed at the airport. The DEIR depicts the annual-average wind speed at the airport as 3.10 meters per second.⁸ The SCAQMD, in their 1981 air modeling meteorological data sets, have measured annual-average wind speeds at Long Beach and Los Alamitos of 1.71 and 2.18 meters per second, respectively. Again, since modeled air concentrations (and health risks computed from these results) are inversely proportional to wind speed, the elimination of low wind speeds will result in underestimated impacts. This is a crucial flaw in the DEIR.

The Long Beach Airport should be required to collect pre-construction meteorological data for use in their project DEIR modeling. The airport, which is a major emission source of many air pollutants, should not be assessed for air quality and human health impacts using meteorological data collected with none of the quality assurances necessary for air modeling data.

That Camp, Dresser, and McKee consulted with SCAQMD on the use of meteorological data provides no degree of comfort whatsoever.⁹ SCAQMD last developed new data sets for dispersion modeling in 1981 – about 25 years ago. Since that time, dozens of revisions have been made to the regulatory air modeling framework, including continuing refinement to models such as MPTER, ISCST, ISCST2, ISCST3, and now AERMOD. In fact, the greatest hurdle to users of AERMOD, now the USEPA Guideline Model for flat and complex terrain, is the unavailability of suitable meteorological data. And just because AERMOD can be run using a certain meteorological data set, does not mean that the results are reliable. To think that the 1985 Long Beach Airport meteorological data is suitable for use in AERMOD is delusional. In essence, the refined planetary boundary characterization capabilities of AERMOD are negated by the crude meteorological data chosen by the DEIR preparer.

The SCAQMD has been very forgiving in not requiring new emission sources to collect high quality meteorological monitoring for use in air dispersion modeling. And now that AERMOD is the preferred dispersion model, the SCAQMD (and other air districts) are finding that there is no acceptable data to use in air quality impact analyses and health risk assessments. The requirement to collect quality meteorological data before a project enters the permitting process is not unusual. Even smaller air regulatory agencies have been requiring pre-construction meteorological data for many years. As part of their PSD program, the Santa Barbara County (California) Air Pollution Control district requires at least one-year of pre-construction air quality and meteorological monitoring.¹⁰ The Santa Barbara APCD meteorological monitoring requirements are specified in a detailed protocol that implements their PSD Rule.¹¹

The Long Beach Airport air emissions are significant and are released in a complex arrangement of point, area, and volume sources – both at the surface and aloft. Using an antiquated and low-quality

⁸ DEIR, Appendix C, p. 4-4. For reference, 3.10 meters/second equals the DEIR listed value of 6.04 knots.

⁹ DEIR, p. 3.2-8.

¹⁰ Santa Barbara County Air Pollution Control District, Rule 803, Prevention of Significant Deterioration.

¹¹ Barbara County Air Pollution Control District, Air Quality and Meteorological Monitoring Protocol for Santa Barbara County, October 1990.

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cont.

meteorological data set, for no other reason than to expedite the permitting process for the Airport, invalidates the entire air quality impact analysis. The DEIR should be deemed unacceptable because of this poor modeling practice, and not be revised and recirculated until the Long Beach Airport has collected at least one year of AERMOD-suitable meteorological data consistent with USEPA's Meteorological Monitoring Guidance for Regulatory Modeling Applications.

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cont.

II. The Choice of Using Only 1985 Meteorological Data is not Adequately Supported

The problems with using Long Beach Airport meteorological data notwithstanding, the DEIR air modeling is based on only one year of observations – 1985.¹² The DEIR focuses on one year of data to reduce excessive computational demands; however, the basis for how this year was chosen is incomplete and flawed. The DEIR choice of using 1985 is based on annual-average and one-hour average modeled VOC concentrations, while 24-hour impacts are not included in this analysis. Twenty-four hour averaging period impacts could be higher in other years, but the DEIR is silent on this possibility. Using only 1985 Long Beach Airport meteorological data provides no assurance that significant short-term CAAQS, NAAQS, local significance thresholds, or acute hazard indices have been adequately identified. All available years of meteorological data should be included in the modeling.

2

III. Additional Air Modeling and Health Risk Assessment Information is Required

The DEIR discusses only the surface data preparation for the 1985 Long Beach Airport data set. In addition to surface meteorological parameters, AERMOD requires vertical profile data, including measurements of wind direction, wind speed, temperature, and the turbulence parameters characterizing the horizontal wind direction standard deviation (sigma theta) and the vertical wind speed standard deviation (sigma w) at specified levels above the ground.¹³ No discussion of profile data for 1985 meteorological data exists in the DEIR.

Vertical profile data in AERMOD is used to calculate downwind dispersion for elevations corresponding to lofty plumes and pollutant releases. This is particularly important for modeling the impacts from aircraft exhaust during landings and takeoffs when the pollutants are released directly into elevated profiles. If the DEIR is using surface data to characterize these profiles, one of the major advantages of using AERMOD (the ability to have different meteorological data at numerous profiles) is defeated. The DEIR must address how they are modeling elevated profiles with AERMOD.

3

In addition to answering the meteorological issues above, the DEIR preparers and lead agency should make all air dispersion modeling and health risk assessment data available in electronic format – either CD-ROMs or DVDs, depending on the size of the data. These electronic data are imperative for allowing the public to prepare a detailed critique of what actually went into the DEIR. Also, having these data in electronic format will expedite the public review and reanalysis process.

¹² DEIR, Appendix C, Attachment G.

¹³ USEPA, User's Guide for the AMS/EPA Regulatory Air Model – AERMOD, EPA-454/B-03-001, September 2004, p. 3-55.

The DEIR should include an Appendix explicitly listing the electronic files used in preparing the air quality and health risk assessments, and state that these files are publicly available for the review process. The publicly available files should include:

- All AERMOD input and output files;
- All AERMET input and output files;
- All AERMAP input and output files;
- All EDMS input and output files;
- All DEM files used in obtaining receptor terrain elevations;
- All aerial photos, in DOQQ MrSID and other formats;
- All meteorological data – both raw and processed;
- All GIS maps, project files and attribute data (preferably in ArcGIS file format);
- All source layout and plot plans (preferably in ArcGIS or Surfer file formats);
- All emission calculation spreadsheets (preferably in Excel format);
- All health risk assessment calculation programs and spreadsheets;
- All toxicity data used in assessing acute, chronic, and excess cancer risks;
- All non-proprietary programs used, such as EDMS and AERMOD;
- A listing of all proprietary programs used, and their purpose in the DEIR.

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cont.

IV. Passengers and On-site Worker Acrolein Exposures Are Not Adequately Assessed

The DEIR did not assess acute acrolein exposures to passengers, stating that “their exposures to TACS are intermittent and short-term.”¹⁴ This type of exposure, however, is the reason the State of California specifically developed a one-hour reference level (REL) for acrolein.¹⁵ By sidestepping an analysis of acrolein exposures for passengers, the DEIR has failed to identify a potentially significant human health impact. Passengers are exposed entering and exiting terminals, boarding aircraft, and waiting within terminals. The DEIR should be modified to evaluate the health impacts that acrolein exposures would pose to passengers, as it has done for all other populations.

4

While the DEIR does address acrolein exposures to on-site workers, the assessment methodology is based on occupational health and safety values, rather than California RELs.¹⁶ This compromises the DEIR in two ways: 1) The acute exposures to on-site workers are underestimated; and 2) A useful reference to potential passenger exposures is clouded. The DEIR on-site worker exposure assessment used the 8-hour OSHA PEL for acrolein, which is 0.1 ppm (250 µg/m³).¹⁷ This value is over 13 times less stringent than the California one-hour REL for acrolein (19 µg/m³), plus the exposure period can last eight times as long. Since eight-hour modeled concentrations are typically

¹⁴ DEIR, p. 3.2-13.

¹⁵ The acute (one-hour) REL for acrolein is 19 µg/m³. Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values, Updated August 23, 2004.

¹⁶ DEIR Appendix C, p. 5-15.

¹⁷ <http://www.cdc.gov/niosh/idlh/107028.html>

one-half or less the peak modeled one-hour values, using the OSHA PEL approach is actually over 25 times less stringent than the California one-hour REL for acrolein.

The DEIR identified an acute hazard index for on-site worker exposure to acrolein of 0.49 for the incremental 2020 Project.¹⁸ Had the DEIR used the California one-hour REL for acrolein, instead of the eight-hour OSHA PEL, the hazard index for on-site workers would almost certainly be over 12 (an acute hazard index of 1.0 is significant). It is extremely likely that passengers would also be exposed to one-hour acrolein levels similar to this value. Even if passenger exposure is only one-tenth the level of on-site workers, the human health impact would be significant. Both the on-site worker and passenger acrolein exposures are likely significant human health impacts that should be properly addressed in the DEIR.

4
cont.

V. Atmospheric Re-entrainment of Fallout Particulates Are Not Assessed

The Long Beach Airport is located in an area with elevated levels of PM10, PM2.5, and diesel particulate matter. These particles, due to a downward deposition flux, will settle on exposed surfaces such as cars, rooftops, vegetation, and runways. During the DEIR preparation phase, commenters noted that their homes and cars are often coated with particulates and films.¹⁹

Each time a plane (large or small) takes off, lands, or taxis about the runway, the potential exists for significant re-entrainment of deposited particulates back into the atmosphere. In essence, this creates a new source of emissions – stirring up particulates already deposited by regional point and area sources. A simple analogy is the leaf blower. The wind and turbulence caused by the blower can cause very high levels of particulates as the material that settled on the ground is redistributed back into the air. The large surface area of the airport runways and the mixing turbulence generated by aircraft could lead to significant emissions of such particles.

5

The DEIR should address the potential concern of re-entrained particles caused by airport activities. In addition, a network of particulate samplers, measuring black carbon, PM2.5, and PM10 should be installed to encompass the Long Beach Airport. The DEIR should also identify the need to measure atmospheric deposition of particulates at the airport. These deposition measurements, coupled with a network of particulate samplers and wind sensors, are necessary to quantify the true impacts from airport expansion activities.

VI. EDMS has been Withdrawn from USEPA Guideline Model Status

The DEIR used the EDMS/AERMOD modeling system to estimate emission rates and resultant air concentrations from activities associated with the proposed airport expansion. Version 4.3 of EDMS was used, which includes version 02222 of AERMOD, a beta-testing edition which has since been replaced with the approved Guideline version 04300. The DEIR should discuss the consequences of using the outdated beta-testing version of AERMOD.

6

¹⁸ DEIR Appendix C, p. 5-58.

¹⁹ DEIR, Appendix A.

In addition, the EDMS model, which was once part of Appendix A (preferred status) of the USEPA Guideline on Air Quality Models, has recently been withdrawn. The reasons for this withdrawal are discussed in the most recent Revisions to the Guideline on Air Quality Models.²⁰ In essence, the Federal Aviation Administration has decided to withdraw EDMS from the Guideline on Air Quality Models, Appendix A. The USEPA affirmed support for the removal of EDMS from Appendix A status, apparently because a complete model evaluation process had not been submitted. The DEIR, which uses EDMS, must discuss this change in model status and the implications this has on the reliability of significance determinations.

6
cont.

Thank you for the opportunity to comment on the Long Beach Airport DEIR.

Sincerely,



Camille Sears

Attachment: CV

²⁰ 40CFR 51, Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions, Final Rule, November 9, 2005.

Summary

I have 25 years of regulatory and private-sector experience in air quality impact analyses, health risk assessments, meteorological monitoring, and geographic information systems. I specialize in litigation support; I have successfully provided testimony in numerous cases, both as an individual consultant and as part of a team of experts.

Education

- M.S., Atmospheric Science, University of California, Davis, 1980.
- B.S., Atmospheric Science, University of California, Davis, 1978.

Air Dispersion Modeling

- I am experienced in applying many different air dispersion models, including programs still in the development phase. I have prepared well over 1,000 air dispersion modeling analyses requiring the use of on-site or site-specific meteorological data. These runs were made with the USEPA ISC, OCD, MESOPUFF, INPUFF, CALPUFF, ISC-PRIME, AERMOD, COMPLEX-I, MPTER, and other air dispersion models.
- I prepared and submitted technical comments to the USEPA on beta-testing versions of AERMOD; these comments are being addressed and will be incorporated into the model and instructions when it is ready for regulatory application.
- I am experienced in performing air dispersion modeling for virtually every emission source type imaginable. I have modeled:
 - Refineries and associated activities;
 - Mobile sources, including cars, trains, airplanes, trucks, and ships;
 - Power plants, including natural gas and coal-fired;
 - Smelting operations;
 - Area sources, such as housing tracts, biocides from agricultural operations, landfills, airports, oil and gas seeps, and ponds;
 - Volume sources, including fugitive emissions from buildings and diesel construction combustion emissions;
 - Small sources, including dry cleaners, gas stations, surface coating operations, plating facilities, medical device manufacturers, coffee roasters, ethylene oxide sterilizers, degreasing operations, foundries, and printing companies;
 - Cooling towers and gas compressors;
 - Diatomaceous earth, rock and gravel plants, and other mining operations;
 - Offshore oil platforms, drilling rigs, and processing activities;
 - Onshore oil and gas exploration, storage, processing, and transport facilities;
 - Fugitive dust emissions from roads, wind erosion, and farming activities;
 - Radionuclide emissions from actual and potential releases.
- I have extensive experience in modeling plume depletion and deposition from air releases of particulate emissions.
- As a senior scientist, I developed the Santa Barbara County Air Pollution Control District (SBAPCD) protocol on air quality modeling. I developed extensive modeling capabilities for the SBAPCD on VAX 8600 and Intel I-860 computer systems; I acted as systems analyst for the SBAPCD air quality modeling system; I served as director of air quality analyses for numerous major energy projects; I performed air quality impact analyses using inert and photochemical models, including EPA, ARB and private-sector models; I performed technical review and evaluating air quality and wind field models; I developed software to prepare model inputs consistent with the SBAPCD protocol on air quality modeling for OCD, OCDCPM, MPTER, COMPLEX-I/II and ISC.
- I provided detailed review and comments on the development of the Minerals Management Service OCD model. I developed the technical requirements for and

supervised the development of the OCDCPM model, a hybrid of the OCD, COMPLEX-I and MPTER models.

- I prepared the "Modeling Exposures of Hazardous Materials Released During Transportation Incidents" report for the California Office of Environmental Health Hazard Assessment (OEHHA). This report examines and rates the ADAM, ALOHA, ARCHIE, CASRAM, DEGADIS, HGSYSTEM, SLAB, and TSCREEN models for transportation accident consequence analyses of a priority list of 50 chemicals chosen by OEHHA. The report includes a model selection guide for adequacy of assessing priority chemicals, averaging time capabilities, isopleth generating capabilities, model limitations and concerns, and model advantages.
- I am experienced in assessing uncertainty in emission rate calculations, source release, and dispersion modeling. I have developed numerous probability distributions for input to Monte Carlo simulations, and I was a member of the External Advisory Group for the California EPA *Air Toxics Hot Spots Program Risk Assessment Guidelines, Part IV, Technical Support Document for Exposure Assessment and Stochastic Analysis*.

Health Risk Assessment

- I have prepared more than 300 health risk assessments of major air toxics sources. These assessments were prepared for AB 2588 (the Air Toxics "Hot Spots" Information and Assessment Act of 1987), Proposition 65, and other exposure analysis activities. More than 120 of these exposure assessments were prepared for Proposition 65 compliance verification in a litigation support setting.
- I reviewed approximately 300 other health risk assessments of toxic air pollution sources in California. The regulatory programs in this review include AB 2588, Proposition 65, the California Environmental Quality Act, and other exposure analysis activities. My clients include the California Attorney General's Office, the Los Angeles County District Attorney's Office, the SBAPCD, the South Coast Air Quality Management District, numerous environmental and community groups, and several plaintiff law firms.
- I am experienced in assessing public health risk from continuous, intermittent, and accidental releases of toxic emissions. I am experienced in generating graphical presentations of risk results, and characterizing risks from carcinogenic and acute and chronic noncarcinogenic pollutants.
- I am experienced in communicating adverse health risks discovered through the Proposition 65 and AB 2588 processes. I have presented risk assessment results in many public settings -- to industry, media, and the affected public.
- For four years, I was the Air Toxics Program Coordinator for the SBAPCD. My duties included: developing and managing the District air toxics program; supervising District staff assigned to the air toxics program; developing District air toxics rules, regulations, policies and procedures; management of all District air toxics efforts, including AB 2588, Proposition 65, and federal activities; developing and tracking the SBAPCD air toxics budget.
- I have prepared numerous calculations of exposures from indoor air pollutants. A few examples include: diesel PM₁₀ inside school buses, formaldehyde inside temporary school buildings, lead from disturbed paint, phenyl mercuric acetate from water-based paints and drywall mud, and tetrachloroethene from recently dry-cleaned clothes.

Litigation Support

- I have prepared numerous analyses in support of litigation, both in Federal and State Courts. I am experienced in preparing F.R.C.P. Rule 26(a)(2) expert reports and providing deposition and trial testimony (I have prepared eight Rule 26 reports). Much of my work is focused on human dose and risk reconstruction resulting from multiple air emission sources (lifetime and specific events).

- I am experienced in preparing declarations (many dozens) and providing expert testimony in depositions and trials (see my testimony history).
- I am experienced in providing support for legal staff. I have assisted in preparing numerous interrogatories, questions for depositions, deposition reviews, various briefs and motions, and general consulting.
- Recent examples of my work include:

DTSC v. Interstate Non-Ferrous; United States District Court, Eastern District of California (2002).

In this case I performed air dispersion modeling, downwind soil deposition calculations, and resultant soil concentrations of dioxins (TCDD TEQ) from historical fires at a smelting facility. I prepared several Rule 26 Reports in my role of assisting the California Attorney General's Office in trying this matter.

Akee v. Dow et al.; United States District Court, District of Hawaii (2003-2004).

In this case I performed air dispersion modeling used to quantify air concentrations and reconstruct intake, dose, excess cancer risk, and noncancer chronic hazard indices resulting from soil fumigation activities on the island of Oahu, Hawaii. I modeled 319 separate AREAPOLY pineapple fields for the following chemicals: DBCP, EDB, 1,3-trichloropropene, 1,2-dichloropropane, and epichlorohydrin. I calculated chemical flux rates and modeled the emissions from these fumigants for years 1946 through 2001 (56 years) for 34 test plaintiffs and 97 distinct home, school, and work addresses. I prepared a Rule 26 Expert Report, successfully defended against Daubert challenges, and testified in trial.

Lawrence O'Connor v. Boeing North America, Inc., United States District Court, Central District of California, Western Division (2004-2005).

In this case I performed air dispersion modeling, quantified air concentrations, and reconstructed individual intake, dose, and excess cancer risks resulting from approximately 150 air toxics sources in Los Angeles and Ventura Counties, California. I prepared these analyses for years 1950 through 2000 (51 years) for 173 plaintiffs and 741 distinct home, school, and work addresses. I prepared several Rule 26 Reports, and the case settled on the eve of trial in September, 2005. Defendants did not attempt a Daubert challenge of my work.

- I have prepared hundreds of individual and region-wide health risk assessments in support of litigation. These analyses include specific sub-tasks, including: calculating emission rates, choosing proper meteorological data inputs, performing air dispersion modeling, and quantifying intake, dose, excess cancer risk, and acute/chronic noncancer health effects.
- I have prepared over 120 exposure assessments for Proposition 65 litigation support. In these analyses, my tasks include: reviewing AB 2588 risk assessments and other documents to assist in verifying compliance with Proposition 65; preparing exposure assessments consistent with Proposition 65 Regulations for carcinogens and reproductive toxicants; using a geographic information system (Atlas GIS) to prepare exposure maps that display areas of required warnings; calculating the number of residents and workers exposed to levels of risk requiring warnings (using the GIS); preparing declarations, providing staff support, and other expert services as required. I have also reviewed scores of other assessments for verifying compliance with Proposition 65. My proposition 65 litigation clients include the California Attorney General's Office, the Los Angeles County District Attorney's Office, As You Sow, California Community Health Advocates, Center for Environmental Health, California Earth Corps, Communities for a Better Environment, Environmental Defense Fund, Environmental Law Foundation, and People United for a Better Oakland.

Geographic Information Systems

- ArcGIS: I am experienced in preparing presentation and testimony maps using ArcView. I developed methods to convert AutoCAD DXF files to ArcView polygon theme shape files for use in map overlays.

- I have created many presentation maps with ArcView using MrSID DOQQ and other aerial photos as a base and then overlaying exposure regions. This provides a detailed view (down to the house level) of where air concentrations and health risks are projected to occur.
- Using ArcView, I have created numerous presentations using USGS Topographic maps (as TIFF files) as the base on to which exposure regions are overlaid.
- MapInfo for Windows: I prepared numerous presentation maps including exposure isopleths, streets and highways, and sensitive receptors, labels. I developed procedures for importing Surfer isopleths in AutoCAD DXF format as a layer into MapInfo.
- Atlas GIS: I am experienced in preparing presentation maps with both the Windows and DOS versions of Atlas GIS. In addition to preparing maps, I use Atlas GIS to aggregate census data (at the block group level) within exposure isopleths to determine the number of individuals living and working within exposure zones. I am also experienced in geocoding large numbers of addresses and performing statistical analyses of exposed populations.
- I am experienced in preparing large-scale graphical displays, both in hard-copy and for PowerPoint presentations. These displays are used in trial testimony, public meetings, and other litigation support.
- I developed a Fortran program to modify AutoCAD DXF files, including batch-mode coordinate shifting for aligning overlays to different base maps.

Ozone and Long-Range Transport

- I developed emission reduction strategies and identified appropriate offset sources to mitigate project emissions liability. For VOC offsets, I developed and implemented procedures to account for reactivity of organic compound species for ozone impact mitigation. I wrote Fortran programs and developed a chemical database to calculate ozone formation potential using hydroxyl radical rate constants and an alkane/non-alkane reactive organic compound method.
- I provided technical support to the Joint Interagency Modeling Study and South Central Coast Cooperative Aerometric Monitoring Program. With the SBAPCD, I provided technical comments on analyses performed with the EKMA, AIRSHED, and PARIS models. I was responsible for developing emissions inventory for input into regional air quality planning models.
- I was the project manager for the Santa Barbara County Air Quality Attainment Plan Environmental Impact Report (EIR). My duties included: preparing initial study; preparation and release of the EIR Notice of Preparation; conducting public scoping hearings to obtain comments on the initial study; managing contractor efforts to prepare the draft EIR.
- I modified, tested, and compiled the Fortran code to the MESOPUFF model (the precursor to CALPUFF) to incorporate critical dividing streamline height algorithms. The model was then applied as part of a PSD analysis for a large copper-smelting facility.
- I am experienced in developing and analyzing wind fields for use in long-range transport and dispersion modeling.
- I have run CALPUFF numerous times. I use CALPUFF to assess visibility effects and both near-field and mesoscale air concentrations from various emission sources, including power plants.

Emission Rate Calculation

- I developed methods to estimate and verify source emission rates using air pollution measurements collected downwind of the emitting facility, local meteorological data, and dispersion models. This technique is useful in determining whether reported source emission rates are reasonable, and based on monitored and modeled air concentrations, revised emission rates can be created.

- I am experienced in developing emission inventories of hundreds of criteria and toxic air pollutant sources. I developed procedures and programs for quantifying emissions from many air emission sources, including: landfills, diesel exhaust sources, natural gas combustion activities, fugitive hydrocarbons from oil and gas facilities, dry cleaners, auto body shops, and ethylene oxide sterilizers.
- I have calculated flux rates (and modeled air concentrations) from hundreds of biocide applications to agricultural fields. Emission sources include aerial spraying, boom applications, and soil injection of fumigants.
- I am experienced in calculating emission rates using emission factors, source-test results, mass-balance equations, and other emission estimating techniques.

Software Development

- I am skilled in computer operation and programming, with an emphasis on Fortran 95.
- I am experienced with numerous USEPA dispersion models, modifying them for system-specific input and output, and compiling the code for personal use and distribution. I own and am experienced in using the following Fortran compilers: Lahey Fortran 95, Lahey Fortran 90 DOS-Extended; Lahey F77L-EM32 DOS-Extended; Microsoft PowerStation 32-bit DOS-Extended; and Microsoft 16-bit.
- I configured and operated an Intel I-860 based workstation for the SBAPCD toxics program. I created control files and recoded programs to run dispersion models and risk assessments in the 64-bit I-860 environment (using Portland Group Fortran).
- Using Microsoft Fortran PowerStation, I wrote programs to extract terrain elevations from both 10-meter and 30-meter USGS DEM files. Using a file of discrete x,y coordinates, these programs extract elevations within a user-chosen distance for each x,y pair. The code I wrote can be run in steps or batch mode, allowing numerous DEM files to be processed at once.
- I have written many hundreds of utilities to facilitate data processing, entry, and quality assurance. These utility programs are a "tool chest" from which I can draw upon to expedite my work.
- While at the SBAPCD, I designed the ACE2588 model - the first public domain multi-source, multi-pathway, multi-pollutant risk assessment model. I co-developed the structure of the ACE2588 input and output files, supervised the coding of the model, tested the model for quality assurance, and for over 10 years I provided technical support to about 200 users of the model. I was responsible for updating the model each year and ensuring that it is consistent with California Air Pollution Control Officer's Association (CAPCOA) Risk Assessment Guidelines.
- I developed and coded the ISC2ACE and ACE2 programs for distribution by CAPCOA. These programs were widely used in California for preparing AB 2588 and other program health risk assessments. ISC2ACE and ACE2 contain "compression" algorithms to reduce the hard drive and RAM requirements compared to ISCST2/ACE2588. I also developed ISC3ACE/ACE3 to incorporate the revised ISCST3 dispersion model requirements.
- I developed and coded the "HotSpot" system - a series of Fortran programs to expedite the review of air toxics emissions data, to prepare air quality modeling and risk assessment inputs, and to prepare graphical risk presentations.
- I customized ACE2588 and developed a mapping system for the SBAPCD. I modified the ACE2588 Fortran code to run on an Intel I-860 RISC workstation; I updated programs that allow SBAPCD staff to continue to use the "HotSpot" system - a series of programs that streamline preparing AB 2588 risk assessments; I developed a risk assessment mapping system based on MapInfo for Windows which linked the MapInfo mapping package to the "HotSpot" system.
- I developed software for electronic submittal of all AB 2588 reporting requirements for the SBAPCD. As an update to the "HotSpot" system software, I created software that allows facilities to submit all AB 2588 reporting data, including that needed for risk prioritization, exposure assessment, and presentation mapping. The data submitted

by the facility is then reformatted to both ATDIF and ATEDS formats for transmittal to the California Air Resources Board.

- I developed and coded Fortran programs for AB 2588 risk prioritization; both batch and interactive versions of the program were created. These programs were used by several air pollution control districts in California.

Air Quality and Meteorological Monitoring

- I was responsible for the design, review, and evaluation of an offshore source tracer gas study. This project used both inert tracer gas and a visible release to track the onshore trajectory and terrain impaction of offshore-released buoyant plumes.
- I developed the technical requirements for the Santa Barbara County Air Quality/Meteorological Monitoring Protocol. I developed and implemented the protocol for siting pre- and post-construction air quality and meteorological PSD monitoring systems. I determined the instrumentation requirements, and designed and sited over 30 such PSD monitoring systems. Meteorological parameters measured included ambient temperature, wind speed, wind direction, sigma-theta (standard deviation of horizontal wind direction fluctuations), sigma-phi (standard deviation of vertical wind direction fluctuations), sigma-v (standard deviation of horizontal wind speed fluctuations), and sigma-w (standard deviation of vertical wind speed fluctuations). Air pollutants measured included PM₁₀, SO₂, NO, NO_x, NO₂, CO, O₃, and H₂S.
- I was responsible for data acquisition and quality assurance for an offshore meteorological monitoring station. Parameters measured included ambient temperature (and delta-T), wind speed, wind direction, and sigma-theta.
- In coordination with consultants performing air monitoring for verifying compliance with Proposition 65 and other regulatory programs, I wrote software to convert raw meteorological data to hourly-averaged values formatted for dispersion modeling input.
- Assisting the Ventura Unified School District, I collected air, soil, and surface samples and had them analyzed for chlorpyrifos contamination (caused by spray drift from a nearby citrus orchard). I also coordinated the analysis of the samples, and presented the results in a public meeting.
- Using summa canisters, I collected numerous VOC samples to characterize background and initial conditions for use in Santa Barbara County ozone attainment modeling. I also collected samples of air toxics (such as xylenes downwind of a medical device manufacturer) to assist in enforcement actions.
- For the California Attorney General's Office, I purchased, calibrated, and operated a carbon monoxide monitoring system. I measured and reported CO air concentrations resulting from numerous types of candles, gas appliances, and charcoal briquettes.

Support, Training, and Instruction

- For 10 years, I provided ACE2588 risk assessment model support for CAPCOA. My tasks included: updating the ACE2588 risk assessment model Fortran code to increase user efficiency and to maintain consistency with the CAPCOA Risk Assessment Guidelines; modifying the Fortran code to the EPA ISC model to interface with ACE2588; writing utility programs to assist ACE2588 users; updating toxicity data files to maintain consistency with the CAPCOA Risk Assessment Guidelines; developing the distribution and installation package for ACE2588 and associated programs; providing technical support for all users of ACE2588.
- I instructed approximately 20 University Professors through the National Science Foundation Faculty Enhancement Program. Instruction topics included: dispersion modeling, meteorological data, environmental fate analysis, toxicology of air pollutants, and air toxics risk assessment; professors were also trained on the use of the ISC2ACE dispersion model and the ACE2 exposure assessment model.
- I was the instructor of the Air Pollution and Toxic Chemicals course for the University of California, Santa Barbara, Extension certificate program in Hazardous Materials Management. Topics covered in this course include: detailed review of criteria and

noncriteria air pollutants; air toxics legislation and regulations; quantifying toxic air contaminant emissions; criteria and noncriteria pollutant monitoring; air quality modeling; health risk assessment procedures; health risk management; control/mitigating air pollutants; characteristics and modeling of spills and other short-term releases of air pollutants; acid deposition, precipitation and fog; indoor/occupational air pollution; the effect of chlorofluorocarbons on the stratospheric ozone layer. I taught this course for five years.

- I have trained numerous regulatory staff on the mechanics of dispersion modeling, health risk assessments, emission rate calculations, and presentation mapping. I provided detailed training to SBAPCD staff in using the HARP program, and in comparing and contrasting ACE2588 analyses to HARP.
- Through UCSB Extension, I taught a three-day course on dispersion modeling, preparing health risk assessments, and presentation mapping with Atlas GIS and MapInfo.
- I hold a lifetime California Community College Instructor Credential (Certificate No. 14571); Subject Matter Area: Physics.
- I have presented numerous guest lectures – at universities, public libraries, farm groups, and business organizations.

Affiliations

- American Meteorological Society (former president, Ventura/Santa Barbara County Chapter).

Publications

- To establish a legal record and to assist in environmental review, I prepared and submitted dozens of detailed comment letters to regulatory and decision-making bodies.
- I have contributed to over 100 Environmental Impact Statements/Reports and other technical documents required for regulatory decision-making.
- I prepared two software review columns for the *Journal of the Air and Waste Management Association*.

Employment History

- | | |
|---|--------------|
| • Self-Employed Air Quality Consultant | 1992 to 2006 |
| • Santa Barbara County APCD, Senior Scientist | 1988 to 1992 |
| • URS Consultants, Senior Scientist | 1987 to 1988 |
| • Santa Barbara County APCD, Air Quality Engineer | 1983 to 1987 |
| • Dames and Moore, Meteorologist | 1982 to 1983 |
| • UC Davis, Research Associate | 1980 to 1981 |

Testimony History

- People of the State of California v. McGhan Medical, Inc.
Deposition: Two dates: June - July 1990
- People of the State of California v. Santa Maria Chili
Deposition: Two dates: August 1990
- California Earth Corps v. Johnson Controls, Inc.
Deposition: October 26, 1995
- Dale Anderson v. Pacific Gas & Electric
Deposition: January 4, 1996
Arbitration: January 17, 1996
- Adams v. Shell Oil Company
Deposition: July 3, 1996
Trial: August 21, 1996
Trial: August 22, 1996

- California Earth Corps v. Teledyne Battery Products
Deposition: January 17, 1997
- Marlene Hook v. Lockheed Martin Corporation
Deposition: December 15, 1997
- Lawrence O'Connor v. Boeing North America, Inc.
Deposition: May 8, 1998
- Bristow v. Tri Cal
Deposition: June 15, 1998
- Abeyta v. Pacific Refining Co.
Deposition: January 16, 1999
Arbitration: January 25, 1999
- Danny Aguayo v. Betz Laboratories, Inc.
Deposition: July 10, 2000
Deposition: July 11, 2000
- Marlene Hook v. Lockheed Martin Corporation
Deposition: September 18, 2000
Deposition: September 19, 2000
- Tressa Haddad v. Texaco
Deposition: March 9, 2001
- California DTSC v. Interstate Non-Ferrous
Deposition: April 18, 2002
- Akee v. Dow et al.
Deposition: April 16, 2003
Deposition: April 17, 2003
Deposition: January 7, 2004
Trial: January 17, 2004
Trial: January 20, 2004
- Center for Environmental Health v. Virginia Cleaners
Deposition: March 4, 2004
- Lawrence O'Connor v. Boeing North America, Inc.
United States District Court, Central District of California,
Western Division. Case No. CV 97-1554 DT (RCx)
Deposition: March 1, 2005
Deposition: March 2, 2005
Deposition: March 3, 2005
Deposition: March 15, 2005
Deposition: April 25, 2005
- Clemente Alvarez, et al, v. Western Farm Service, Inc.
Superior Court of the State of California
County of Kern, Metropolitan Division. Case No. 250 621 AEW
Deposition: April 11, 2005

Other Interests

- I have a small urban farm: CCOF-certified organic since 1997, growing tangerines, figs, cantaloupes, apricots, plums, peaches, herbs, and bamboo.
- I'm also a food and garden writer for Edible Ojai and Edible Communities.

"Ray Manning" <ramanning@charter.net>
01/27/2006 08:58 PM

To: <Angela_Reynolds@longbeach.gov>
cc: <district8@longbeach.gov>
Subject: A comment on Long Beach Airport Terminal Area Improvement Project

Dear Ms. Reynolds,

I have been reading through the EIR on the Long Beach Airport Terminal Area Improvement Project, EIR No 37-03. There are a number of concerns and disconcerting items within the report related to air quality that I think need more study.

It appears that we are still taking a piecemeal approach to the subject of air quality within the city of Long Beach. In addition to studies by the SCAQMD, we should be thinking about the impacts of the airport, the ports of Long Beach and Los Angeles, mobile sources, and other industrial sources on air quality. It is not easy to separate out the impacts of each of these (and other) sources on overall air quality. Thus an overall model of the effects of the various sources is needed.

Disconcerting is the fact that we currently have nonattainments on both measures of airborne particulate matter related to national and California standards (Table 3.2-3) and yet we are moving forwards with projects that can only increase particulate matter further. Particulate emissions are strongly correlated with cancer rates as well as other respiratory illnesses and effects. Note that Table 3.2-4 shows only slight improvements in both particulate matters in the last 4 years and that both levels are well above the CAAQS standards. In fact, the both particulate matters are approximately 50% higher than the CAAQS standards.

During the adoption of the 2003 AQMP, the SCAQMD committed to analyzing 12 additional long-term control measures among others. Have we seen the results of these analyses? And have they given indications of any progress at reducing air pollution in the Long Beach area?

We should also have more monitoring stations in the areas of the city of Long Beach. The EIR talks about air dispersion modeling, terrain evaluation, land use, and source parameters, yet relies on a single monitoring station. To get a better picture of the citywide levels of pollutants, we should have additional monitoring stations to determine the effects of the airport, the ports, and mobile and stationary sources of pollutants (and pre-reactive chemicals). The single monitoring station in use is quite a distance from the airport and may not capture the full effects of the airport's effect on air quality.

I thank you for your time in reading this email and for including it with others received on the EIR. I thank you for your effort at making the city of Long Beach a great place to live, work, and play.

Sincerely,
Ray Manning
910 Luray Street
Long Beach, CA 90807



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January 27, 2006

Angela Reynolds
 Environmental Officer
 City of Long Beach
 Planning & Building Dept
 333 West Ocean Blvd
 Long Beach, CA 90802

VIA Fax & Overnight Delivery

RE: Draft EIR No. 37-03
 Long Beach Airport Terminal Area Improvement - Alaska Airlines, Inc. Response.

Dear Ms. Reynolds;

Upon completing its review of the above referenced EIR, Alaska Airlines, Inc. ("Alaska") submits this letter to clarify its position with respect to the EIR process and related proposed terminal building upgrade/modernization project. As stated in its letter to you dated May 6, 2005, Alaska supports the concept of an upgrade/modernization project for the Long Beach Municipal Airport.

While Alaska does not currently have enough information to lend its support to a particular project design alternative, Alaska does concur with the EIR and Long Beach City Council's recommendation that any terminal upgrade/modernization project shall not exceed 102,850 square feet. Given the existing limits on airport capacity at Long Beach Municipal Airport, Alaska restates the need for the airport and airlines to continue their dialogue so that the airlines can better understand the proposed project scope, capital cost, and long-term operating/maintenance costs. Until such time, Alaska is unable to support any particular project design/scope alternative.

Since the initial HNTB Study dated May 2004, many operational related decisions continue to affect the way airlines do business. Because of these changes, Alaska proposes that revisiting the programming study may better produce a facility that is financially viable and even more efficient in its design and allocation of space. Alaska also proposes that the planned use and assignments for aircraft parking be revisited before determining the final number of positions that are necessary.

Thank you for the opportunity to comment on this important matter. Alaska is committed to continuing its award-winning service to the Long Beach community. Please feel free to contact me if I can be of any assistance. Thank you.

Sincerely,
 Alaska Airlines, Inc.

Mukesh (Mookie) Patel
 Manager, Airport Affairs

Cc:
 Mayor Beverly O'Neill
 City Council Members
 Planning Commission Members
 Chris Kunze, Airport Manager

} 1

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Charles Marvin
 <charles@efficientlynetworked.com>

01/29/2006 09:52 AM

To: AirportEIR@longbeach.gov, district1@longbeach.gov, district2@longbeach.gov, district3@longbeach.gov, district4@longbeach.gov, district5@longbeach.gov, district6@longbeach.gov, district7@longbeach.gov, district8@longbeach.gov, district9@longbeach.gov, mayor@longbeach.gov

cc:

Subject: [Suspected Spam]Long Beach Airport EIR

I would like to thank you for the opportunity to provide a response to the Draft Environmental Impact Report (EIR). I am concerned about the HNTB's conclusions.

I am alarmed by the Draft EIR's conclusion that the proposed project of a 103,000 square foot Terminal Building "is the environmentally superior alternative." According to USGBC LEED criteria which is supposed to be a guiding principal for this project, the larger a building is, the more it materials it requires to build, the more energy it requires to light, the more energy it requires to air condition, the more energy it requires to heat, more chemicals it requires to maintain, and it creates more heat source in an urban landscape. Furthermore the larger alternative relies on the development presently undeveloped of Parcel "O" which is now open space and permeable land. **According to LEED principals, the larger building would be the environmentally INFERIOR alternative.**

1

HNTB's 2004 study recommending an even larger terminal building shows bias. City Council approved a smaller size option because HNTB conclusions ignored the voices of hundreds of hours of testimony of residents who oppose airport expansion. For purposes of this study, the City Council voted to study a stated project - nothing more. If the EIR discusses HNTB's recommendations at all, it **must also cite all the public testimony that HNTB ignored** because airport management was paying for the study.

2

The public has just recently learned that the noise calculation **disregarded the high level of noise when a jet is taking off and landing, when wheels are on the ground.** Full public disclosure requires that ALL the airport noise, noise that the surrounding community is exposed to, must be disclosed. This includes ALL the noise from life-flight, military and any other aviation noise that may be disregarded in the budgets for the Noise Ordinance. Policy makers and the public must have a comprehensive data of all the noise exposure. The noise contours must show all the present and expected noise impacts.

3

It is unacceptable that the Draft EIR **failed to include air quality data of actual air sampling** taken at, near and around the airport property. The evaluation of emissions form aircraft still using lead-based additives in aviation fuel must be conducted. **Lead exposure** is very hazardous. In public scoping meetings, there was an overwhelming public demand for actual air sampling, The only existing air collection point is many blocks upwind of the airport. When a jet runs up it engines at take off, jet exhaust levels are very high and are blown into residential neighborhoods. A single collection point upwind of the runway is unacceptable to evaluate this pollution. Residents demand to know the cumulative negative impact associated with the ports pollution and the 710 corridor for the movement of goods, must be considered so the public knows the **health risks and liability.**

4

I am not fundamentally opposed to modernizing the airport. I am opposed to enlarging it.

5

I am concerned that the Draft EIR is flawed. It should be treated with skepticism.

Thank you,

Charles L. Marvin
Long Beach Business Owner and Resident
ph: 562-756-1272
5353 E. Daggett St.
Long Beach, CA 90815



j mello
 <mello.joe@gmail.com
 >
 01/29/2006 11:56 AM

To: AirportEIR@longbeach.gov, district1@longbeach.gov,
 district2@longbeach.gov, district3@longbeach.gov,
 district4@longbeach.gov, district5@longbeach.gov,
 district6@longbeach.gov, district7@longbeach.gov,
 district8@longbeach.gov, district9@longbeach.gov,
 mayor@longbeach.gov

cc:
 Subject: EIR COMMENTS

**Questions and Concerns about the Long Beach Airport Terminal EIR :
 DESIGN**

The patio-type enclosures as part of the airport building do not seem to be part of the total square footage. This seems like it is a bigger structure than advertised. If these structures are being built under one roof, shouldn't they count as part of the structure total? What is the total square footage if these structures are included in the total? } 1

The concept illustrations for plane parking show 11 planes. Is this the correct amount or is it 14 like we have been told? Will the design keep the historic buildings as the main architectural feature? } 2

Night flights would seem to me to need fewer concession services but the EIR does not seem to take the various flight patterns into consideration. I am confused about the assumptions in the EIR about the concessions and what number the EIR uses for the phrase "*anticipated number of passengers*". } 4

The EIR seems to indicate that the TSA wants more space. Is there documentation of this? They seem to be doing fine with the current space allocated to them. Have they declared it is currently dangerous to fly from Long Beach Airport? Is there documentation that the TSA is concerned about safety as stated in the EIR? The point about *TSA delays*, what does that mean and is their documentation to back this up? What are the alternatives to insuring safety and no delays with TSA? Is the biggest alternative the ONLY answer? } 5

OTHER ISSUES:

The Airport Advisory Committee states that the 25 slots allocated for commuter airlines are "*to be in regular operation between December 2005 and Spring 2006*". This assumption does not seem to be true. So far I have heard and read the Smooth Airlines granted the slots is an airline in name only. } 6

The phrase in the EIR "*The airport has been a significant part of the City's economy since its founding in 1924, and an important factor in Long Beach's economic growth*" } 7
 Appears to be a generalization. Where is the comparisons of economic activity when we had fewer flights (after the various start up airlines pulled out) and now with the 41 flights?

The statements about air quality, are they from actual air sampling at the airport over an extended period of time? The statements about noise are only about take-off and landing, why not about time on the ground? } 8

What is the **General Aviation Noise Committee**? What authority does it operate and who is it accountable too? What are its powers and where are they spelled out? } 10

Joe Mello
5469 E Daggett St
Long Beach, CA 90815
562-301-6015

"Ardizzone, Kristy" <Kristy.Ardizzone@jetblue.com>
01/29/2006 07:16 PM

To: <AirportEIR@longbeach.gov>, <Angela_Reynolds@longbeach.gov>
cc:
Subject: EIR comment for Long Beach Airport Terminal Project

Comments re: EIR \ Long Beach Airport Terminal Project

I am very supportive of improving the Long Beach Airport terminal facility - and hope the city will move forward with the project and timeline with no further delays.

*

I urge the city to upgrade the Long Beach Airport with much needed improvements, and take the process \ project to fruition.

*

The airport needs better working conditions, as well as allowing for functional space for passengers, TSA \ security lanes and staffing, adequate holdrooms, concessions, restrooms, and much more.

*

The city should be able to create a better experience for work, travel and business at the Long Beach Airport.

*

I support the "proposed project" which allows a new parking structure for additional parking spaces to reduce traffic congestion and pollution.

*

I encourage the city to support the "proposed project" representing approximately 102,000 sq ft, and support "not less" than 14 aircraft parking positions.

It is my hope that the city will actively support the efforts and data put forth in the current Environmental Impact Report \ EIR, and will move the project forward as aggressively as possible - with no delays.

Sincerely,

Kristy Ardizzone
4225 Donald Douglas Dr.
Long Beach, CA 90808

1

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"Lisa King"
<lialisaking@hotmail.com>

01/29/2006 08:41 PM

To: AirportEIR@longbeach.gov, district1@longbeach.gov,
district2@longbeach.gov,
district3@longbeach.gov, district4@longbeach.gov,
district5@longbeach.gov, district6@longbeach.gov,
district7@longbeach.gov, district8@longbeach.gov,
district9@longbeach.gov

cc:

Subject: EIR comments

Dear Ms. Reynolds,

I am currently raising a young family in the area of Los Altos and find it very unreasonable that we as a city are not making sure that every health concern is accurately covered. I am not convinced that building a larger airport is in the best health or financial interest of the city and its tax payers.

Below are my comments to the Draft Environmental Impact Report for the Long Beach Airport Area Terminal Improvement Project.

I am particularly alarmed by the Draft EIR's conclusion that the proposed project of a 103,000 square foot Terminal Building "is the environmentally superior alternative." According to USGBC LEED criteria which is supposed to be a guiding principal for this project, the larger a building is, the more it materials it requires to build, the more energy it requires to light, the more energy it requires to air condition, the more energy it requires to heat, more chemicals it requires to maintain, and it creates more heat source in an urban landscape. Furthermore the larger alternative relies on the development presently undeveloped of Parcel "O" which is now open space and permeable land. According to LEED principals, the larger building would be the **environmentally inferior alterantive**.

} 1

Most people would agree that building a parking structure to accommodate passengers driving single accompany vehicles to and from the airport is also an **environmentally inferior alternative**.

HNTB's 2004 study recommending an even larger terminal building shows bias. City Council approved a smaller size option because HNTB conclusions ignored the voices of hundreds of hours of testimony of residents who oppose airport expansion. For purposes of this study, the City Council voted to study a stated project - nothingmore. If the EIR discusses HNTB's recomendations at all, it must also cite all the public testimoney that HNTB ignored because airport management was paying for the study.

} 2

Noise evaluations in this Draft report are very problematic. The public has just recently learned that the noise calculation disregard the nigh level of noise when a jet is taking off and landing, when wheels are on the ground. Full public disclosure requires that ALL the airport noise, noise that the surrounding community is exposed to, must be disclosed. This includes ALL the noise from life-flight, military and any other aviation noise that may be disregarded in the budgets for the Noise Ordinance. Policy makers and the public must have a comprehensive data of all the noise exposure. The noise contours must show all the present and expected noise impacts.

} 3

It is unacceptable that the Draft EIR failed to include air quality data of actual air sampling taken at, near and around the airport property. In public scoping meetings, there was an overwhelming public demand for actual air sampling. The only existing air collection point is many blocks upwind of the airport. When a jet runs up its engines at take off, jet exhaust levels are very high and are blown into residential neighborhoods. A single collection point upwind of the runway is unacceptable to evaluate this pollution. Residents demand to know the cumulative negative impact associated with the ports pollution and the 710 corridor for the movement of goods, must be considered so the public knows the health risk.

The evaluation of emissions from aircraft still using lead-based additives in aviation fuel, must be conducted. Lead exposure is very hazardous to humans.

4

My personal opinion is that the council is seeking a larger airport because they don't live under it. Consider the issue as if they were flying over your home or taking off down the street from you and your family.

5

Lisa King

562 896-7534 cell

"Berman, Suzanne" <Suzanne.Berman@jetblue.com>
01/30/2006 03:05 PM

To: <Angela_Reynolds@longbeach.gov>, <AirportEIR@longbeach.gov>
cc: <Chris_Kunze@longbeach.gov>, <Mayor@longbeach.gov>, <district1@longbeach.gov>, <district2@longbeach.gov>, <district3@longbeach.gov>, <district4@longbeach.gov>, <district5@longbeach.gov>, <district6@longbeach.gov>, <district7@longbeach.gov>, <district8@longbeach.gov>, <district9@longbeach.gov>
Subject: LGB New Terminal EIR comments

January 30, 2006

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Blvd
Long Beach, CA 90802

Angela_Reynolds@longbeach.gov, AirportEIR@longbeach.gov

RE: Environmental Impact Report No. 37-03, SCH NO.200309112

Dear Ms. Reynolds,

On behalf of JetBlue Airways, I am writing in further support of the draft Environmental Impact Report for the proposed Airport Improvement Project.

This draft EIR is an objective and comprehensive study that addresses in detail the environmental effects of terminal modernization. JetBlue agrees with the Report's conclusion that, from an environmental perspective, the 102,850 square foot Project is superior to the other projects studied. Accordingly, the draft EIR should be certified and the proposed facility, having not less than 14 aircraft parking pad positions and 102,850 square feet of space, should move forward.

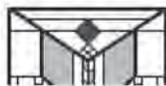
JetBlue strongly urges the City of Long Beach to advance the Project without delay, and gives its full support to this effort.

Sincerely,

Suzanne G. Berman
Manager Environmental Services
JetBlue Airways, Safety Crew
118-29 Queens Blvd.
Forest Hills, NY 11375
(718) 709 3636 FAX
(718) 709 3042 office
suzanne.berman@jetblue.com

} 1

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Mark Christoffels
01/31/2006 04:50 PM

To: airporteir@longbeach.gov
cc:
Subject: Draft EIR

CarterCM@aol.com

01/30/2006 04:59 PM

To: angela_reynolds@longbeach.gov
cc:
Subject: Draft EIR

Submitted via Email, January 30, 2006

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Blvd.
Long Beach, CA 90802

Dear Ms. Reynolds:

Thank you for the opportunity to comment on the Long Beach Airport Expansion Draft Environmental Impact Report ("DEIR"). Since 1986 when the last EIR was prepared for the Long Beach Noise Compatibility Study (Part 150), the airport has grown in an incremental and piecemeal fashion. This segmentation, which is inconsistent with the California Environmental Quality Act (CEQA), has resulted in many impacts occurring without proper evaluation, disclosure and mitigation.

The City now proposes to consider a major permanent expansion to the airport with the potential to increase commercial flights by 27%, the number of passengers served by 40%, the number of airport gates by 40% and the terminal size increase by 100% over the existing conditions. For decades to come, this project will undoubtedly set the course and direction for the airport, as well as the environment, the health and safety of Long Beach residents, the quality and valuation of our communities, and the long term financial and legal obligations for the City of Long Beach and its individual residents and businesses.

As such, it is incumbent on all of us that we have an objective and full disclosure document, as required under CEQA, to ensure that 1) the decision-makers and the public are informed on the direct and indirect environmental effects of the proposed project, 2) all feasible mitigations are identified and adopted, and 3) all alternatives that lessen or avoid significant impacts are identified and evaluated. In addition, we must ensure that the Airport Expansion Project does not jeopardize the Long Beach Airport Noise Compatibility Ordinance ("Noise Ordinance") which stands as the most important protection for Long Beach residents against the adverse effects of

1

the Airport. Therefore, the Draft EIR fails to fully meet the requirements of CEQA.

} 1
cont.

The following are inadequacies of the DEIR:

I. Flawed Proposed Project Definition

The DEIR incorrectly limits the Proposed Project to onsite facility improvements and states that there is no causal relationship between the proposed expansion and flight operations.

In fact, the Optimized Scenario presented in the DEIR is a component of the proposed project, and significant impacts from the Optimized Flights Scenario (Optimized Scenario) must be addressed as part of the project. The Negative Declaration (ND-19-94) for the proposed Amendments to the Long Beach Noise Ordinance limited its CEQA evaluation to 41 commercial flights and no other improvements. As such, the proposed expansion of the Airport terminal facilities, increased number of flights and gates and aircraft parking positions will cause an increase in the environmental impacts that must be fully evaluated in this EIR as part of the Proposed Project.

Furthermore, there is no real assurance that the Noise Ordinance may not be invalidated, repealed or compromised at a later date, allowing the expanded facilities, additional gates and parking to be constructed without the proper evaluations under CEQA.

} 2

It also should be noted that the NOP released in 2004 stated that the number of passengers served is estimated to be 3.8 million. The current DEIR states that the number of passengers to be served is estimated to increase to 4.2 million annual passengers (MAP) However, it is clear that the proposed project will increase the MAP over this level. Mitigation MM3.8-2 states that "when the annual passenger levels reach 4.2 MAP the Airport Manager will identify... additional onsite parking." This indicates that the Proposed Project is both growth-inducing and may exceed the Optimized Scenario assumptions.

} 3

As such, we request that the EIR clearly state that if 4.2 MAP or 52 commercial flights are exceeded, additional environmental review will be completed before allowing additional growth. Otherwise, the underlying assumptions used for evaluating the environmental impacts are insufficient and seriously flawed under CEQA, and mislead the public and the decision-makers.

II. Alternatives Analysis

A. Additional Alternative Required: Reduced Aircraft Gate/Parking Space

The DEIR fails to consider the full range of alternatives and acknowledges that the three build alternatives are very similar and have no substantial differences in environmental impacts. CEQA requires the identification and evaluation of alternatives that reduce or avoid significant impacts. Accordingly, alternatives with no additional or a reduced number of additional aircraft

} 4

gates and aircraft parking positions, which would result in fewer adverse impacts, must be addressed.

} 4
cont.

B. Environmentally Superior Alternative Is Not Justified

The DEIR concludes, without proper justification, that the proposed project is the "environmentally superior alternative" although it acknowledges that there are no real differences in the alternatives. This provides additional substantiation that less impacting alternatives (Reduced Aircraft Gate/Parking Spaces Alternative) must also be considered.

} 5

III. Cumulative Impacts, Not Considered

CEQA clearly requires that an EIR evaluate not only project-specific but cumulative impacts between the proposed project and other reasonably foreseeable projects. To-date, the growth at the airport has occurred in a piecemeal and segmented manner, both for airport expansion and related offsite projects. The DEIR on page 5-5 states, "Consideration of a list of other known projects was determined to be inappropriate and infeasible, as most of the projects on cumulative list of projects would occur within the next five years." Rather than utilize the list of reasonably foreseen projects as required by CEQA, the DEIR instead relies on regional growth projections which will mask site-specific cumulative environmental impacts. The related project list, which apparently is available, needs to be identified and evaluated in conjunction with the proposed project alternatives, significant impacts identified and feasible mitigations approved.

} 6

IV. Mitigation Measures, Not Enforceable or Omitted

CEQA requires that all feasible mitigation measures that avoid or reduce significant impacts be identified. There are many additional feasible mitigations that can be identified and considered in the DEIR, and ultimately by the decision-makers. The recently completed FEIR/EIS for the *Los Angeles International Airport Proposed Master Plan Improvements* (LAX Master Plan) identified aggressive but feasible measures that would protect human health and the environment, and further reduce significant impacts. Similar measures should be considered in this DEIR. The mitigation measures adopted by the Los Angeles World Airport in the FEIR for the LAX Master Plan are incorporated in this comment letter by reference. The FAA has approved the expenditure of airport funds for a package of community benefits and mitigations for the LAX expansion.

} 7

In addition to omitting many feasible mitigation measures, the DEIR also concludes that several issues are mitigated to a level of insignificance even though the identified "mitigations" are stated as voluntary or for later study. The EIR cannot rely on future studies and voluntary mitigations to support its conclusions. Notably the mitigations for air quality, noise, traffic, parking, cultural /historic resources and others lack sufficient detail, commitment and enforceability for the DEIR to conclude that no significant impact would occur.

} 8

Furthermore, the DEIR does not clearly identify the responsible parties for the mitigations. Who will require? Who will implement and/or pay? Who will enforce? It is not clear how the commitments will be made. Absent information to the contrary, are we to assume that the City of

Long Beach will be responsible for the payment? CEQA requires that the mitigations be enforceable which will require a commitment from a specific party. The EIR should identify the party (City, Airport trust fund, airlines, terminal operators, etc.) that will be held accountable to implement the mitigations. For example, in the Air Quality section there is a mitigation that the City of Long Beach shall incorporate electric charging infrastructure for electric GSE and other on-airport vehicles (MM3.2-12). Has the City committed to undertaking and paying for this effort? Additionally, it appears that the existing utility service is inadequate to support significant electrification. Will the City pay for the utility service upgrade, if needed?

8
cont.

Mitigations, with the responsible parties, should be provided for all significant impacts associated with the Optimized Scenario (Table 1.11-1). As discussed above, the Optimized Scenario should be a component of the proposed project.

V. Compliance with the National Environmental Policy Act (NEPA)

As indicated in letters to the NOP for the EIR, the proposed project would likely require federal approvals and receive federal funding. As such, this is a discretionary action requiring compliance with the National Environmental Policy Act (NEPA). Given the significant environmental impacts of the proposed project, some which cannot be mitigated to insignificant levels, the proper federal environmental document is an Environmental Impact Statement (EIS) and not a Finding of No Significant Impact (FONSI). CEQA and NEPA guidelines both encourage the preparation of a joint EIR/EIS.

9

VI. Growth Inducing Impact and Consistency with Regional Plans

The DEIR does not adequately study the growth-inducing impacts of the proposed expansion. An EIR must consider "reasonably foreseeable" direct and indirect consequences of a project. The DEIR acknowledges that the Proposed Project "... may induce airport land uses beyond the airport boundaries"; yet concludes the Project is not growth inducing.

10

The Proposed Project will result in significant impacts to air quality, noise, historic designation, transportation and other impacts. As such, the Proposed Project appears to be inconsistent with the Long Beach General Plan and its various elements. The air quality impacts contribute to the ongoing non-attainment of the SCAQMD air quality standards. In addition, it appears that the project may exceed the MAP levels stated in the SCAG Regional Transportation Plan. The EIR should more clearly address the potential inconsistencies with Local and Regional Plans.

11

VII. Recirculation of the EIR

CEQA requires that if there are substantial changes and revisions to the DEIR that it must be recirculated for additional public review and comment. This should certainly apply.

12

VIII. Specific Comments

A. Air Quality and Human Health Risk Assessment

13

The DEIR states that the incremental air quality emissions are significant: exceeding established air quality thresholds, contributing substantially to air quality violations and exposing sensitive receptors to significant PM 10, CO and NOx concentrations.

As such, the air quality mitigations are inadequate as previously noted. There are many additional, feasible mitigations that should be identified and considered, particularly that reduce toxic contaminants, such as alternative fuel vehicles and electrification of equipment. The adopted mitigations in the recent FEIR/EIS for the LAX improvements should be reviewed and included in the DEIR. Justification must be given if any of those measures would not be similarly required for the Long Beach airport improvement project.

In addition, mitigations must be real commitments, and not voluntary or deferred for future study. It is inappropriate to consider such measures as reducing impacts, particularly for reducing significant impacts to less than significant levels. (see IV above)

The Human Health Risk Assessment (HHRA) should include a more detailed evaluation of the cumulative exposures to residents and particularly to sensitive receptors from future foreseeable projects from the Ports of LA/LB and 710 Freeway expansions, as well as other major projects that will expose residents, not only in Long Beach but in adjoining areas.

B. Cultural Resources

The DEIR concludes that there will be significant impacts to Cultural Resources due to the alteration of a designated historical landmark. However, the DEIR fails to provide adequate details in the analysis and fails to substantiate, with enforceable mitigations, the conclusion of no significant impact with mitigations.

C. Hazards and Hazardous Materials

Previous documents indicated that the proposed project site is contaminated. Yet the DEIR does not indicate that a Phase I/II study was undertaken to properly characterize the contamination, evaluate the potential toxic exposures particularly in areas where the soil will be excavated and disturbed, and provide adequate mitigation to protect workers, residents, visitors and businesses. Major contamination could substantially increase air pollution, construction time, costs and require remediation, which should also be addressed in the DEIR.

The DEIR should address aviation safety and the potential incidents and accidents resulting from the increased aircraft flights. In addition, the DEIR should include potential safety hazards due to the proposed significant changes to the existing airport configuration. These would include alterations to aircraft and vehicular parking and staging, including relocating the General Aviation aircraft to Parcel O.

D. Noise

13
cont.

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18

The noise assessment is inadequate. The land use compatibility program should be completed and included in the DEIR for review and comment.

18
cont.

Noise will be generated from additional flights, traffic from passenger and support staff and other expanded airport activities. These sources should be included in the noise assessment. It is also unclear why the significant noise impacts are limited to Parcel O during the nighttime hours. In addition, the mitigations are deferred to a future study; therefore, the impacts cannot be considered as mitigated to insignificance.

19

The DEIR fails to address the existing and regular violations of the Noise Ordinance. Mitigations such as sound proofing and noise barriers should be undertaken currently. Additional mitigations should be taken to ensure that existing noise violations are addressed before any additional flights are allowed.

20

With the increased noise, air pollution and other environmental and health impacts, coupled with potential declining property values and associated blight, a reasonable mitigation to consider would be to identify appropriate parcels for purchase. This has been, and continues to be undertaken at LAX.

21

E. Transportation and Circulation /Land Use

The DEIR identifies significant impacts in traffic will occur and proposes that a traffic monitoring program be developed in the future. This program should be developed and included in the DEIR to ensure that this program will reduce traffic to insignificant levels.

22

As addressed earlier, there will be potentially significant traffic and circulation impacts from the cumulative impacts of the build alternatives and other projects in and around the airport. The DEIR must conduct additional cumulative traffic analysis based on the reasonably foreseen projects in the airport area and propose appropriate mitigations.

23

As to the parking, the DEIR acknowledges that the Proposed Project may induce airport land uses beyond the airport boundaries, as off site parking may be required. As such, these impacts need to be analyzed now for the various parking options. It also brings into question the assertion that this project is "not growth inducing".

24

In addition, the DEIR acknowledges that the Proposed Project will result in more than 4.2 MAP. Mitigation measure MM3.8-2 states that "...when the annual passenger levels reach 4.2 MAP, the Airport Manager shall identify and develop additional on-site parking opportunities." If 4.2 MAP is exceeded, the environmental impact analysis in the DEIR will be underestimated.

25

F. Others

While the DEIR states that there will be no impact on utilities. Public testimony in the record will show that numerous comments were made about the need for additional electric power, particularly to support various electric equipments, such as GSE.

26

Thank you for the opportunity to provide comments. We look forward to a revised EIR that fully evaluates the potential impacts of this very important project.

Sincerely,

Craig M. Carter
4281 Country Club Dr.
Long Beach, CA 90807

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GARY W. FRAHM
 6481 Bixby Hill Road
 Long Beach, CA 90815
 Phone: (562) 307-0816 - Email: glgary@aol.com

**QUESTIONS FOR
 THE LONG BEACH AIRPORT TERMINAL EIR**

1. Was the annual noise budget exceeded by commercial flights in 2002 and 2003?
2. By how much was the annual noise budget was exceeded?
3. How is the noise budget calculated?
4. Is a computer program is used to determine the annual noise budget? If so, what it the name and version of this program?
5. When the 1989-1990-baseline noise budget was first established, how were the measurements performed?
6. Who or what company performed the 1989-1990-baseline budget?
7. What noise monitoring sites were included in the 1989-1990-baseline budget?
8. If the annual noise budget was exceeded in the prior years, does this information carry over into the next year in anyway?
9. What is the exact wording of the Development and Use Standard for the Long Beach Airport Terminal Planned Development Plan Ordinance?
10. Why hasn't the Airport Manager developed a land use compatibility program addressed existing and future aviation noise levels before certification of this EIR?
11. Why is the land use compatibility program voluntary?
12. Why is the noise attenuation only available to residential units with the 65 CNEL contour?
13. What improvements are included in the sound insulation treatment of the owners of affected property?
14. What language would be included in the noise easement over said property?
15. What are the possible funding sources for the noise attenuation?
16. What is the total amount of funds that would be available to a resident for noise attenuation?
17. What are the possible methods for establishing priorities for implementing improvements to property affected by airport noise?
18. What language would be contained in the installation agreement?
19. What qualifies the City of Long Beach, Airport Bureau to administer the land use compatibility program?
20. Where would one find/or who has the voluntary noise attenuation program recommended in the DEIR?
21. What is the difference in noise levels between a fully loaded commercial airplane and a fifty percent loaded commercial airplane?

22. Some of the monthly noise statistics provided by the City of Long Beach cite complaints in Sunset Beach. How are these noise complaints being addressed? Are there any plans to install monitoring equipment in those areas?
23. Some of the monthly noise statistics provided by the City of Long Beach cite complaints in Huntington Beach. How are these noise complaints being addressed? Are there any plans to install monitoring equipment in those areas?
24. Why is Bixby Hill not included in the noise monitoring system?
25. In 2004 carriers flew at an average of 72% of passenger capacity, for the first 10 months in 2005 they flew at 80%. The city sound consultants say, "the more load the higher the noise level". How does this factor into the City of Long Beach DEIR?
26. In Appendix F, Technical Report, Noise Analysis, dated October 2005, page F-2, in the paragraph entitled Propagation of Noise, it states, "the degree of absorption varies depending on the frequency of the sound as well as the humidity and temperature of the air". Are these measurements being recorded at the various monitoring sites and factored into the noise monitoring program?
27. In Appendix F, Technical Report, Noise Analysis, dated October 2005, page F-2, in the paragraph entitled Propagation of Noise, it states, "turbulence and gradients of wind, temperature and humidity play a significant role in determining the propagation of sound over a large distance". Are these measurements being recorded at the various monitoring sites and factored into the noise monitoring program?
28. "Over large distances, the lower frequencies become the dominant sound as higher frequencies are attenuated". Do the monitoring stations have the ability to measure these frequencies?
29. In Exhibit 1-2, the Effect of Weather on Sound Propagation shows the effect water plays in sound propagation. Bixby Hill is surrounded on two sides by water or concrete. Is this a fair representation of the effects of sound on Bixby Hill, considering the sound source is located on the ground?
30. Exhibit 1-4, Typical Outdoor Noise Levels in Terms of CNEL shows a noise level of 92 CNEL for Touchdown at Major Airport at a distance of $\frac{3}{4}$ of a mile. Why are the measurements of the City of Long Beach so much lower?
31. "Extensive research has been conducted on the effect of noise on sleep disturbance. Recommended values for desired sound levels in residential bedroom space range from 25 to 45 dBA with 35 to 40 dBA being the norm". Has the City of Long Beach ever conducted any research on the effect of noise on sleep disturbances local residents' experience?
32. Has the City of Long Beach ever surveyed the residents and business owners regarding the annoyance levels caused by Long Beach Airport noise?
33. The Airport and Airway Improvement Act of 1982, as amended (Public Laws 91-258 and 94-353), establishes the Federal requirement for funding of airport planning. Has the City of Long Beach adopted any zoning laws restricting the use of any land in the City of Long Beach under this Act?
34. Has the City of Long Beach developed an airport noise abatement plan?

35. Exhibit 1-9 shows residential sound levels of 75-80dba and 80-85dba as not being acceptable. Why is the City of Long Beach sound monitoring system not including Bixby Hill which has levels of 74-85dba?
36. Are the sound levels of between 74-85dba found in Bixby Hill compatible with Part 150?
37. Do sound levels of 74-85dba require additional restrictions?
38. Are sound levels of 74-85dba acceptable to Caltrans?
39. Why are single-family residences exempt from California Noise Insulation Standards?
40. Why has the Long Beach General Plan Noise Element not been updated since 1974?
41. Why does the City of Long Beach not have a specific city wide noise standard?
42. What categories of airport users has the Airport Manager adjusted permissible single event noise limitations on in the last five years? Why were the limitations adjusted?
43. How long are noise levels at the airport stored in the "state of the art noise monitoring system"?
44. Why are the SENEL limits in the Long Beach Noise Ordinance so high?
45. When was Monitoring Site 1 installed?
46. Who is the manufacturer of Monitoring Site 1?
47. What type of equipment does Monitoring Site 1 contain? What are the components and serial numbers?
48. How often is Monitoring Site 1 calibrated? What were the dates in the last three years?
49. Does Monitoring Site 1 have the ability to monitor temperature, barometric pressure, wind speed and humidity?
50. How was Monitoring Site 1 installation site selected?
51. When was Monitoring Site 2 installed?
52. Monitoring Site 2, who is the manufacturer?
53. Monitoring Site 2, what type of equipment does it contain? Please list components and serial numbers.
54. Monitoring Site 2, how often is it calibrated? Please list dates over the last three years.
55. Monitoring Site 2, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
56. Monitoring Site 2, how was the installation site selected?
57. Monitoring Site 3, when was it installed?
58. Monitoring Site 3, who is the manufacturer?
59. Monitoring Site 3, what type of equipment does it contain? Please list components and serial numbers.
60. Monitoring Site 3, how often is it calibrated? Please list dates over the last three years.
61. Monitoring Site 3, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
62. Monitoring Site 3, how was the installation site selected?
63. Monitoring Site 4, when was it installed?

64. Monitoring Site 4, who is the manufacturer?
65. Monitoring Site 4, what type of equipment does it contain? Please list components and serial numbers.
66. Monitoring Site 4, how often is it calibrated? Please list dates over the last three years.
67. Monitoring Site 4, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
68. Monitoring Site 4, how was the installation site selected?
69. Monitoring Site 5 when was it installed?
70. Monitoring Site 5, who is the manufacturer?
71. Monitoring Site 5, what type of equipment does it contain? Please list components and serial numbers.
72. Monitoring Site 5, how often is it calibrated? Please list dates over the last three years.
73. Monitoring Site 5, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
74. Monitoring Site 5, how was the installation site selected?
75. Monitoring Site 6 when was it installed?
76. Monitoring Site 6, who is the manufacturer?
77. Monitoring Site 6, what type of equipment does it contain? Please list components and serial numbers.
78. Monitoring Site 6, how often is it calibrated? Please list dates over the last three years.
79. Monitoring Site 6, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
80. Monitoring Site 6, how was the installation site selected?
81. Monitoring Site 7, when was it installed?
82. Monitoring Site 7, who is the manufacturer?
83. Monitoring Site 7, what type of equipment does it contain? Please list components and serial numbers.
84. Monitoring Site 7, how often is it calibrated? Please list dates over the last three years.
85. Monitoring Site 7, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
86. Monitoring Site 7, how was the installation site selected?
87. Monitoring Site 8, when was it installed?
88. Monitoring Site 8, who is the manufacturer?
89. Monitoring Site 8, what type of equipment does it contain? Please list components and serial numbers.
90. Monitoring Site 8, how often is it calibrated? Please list dates over the last three years.
91. Monitoring Site 8, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
92. Monitoring Site 8, how was the installation site selected?
93. Monitoring Site 9, when was it installed?
94. Monitoring Site 9, who is the manufacturer?

95. Monitoring Site 9, what type of equipment does it contain? Please list components and serial numbers.
96. Monitoring Site 9, how often is it calibrated? Please list dates over the last three years.
97. Monitoring Site 9, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
98. Monitoring Site 9, how was the installation site selected?
99. Monitoring Site 10, when was it installed?
100. Monitoring Site 10, who is the manufacturer?
101. Monitoring Site 10, what type of equipment does it contain? Please list components and serial numbers.
102. Monitoring Site 10, how often is it calibrated? Please list dates over the last three years.
103. Monitoring Site 10, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
104. Monitoring Site 10, how was the installation site selected?
105. Monitoring Site 11, when was it installed?
106. Monitoring Site 11, who is the manufacturer?
107. Monitoring Site 11, what type of equipment does it contain? Please list components and serial numbers.
108. Monitoring Site 11, how often is it calibrated? Please list dates over the last three years.
109. Monitoring Site 11, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
110. Monitoring Site 11, how was the installation site selected?
111. Monitoring Site 12, when was it installed?
112. Monitoring Site 12, who is the manufacturer?
113. Monitoring Site 12, what type of equipment does it contain? Please list components and serial numbers.
114. Monitoring Site 12, how often is it calibrated? Please list dates over the last three years.
115. Monitoring Site 12, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
116. Monitoring Site 12, how was the installation site selected?
117. Monitoring Site 12, how was the installation site selected?
118. Monitoring Site 13, when was it installed?
119. Monitoring Site 13, who is the manufacturer?
120. Monitoring Site 13, what type of equipment does it contain? Please list components and serial numbers.
121. Monitoring Site 13, how often is it calibrated? Please list dates over the last three years.
122. Monitoring Site 13, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
123. Monitoring Site 13, how was the installation site selected?
124. Monitoring Site 14, when was it installed?
125. Monitoring Site 14, who is the manufacturer?

126. Monitoring Site 14, what type of equipment does it contain? Please list components and serial numbers.
127. Monitoring Site 14, how often is it calibrated? Please list dates over the last three years.
128. Monitoring Site 14, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
129. Monitoring Site 14, how was the installation site selected?
130. Monitoring Site 15, when was it installed?
131. Monitoring Site 15, who is the manufacturer?
132. Monitoring Site 15, what type of equipment does it contain? Please list components and serial numbers.
133. Monitoring Site 15, how often is it calibrated? Please list dates over the last three years.
134. Monitoring Site 15, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
135. Monitoring Site 15, how was the installation site selected?
136. Monitoring Site 16, when was it installed?
137. Monitoring Site 16, who is the manufacturer?
138. Monitoring Site 16, what type of equipment does it contain? Please list components and serial numbers.
139. Monitoring Site 16, how often is it calibrated? Please list dates over the last three years.
140. Monitoring Site 16, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
141. Monitoring Site 16, how was the installation site selected?
142. Monitoring Site 17, when was it installed?
143. Monitoring Site 17, who is the manufacturer?
144. Monitoring Site 17, what type of equipment does it contain? Please list components and serial numbers.
145. Monitoring Site 17, how often is it calibrated? Please list dates over the last three years.
146. Monitoring Site 17, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
147. Monitoring Site 17, how was the installation site selected?
148. Monitoring Site 18, when was it installed?
149. Monitoring Site 18, who is the manufacturer?
150. Monitoring Site 18, what type of equipment does it contain? Please list components and serial numbers.
151. Monitoring Site 18, how often is it calibrated? Please list dates over the last three years.
152. Monitoring Site 18, does this site have the ability to monitor temperature, barometric pressure, wind speed and humidity?
153. Monitoring Site 18, how was the installation site selected?
154. What is the name of the manufacturer and what is the version of the computer program used to accumulate the information of monitoring sites?

155. How much historical information is stored on the computer monitoring program?
156. What is the noise budget for residences nearest to Station 1, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
157. What is the noise budget for residences nearest to Station 2, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
158. What is the noise budget for residences nearest to Station 3, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
159. What is the noise budget for residences nearest to Station 4, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
160. What is the noise budget for residences nearest to Station 5, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
161. What is the noise budget for residences nearest to Station 6, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
162. What is the noise budget for residences nearest to Station 7, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
163. What is the noise budget for residences nearest to Station 8, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
164. What is the noise budget for residences nearest to Station 9, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
165. What is the noise budget for residences nearest to Station 10, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
166. What is the noise budget for residences nearest to Station 11, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
167. What is the noise budget for residences nearest to Station 12, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
168. What is the noise budget for residences nearest to Station 13, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
169. What is the noise budget for residences nearest to Station 14, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)

170. What is the noise budget for residences nearest to Station 15, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
171. What is the noise budget for residences nearest to Station 16, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
172. What is the noise budget for residences nearest to Station 17, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
173. What is the noise budget for residences nearest to Station 18, for air carriers, commuters, industrial, charter and general aviation? (Weighted by time of day and noise level)
174. Is there a newer version FAA's Integrated Noise Model (INM) version 6.1?
175. Who makes Arcview Geographic Information System?
176. Who insures the operational data collected in the Integrated Noise Model (INM) Version 6.1 is correct before it is loaded in Arcview Geographic Information System (GIS) software?
177. What optionally data on the Long Beach Airport has been inputted into the INM program?
178. Where does data for the meteorological conditions inputted in the INM program originate?
179. Who developed the ANOMS system?
180. What version of the ANOMS program is used?
181. Does the ANOMS program have the ability to monitor wind, humidity or temperature?
182. How is noise complaint data analyzed?
183. What criteria are used to analyze noise complaints?
184. Would the CNEL contours used to depict existing noise exposure at LGB, be higher if data for ANOMS system was wrong?
185. Can trees, walls, and foliage around ANOMS sites distort the data collected?
186. If SENEL readings of 75 dbA to 84 dbA are being recorded in Bixby Hill, would this change the CNEL contour?
187. In Table 3-2, how is the community measured CNEL complied and computed?
188. In Table 3-2, how is the aircraft measured CNEL complied and computed?
189. In Table 3-2, how is the total complied?
190. "The City Noise Ordinance limits SENEL values to range between 79 and 102.5 dBA depending on runway, operation and time of day". Exhibit 1-1, lists these levels as "High Urban Ambient Sound (80) to a Boeing 747-200 taking off, measured 6,500 meters from beginning of takeoff roll". How far from the Airport do these City Noise Ordinance limitations extend?
191. How are the contours in Exhibit 3-4a extended over the ocean beyond Monitoring Site 3? What are the projections based on considering Monitoring Site 3 is the first monitoring site on the arrival approach?
192. Why was only calendar year 2004 used to compute Time of Day of Operations?
193. How is the night time penalty for the noise budget computation processed?
194. What is the "Noise Element of the General Plan"? (Please give details).

195. How many times during the last 10 years has the Long Beach Airport been non-compliant with the Noise Ordinance, regulations and Noise Element.
196. Did the analysis to determine the realistic number of flights which could be accommodated under the Long Beach Airport Noise Budget, take into consideration the load values of full planes?
197. Why would the City of Long Beach assume airlines will reduce night operations by 50% from the 2004 level? How do the City projections for additional flights work and compare with current and past levels (2002, 2003)? Which of the years would be the worst scenario?
198. How does the departure of American Airlines affect Fleet Mix assumption?
199. Who is MGA who generated CNEL contours for full budget utilization?
200. Why did the City of Long Beach only use AAAI, Inc. data files in 2004 for projections at full budget utilization?
201. If you use data files for 2000-2003, what would be the full budget utilization contours?
202. Who maintains sound monitoring sites 1-18?
203. Why was duct tape covering part of Monitoring Site 3 microphone in 2004?
204. When was the last date the City of Long Beach submitted an Updated Noise Map to the FAA?
205. Has the City of Long Beach applied for any grants to update the sound monitoring system in the last three years?
206. Federal Aviation Regulations Part 150 established FAA's Noise Compatibility Program. Under its Noise Compatibility Program, FAA awards Airport Improvement Program grants to airports to acquire land and sound-insulate homes and public buildings in areas already exposed to significant aircraft noise. Is the City of Long Beach planning to acquire any residential or commercial property affected by airport noise?
207. Is the City of Long Beach seeking funds to insulate homes?
208. What is the maximum amount of funds a homeowner could be granted for insulation?
209. The Airport Improvement Program Handbook and Noise Compatibility Program guidance require airports dispose of land acquired with noise grants when the land is no longer needed for noise purposes or airport expansion. Has the City of Long Beach disposed of any land acquired with noise grant money?
210. Approach noise has recently become a more prominent issue. Greater noise emissions from fans and compressors in high-bypass engines have increased the comparative importance—and sometimes the actual noise levels—of aircraft approaches. Has the City of Long Beach take into consideration these factors?
211. Were the noise contours developed in the EIR from project noise contours from type of aircraft or from actual contours developed from the noise monitoring system?
212. What is the actual altitude of commercial aircraft approaching the Long Beach Airport over sound monitoring site 3?
213. The presence of nearby structures or steep terrain can cause sound wave reflections which may locally increase noise levels. Water or hard ground

surfaces can particularly contribute to such occurrences. Certain meteorological conditions—such as a temperature inversion layer—also can reflect sound back to the ground, resulting in higher noise levels. Rising or falling terrain changes the distance between an aircraft and people on the ground relative to the flat ground assumed in standard INM calculations. These changes in turn increase or reduce the actual sound levels experienced on the ground compared to the levels calculated by the noise model. The FAA's Integrated Noise Model version 6.0 allows assessment of the effects of elevation variations. Has the City of Long Beach used these factors in their noise models?

214. Does the City of Long Beach use the Helicopter Noise Model (HNM) for calculation of noise contours?
215. In order to calculate noise contours or other noise impact information, INM and the other noise models require several types of data. Some of the data is built into the model database, although (except for HNM) it can be modified by the user. Other data must be entered for each individual noise study. Still other types of data can be entered to refine the analyses, but are not required. Has the City of Long Beach modified the INM model database in any way?
216. Does the City of Long Beach airport monitor noise levels with FAA radar data?
217. Does the airport noise monitoring system correlate noise events to specific flights?
218. INM allows census data to be entered into the program to facilitate evaluation of the numbers of people impacted by various noise levels or aircraft operational scenarios. Does the City of Long Beach use this opinion in its contours?
219. Because of the many variables and assumptions associated with their computation, cumulative noise contours representing existing airport activity are often considered to have a precision of approximately ± 3 dB. Precision is greatest close to the runway and decreases beyond where flight tracks diverge. Is this why the sound monitoring system for arrivals has not been extended beyond sound monitoring site 3?

CALIFORNIA EARTH CORPS
4927 Minturn Avenue
Lakewood, CA 90712
(562) 630-1491

January 30, 2006

HAND CARRIED

Angela Reynolds, Environmental Planning Officer
City of Long Beach
Dept. of Planning & Building
333 Ocean, 7th Floor
Long Beach, CA 90802

Re: Long Beach Airport DEIR Comments

Dear Ms. Reynolds,

California Earth Corps appreciates this opportunity to comment on the DEIR for the Long Beach Airport Terminal Improvement Project. Our concerns are focused on the air quality impacts of Long Beach Airport operations on nearby residents, airport personnel, and the traveling public. The DEIR fails to understand the nature and severity of the Health Risk from current operations and cannot therefore construct an accurate baseline of exposure. Without acceptable data on current emissions and background, there is no way to project impacts from the Project with sufficient confidence to form the basis for Decision to Approve the Project.

1

Why were no actual measurements of airborne toxicants taken at the Airport?

Emission factors based upon aircraft engine manufacturers' specifications derived from test stand measurements of brand new engines highly tuned for peak performance do not reflect actual emissions from the aircraft using LGB today, nor was there any indication we could find that manufacturers' data from the A320 engines, the predominant aircraft using LGB, were used. The most significant risk, that from ultrafine particulates <2.5 microns, are not included or considered at all. Emissions vary substantially with the quality of the fuel as well as the performance of the engine, determining factors unavailable for actual emissions at LGB. Without accurate emission data, modeling is hopelessly skewed and any determination of Health Risk with any certainty impossible for responsible decision making or even to suggest what measures could be taken to reduce or mitigate public health risks.

2

Use was made of a single AQMD sampling station miles away and located to collect a pool of diesel exhaust particulates from the Ports and I710 freeway on filter paper changed daily and periodically analyzed. Since filters allow particles less than pore size to pass through, all ultrafines that pose the greatest health risk, even those up to 2.5 microns, are uncollected and their impacts not included. No methodology was included as to how the fraction due to airport operations was differentiated from ships, trucks and trains. Because aircraft emissions are highly episodic, and fluky wind currents and eddies can cause concentrations to vary by orders of magnitude from minute to minute and because many health impacts, like acute asthma episodes, are triggered by high concentrations in a single breath, multiple monitoring (real time, continuous readout) stations with meteorology are required to determine health risk.

3

Why were airborne toxicants “of concern” not measured, analyzed or included?

Non carbon particulates contaminated with metals and other toxicants have long been known to be present on LGB runways and loading zones, as at most airports. Jet engines are not only a source themselves, they are giant leaf blowers that entrain this dust into the air column; the vortices from aircraft wing tips can concentrate and lift these dusts, both fine and ultrafine, high in the air, with a fallout plume measurable for miles downwind in ground samples using airport “markers” to differentiate from other sources.

4

Why was accurate meteorological data not collected and used?

As any Long Beach sailor will attest, coastal winds are highly variable. Urban structures greatly increase shifting winds; passing trucks, cars and especially aero planes cause not only speed and direction to shift from minute to minute, but temperature and barometric pressure as well. Vortex from airliner wingtips can be strong enough to flip small planes; a well known safety hazard when mixing general aviation and commercial aircraft. Airport weather data collected hourly from a single site is an unacceptable error source; that is why a full meteorology complement must be included with each monitoring station, with accurate clock to correlate data, hopefully barometer, thermometer, even a db meter, as well as the requisite real time nox, tox, sox, and particulate instrumentation. “The refined planemetric boundary characterization capabilities of AEROMOD are negated by the crude meteorological data chosen by the DEIR preparer” (Sears)

5

Cost is not an answer

California Earth Corps has been monitoring stationary source emissions for fifteen years; our data and methodology, used in regulatory and court proceedings, has never been successfully challenged. We have recently partnered with HUSH2, a community based organization concerned with direct impacts of LGB operations on neighborhood health and well being, in multistation, multivariate monitoring of LGB particulate emissions from late September, 2005 until mid January of this year. The study of those data and projected Health Risk are still underway and will be widely shared upon completion, but the preliminary Summary (attached) and data show concentrations of particulates in neighborhoods in the vicinity of the LGB Airport are orders of magnitude higher than that used by the DEIR to form the basis of the entire Air Quality analysis. And at a cost orders of magnitude less than the million dollar cost of the DEIR. To base an EIR on flawed methodology, unwarranted assumptions and unreliable data compromised by inadequate meteorological data is misleading at best, and a waste of time and money.

6

Why was the outmoded Version 4.3 of EDMS/AEROMOD used?

The outdated beta-testing version of AEROMOD is particularly vulnerable to the meteorological inaccuracies induced by using Airport met data. That, in part, is why the Federal Aviation Administration has withdrawn EDMS from the guideline on Air Quality Models, Appendix A. Failure to follow the most recent revisions, or to fully evaluate those consequences, could lead to increased scrutiny by FAA and exercise of their option to challenge the Noise Ordinance and the flight limitations. Conversely, meticulous adherence to FAA suggested guidelines may enhance the security of the Ordinance and open the way for adoption of a “pollution bucket” or no net increase in LGB emissions of toxicants, esp. particulates, to a non attainment area, as suggested by the Clean Air Act.

7

Angela Reynolds
Pg 3

This past year has seen a sharp increase in public and regulatory concern about the health and climate impacts of air traffic and jet engine emissions. Both the Kyoto and recent Montreal convention has identified increased air traffic and jet exhausts as a major contributor to global warming. Recent medical findings increasingly identify particulates, especially ultrafines, and most alarming, aromatics associated with jet engine exhaust, as **the major cause** of COPD and asthma related diseases, the 3rd largest cause of death in the south coast airshed. They are also a major contributor to heart attack, #1, and stroke, #2. While most attention is directed at shipboard large scale diesel engines and older trucks and trains, jet engines are of increasing concern, as are the difficulties in measuring, monitoring and understanding their emissions and their impacts on air travelers, airport workers, nearby residents and sensitive receptors, all who suffer chronic exposure and insult. That is why CARB held a series of hearings and seminars last year on this topic and plans more this year. We must understand where and how these toxicants originate before we can control and reduce the emissions. Goods Movement and Ports is a hot issue; "no net increase" in emissions is becoming a preferred strategy; recognition of the health costs borne by the taxpayers as well as the personal tragedy of those struck down is becoming widely recognized. As with the Port of Long Beach and 710 freeway, LGB is becoming recognized as a serious insult and threat to public health. That is why is DEIR must be withdrawn, and proper air quality monitoring conducted sufficient to provide reliable data for the proper model to form the basis of a credible Health Risk Assessment as required by CEQA and sorely needed for informed Decision by City and an informed public.

8

We ask that this DEIR be withdrawn and not reissued until a credible Health Risk Assessment has been prepared and peer reviewed.

9

Thank you for your consideration.

Sincerely,



Don May, President
California Earth Corps

Attached:

Declarations of

Camille Sears
Eric Winegar

10

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January 30, 2006

City of Long Beach
Planning and Bldg. Dept.
333 West Ocean Blvd.
Long Beach, CA 90802

Dear Ms. Angela Reynolds,

In response to the Long Beach Airport Draft EIR for possible future airport expansion I feel as though nobody is listening or cares about those of us who are being "sacrificed" and live in the local neighborhoods surrounding the Long Beach Airport.

As a Los Altos resident and homeowner I feel almost powerless anymore and it is so sad to see a good neighborhood about to be lost to this possible expansion project.

I have lived under the landing flight pattern for more than 20 years and am very aware of the quality of life and how my neighborhood has been affected by this airport.

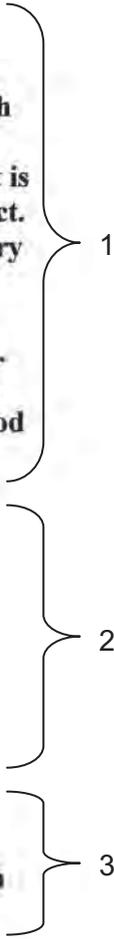
The noise and air quality has become extremely unhealthy in the last few years. There was a time when rules of airplanes flying late at night was being adhered to. That is no longer the case and the entire summer of 2005 my family never got a good nights sleep due to constant planes "roaring" over our house in the middle of the night.

It is unbelievable to me that your studies do not focus on actual statistics of air quality (particulate matter). All I have to do is sit out in my backyard and see the pollution on my house, plants, and patio furniture. Every day I look at and smell the unhealthy air, listen to the loud noise as the planes fly overhead, and worry about the poor children out on the playground at Minnie Gant Elementary School. It is so alarming to me and sad to realize there are people who don't care about me or my neighbors and the high rates of cancer and asthma in this area. The future health and safety of our children's lives are at stake.

I love our Long Beach Airport and fly out of there often. I can fully appreciate some "upgrades" being done and a fresh coat of paint – but expansion ...NO !! Listen to the local residents and maybe come and spend a day living here with us in Los Altos – then you will understand our concerns.

Sincerely,

Janice Sampson
1877 N. Britton Drive
Long Beach, CA 90815
(562)493-7077



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January 30, 2006

*SENIOR COUNSEL

Via hand delivery and electronic mail to airporteir@longbeach.gov

Angela Reynolds
Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Boulevard
Long Beach, CA 90802

Re: Comments submitted on behalf of LBHUSH2 on the Draft Environmental Impact Report for the Proposed Long Beach Airport Terminal Area Improvement Project

Dear Ms. Reynolds:

This firm represents LBHUSH2 with regard to the proposed Long Beach Airport ("Airport") Terminal Area Improvement Project ("the Project") in the City of Long Beach ("City" or "Long Beach"). On behalf of LBHUSH2, we have reviewed the Draft Environmental Impact Report ("DEIR") circulated by the City for the Project pursuant to the California Environmental Quality Act, Public Resources Code Sections 21000 *et seq.* ("CEQA"), and its implementing regulations, 14 California Code of Regulations Sections 15000 *et seq.* ("CEQA Guidelines").

We conclude, based on this review, that the DEIR consultants have identified correctly several significant impacts that would result from implementation of the Project, unless mitigated, including: (1) releases of significant nitrogen oxide ("NO_x") and volatile organic compounds ("VOC") emissions related to Project construction; (2) alterations to the Airport Terminal Building ("Terminal") that could impair the Terminal's status as a historic landmark; (3) creation of significant new sources of light and glare; (4) releases of hazardous materials, such as asbestos, lead, and DDT, into the environment during construction and transport of hazardous materials adjacent to school sites; and (5) occurrence of nighttime noise levels in excess of levels permissible under the Long Beach Noise Ordinance ("the Noise Ordinance").

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Moreover, the DEIR properly identifies significant impacts that would result from the so-called "Optimized Flights Scenario," unless mitigated, including: (1) emissions of particulate matter ("PM₁₀"), carbon monoxide ("CO"), and NO_x that would contribute substantially to existing air quality concerns; (2) induced demand for additional parking, potentially beyond the Airport boundary; and (3) increased passenger vehicle activity resulting in unacceptable levels of service at intersections near the Airport. As described in more detail in Section III.A below, we believe that the Optimized Flights Scenario is a component of the Project and, thus, the significant impacts that would result from the Optimized Flights Scenario must be treated as a result of the Project. It is important that the City heed its consultants' advice with regard to these issues and weigh carefully whether the Project should be approved in light of its serious impacts.

Other issue areas, however, are analyzed inadequately or have not been addressed at all in the DIER. In addition, the range of alternatives to the proposed Project described in the DEIR does not meet the requirements of CEQA. Finally, the DEIR provides insufficient detail and improperly defers development of important mitigation measures. These legal inadequacies are discussed in more detail below. The purpose of this letter is to inform the City that the environmental documentation for the Project fails to comply with the requirements of CEQA and the CEQA Guidelines. These problems must be remedied before the City can take action on the Project.

LBHUSH2 wishes to underscore that it does not oppose all Airport improvements or modernization. LBHUSH2 supports many aspects of the proposed Project, such as the implementation of LEED specifications for terminal improvements, the use of electric charging equipment for aircraft, and the utilization of ultra-low sulfur diesel for non-electric ground support vehicles. LBHUSH2 is concerned, however, that approval of the Project as proposed will jeopardize the Noise Ordinance, which stands as the most significant protection for Long Beach residents against the Airport's adverse environmental impacts. The Project's potentially irreversible consequences call for measured action by the City.

I. CITY DECISION-MAKERS MUST RECOGNIZE THAT THE PROPOSED PROJECT MAY ACCOMMODATE AIRPORT OPERATIONS ABOVE THE OPTIMIZED FLIGHTS SCENARIO.

Preparation of the EIR and approval of the proposed Project may represent the last meaningful opportunity the City has to influence growth, development and operations at the Airport. Specifically, approving the Project, which is made up of infrastructure that could accommodate aircraft operations far in excess of the Optimized Flights Scenario, paves the way for operations at the Airport to increase in the future, if the operational constraints provided by the Noise Ordinance are ever removed. Indeed, approving the Project will exert considerable pressure for the Noise Ordinance to be changed in the future. Such threats are entirely

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avoidable, however, because much of the expansion of Airport facilities currently proposed, including the additional airline gates and aircraft parking places, does not appear to be necessary to achieve the purpose and objectives articulated by the City for the proposed Project. Proceeding with the Project as proposed would therefore unnecessarily set the Airport on a path toward future growth.

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A. City Decision-Makers and the Public Must Understand the Maximum Number of Flights that Could be Accommodated by the Proposed Project if the Operational Restraints in the Noise Ordinance Are Removed.

The DEIR is predicated on the assumption that the Noise Ordinance will protect the residents of Long Beach indefinitely from the adverse environmental and other impacts associated with increased Airport operations. Although the Noise Ordinance enjoys broad support from the current City leadership and residents, it would be shortsighted to assume that the Noise Ordinance will always protect the City from increased airport operations and impacts. Relying solely on the continued durability of the Noise Ordinance does a great disservice to the City and may commit the City to following an irreversible path toward increased Airport operations and impacts in the future.

Although the Airport has entered agreements in the past with commercial airlines recognizing the validity of the City's Noise Ordinance, such agreements may not provide indefinite protection to the City and its residents. While the Federal Aviation Administration ("FAA") in 2003 apparently affirmed the "grandfathered" status of the City's Noise Ordinance under the Airport Noise and Capacity Act, 49 U.S.C. §§ 47521 *et seq.* ("ANCA"), new federal legislation could trump any grandfathered status provided by FAA. Without grandfathered status, the City's Noise Ordinance would be preempted by ANCA and, thus, would be unenforceable. *See City of Burbank v. Lockheed Air Terminal* (1973) 411 U.S. 624, 633 ("It is the pervasive nature of the scheme of federal regulation of aircraft noise that leads us to conclude that there is preemption" of state and local control.) And any Long Beach City Council may decide to exercise its authority to modify or eliminate the Noise Ordinance. Tellingly, Chris Kunze, Manager of Long Beach Airport, has recognized the potentially tenuous status of the Noise Ordinance, reportedly commenting that "[i]t is not a matter of if, but when" the Noise Ordinance is challenged. In short, although the Noise Ordinance may remain in place indefinitely, there are lingering threats to its continued viability.

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If the operational restraints in the City's Noise Ordinance were removed today, the result would almost certainly be a dramatic increase in airport operations, with associated increased impacts on the surrounding community. Without the Noise Ordinance, Airport operations would be constrained only by the physical facilities available at the Airport. For example, the number of flights operated by the airlines would be limited only by the Airport's

physical capacity to accommodate such flights at airline gates and similar facilities. The proposed Project would substantially increase the capacity of the Airport's facilities. As such, if the operational constraints in the City's Noise Ordinance were removed following implementation of the Project, the airlines would encounter far fewer physical constraints on increased operations, and far more operations would result.

As the Airport proprietor, the City of Long Beach has the authority and responsibility to determine whether to expand the physical capacity of the Airport. Decisions to increase capacity must be taken with great care because once capacity is allowed to increase, it becomes essentially impossible to limit the use of that capacity. *See* 49 U.S.C. § 47107. These high-stakes consequences of the proposed Project call for prudence. In order to understand the full ramifications of approving the infrastructure improvements included in the proposed Project, we encourage the City's decision-makers to assume that the operational restraints in the Noise Ordinance could be removed.

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The DEIR does not describe the theoretical maximum operations that could be accommodated by the proposed Project if Airport operations were not constrained by the Noise Ordinance. In particular, the DEIR provides no information regarding the maximum potential operational capacity of the proposed 11 airline gates and 14 aircraft parking positions. Airline gates and aircraft parking positions are two critical facilities components that can constrain an airport's operations.¹ The City should direct its consultants to describe the maximum potential operations of the proposed Project in order to understand what would happen if the operational restraints in the Noise Ordinance were removed following Project approval.

B. The City Should Not Approve Any Proposal to Increase Airline Gates and Aircraft Parking Positions When Such Facilities Are Not Necessary to Achieve the Proposed Project's Objective.

The DEIR does not describe how increasing the number of gates and aircraft parking places at the Airport achieves the proposed Project's express objective to "provide Airport facilities to accommodate the minimum permitted number of flights at the Airport (i.e., 41 commercial flights and 25 commuter flights)" DEIR p.1-3. In fact, the DEIR repeatedly acknowledges that the Airport could achieve increased operations up to and including the

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¹ It is beyond dispute that the number of gates available at an airport is a key factor in determining the maximum potential aircraft operations of an airport. An airport's maximum passenger capacity can be determined by evaluating the airport's aircraft fleet mix, the total number of available seats per aircraft, and the maximum number of operations per aircraft based on available gates. If the operational restraints in the City's Noise Ordinance were removed, the Airport's operations and passenger capacity would be far in excess of current activity level.

Optimized Flights Scenario (i.e., 52 commercial flights and 25 commuter flights) without adopting the Project or adding any infrastructure to the Airport. *See, e.g.*, DEIR pp.1-3 (“If the additional commuter flights occur [under the Optimized Flights Scenario], they will result from carrier decisions to optimize flight operations under the [Noise Ordinance], rather than the availability of specific terminal are[a] facilities.”); 1-25 (“[A]ll provisions of the [Noise Ordinance] would apply to all the project alternatives, including the No Project Alternative. Since under optimal flight operations, the number of commercial flights could reasonably be projected to increase up to 52 daily flights and a minimum of 25 commuter flights are provided for with the Ordinance, these assumptions are also used for the No Project Alternative.”); 2-7. Although the existing Airport conditions apparently can accommodate the operations allowed under the Noise Ordinance, as described above, improved infrastructure is unavoidably linked to *increasing* flights and passengers at the Airport.

The DEIR fails to provide any evidence that would support any alleged need to increase airline gates and aircraft parking places at the Airport simply to accommodate operations under the City’s existing Noise Ordinance.² In fact, the proposal to substantially increase these facilities appears superfluous to the objective of the Project as defined by the City in the DEIR. It is the DEIR’s burden to demonstrate that each of the components of the proposed Project is necessary to achieve the Project’s objective. The DEIR has not met this burden.

The City would be taking an unnecessary risk if it were to approve the proposed airport expansion, including the additional gates and aircraft parking infrastructure, when these facilities do not appear to be necessary to meet the objectives of the proposed Project. As described above, the number of airline gates and aircraft parking positions are two critical components to determining the maximum operational capacity of an airport; limiting the number of gates and parking facilities limits the capacity of an airport. It is troublesome that the proposed Project appears to increase the operational capacity of the Airport unnecessarily. Such

² In analyzing the air quality impacts of the proposed alternatives, the DEIR states that more aircraft parking positions may help reduce aircraft idling time on the tarmac, thereby reducing aircraft emissions. DEIR pp.3.2-27, 4-9. The DEIR does not provide data sufficient to support this claim. In addition, reduction of delay and aircraft idling time on the tarmac is not an express objective of the proposed Project. If the City is to rely on this argument, the DEIR must provide sufficient data to analyze the extent of the alleged problem and the alternatives’ potential to solve the alleged problem. For example, the DEIR would need to describe: the number of aircraft that currently experience delay at the Airport; the time of day, day of the week, and time of year that the delay occurs; how long aircraft are typically required to idle because insufficient parking places are available at the Airport; and how increasing available parking places at the Airport would significantly reduce idling time and delay.

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an unjustified increase in capacity-enhancing facilities should be rejected by City decision-makers.

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II. THE DEIR FAILS TO ADDRESS REASONABLE AND FEASIBLE ALTERNATIVES TO THE PROPOSED PROJECT.

“An EIR for any project subject to CEQA must consider a reasonable range of alternatives to the project, or to the location of the project, which (1) offers substantial environmental advantages over the project’s proposal . . . ; and (2) may be feasibly accomplished in a successful manner considering the economic, environmental, social and technological factors involved.” *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566. “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b).

The DEIR analyzes two alternatives to the proposed Project (Alternatives A and B), in addition to the No Action Alternative required by CEQA (Alternative C). Alternatives A and B are nearly identical to the proposed Project, with only minor variations in the number of square feet allotted to holdrooms, passenger security screening, the concession area, baggage claim devices, restrooms, office space and ticketing facilities. See DEIR, Table 4.3-1, Long Beach Airport Passenger Terminal Improvements EIR Alternatives. Critically, the number of airline gates (11), aircraft parking positions (14)³, and vehicular parking positions (2,835) is identical to the proposed Project for each of the alternatives presented in the DEIR, except the No Action Alternative. The DEIR does not address any alternative with airline gates and aircraft parking positions less than the maximum number of aircraft parking positions established by the City Council.

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The result of such a narrow range of variation among the alternatives is tellingly displayed in Table 4.5-1, Comparison of Impacts by Alternative. Unsurprisingly, that Table shows that the impacts of Alternatives A and B are “similar in nature” to the proposed Project for each and every impact category. See also DEIR p.4-9 (“When comparing the three build alternatives, the impacts would be very similar because the same types of improvements are

³ Although the DEIR describes the proposed Project as including “12-14” aircraft parking positions, see, e.g., DEIR Table 2.5-1, the substantive analysis in the DEIR assumes that the proposed Project will implement 14 aircraft parking positions. See, e.g., DEIR pp. 3.2-28; 4-9. While CEQA mandates that the DEIR analyze the potentially significant impacts of the maximum number of aircraft parking positions potentially included in the proposed Project, it also requires the DEIR to analyze an alternative with fewer potential aircraft parking positions.

proposed with each alternative.”). The analysis of three nearly identical alternatives described in the DEIR fails to comply with one of CEQA’s most fundamental purposes – providing decision-makers and the public with a sufficient basis for comparing a proposed project to other potential ways to achieve a project’s objectives. Moreover, the narrow range of alternatives presented in the DEIR appears contrary to the spirit of the City Council’s February 8, 2005 direction that the alternative presenting the greatest expansion of the Airport shall contain a maximum of 12-14 aircraft parking positions. We understand the City Council as setting a ceiling on the number of potential aircraft parking positions under consideration, not a floor.

The DEIR must include at least one alternative that involves a number of airline gates and aircraft parking positions between the existing conditions (8 airline gates and 10 aircraft parking positions) and the maximum number established by the City Council (14 aircraft parking positions) (“Reduced Gates and Parking Alternative”). Such an alternative is required for two related reasons. First, it appears that a Reduced Gates and Parking Alternative would clearly meet the primary objective of the Project, given that the Airport already accommodates 41 air carrier flights and 25 commuter flights with the existing number of gates and parking positions.

Second, a Reduced Gates and Parking Alternative may provide environmental advantages over the proposed Project. The DEIR recognizes that increased aircraft operations result in significant air quality, noise, and traffic impacts. A Reduced Gates and Parking Alternative could reduce such impacts since it would constrain maximum potential operations at the Airport below the maximum operations that the proposed Project may accommodate. CEQA mandates that public agencies deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. Pub. Res. Code § 21002; *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41. Analysis of a Reduced Gates and Parking Alternative is, thus, necessary to determine whether there may be a less-environmentally harmful way to meet the City’s objectives for the Airport. In addition, a reduced scale alternative would be consistent with the City Council’s February 8, 2005 direction, which provided a ceiling on the number of aircraft parking positions that may be approved.

III. THE DEIR’S ANALYSIS OF THE PROJECT’S ENVIRONMENTAL IMPACTS FAILS TO SATISFY THE REQUIREMENTS OF CEQA.

Under CEQA, an EIR may conclude that impacts are insignificant only if it provides an adequate analysis of the magnitude of the impacts and the degree to which they will be mitigated. Thus, if an agency fails to investigate a potential impact, its finding of insignificance simply will not stand.

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A. The Environmental Impacts of the Optimized Flights Scenario Must be Analyzed as a Reasonably Foreseeable Consequence of the Project.

The DEIR states that there is no causal relationship between the proposed Project and increased flight operations under the Optimized Flights Scenario, which the DEIR insists is not a component of the Project. *See, e.g.*, DEIR pp. 1-3, 2-7. On this basis, the DEIR claims that any significant environmental effects that will be caused by increased Airport operations under the Optimized Flights Scenario are not impacts attributable to the Project. *Id.* The DEIR asserts that the analysis of the significant impacts of increased operations are provided solely at the direction of the City Council, not a requirement of CEQA. *See* DEIR p.2-7. This claim is convenient and self-serving because the DEIR attributes five potentially significant impacts, including an air quality impact that cannot be mitigated below a level of significance, to flight and passenger activity associated with the Optimized Flights Scenario. *Compare* DEIR Table 1.10-1 (Summary of Impacts and Mitigation Measures) *with* DEIR Table 1.11-1 (Summary of Impacts and Mitigation Measures Related to the Optimized Flights Scenario). The DEIR also recognizes that additional facilities will be required to accommodate increased operations, including the potential construction of a third parking garage, yet it refuses to analyze the significant environmental impacts of such facilities because it claims the facilities are unrelated to the Project.

The DEIR's grudging compliance is contrary to the requirements of CEQA. CEQA requires the DEIR to evaluate those activities related to a project which will result in a direct or reasonably foreseeable indirect physical change in the environment. Pub. Res. Code § 21065. The operations anticipated under the Optimized Flights Scenario are authorized under existing law and regulation, can be accommodated by existing Airport infrastructure, and will be facilitated by the increased infrastructure included in the proposed Project. As the DEIR acknowledges, significant environmental impacts, particularly to air quality, noise, and traffic resources, are reasonably foreseeable changes in the physical environment that will result from the Optimized Flights Scenario. *See* DEIR Table 1.11-1. Thus, CEQA requires the DEIR to present these significant impacts as a result of implementing the proposed Project. *See Laurel Heights Improvement Ass'n v. Regents* (1988) 47 Cal.3d 376, 388. The DEIR fails to meet this requirement.

Moreover, the DEIR's effort to deflect any responsibility for the significant environmental impacts (including growth-inducing impacts) associated with operations that are already allowable under the Noise Ordinance is contrary to the clear direction of the Long Beach City Council. In February 2005, the City Council directed staff to reduce the scale of the proposed Project and to evaluate the environmental impacts of the maximum operations under the Noise Ordinance. Rather than performing a straightforward analysis that presents a cohesive picture of the total significant impacts, the DEIR presents a complicated scheme that separates

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the significant impacts of aircraft operations *currently authorized* under the Noise Ordinance from the remainder of the proposed Project. This convoluted effort does not comport with the City Council's direction or CEQA.

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B. Air Quality Analysis.

As an initial matter, we join the concerns raised by Camille Marie Sears in her January 27, 2006 letter to the City commenting on the DEIR's air quality analysis. Her detailed review and critique of the DEIR raise numerous inadequacies that the City must remedy.

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In addition, the DEIR's air quality analysis understates emissions caused by reverse thrust and other emissions. Specifically, the DEIR's air quality analysis improperly shortcuts analysis of emissions discharged when aircraft use reverse thrust rather than braking. Reverse thrust is a high thrust mode that produces very high NO_x emissions per unit of time when compared to other operational procedures. NO_x emissions are a significant problem in the region surrounding the Airport. Based on the substantial emissions that reverse thrust produces, accurately describing the time-in-mode for reverse thrust is critical to the integrity of the air quality analysis. Understating the number of seconds spent in this high thrust mode would significantly skew analysis of emissions.

The air quality analysis in the DEIR uses a rough estimation, rather than the FAA's preferred method for calculating emissions released during reverse thrust. The FAA publication "Air Quality Procedures for Civilian Airports and Air Force Bases" (April 1997) ("Air Quality Handbook") provides that "[t]ime spent in reverse thrust should be combined with take-off mode emissions indices and fuel flow as a means of accounting for reverse thrust mode emissions." *Id.* The DEIR provides no explanation for why it fails to utilize the FAA's preferred method.

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While the Air Quality Handbook finds that estimation of reverse thrust may be acceptable if properly applied, it notes that "[a]ircraft reverse thrust typically is applied for 15-20 seconds on landing." It appears that the DEIR's estimate resulted in an assumption that aircraft would operate in the mode for only 12 seconds. The three to seven second difference between FAA's estimation of time-in-mode and the DEIR's estimate significantly understates the Project's NO_x emissions. Moreover, it appears that the DEIR developed its estimation based on average take-off mode and climb-out mode times of three aircraft. *See* DEIR Appendix C, Attachment B. Since the reverse thrust mode occurs exclusively when aircraft are operating on the ground, it is inappropriate for the DEIR to base its emissions analysis on climb-out mode, which occurs exclusively when aircraft are operating in the air. In addition, the DEIR only considers the emissions caused by reverse thrust "in some analyses." DEIR p.3.2-2. The DEIR provides no explanation as to why significant emissions caused by this mode were considered

only selectively and does not identify the emissions analyses where reverse thrust emissions are absent.

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On a related note, the DEIR apparently assumes that aircraft regularly would operate at 90 percent of maximum take-off weight. Assuming that aircraft will operate at less than full capacity underestimates potential emissions. The DEIR should describe the anticipated emissions of the proposed Project assuming that airlines operate all aircraft at full capacity.

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C. Noise Analysis.

Recent definitive case law requires that an EIR “measure how many high noise events will take place during the noise sensitive nighttime hours [and] describe the effects of noise on normal nighttime activities such as sleep.” *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1382 n. 23 (“*Berkeley Jets*”). The Court of Appeal in that case stressed the need to provide information *in a form that is useful to help nearby residents* evaluate the impact of future increased air traffic on their daily lives. In particular, the EIR must enable residents to evaluate the degree to which the “single events” of aircraft takeoffs and landings interfere with their sleep and conversation. *Id.* at 1372-83.

The DEIR’s methodology, however, translates simple single event data into a fraction of a “noise budget,” which is made up of the number of operations weighted by the time of day and the noise level. *See* DEIR pp.3.6-9 to 3.6-11. While we understand that the noise budgeting technique is provided for in the Noise Ordinance and may be a useful “language” for Airport technicians and consultants to discuss noise impacts, we submit that it fails to provide useful information to City decision-makers or residents, as required by *Berkeley Jets*. The DEIR should have provided single event noise contours for each aircraft type on each flight track, as well as their frequency and times of occurrence. Doing so would give residents important information about the noise impact, frequency, and timing of “single events,” enabling them to evaluate the significance of those impacts on sleep, conversation, and quality of life. Without such information, the analysis remains insufficient and the level of disclosure of impacts does not satisfy CEQA.

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D. Cultural Resources.

The DEIR’s cultural resources analysis lacks substantial required detail about the planned modifications to the historic Terminal and design of new structures attached and adjacent to the Terminal. The Airport’s own cultural resources consultant recognizes that the vague description of the Terminal modifications and associated improvements prevents a complete analysis. For example, the consultant notes that although interior elements of the Terminal are “considered character-defining features” of the historic landmark, “the changes to

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the interior floor plan are also not specified in the design concept drawings and *cannot be evaluated in the historical assessment.*” DEIR p.3.3-12 (emphasis added). Similarly, the consultant finds that “[t]he general interior decoration/design of the original concourse/waiting room is not known at this time,” and potential interior changes to the Terminal “are not evaluated in the historical assessment because the proposed design is conceptual.” *Id.* Likewise the consultant finds that it is “unclear from the design concept drawings if the proposed walls on the outside of the garden area are transparent,” or instead “will conceal the [historic] curved window walls.” DEIR p.3.3-11. Even where some detail is provided, the consultant suggests a lack of clarity in the proposals and a qualification of the analysis based on the possibility that design plans may change. *See, e.g.,* DEIR p.3.3-11 (“*It appears from the drawings that no alterations have been proposed*” to Terminal elevations of historical significance.” [emphasis added]); *id.* (“*[I]t appears in the design concept drawings that a door would be installed . . .*”). Despite such a qualified analysis, the DEIR finds that all impacts to cultural resources can be mitigated below a level of significance. Such a conclusion cannot be supported. The lack of detail makes it impossible for the decision-makers and the public to assess the severity of impacts to the historic landmark and the adequacy of proposed mitigation measures.

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IV. THE PROPOSED MITIGATION MEASURES FAIL TO ENSURE THAT ENVIRONMENTAL IMPACTS WILL BE MITIGATED BELOW A LEVEL OF SIGNIFICANCE.

In several cases, the DEIR proposes mitigation measures that are infeasible and unenforceable. The DEIR also impermissibly concludes that the Project’s environmental impacts will be mitigated below a level of significance, while at the same time deferring necessary development and analysis of critical mitigation measures. This flawed approach results in the DEIR’s failure to disclose the true scope of the Project’s environmental impacts.

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A. Air Quality Mitigation.

We agree with the DEIR’s determination that incremental air quality emissions from increased aircraft operations and passenger vehicle operations at the Airport would exceed the South Coast Air Quality Management District’s (“SCAQMD”) PM₁₀, CO and NO_x thresholds and result in a significant impact, unless mitigated. The DEIR proposes to address these long-term significant effects by cross-referencing two mitigation programs described in Table 1.10-1. However, the offered mitigation programs were designed to address air quality impacts caused by other components of the Project. Neither of these programs are adequate mitigation under CEQA for the impacts caused by increased aircraft and vehicle operations.

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The first mitigation program described in Table 1.10-1 was developed to address significant short-term NO_x and VOC emissions stemming from the proposed Project’s

construction activities and is focused *exclusively* on construction practices and activities that will reduce emissions. See SC 3.2-1, SC 3.2-2; MM 3.2-1 through MM 3.2-10. It is completely unsurprising then that this mitigation will not reduce the significant NO_x emissions that are anticipated to result from increased *aircraft operations*.

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The second “mitigation” program described in Table 10.1-1 is not actually mitigation at all because it was not developed to reduce a potentially significant effect. Rather, the program is a series of measures which are “recommended where the Proposed Project would have an opportunity to further reduce emissions” in order to achieve a net air quality benefit. DEIR Table 1.10-1, p.1-14. The heart of that program is a *recommendation* that the City require airlines to comply with a memorandum of understanding between the airlines and the California Air Resources Board, or other similar agreements, aimed at reducing PM₁₀ and NO_x emissions from Ground Support Equipment (“GSE”). Reference to this program does not serve as adequate mitigation for the significant impacts anticipated from increased aircraft and vehicle operations for several reasons.

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First, the *recommended* program is not mandatory and the DEIR does not claim that the City will commit to ensuring its implementation. Second, even if the City committed to requiring agreements regarding GSE, it is not clear the Airport has the authority to require airlines to enter this type of agreement. Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments. CEQA Guidelines § 15126.4(a)(2). Where mitigation is not fully enforceable, it is inadequate. *Federation of Hillside and Canyon Ass’ns v. Los Angeles* (2000) 83 Cal.App.4th 1252, 1261-62 (mitigation must “actually be implemented [and] fully enforceable”).

Third, the recommended program is designed to address PM₁₀ and NO_x emissions from GSE. Yet the significant emissions that the DEIR is required to address will come from increased GSE *and vehicular* operations at the Airport. There is no measure included in the program to address emissions from a vehicular source. Finally, the program described in Table 1.10-1 is inadequate because it is not designed to address CO emissions, which the DEIR anticipates will be emitted from increased aircraft operations. In sum, the DEIR makes a half-hearted effort to reduce the anticipated significant emissions of PM₁₀, CO and NO_x from increased aircraft operations and passenger vehicle activity at the Airport. Its effort is inadequate and does not meet the requirements of CEQA.

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B. Noise Mitigation.

To mitigate noise impacts, the DEIR relies on the following mitigation measure:

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MM 3.6-2: Within 24 months of certification of the EIR, the Airport Manager shall develop a land use compatibility program addressing existing and future aviation noise levels. The program shall be an ongoing voluntary program that will provide noise attenuation and be available to all residential units within the 65 CNEL contour and schools within the 60 CNEL contour based on the contours published for Long Beach Airport for the previous calendar year (Quarterly Report for 12 month Period Ending December 31). In exchange for sound insulation treatment, the owners of the property will provide the City of Long Beach an avigation easement over said property. The program shall identify (1) methods of providing noise attenuation; (2) funding sources for the improvements; (3) methods for establishing priorities for implementing the improvements; and (4) an installation agreement. The land use compatibility program will be administered by the City of Long Beach, Airport Bureau.

This mitigation measure is problematic for a number of reasons. First, it is simply a statement of the City's preexisting obligations under State law, and does not provide any additional protection or mitigation to residents impacted by airport noise. Under State law, the City, as operator of the Airport, is required to take action to avoid incompatibility between the Airport and surrounding land use. *See* California Public Utilities Code §§ 21001 *et seq.* (State Aeronautics Act); California Code of Regulations Title 21, § 5000 *et seq.* Long Beach Airport has been designated as a noise problem airport and it exposes a number of neighboring land uses to noise in excess of standards set by the State.⁴ Contrary to the requirements of State law, the Airport does not currently have a variance from CalTrans that would allow it to operate in excess of applicable State standards (e.g., exposing neighboring residences to noise in excess of 65 CNEL). *See* California Code of Regulations Title 21 § 5012 ("No airport proprietor of a noise problem airport shall operate an airport with a noise impact area based on the standard of 65 dB CNEL unless the operator has applied for or received a variance . . ."). If the Airport were to apply for and obtain such a variance, it would, as a condition of the variance, be required to implement a residential sound insulation program and/or other strategies to eliminate the incompatibility between airport operations and neighboring land uses. In other words, the City is already obligated to implement the kinds of measures it has put forth as a noise mitigation measure in the DEIR. The fact that the City has previously failed to satisfy its obligations in this regard raises serious questions regarding whether the City would actually comply with MM 3.6-2, if it were adopted.

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⁴*See* <http://www.dot.ca.gov/hq/planning/aeronaut/htmlfile/avnoise.php> (California Department of Transportation Division of Aeronautics website).

Another problem with the MM 3.6-2 is that the City proposes to require land owners to grant the City of Long Beach an avigation easement over their property in exchange for receiving sound insulation treatment. This requirement would put land owners in the untenable position of having to grant a perpetual property right (an avigation easement) to the City without compensation, if they want to receive the sound insulation they are entitled to as mitigation for airport noise. Such a requirement is inappropriate for a number of reasons. First, although the property right (avigation easement) granted is permanent in nature, sound insulation has a limited lifespan and becomes less effective over time. Over the long term, an avigation easement will almost certainly be more valuable than the sound insulation a land owner receives in exchange, so requiring such an exchange is inappropriate. Second, the exchange envisioned by the City, which is clearly not required by State law, will likely discourage or prevent those who are entitled to receive sound insulation from participating in the program. In short, the avigation easement requirement would dramatically undermine the effectiveness of the proposed mitigation measure.

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Moreover, the City has improperly failed to consider whether offering such insulation without requiring an avigation easement would invite greater participation and thus be a more effective mitigation measure. Because such a revised mitigation measure is, at the very least, facially feasible, the City must consider it in a revised DEIR. *See Los Angeles Unified School District v. Los Angeles* (1998) 58 Cal.App.4th 1019, 1029 (failure to meaningfully respond to proposed mitigation measures requires invalidation of EIR unless proposed measure is “facially infeasible”).

C. Traffic and Circulation Mitigation.

1. Intersections.

The DEIR finds that increased Airport operations will cause significant traffic impacts at certain intersections near the airport. DEIR p.6-16. The DEIR suggests that the City’s options for reducing such impacts are identifiable now. DEIR p.6-16 (“Additional improvements [to reduce traffic impacts at the intersections] would require extensive right of way purchases that would impact several local businesses.”). Yet the DEIR defers analysis and implementation of presently identifiable mitigation. *See* MM 3.8-1 (proposing that “when the ADPM passenger levels reach 12,700, the Airport Manager shall develop a traffic monitoring program”). It concludes that the proposed deferred mitigation is sufficient to mitigate the significant impacts below a level of significance.

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Under CEQA, an EIR may conclude that impacts are insignificant only if it provides an adequate analysis of the degree to which such impacts will be mitigated. *See Sundstrom v. County of Mendocino* (1989) 202 Cal.App.3d 296, 306-07 (CEQA prohibits

deferral of mitigation measure design). Thus, CEQA generally requires that all mitigation measures be adopted simultaneously with, or prior to, project approval. *Id.* An agency may defer preparation of a plan for mitigation only when the agency commits itself and/or the project proponent to satisfying specified performance standards that will ensure the avoidance of any significant effects. *Id.*

Contrary to CEQA's requirements, the present DEIR fails to provide specified performance standards by which future mitigation would be measured to ensure avoidance of any significant environmental effects. For example, MM 3.8-1 merely finds that the mitigation should "enhance the efficiency of traffic movement." The DEIR must either analyze mitigation such that the decision-makers can adopt the measures along with, or prior to, project approval, or provide a description of the specific performance standards by which it will be judged. *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 195 (invalidating EIR for improperly deferring analysis). Without this information, it is impossible for the public and the decision-makers to understand the severity of the traffic and parking impacts and the effectiveness of the proposed mitigation.

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cont.

We are particularly skeptical that any measures developed in the future pursuant to MM 3.8-1 will reduce significant impacts to intersections near the Airport. Specifically, the DEIR states that "[d]iscussions with City staff indicate that no further lane additions are feasible at [the] two intersections" of concern, and that extensive acquisition of right of ways would be required to reduce congestion. DEIR p.6-16. Unsurprisingly, the DEIR recognizes that one of the intersections "will still operate at a deficient level of service in [] 2020," even after adoption of the proposed mitigation. DEIR p.6-16. Curiously, the DEIR concludes that this impact will be mitigated below a level of significance. This conclusion is unsupportable and contrary to statements in the DEIR itself.⁵

2. Parking.

Mitigation proposed to remedy significant parking impacts is similarly flawed. Specifically, the DEIR finds that the parking demand anticipated to occur in conjunction with the Optimized Flights Scenario will cause a significant impact on the environment. DEIR p.6-

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⁵ The DEIR claims that "the improvements associated with the Douglas Park [Project] would accommodate the additional [passenger vehicle traffic] demand associated with the Optimized Flights scenario." DEIR p.6-16. Even were the DEIR to provide sufficient evidence to support this claim (which it does not), we agree with the DEIR's conclusion that potential "implementation [of the Douglas Park improvements] cannot be relied upon to mitigate the impacts of the Existing with Optimized Flights scenario," DEIR p. 6-16, because the measures are unfunded and there is no guarantee that they will be implemented.

17. The DEIR proposes that mitigation of parking impacts “may include development of an additional parking structure within the Airport Entrance area.” DEIR p.6-17. However, it defers analyzing the potential environmental consequences of building a third parking garage, or any other potential mitigation, at the Airport. MM 3.8-2 (proposing that “when the annual passenger levels reach 4.2 MAP, the Airport Manager shall identify and develop additional on-site parking opportunities”).⁶ It provides no standards by which the decision-makers or the public may evaluate the effectiveness of the proposed mitigation measure. Perhaps more troubling, the DEIR provides no explanation for why it defers analysis of the environment impacts of constructing a parking structure near the entrance to the airport. No complicated study is required in order to reasonably conclude that significant impacts to the environment may stem from construction and operation of a third parking garage at the Airport.

The DEIR recognizes that the parking structure included in the Project will not satisfy the increased parking demand that will occur under the Optimized Flights Scenario and that a significant impact will result. DEIR p.3.8-18. It admits that the Airport will need to develop additional parking facilities in order to meet this demand, and suggests a third parking structure at the Airport could be constructed. DEIR p.3.5-18 (“The only way this impact [increased demand for parking] could be mitigated is to provide additional parking on the Airport . . .”). Yet the DEIR defers analyzing the impacts of an additional parking garage, or any other parking solution, for another day.

The DEIR’s suggestion that environmental review of the additional parking facilities would be required prior to construction is unsatisfactory. Deferring the analysis of the environmental impacts of a physical improvement that is a critical component of the proposed Project constitutes segmentation.⁷ Segmentation is strictly prohibited under CEQA. *See* CEQA Guidelines § 15378(a) (definition of “Project” as “the whole of an action which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect change in the physical environment . . .”); *Orinda Association v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171-72 (“A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the

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⁶ The DEIR also relies on MM 3.8-2 in the Land Use and Relevant Planning analysis to reach the conclusion that the proposed Project’s significant impact will be reduced below significance. The flaws in this mitigation measure as described in the Traffic and Parking discussion are equally applicable to, and serve to similarly discredit, the DEIR’s Land Use and Relevant Planning analysis.

⁷ The DEIR’s admission that the proposed Project will induce additional parking demand is likewise an example of the DEIR’s failure to adequately analyze the growth-inducing impacts of the proposed Project.

Angela Reynolds
January 30, 2006
Page 17

environmental impacts of the project as a whole.”). To be legally adequate, the DEIR must be revised to include a thorough analysis of the potentially significant environmental impacts of proposed options to meet increased parking demand associated with the proposed Project.

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CONCLUSION

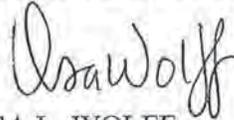
For the reasons detailed in this comment letter, the DEIR fails to provide a reasonable range of alternatives to the proposed Project, fails to provide adequate disclosure and mitigation of significant environmental impacts, and therefore violates CEQA. The DEIR should be revised and re-circulated to assure compliance with the legal requirements of CEQA.

The City sits in a unique position vis-a-vis its Noise Ordinance. The durability of the Noise Ordinance, however, is far from assured. As the City sits on the cusp of a decision regarding the development of Long Beach Airport, it should be mindful that imprudent action now could effectively eliminate the City’s ability to control and direct Airport growth in the future.

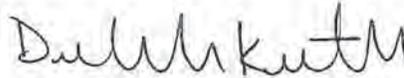
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Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



OSA L. WOLFF



DEBORAH L. KEETH

cc: LBHUSH2

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Applied Measurement Science

Consultants in Quantitative Process and Environmental Measurements

January 30, 2006

Angela Reynolds, Environmental Planning Officer
 City of Long Beach
 Dept. of Planning & Building
 333 Ocean, 7th Floor
 Long Beach, CA 90802

Re: Comments on Long Beach Draft Environmental Impact Report

Dear Ms. Reynolds:

The purpose of this letter (and attachments) is to present the results of my review of the Long Beach Airport Terminal Area Improvement Project Draft Environmental Impact Report (DEIR), dated November 2005. The format of this letter is to present discussions related to areas of concern, followed at the end of each by a specific question that the DEIR should address.

Issue 1. Uncertainty Related to Aircraft Emission Factor Determination

Summary: The emission factors that are used in the dispersion model for aircraft emissions are based on inadequate test methods augmented by conservative assumptions. The result is highly uncertain and possibly biased results.

Discussion: The dispersion of airport emissions are modeled using the FAA EDMS model, which takes input on the emission factors from the various types of emission sources and models them using the current EPA AERMOD dispersion model. The accuracy of the output is dependent on the accuracy of the input. When one examines typical input parameters used in the modeling process, it appears to have significant potential for inaccuracy. In particular, the DEIR glossed over these limitations in its discussion of engine emission factors.

A review of the methods The methods used to produce the emission factor for the aircraft emissions are highly uncertain at best, and wholly inadequate at worse, based on several factors:

- EDMS does not have an extensive database of emission factors for aircraft. Most are estimated from the small data base of existing emission factors—six. The emission factor determination was likely performed many years ago, using older measurement technology as well as older engines. It is likely that this group of aircraft is not representative of the current fleet of aircraft.
- The determination is based on what is called a First Order Approximation. Some call this an “educated guess at an answer.”¹ Following is the FAA description of the process (emphasis added):

¹ http://en.wikipedia.org/wiki/Zeroth_order_approximation

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“The Federal Aviation Administration’s (FAA) first order approximation (FOA) methodology estimates PM emissions from commercial jet-turbine aircraft engines. The FOA serves an interim purpose of meeting PM compliance issues now, *while the science and accuracy of PM measurement techniques mature*. The non-volatile portion of PM is based on a correlation between the Smoke Number (SN) from the engine certification test and the fuel flow for a specific mode of operation, namely take-off, climb-out, taxi/idle, and approach. For some engines, a maximum SN is conservatively used because modal-specific SNs are not available. The volatile portion of PM is derived from a limited number of field measurements and theoretical relationships....”²

- The actual measurement of engine emissions is based on a very simple procedure called a ‘smoke number.’ This uses the reflectance of emission material (soot, organics, metals, etc.) collected on paper filters. However, this measurement is not directly related to the emissions of the engine. Following is the statement of research objectives by the FAA model development group:

“The measurement methodology results in a smoke number which is not directly useable to determine the mass of emissions. Several approximate measures have been developed in an attempt to predict mass emissions using the smoke number, but *it is generally agreed that the results are not accurate*. The EPA maintains a minimal set of PM data for six, mostly older, aircraft.”³

- Much of the emissions from aircraft and diesel engines is fine and ultrafine particulate matter—particles less than 1 micron in diameter. The measurement of these kind of emissions is currently an intensive area of on-going research. At a minimum, it is clear that the smoke number method that has been used does not represent the most current advances in measurement technology and likely does not accurately represent the actual emissions of aircraft, particularly as it relates to fine and ultrafine particles.⁴
- Finally, the EDMS system as been removed from EPA’s list of preferred regulatory models because of a lack of appropriate validation studies and performance evaluation.⁵

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cont.

² <http://www.volpe.dot.gov/air/publications.html>.

³ <http://www.volpe.dot.gov/air/publications.html>

⁴ Air and Waste Management Association Conference, June, 2003. Roger L. Wayson et al. “Derivation of a First Order Approximation of Particulate Matter from Aircraft.” Paper 69970.

⁵ 40CFR 51, Revision to the Guideline on Air Quality Models: Adoption of a Preferred General Purpose (Flat and Complex Terrain) Dispersion Model and Other Revisions, Final Rule, November 9, 2005. http://www.epa.gov/scram001/guidance/guide/appw_05.pdf

Therefore, with the uncertain nature of the emission factors at the core of the modeling process, the predicted impact as determined by those models is highly uncertain. Other aspects of the model uncertainty are discussed below.

Issue #1 Question on DEIR: Given this information, how will the emission parameters be more accurately determined, and how will the revised dispersion estimates take these noted uncertainties into account?

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2. Modeling Accuracy

Summary: The models used to predict the current and future emissions are highly uncertain, with decisions based on their output being about as uncertain as the models themselves, which is considerable.

Discussion: Many of the estimates produced by the DEIR for risk, emissions, and exposure are reported to two or three significant figures, suggesting a high degree of accuracy. In reality, the modeling upon which the results depend is highly uncertain.

Most estimates of model accuracy state that under good conditions (e.g., high quality input, ideal configuration, etc.) that they are accurate only to a factor of 2, and some other assessments suggest that single-event errors may range up to a factor of 10.⁶

The reasons for such a level of inaccuracy is due to the propagation of errors from the many inputs that are needed for the model. The models require several types of input, each of which has its own set of uncertainties:

1. Source emissions

Just one aspect of the uncertainty surrounding the emission sources was discussed above, however, similar discussions could be presented in terms of the emission factors used for many other sources. The emission factor collection used in modeling is a compilation of estimates from many sources, with not all data being of equal quality. Many source emission factors are estimates within themselves, so the uncertainty in those parameters gets propagated to other calculations down the line.

For example, an alternative approach to emission factors was presented by Petzold.⁷ Using his emission factor of 84.1 grams of black carbon per take-off cycle to the current rate of 41 flights per day, or a total of 14, 965 flights per year yields a total of 1.3 tons of black carbon per year, or 2.4 tons of diesel particulate matter (see attached report for conversion factor). Assuming a conservative 25% of PM2.5 is elemental carbon and DPM, the net result is an emission of 9.5 tons per year—significantly higher than the 4.1 tons per year cited in the DEIR (page 3.2-25 of the AQ-HHRA).

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⁶ Milton Bechok, www.air-dispersion.com/feature.html

⁷ Petzold A, Stroem J, Schroeder FP, Kaercher B (1999) Carbonaceous aerosol in jet engine exhaust: emission characteristics and implications for heterogeneous chemical reactions. *Atmospheric Environment* 33:2689-2698.

2. Meteorological Data

The DEIR states that airport data was used in the modeling. Detailed descriptions of the data collection methods for that data were not included in the text, but other descriptions of typical airport wind data collection does not fit the expected data quality for use in modeling. In particular, the EDMS and AERMOD models require detailed information on hourly wind conditions, including turbulence. Most airport wind data collection systems rely on only 2-3 minutes of data collection during any one hour.^{8,9} Wind direction is collected on only a 10 degree resolution basis.¹⁰ These aspects make the uncertainty in the computed results compared to actual conditions very high.

3. Dispersion coefficients

The dispersion coefficients are internal parameters related to how the emission plume spreads. These coefficients are generally fixed and in general have been derived in relation to a fixed emission point. In addition, they are related to particular types of stability classes. The extreme fluctuations in emissions from a dynamic (e.g. changing in position and emission rate) have not been considered. Indeed, even within a normal dispersion scenario, the 'normal' fluctuations in wind conditions has been cause for criticism of the standard models.¹¹ The use of this approach for highly dynamic airport emissions, both from aircraft and support equipment, suggests a great deal of uncertainty in the results.

4. Source Type.

The models allow various kinds of input types. For aircraft, their modeled emissions are based on being described as a volume source or an area source. Either method is a gross approximation of the actual configuration of the emission source. As with the other methods of estimation, the application of this kind of description introduces a great amount of uncertainty.

Question on DEIR: How will the modeling process address the balance between prudent conservatism and wholesale erroneous overestimation while maintaining a moderate level of accuracy? Furthermore, how will the modeled ambient concentrations reflect actual ambient conditions in the community?

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⁸ <http://www.wcc.nrcs.usda.gov/climate/windrose.html>

⁹ Richard H. Schulze, Improving The Accuracy Of Dispersion Models. <http://www.environmental-expert.com/resultteacharticle4.asp?cid=3783&codi=5171>

¹⁰ Federal Meteorological Handbook No. 1 "Surface Weather Observations and Reports," FCM-H1-1995, Washington, DC, 1995.

¹¹ Seibert, Petra, "Uncertainties in atmospheric dispersion modeling", Institute of Meteorology and Physics, University of Agricultural Sciences, Vienna, Proceedings Informal Workshop on Meteorological Modeling in Support of CTBT Verification, December 2000.

Issue 3. Ambient Diesel Exhaust Concentrations

Summary: The community exposure to diesel exhaust and aircraft emissions is currently a broad estimate. Given what is at stake, the modeled estimates should be backed up by measurement data on the current ambient air status.

Discussion: Given that 78% of the cancer risk is derived from diesel exhaust¹² it would be useful to put a larger amount of effort into understanding what risks the community is currently subjected to, and then what any increase in exposure would result in the event of increases in local emissions. The concentrations presented in the DEIR are based on estimates from other modeling, not measurement data. These data were modeled from emission rate data, much of which is old or recalculated based on many conservative assumptions.

The South Coast Air Quality Management District air monitoring station in North Long Beach does not allow the capture of airport related emissions. In particular, it does not include key parameters such as PM2.5, black carbon, or elemental carbon, which is used as a surrogate for diesel particulate matter (DPM).¹³ These parameters are related to combustion processes. Competing sources in the area—major highways, ports, etc—have not been assessed relative to the contribution from the airport. Therefore, a complete examination of the risks to the community would include the assessment of the current state of exposure to key health-related parameters.

An initial examination of this exposure was recently conducted in the area surrounding the Long Beach airport and community. See Attachment. The findings showed that there is some potential for directly assessing the impact to the community from aircraft operations. It also showed that some areas of the city were experiencing higher than expected concentrations of DPM, with a subsequently higher health risk. Furthermore, the study showed that there were likely impacts from nearby industrial operations, namely the Ports of Long Beach and Los Angeles. These factors are not new, but the new data allows the start of the process to accurately determine the actual risk to the community instead of relying on modeling that may contain inaccuracies as discussed below.

3

Question on DEIR: How will the City address the potential for increased risk to the community from increased airport operations given the initial disparities in the measured concentrations from the recent study and modeled concentrations?

4. Presence of Ultrafine Particulate Matter

Recent research is showing the ultrafine particles contribute a much higher level of risk than their mass fraction in the overall aerosol burden.¹⁴ While it not currently a regulatory requirement to include such an analysis, there is a growing scientific

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¹² CDM, Health Risk Analysis, Table 5.1, page 5-4.

¹³ http://www.arb.ca.gov/qaweb/site.php?s_arb_code=70072

¹⁴ Chow, Judy, et al. "Nanoparticles and the Environment,," J. Air & Waste Manage. Assoc. 2005, 55, 1411-1417.

consensus that ultrafine particulate matter should be included in discussions of risk, particularly in urban centers. The DEIR discussion of particulate matter does not include sufficient assessment related to exposure to ultrafine particulate matter.

Question on DEIR: Given that the DEIR has ignored the potential risks from ultrafine particulate matter, how will the plan be modified to address this risk to the community?

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Conclusions

Based on this review of the DEIR, it is my conclusion that although significant effort has been expended in producing the estimates of impact to the community from the various project scenarios, the combined uncertainty in the input to the models and the models themselves makes the conclusions highly uncertain. The quality of decisions made rests on the quality of the information to support that decision, and without the application of actual community data, the overall quality of the decisions is lacking.

Many of these concerns can be addressed through following a recommendation already made in an earlier air quality study. The 2005 Baseline Air Quality and Noise Human Health Risk Assessment recommended the collection of ambient air quality at potentially sensitive locations within Long Beach City limits.¹⁵

Thank you for your consideration of these comments to the DEIR.

Sincerely,



Eric D Winegar, PhD, QEP
Principal, Applied Measurement Science

¹⁵ MWH, Inc., "2005 Baseline Air Quality and Noise Human Health Risk Assessment," page ES-8.

Summary Report

**Community Ambient Air Monitoring:
Black Carbon as a Surrogate for
Diesel Exhaust Concentrations
in Long Beach, California**

Presented to:

**California Earthcorps, Inc.
Long Beach, California**

**LBHUSH2
Long Beach, California**

Prepared by:

**Eric D Winegar, PhD, QEP
Applied Measurement Science
Fair Oaks, California**

January 30, 2006

1. INTRODUCTION

The purpose of this report is to present the results of ambient air monitoring conducted around the city of Long Beach, California from September to December, 2005. The primary focus of this monitoring was the collection of black carbon concentrations in the atmosphere in the vicinity of the Long Beach airport and the surrounding community. Black carbon was used as a surrogate for diesel exhaust, or diesel particulate matter (DPM).

The objectives of this investigation were both practical and exploratory:

1. Determine the concentrations of DPM in the community surrounding the Long Beach airport;
2. Explore the potential for using real-time instrumentation for directly detecting the effects of aircraft take-offs to the community;
3. Assess the use of particulate matter-phase PAH (PM-PAH) as a surrogate for ultrafine particulate matter (UFM);
4. Explore the use of continuous instruments for assessing the source signature of detected DPM.

This work was conducted from September, 2005 to January, 2006. The set up and operation was primarily conducted by Eric D Winegar, PhD, principal of Applied Measurement Science, Fair Oaks, California. Assistance for the main phase and subsequent continuing monitoring was provided by Mr. Don May of Earthcorps and Mr. Randy Nisbet of HUSH2.

2. TECHNICAL APPROACH

A. Target Analyte: Black Carbon

Black carbon is the operationally defined parameter as measured optically at 880 nm using the Magee Scientific aethalometer instrument. Operationally defined means that the measured parameter is defined by the analytical process. There are several other operational definitions of carbon in the atmosphere, most of which provide results called 'elemental' carbon instead of black carbon. Black carbon and elemental carbon are related, as they both are subsets of the various carbon fractions that can be found in carbonaceous atmospheric aerosols.

Black and elemental carbon are related to diesel exhaust, as some fraction of diesel exhaust is comprised of carbon. DPM has no direct method for its determination because of the complex nature of the material, consisting of various emission products as well as lubricating oils and unburned fuel. However, several studies have determined the relationship between black and elemental carbon, and DPM.

B. Instrumentation.

Aethalometer: Magee Scientific AE-16 instrument. Collects air samples onto automated quartz fiber tape and detects the absorbed black carbon optically using lamps at 880 nm. At this wavelength, black carbon is the primary absorbing species. Black carbon is a surrogate for diesel

exhaust particulate, or diesel particulate matter (DPM). The aethalometer is the instrument of choice for the collection of real-time DPM samples.

PAS 2000. The EcoChem Photoelectric Aerosol Sensor (PAS) 2000 uses low-energy photoelectric absorption to detect PAH species adsorbed onto particulate matter (PM-PAH). Past work has shown it to be a sensitive detector for combustion species. Due to its high sensitivity optical sensing, it can collect highly time resolved measurements.

Wind speed and wind direction were obtained from the local 10 meter tower operated by the South Coast Air Quality Management District.

2.1 Data Collection Scheme

A. Time Resolved Measurements.

The technical approach to collection of the black carbon data was based on the ability of the aethalometer instrument to collect data on a continuous real-time basis. This would allow the detection of time-based events, which is essential because of the dynamic nature of the emission source (s). The aethalometer time base was 5 minutes, while PM-PAH was collected on a one-minute basis. The Cover Street aethalometer, nearest the airport, collected data on a one-minute basis.

B. Phased Sample Collection Periods.

First Phase: three aethalometers, PM- PAH. The time frame for the study was broken down into two segments. The first segment consisted of 28 days in which multiple instruments would be used to collect data at two or three locations along the flight path. Two instruments collected data for that entire period. In addition, a third instrument collected data at a simultaneous third location for approximately one week during this main initial phase.

Second Phase: two aethalometers. Following completion of the initial phase, the second phase was the collection of data at various background locations. During this phase, one of the initial locations continued data collection. The LaDera site data set consists of nearly the entire period from September 20 to December 21.

Secondly, the collection scheme was driven by the availability of instruments. One aethalometer was available for the duration of the initial monitoring phase and was placed at LaDera. The second was placed at Falcon for 28 days, and the third was available for 8 days at Cover Street. After the Cover Street data was collected, that instrument was moved around to the remaining background locations for the remainder of the study period. PM-PAH was collected at Falcon for the initial 28-day period.

C. Flight Information. Take-offs times for the main study period were obtained from airport staff.

2.2 Monitoring Locations and Time Periods

Two types of locations were chosen. One was a set of three locations along the take-off flight path from Runway 30 and are termed as source-impacted, meaning that they potentially are impacted by exhaust from the aircraft take-offs. The second set of locations were selected based on their siting in areas either upwind or cross-wind to the airport. These locations are shown in Figure 1.

Except for Cover Street and E. Patterson, which consisted of a van with battery power for the instrument, all the sites are residential neighborhoods. Care was taken to select locations without any localized diesel exhaust sources, including proximity to major highways or streets. Specific addresses are not included due to privacy reasons.

2.2.1 Source-Impacted Sites

Cover Street—located at the corner of Cover Street and Pixie Avenue
Falcon Avenue—residence midway in the block between E. Techachapi and E. Cartagena Streets.
LaDera Avenue—residence between E. Claiborne Drive and Cerritos Avenue.

2.2.2 Background Sites

East Patterson Street—in Signal Hill near sparse industrial and commercial areas. Van parked at community garden.
East Colorado Street—residential area
North Britton—residential area
Olive Street—residential area
LaLinda—residential area

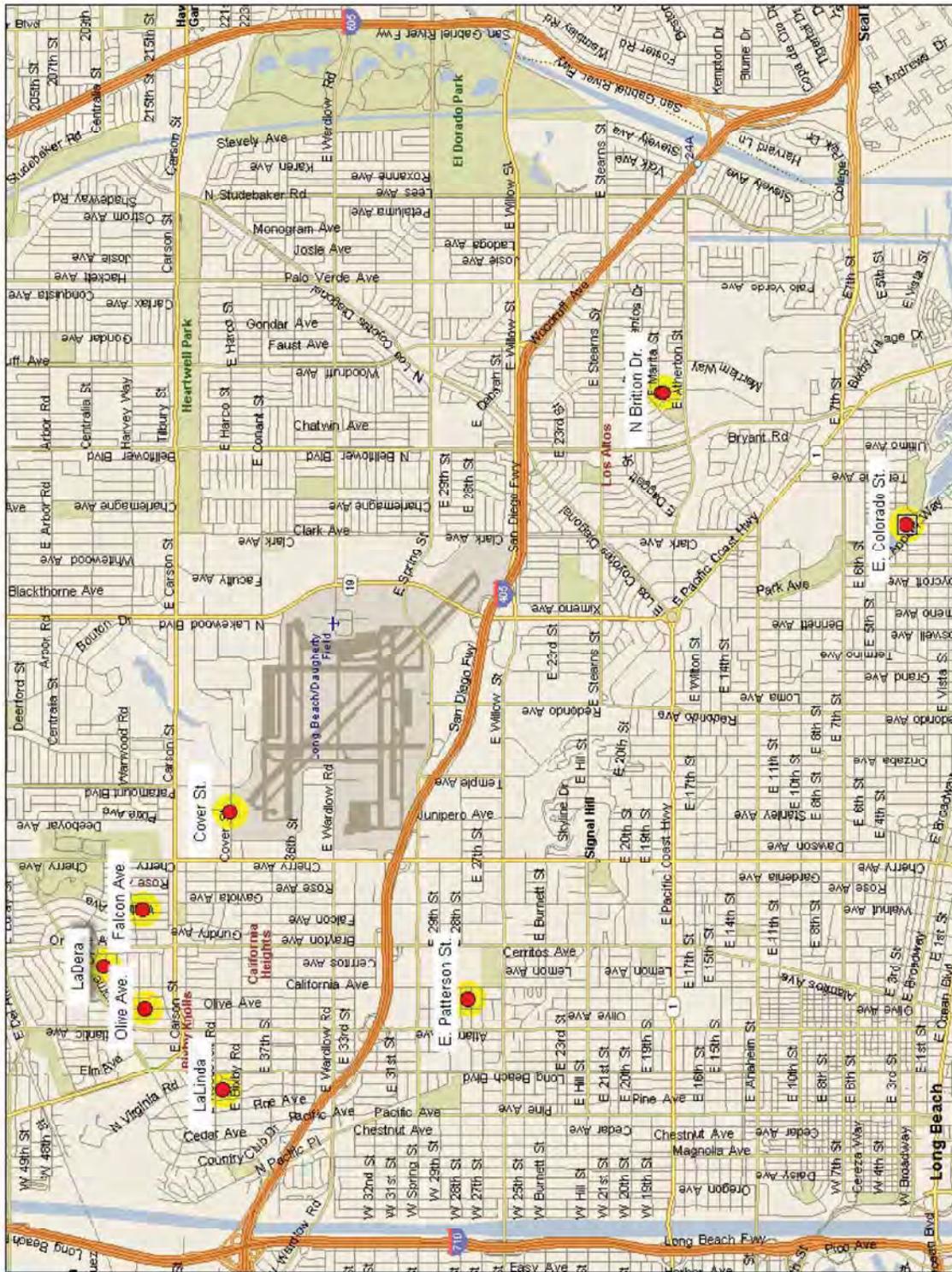


Figure 1. Monitoring Locations

3. RESULTS AND DISCUSSION

The time-resolved measurements were downloaded from each of the instruments, validated to remove anomalous points, and averaged to yield various sets of time frames. The one minute data was averaged into five minute periods so that the two parameters could be directly compared. Finally, all the data were averaged into one-hour values to conform to the usual format for continuous monitoring data. The time series data from the sites are presented below.

The value in time-resolved data is several fold:

1. Discern individual emission events
2. Examine peak concentrations
3. Obtain diurnal or other patterns over extended periods of time

For this data set, individual events were difficult to correlate with particular data points, but the time series and diurnal pattern data reduction can show useful information about trends in black carbon concentrations.

3.1 Time Series Data

3.1.1 Source-Impacted Sites

Figures 2 to 7 show the time series plots of the main source-impacted sites. While the time series are useful in that they show the dynamic nature of ambient concentrations over time, it is difficult to discern overall trends. Individual events have less importance over time, as it is the longitudinal persistence of a pattern that has more significant effect compared to a specific short-duration event.

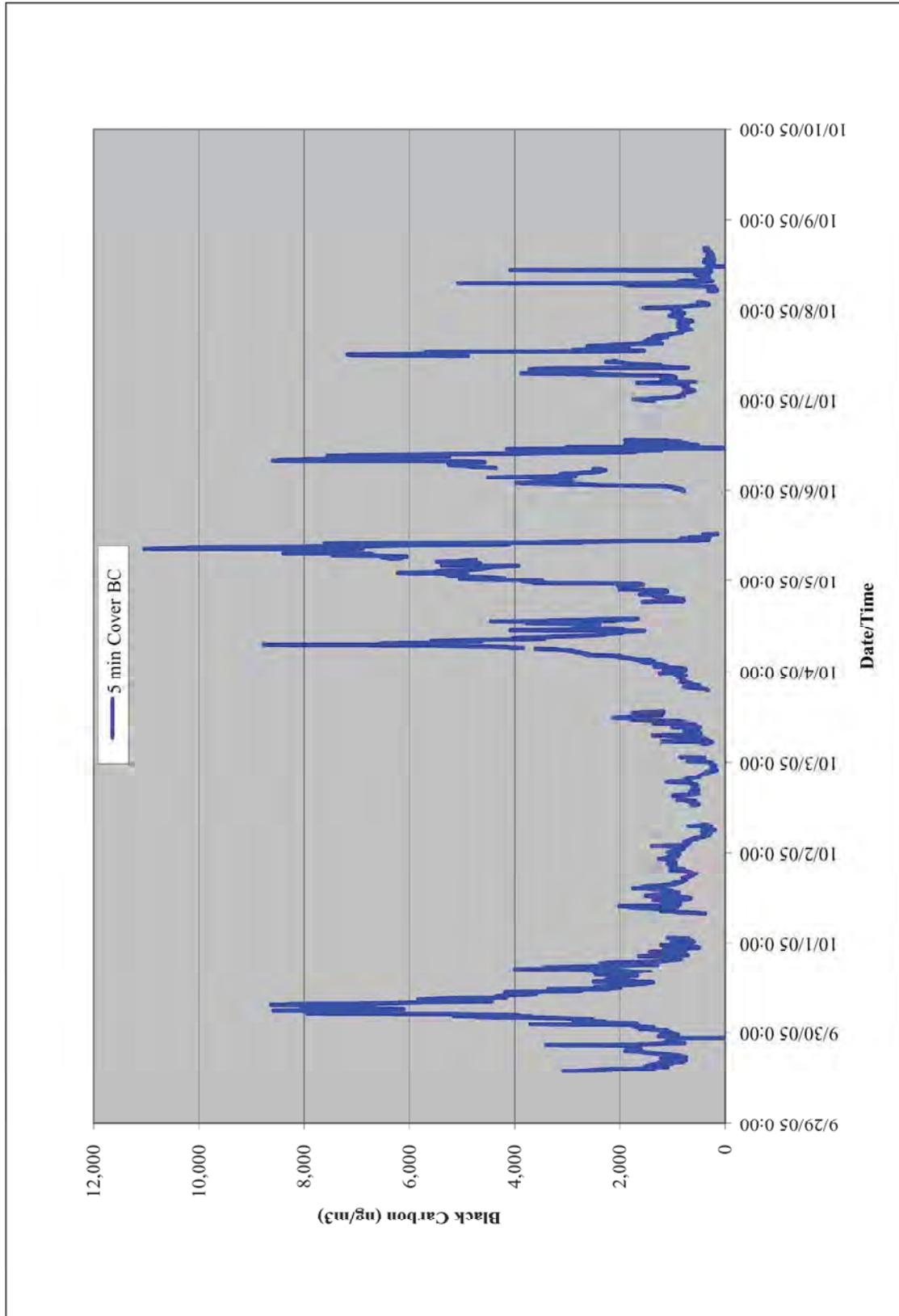


Figure 2. Cover Street BC Data

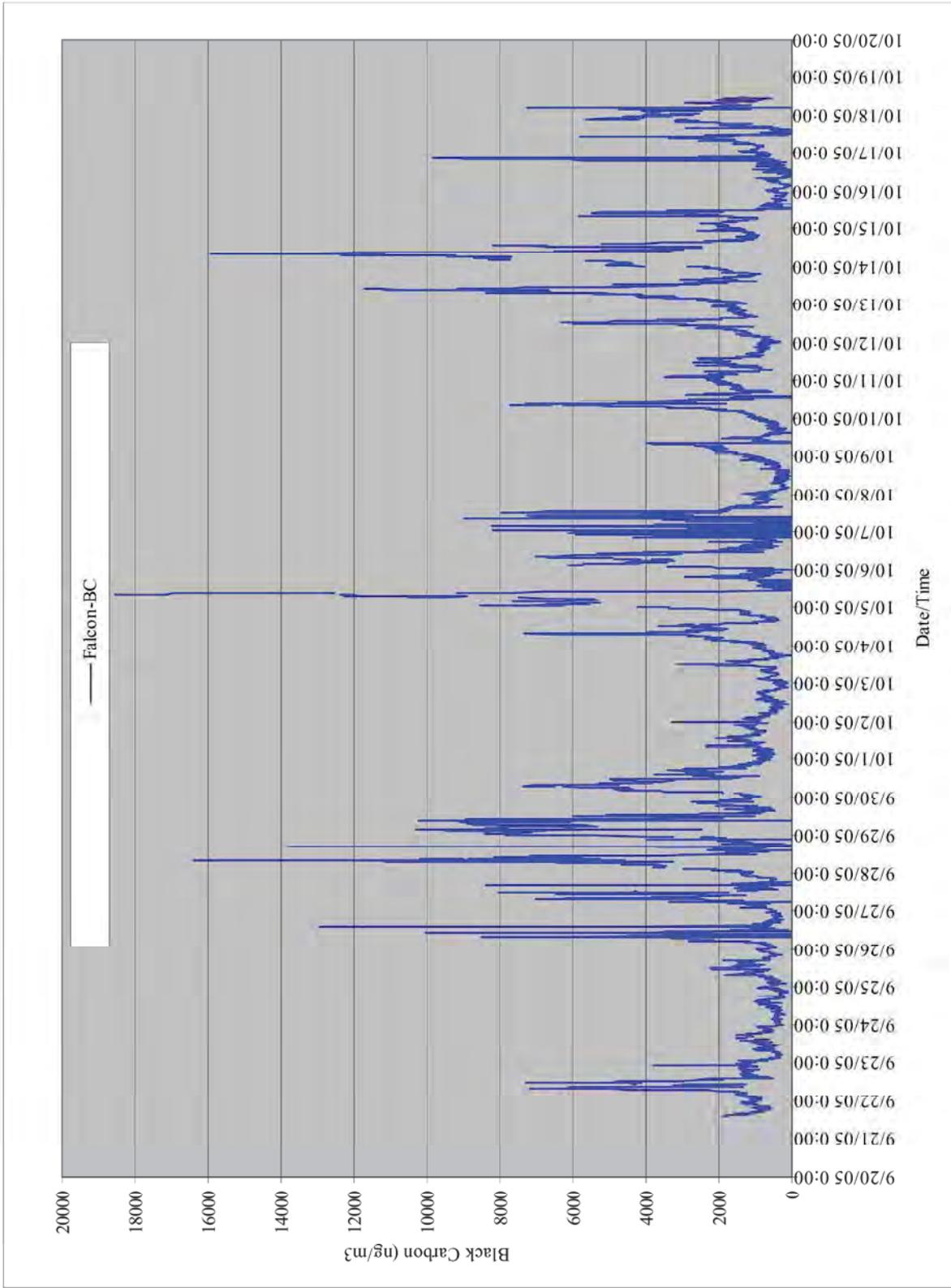


Figure 3. Falcon BC

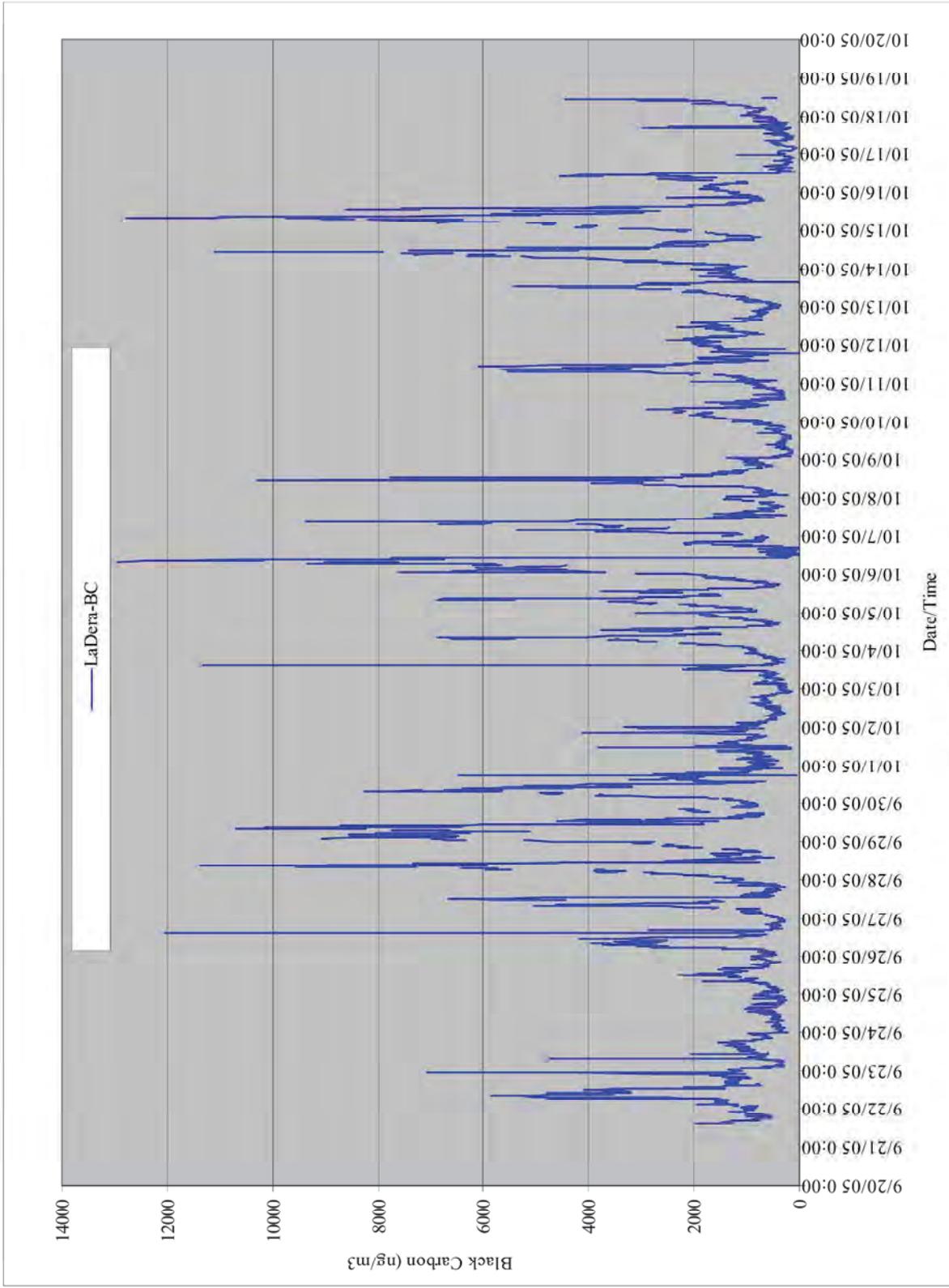


Figure 4. La Dera BC

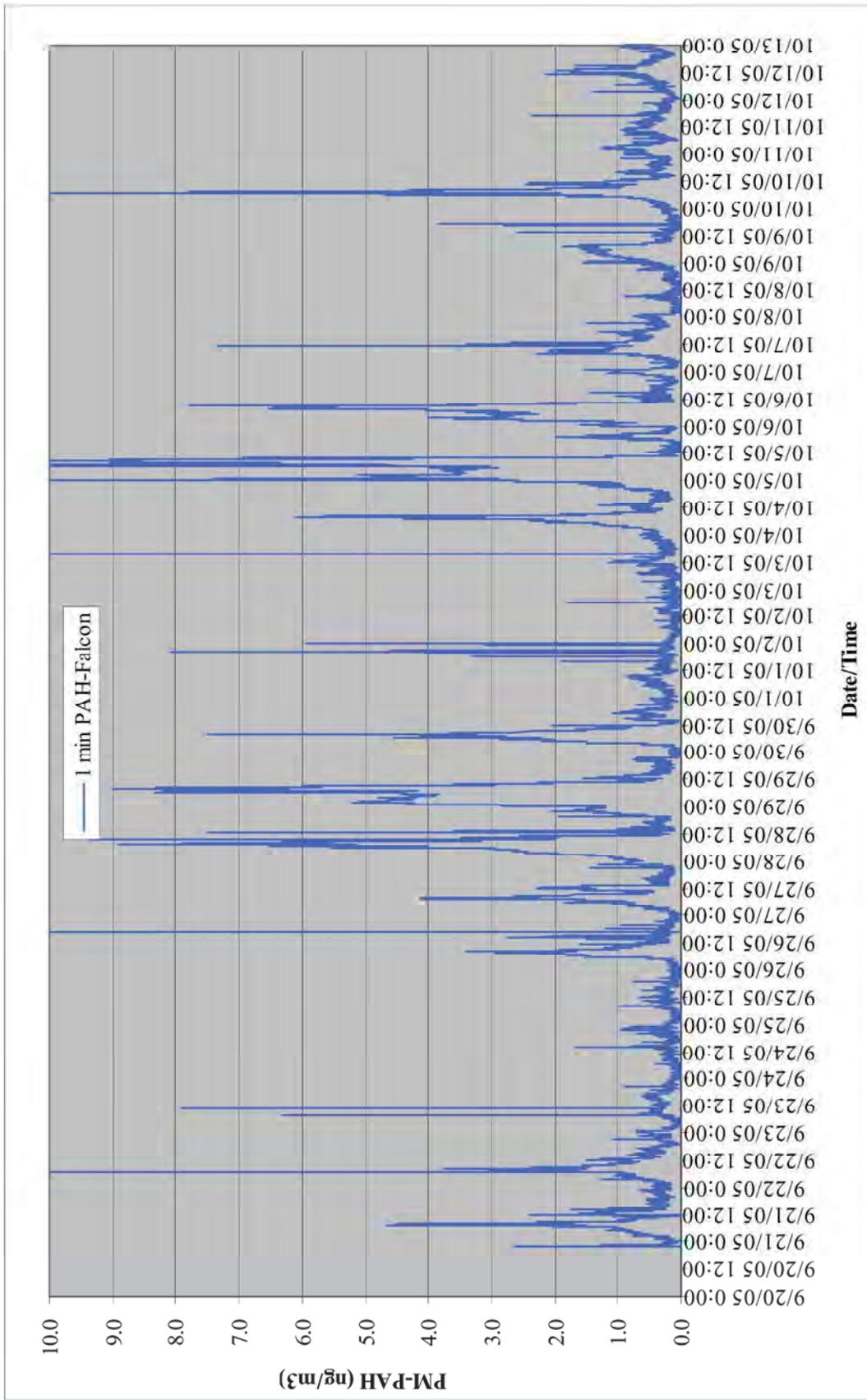


Figure 5. Falcon PM-PAH

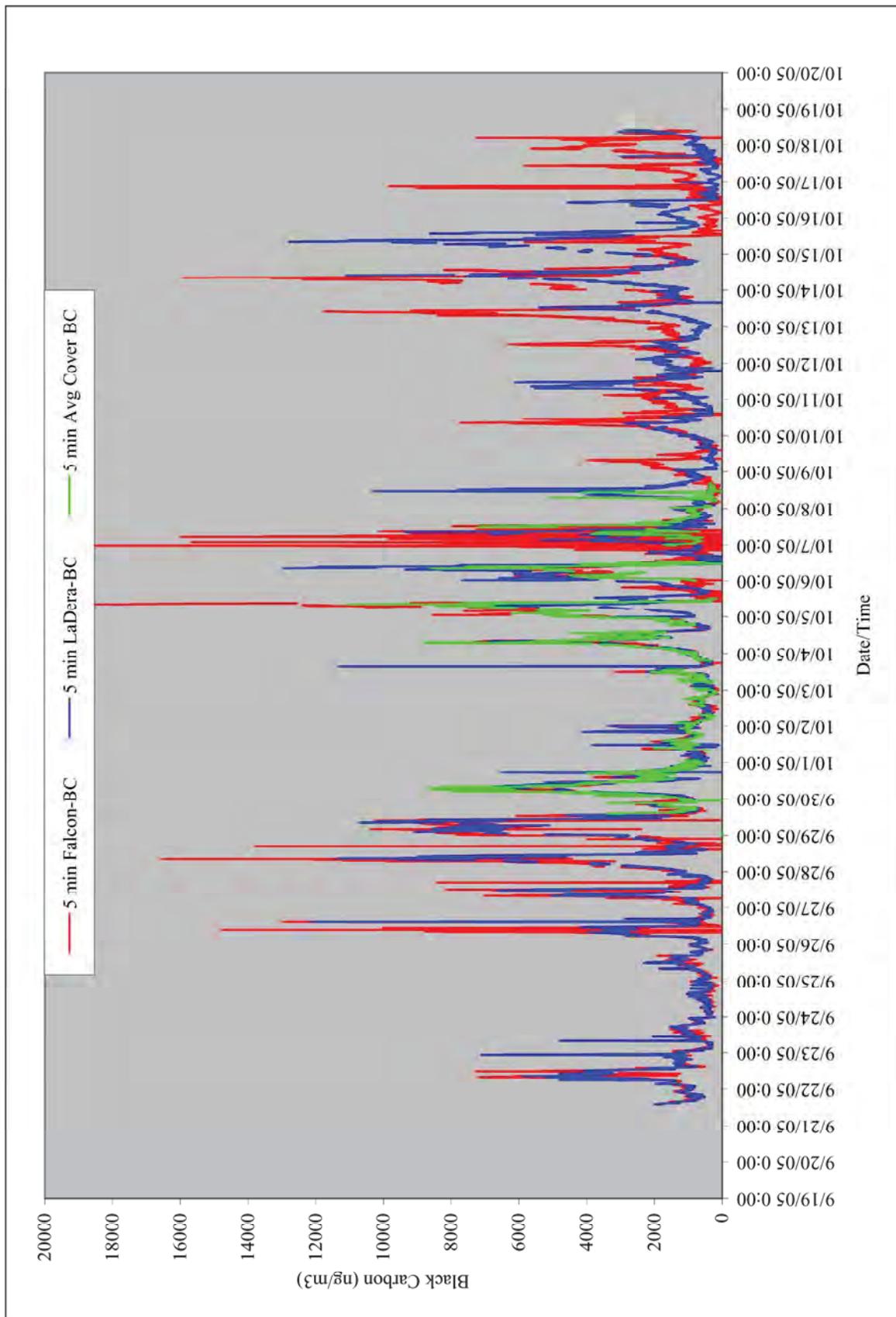


Figure 6. Cover, Falcon, LaDera Black Carbon

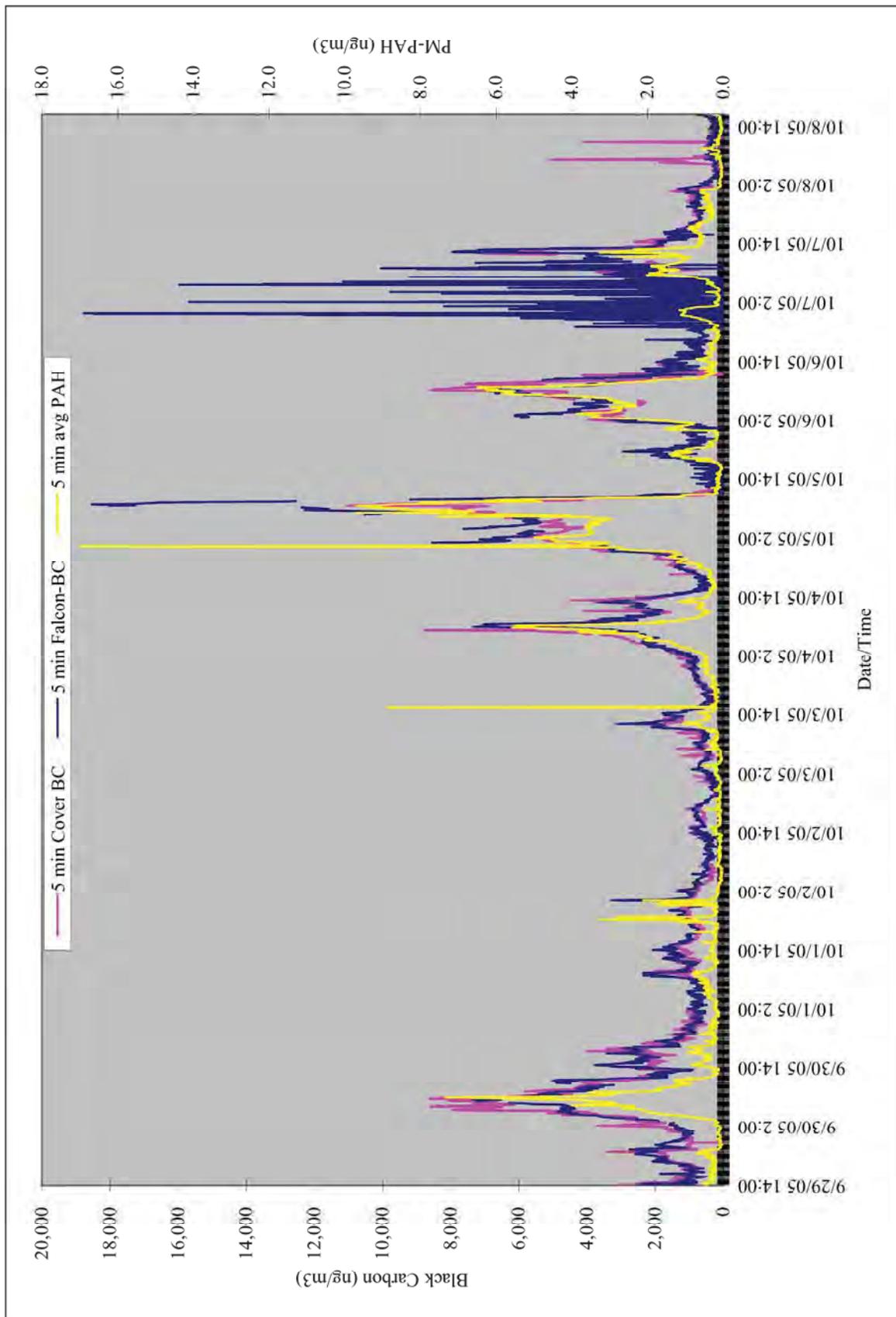


Figure 7. Cover Falcon Black Carbon and PM-PAH

3.1.2 Background Sites

Figures 8 to 12 show the hourly time-resolved concentrations for the background sites.

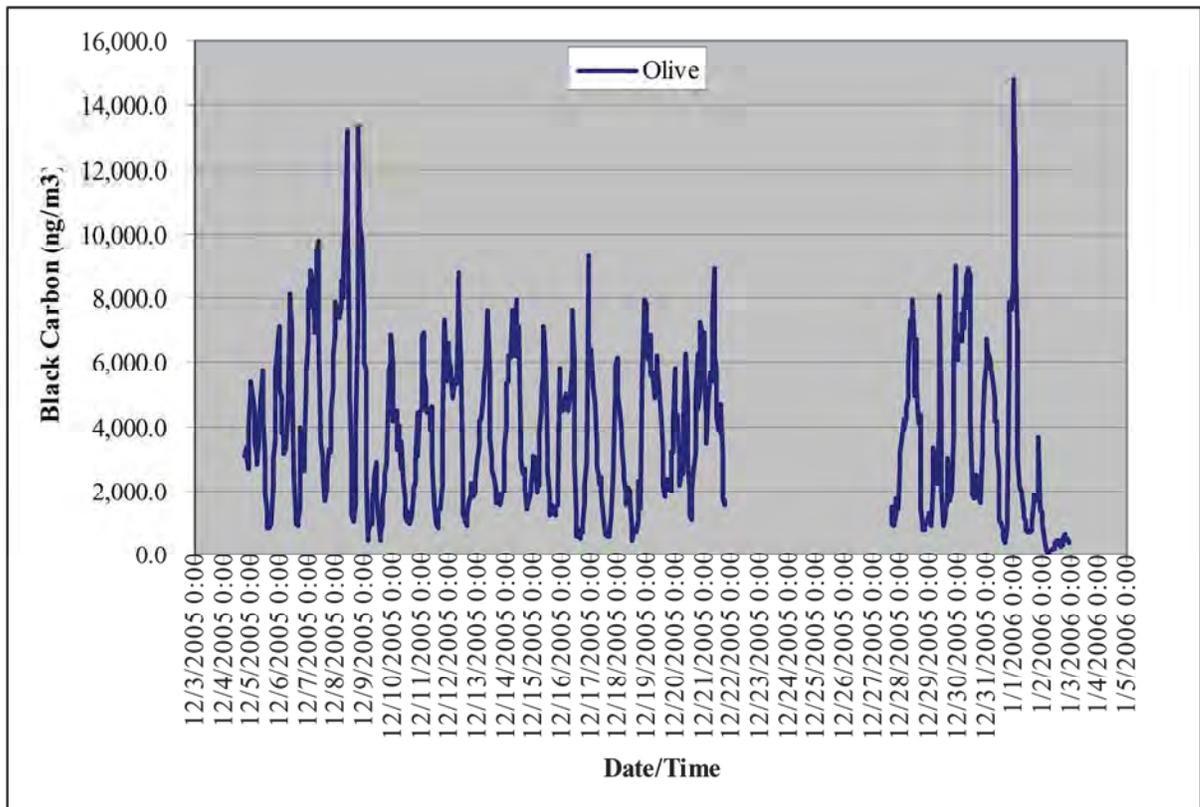


Figure 8. Olive Avenue

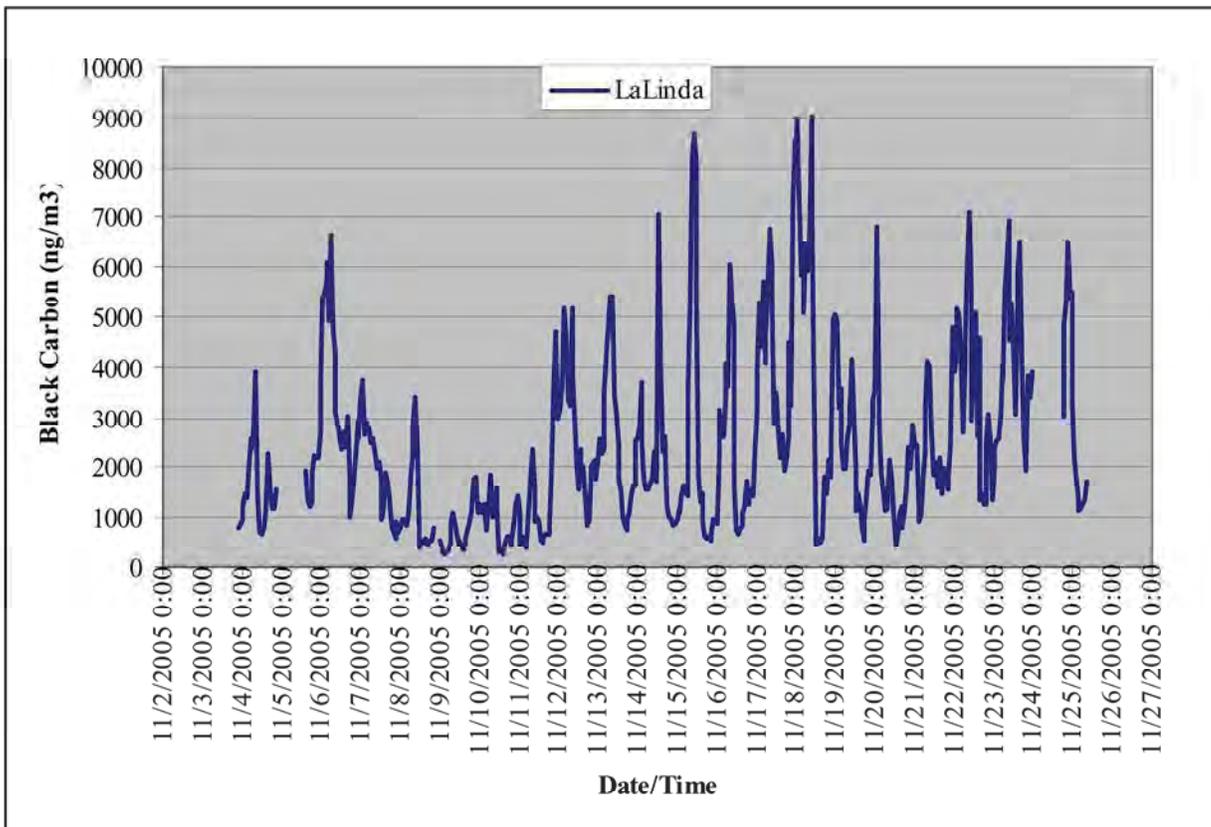


Figure 9. LaLinda Drive

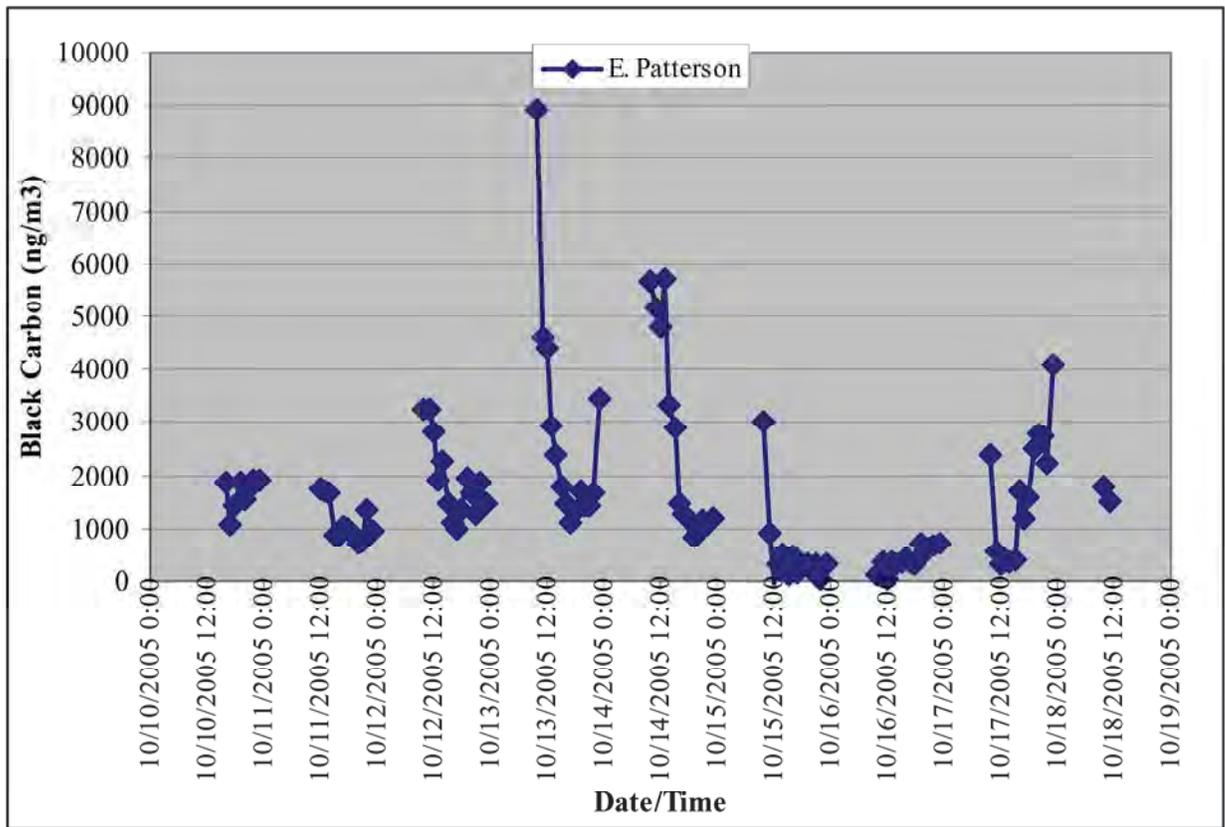


Figure 10. East Patterson Street

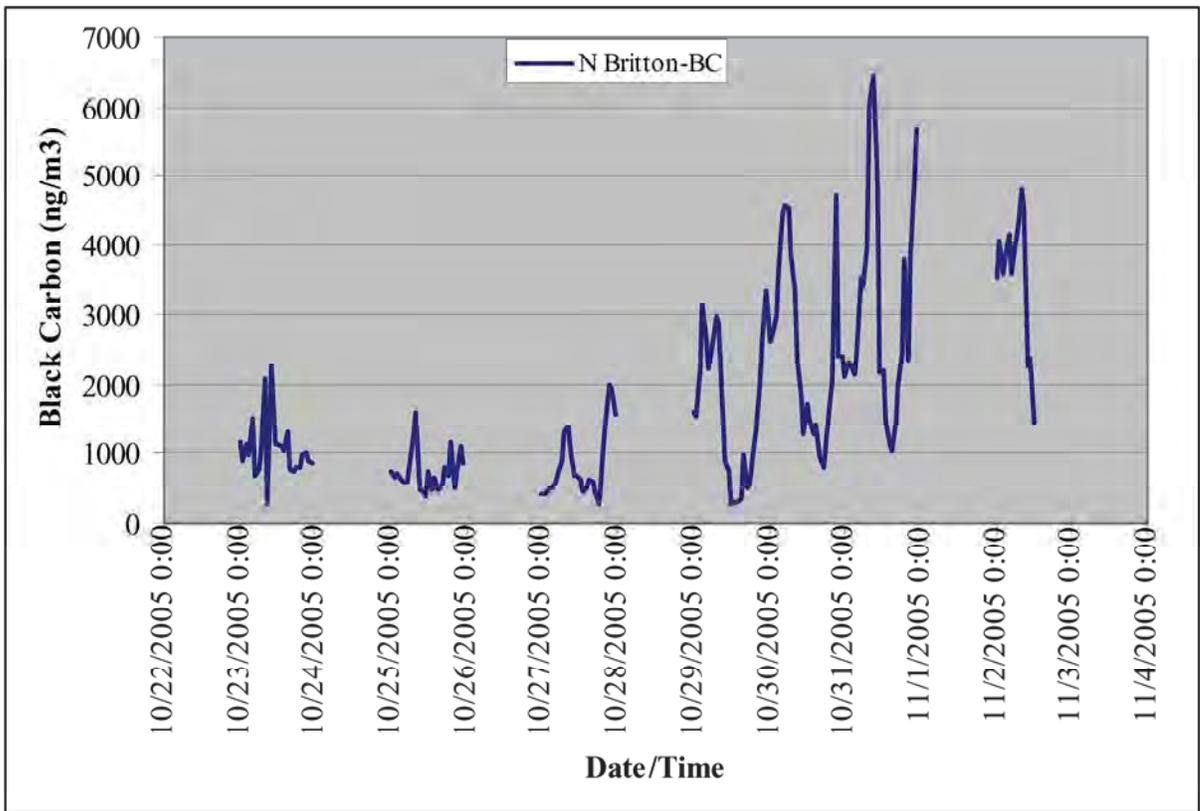


Figure 11. North Britton Drive

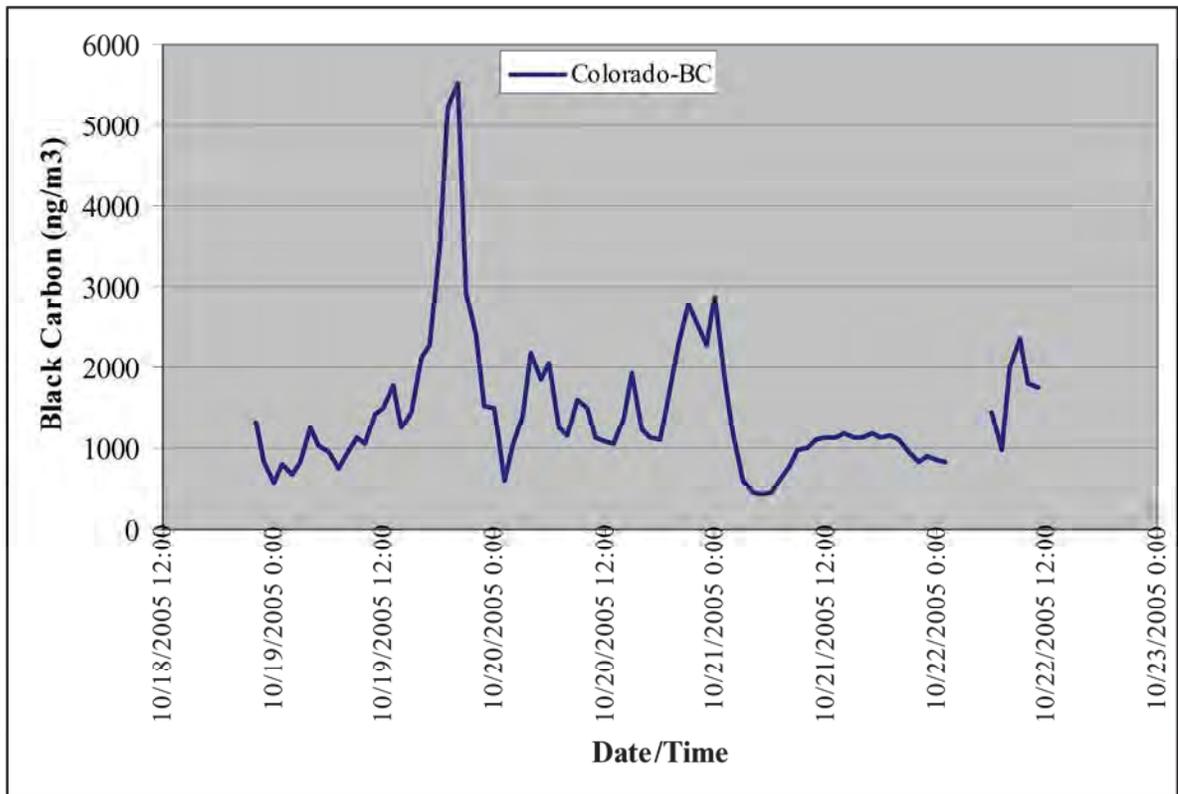


Figure 12. East Colorado Street

3.2 Diurnal Patterns

Figures 13 to 14 show diurnal patterns of the source-impacted and background locations. It is noteworthy that the background locations, particularly E. Patterson, differ from the source-impacted sites.

The background sites have significant noise associated with the trend due to the relatively short monitoring periods in each data set. Longer monitoring times would provide more data that can be averaged to smooth out short fluctuations.

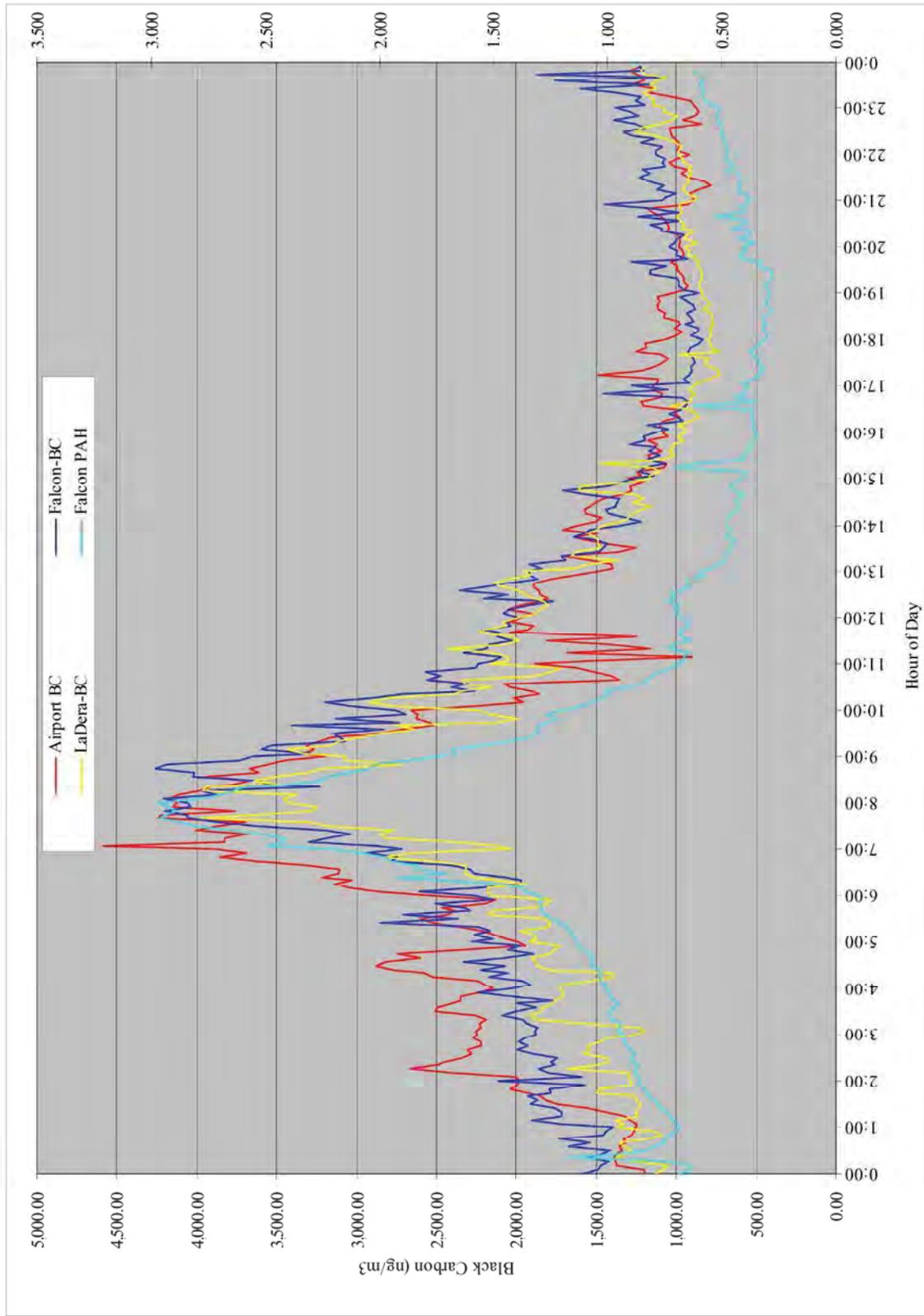


Figure 13. Diurnal Pattern, Source-Impacted Sites

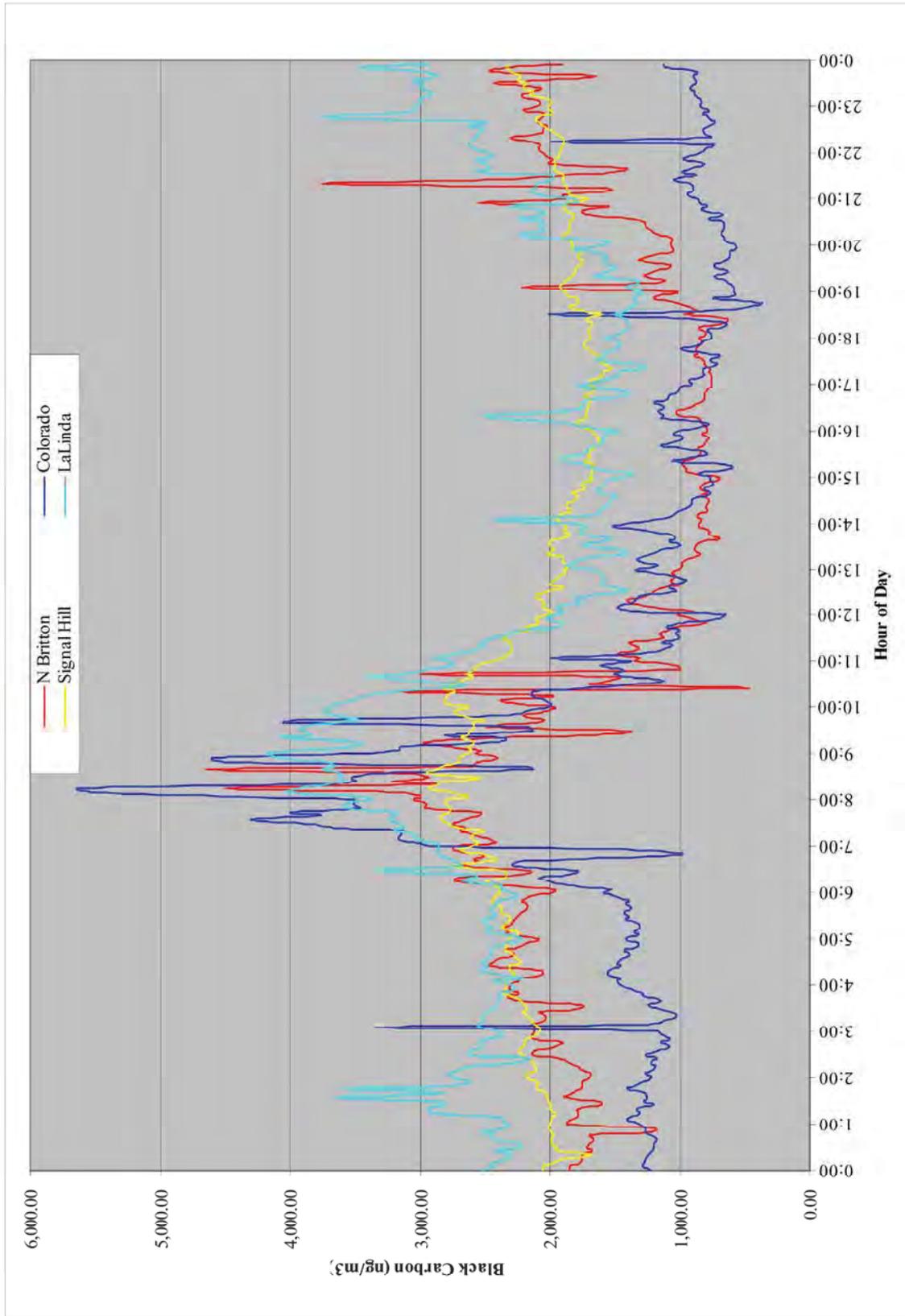


Figure 14. Diurnal Pattern—Background Sites

3.2.3 Diurnal Pattern Associated with Aircraft Take-Offs

Records of take-offs during the months of September and October were obtained from airport staff. A plot (Figure 15) of just the commercial flights compared against the measured black carbon and PM-PAH concentrations shows that some correlation at the Cover Street location can be seen.

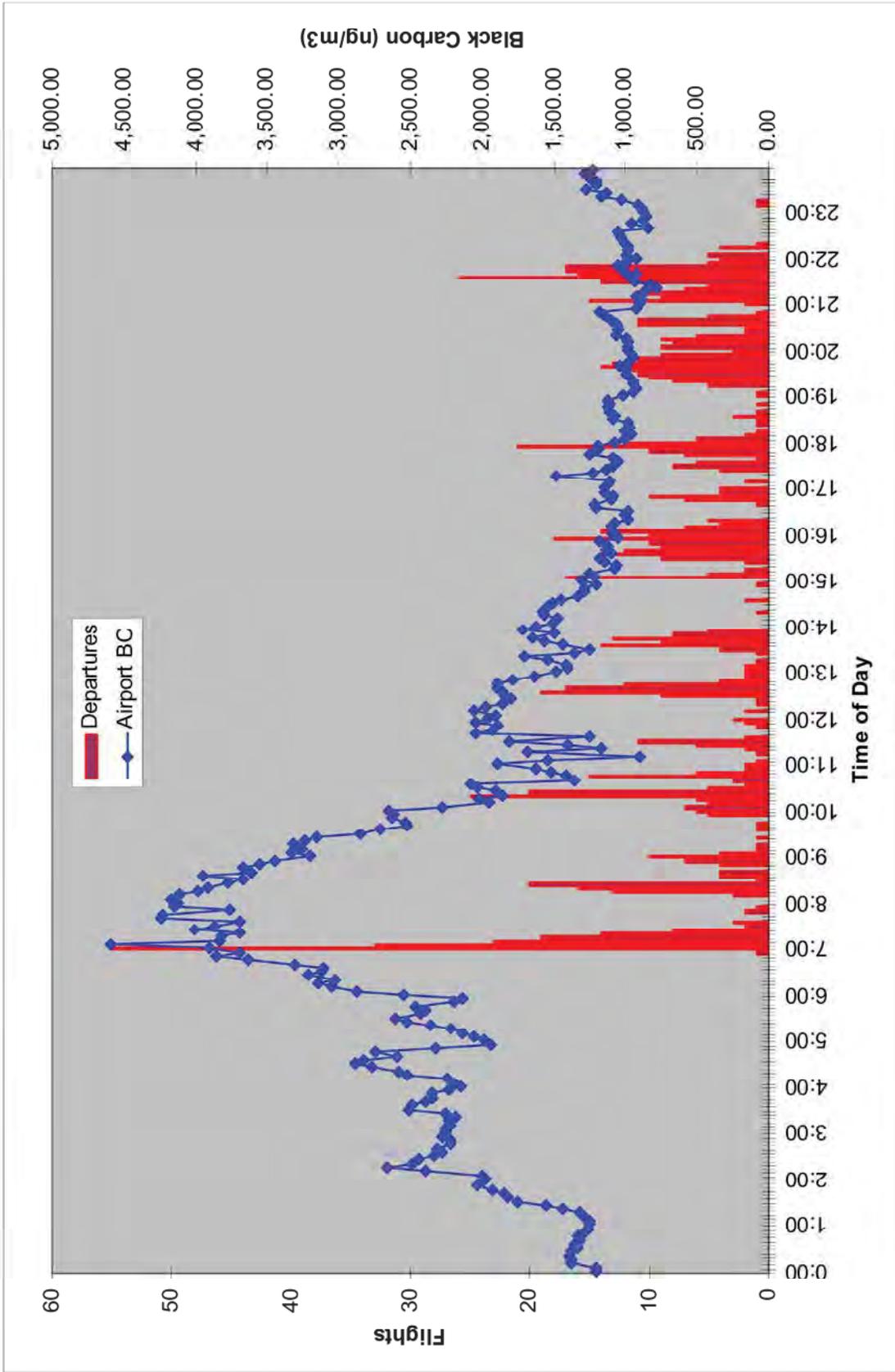


Figure 15. Correlation of Flights with Black Carbon

3.2.4 Traffic and Upper Air Patterns

Figure 16 shows the diurnal pattern of traffic. The morning peak is represented in the data as the early morning peak. The afternoon peak is washed out from the increase in the upper air boundary layer which enhances dispersion.

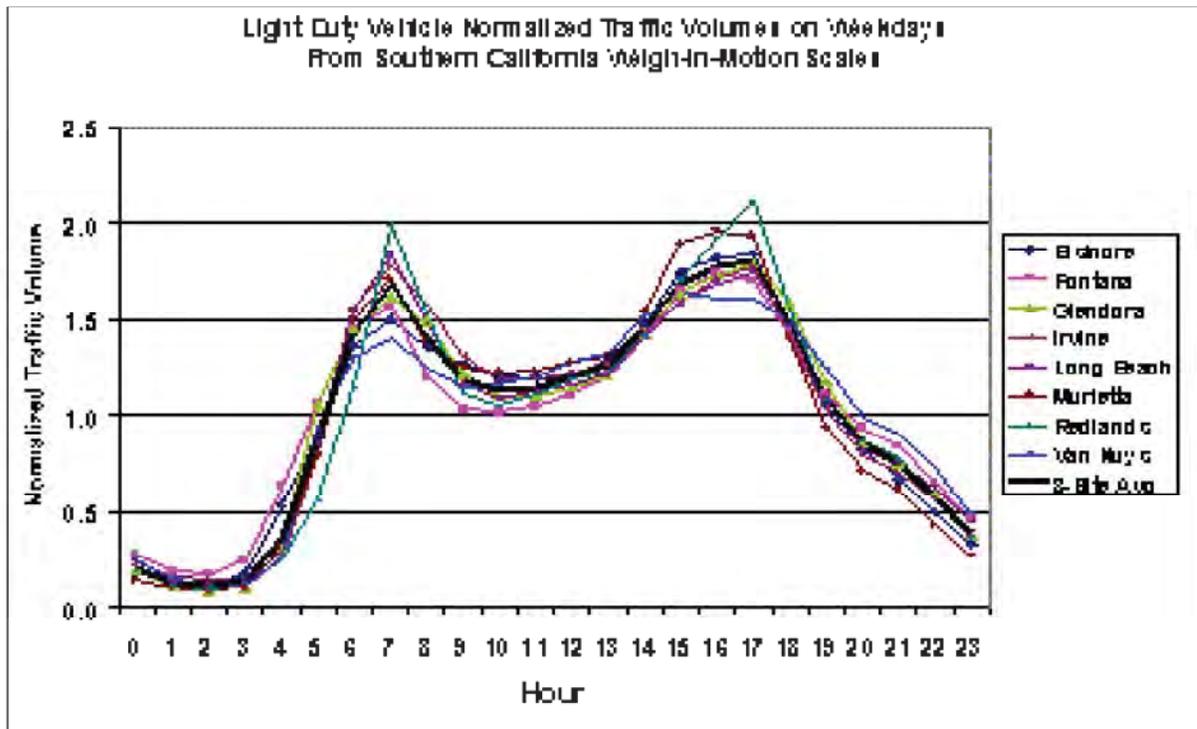


Figure 16. Diurnal Patterns of Traffic¹

3.3 Meteorological Data

Due to instrument malfunction, the meteorological data was obtained from the South Coast AQMD North Long Beach monitoring station. This station is representative of area wind conditions as it is a 10 meter tower.

3.3.1 Wind Roses

Below are wind roses (Figures 17 to 20) for each month from September to December, 2005.

¹ Tami H. Funk and Frederick W. Lurmann, Sonoma Technology, Inc., Petaluma, CA "Using GIS to Investigate Children's Exposure to Air Pollution"

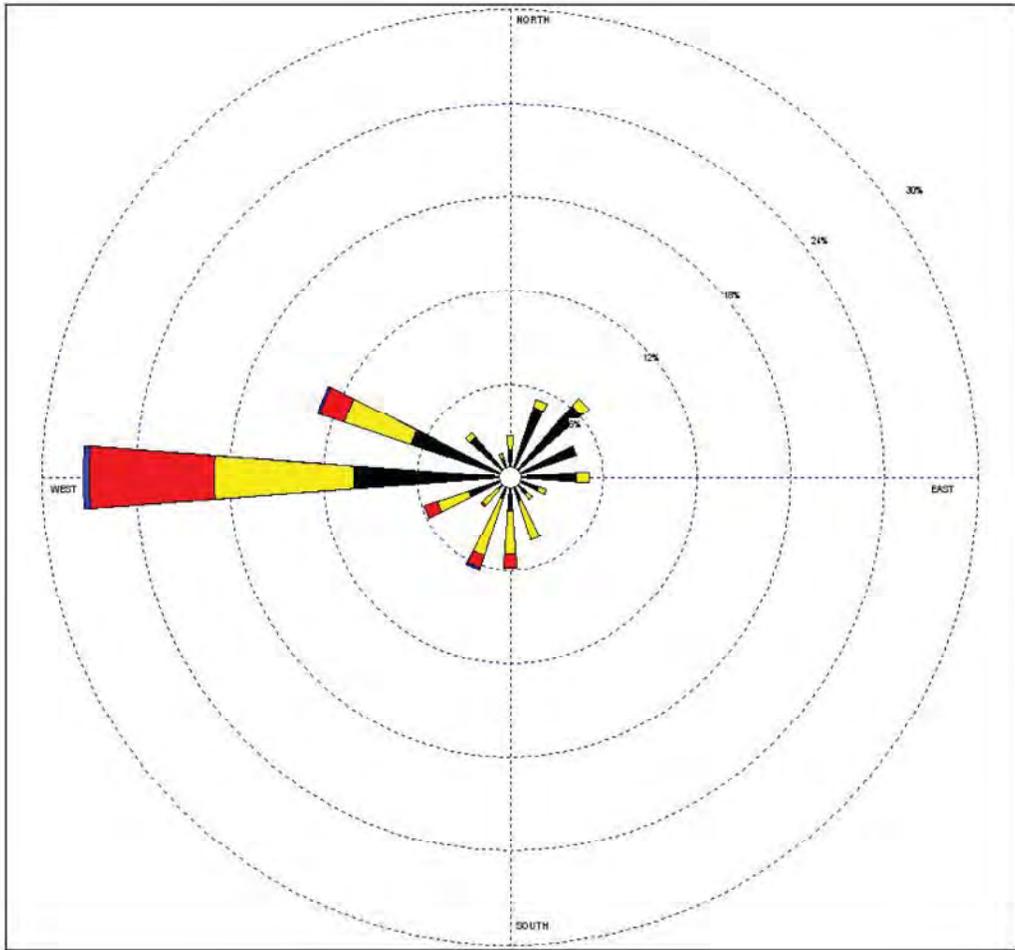


Figure 17. September Wind Rose

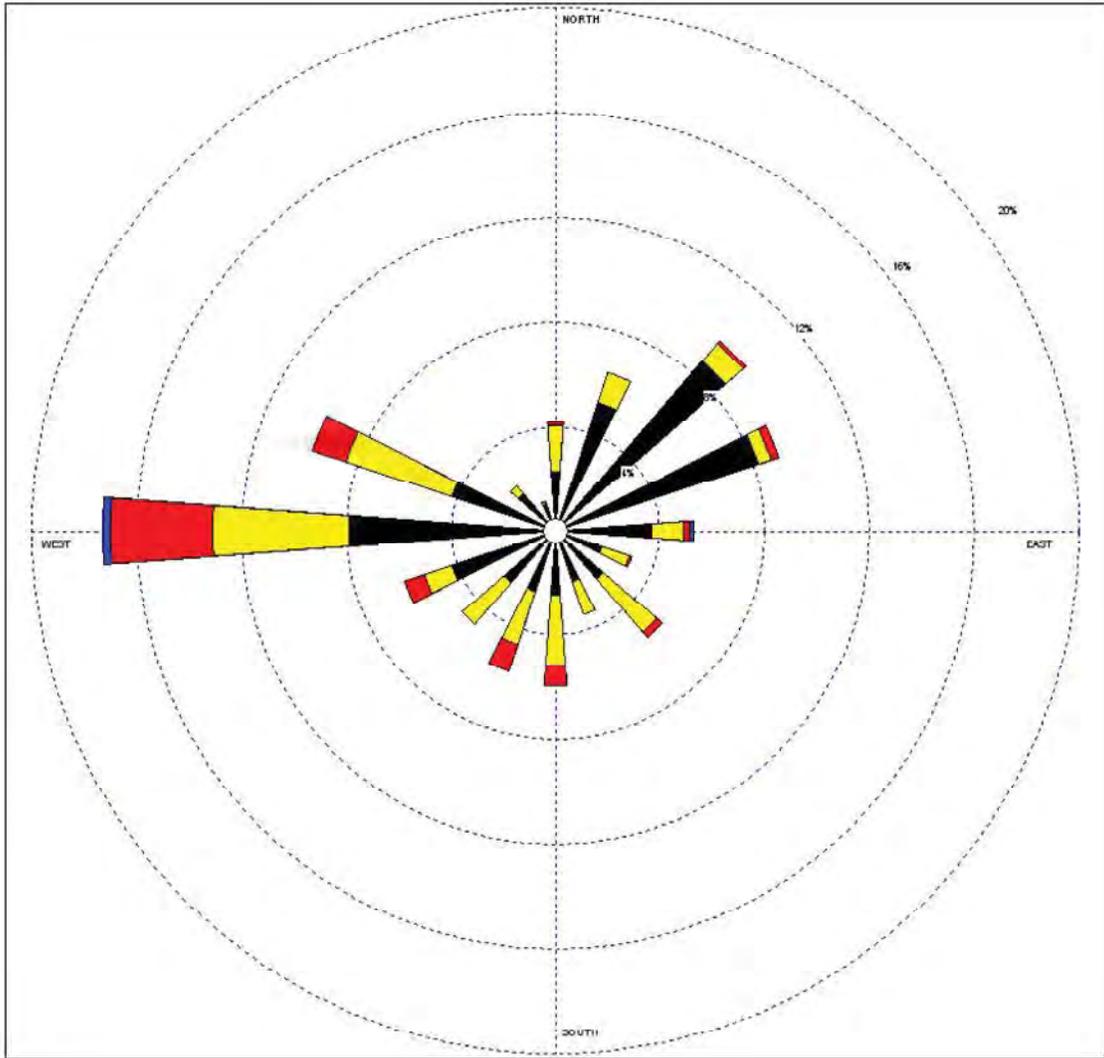


Figure 18. October Wind Rose

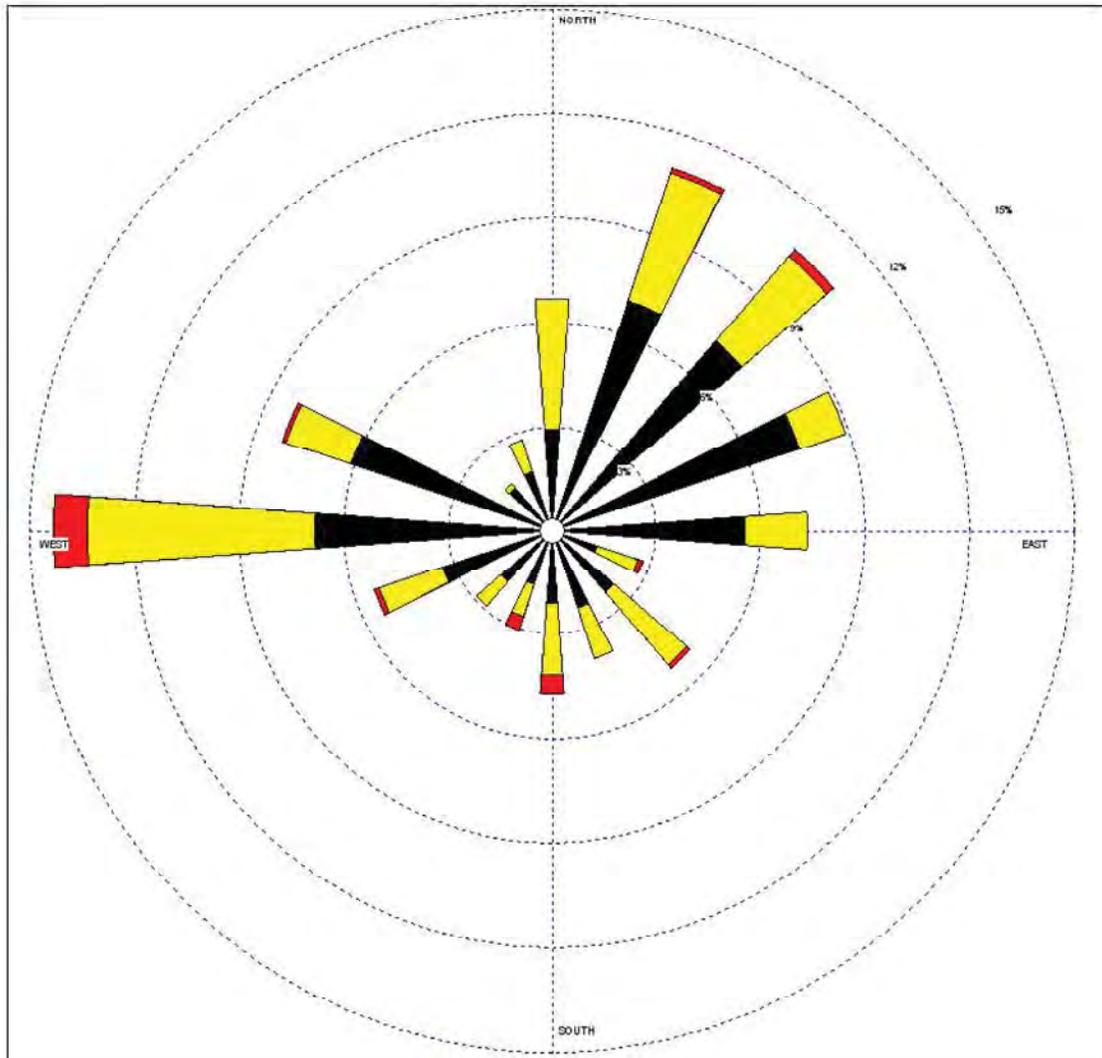


Figure 20. December Wind Rose

3.3.2 Diurnal Wind Pattern

Figures 21 and 22 show the diurnal pattern of the wind speed and wind direction. The morning hours facilitate the dispersion of airport emissions towards the community along the flight path, which is somewhat represented in the data, particularly the Cover Street data.

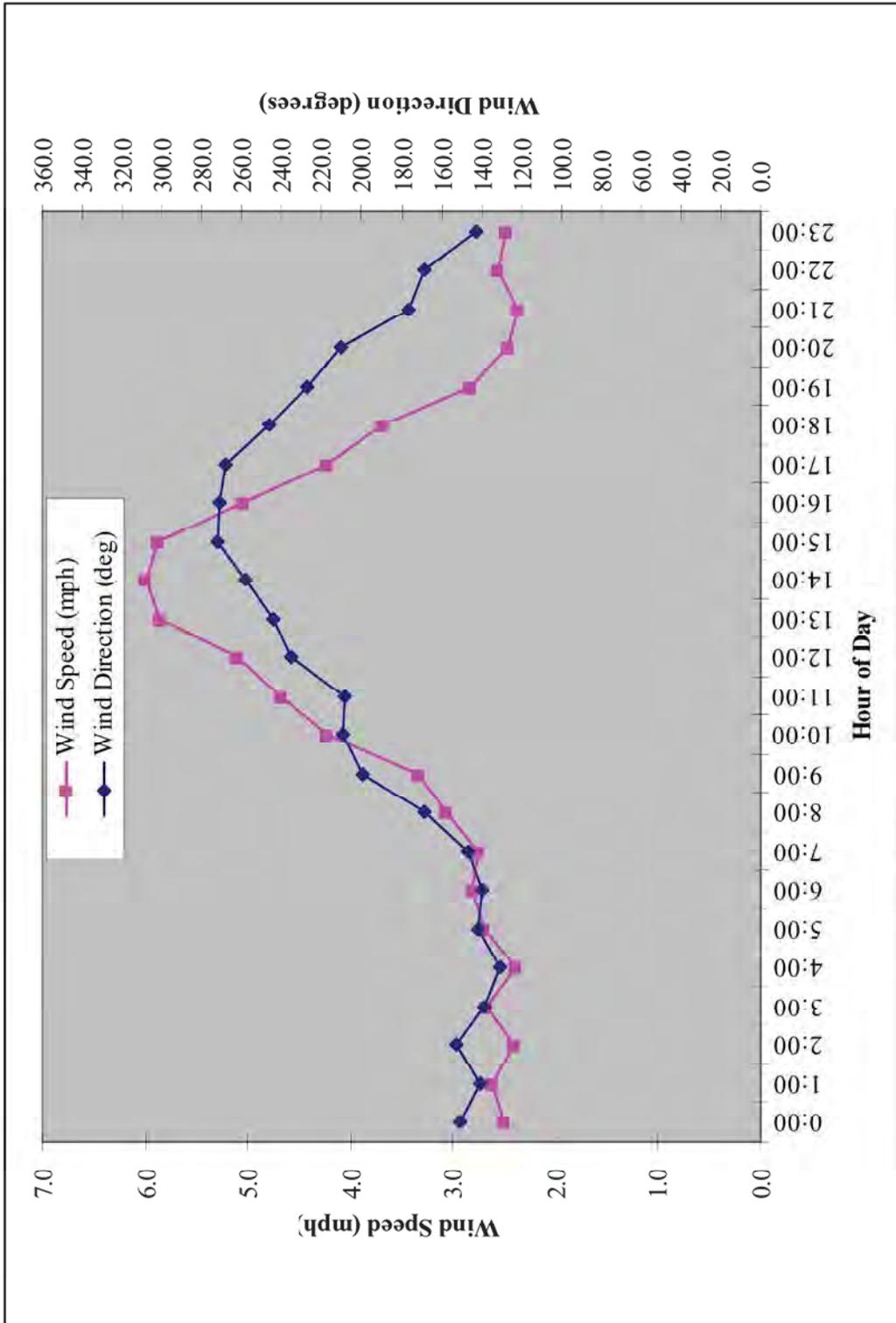


Figure 21. Diurnal Pattern—Wind Speed and Direction

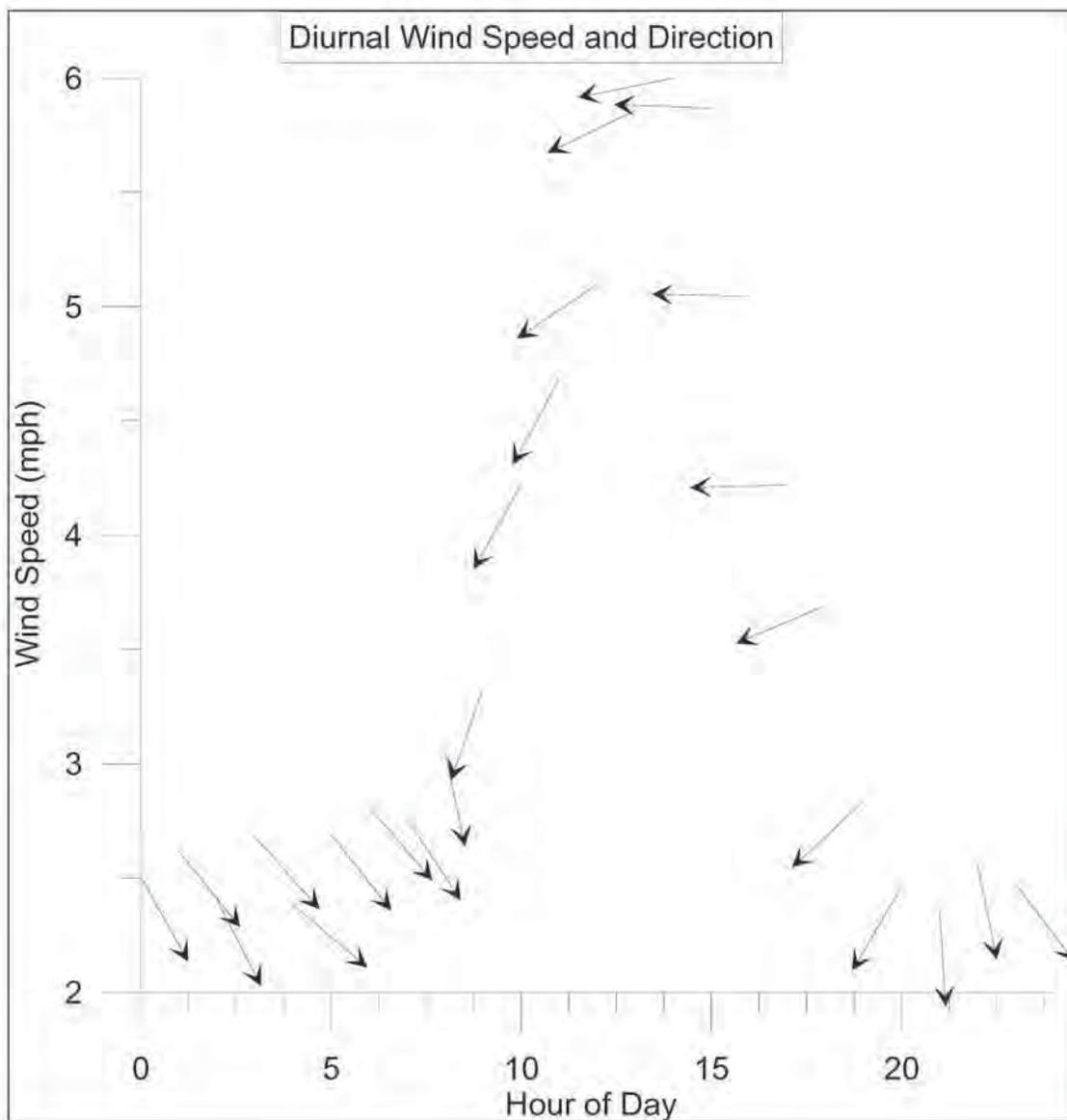


Figure 22. Alternate Diurnal Wind Speed and Direction Pattern
(North is UP, South is DOWN)

4. DIESEL PARTICULATE CONCENTRATIONS

As noted in the introduction, black carbon as measured by the aethalometer instrument is a subset of all the carbon material in a particular kind of aerosol. Therefore, black carbon must be converted to diesel particulate matter concentrations through the use of correlations and other factors. Unfortunately, the conversion process is not straightforward, as there is no set factor that is universally agreed upon. Much of this is due to the state of understanding regarding the fraction of diesel exhaust that can be assigned to elemental carbon.

It is beyond the scope of this work to assess each conversion factor and make a selection of which is most appropriate. Therefore, two conversion factors will be used here that represent conservative upper and lower bounds for the calculation of ambient DPM. These factors are based on the work presented in Fruin et al.² The range of factor goes from 1.8 times BC to 5.6 times BC.

Using these factors, the average DPM concentrations at the study locations are contained in Table 1.

Table 1. Summary of Black Carbon and DPM Concentrations

Site	BC (ug/m3)	DPM Low Factor (1.8) (ug/m3)	DPM High Factor (5.6) (ug/m3)
Cover	1.92	3.5	10.8
Falcon	1.66	3.0	9.3
LaDera	2.61	4.7	14.6
Olive	3.71	6.7	20.8
LaLinda	2.43	4.4	13.6
E. Patterson	1.59	2.9	8.9
N Britton	1.80	3.2	10.1
Colorado	1.46	2.6	8.2
Grand Avg	2.15	3.87	12.03

Comparison with other locations is useful. A study of six locations across the US yielded an average BC concentration of 1.49 $\mu\text{g}/\text{m}^3$. The average obtained here is 44% higher than this value. The Fruin reference shows that the ambient concentration of DPM (using the low conversion factor) in high congestion areas of Los Angeles was 2.4 $\mu\text{g}/\text{m}^3$. The average DPM determined here is 61% higher than this low estimate.

These data suggest that additional monitoring to understand the distribution and magnitude of the DPM in the community is warranted.

² Fruin, Scott, Arthur Winer, Charles Rodes, "Black Carbon Concentrations in California vehicles and estimation of in-vehicle diesel particulate matter exposures," *Atm. Env.* 2004, 38, 4123-4133.

5. CONCLUSIONS

Monitoring has been conducted at several locations over a period of several months in order to ascertain the black carbon (as surrogate for DPM) concentrations surrounding the Long Beach air port. Time series data as well as diurnal patterns were assessed at each of the eight sites. The resulting BC and converted DPM concentrations are higher than other sites and estimates of the area DPM concentration.

Using time-resolved data collection, attempts were made to correlate the take-off from runway 30 with detections of black carbon and/or PM-PAH along the flight path. Some success was seen, but additional data collection will be necessary in order to fully exploit this potential tool.

The use of the PM-PAH sensor was shown to be useful in that it correlated well with black carbon. Its higher sensitivity (a factor 100 greater than the aethalometer) may allow it to detect specific events with more precision. In addition, this and other work suggest that it may be useful as a surrogate for ultrafine particulate matter, a category of aerosol is seeing increasing attention due to its health impact.

The time-dependence of the continuous instruments was shown to yield useful information relating to daily patterns. Comparison with traffic and other dispersion parameters such as upper air trends will assist in understanding the impact from other sources such as the Ports of Los Angeles and Long Beach as well as the major highways in the area.

This work suggests that the community would benefit from further information on the origin and distribution of black carbon/DPM in their area.

30 January 2006

Angela Reynolds
 Planning and Building Dept.

I am writing regarding the proposed terminal expansion for the Long Beach Airport.

I have lived near the intersection of Spring and Clark since 1974. I know very well how the noise has increased. Even with such airlines as PSA , Western Airlines , Jet America , Winair , United etc.. that flew here years ago, there is much more noise due to the airlines insistence to flood the airways with flights.

First of all the airlines are NOT loyal to airports. They can stop service at a whim (such as AA recently). I know how the airlines think because I worked for a major U.S. domestic / International carrier at LAX for 38 years. (just recently retired) I've seen it time and time again, such as LGB in the past 30 years with on and off again service . Already JetBlue will post a loss for the last quarter of 2005. This is their beginning.

Airlines can leave anytime and then who would be left holding the bag for noise abatement costs and terminal expansion? If the airlines and the city get their way, then I see an enormous cost to sound proof surrounding homes. Also the need to plant many trees to absorb sound around the area. Near Spring and Clark Ave. for example, the office buildings that were built (which is an eyesore to our neighborhood and ends our day an hour earlier due to the shadows they cast) echo and echo lots of noise. Many residents around Long Beach say that "you knew there was an airport there when you moved there ". I say yes we knew, but it just keeps getting worse and there seems to be a total disregard for the residents. Many people buy homes next to freeways and are aware of freeway noise, but CalTrans builds tall walls to stop the noise. Also who knows what complaints will arise from the people who buy condos in the Douglas Park when it is completed.

The airlines are very aware of the situation at LGB. Terminal size noise restrictions , etc. They should participate heavily in the cost. I don't think they would be too eager.

I hope this letter will give you some insight on the problems at LGB from a 31 year resident and former airline employee. I've gone to city forums before and it seems that the meetings were held just to "humor" the public in to thinking that their input mattered. I hope you will take this letter into consideration.

Thank You



Gilbert Cano

5129 E. Spring St.
 Long Beach , 90808

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Angela Reynolds, Environmental Office

I and the members of my household (3 voters), are totally against the expansion of Long Beach Airport. The facility as it exists today ~~is~~ is a menace to the quality of life & health to the residence of California height and surrounding areas.

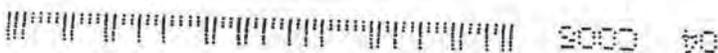
In a city the age of Long Beach there comes a time when the expansion of business needs to take a back seat to the needs & quality of life of the residence. J. Breen

Terrence J. Breen
3525 Walnut Av
Long Beach 90807

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I lived in LB for 20 years. I went to all kinds of city council meetings held for special subjects such as use of old navy Base (I said for the homeless + they themselves could fix up + maintain), for improvement of the 710 + disbursement of trucks on Alameda instead of 710, for LB airport improvement, they never actually have the guts to make any decision - They just pay with OUR MONEY for study after study after study. People have been breathing airborne particles forever, and we're just fine. The ones who get sick want to protest EVERYTHING, but it's just their own genes + heredity causing it; they'd get sick no matter WHERE they lived. So, Stop studying + ACTUALLY BUILD SOMETHING!
 S. Ranaldi

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Clayton Reynolds, San Jose
 LB Brent + Hwy Dept - 47th Flr
 333 W. Ocean Blvd.
 Long Beach, CA 90802



Shirley Loreita Ranaldi
 1562 Merton Way #363F
 Seal Beach, CA 90740

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**NOTICE OF AVAILABILITY OF DRAFT EIR NO. 37-03
LONG BEACH AIRPORT TERMINAL AREA IMPROVEMENTS PROJECT**

What is a Notice of Availability: The City of Long Beach has prepared a Draft Environmental Impact Report (EIR) to address the potential environmental impacts associated with improvements to the Long Beach Airport (the Airport). The document has been prepared in conformance with CEQA (Public Resources Code 21000 et seq.) and assesses the potential individual and cumulative impacts of the Proposed Project. The City, as the lead agency, will review and consider the Long Beach Airport EIR in its decision to approve, revise, or deny the project. The purpose of this Notice of Availability (NOA) is to inform local residents, institutions, and other interested parties about the availability of the Draft EIR during the Public Comment Period and to solicit comments regarding the Draft EIR.

Project Location & Description: The Proposed Project is located at the Airport. The Proposed Project provides improvements to the existing Airport Terminal Building and related facilities at the Airport in order to accommodate recent increases in flight activity at the Airport consistent with operational limitations of the Airport Noise Compatibility Ordinance and the 1995 Settlement Agreement. The Proposed Project includes construction of, or alteration to, the 13 areas listed and described below:

- Holdrooms
- Concession Area
- Passenger Security Screening
- Baggage Security Screening
- Baggage Claim Devices
- Baggage Service Office
- Restrooms
- Office Space
- Ticketing Facilities
- Airline Gates
- Aircraft Parking Positions
- Vehicular Parking
- Traffic and Pedestrian Circulation

Thanks for this notice but you should know I approve of everything the LB airport needs to do to keep serving us and stay in operation. I lived under the take-off path 20 years and now live under the landing path and I love the beautiful planes and love using the close convenient little LB airport and don't care about the noise. Those "NIMBYS" all need to get a life. J. L. Ranaldi

The terminal area improvements are being designed to accommodate the 41 airline flights and 25 commuter flights, passengers associated with those flights, and security requirements imposed by TSA. Considering all improvements, the size of the terminal area facilities would increase from 56,320 square feet to 102,850 square feet. There would also be additional area at the Airport that would be covered, though not enclosed in a building. The majority of all the improvements would occur in the vicinity of the existing Airport Terminal Building, the aircraft ramp area, and terminal area parking lot. However, by providing up to 14 aircraft parking positions, the Proposed Project would displace general aviation aircraft that are located on land leased to Million Air Inc. The Proposed Project would relocate the general aviation aircraft to Parcel O, which is currently undeveloped and is located at the south end of runway.

List of Anticipated Significant Environmental Effects: Draft EIR 37-03 examines the potential impacts generated by the Proposed Project in relation to the following CEQA Checklist categories: aesthetics, air quality, cultural resources, hazards and hazardous wastes, land use and relevant planning, noise, public services, and transportation. The Proposed Project would result in significant, unavoidable short-term impacts to air quality during the various stages of construction. In addition, the Proposed Project would result in potentially significant impacts on aesthetics, cultural resources, hazards and hazardous materials, and noise; however, these impacts could be reduced with implementation of the proposed mitigation program. The Proposed Project would also result in beneficial impacts with respect to traffic and circulation.

Public Comment Period: The Public Comment Period is from Monday, NOVEMBER 7, 2005 to Thursday, DECEMBER 22, 2005.

SUBMIT ALL COMMENTS OR OTHER RESPONSES TO THIS NOTICE IN WRITING TO:

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 W. Ocean Boulevard
Long Beach, CA 90802

P.S. In my opinion the City Council doesn't have a clue what the hell they're doing and are afraid to make a move or a decision about the 710, the airport or the Port without delaying everything for expensive "studies", etc. ad infinitum, the Mayor's running all over the world at our expense. They're all useless to progress. Even put the GM at risk. IDIOTS.

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In addition, comments can be e-mailed to: AirportEIR@longbeach.gov

If e-mail comments are submitted with attachments, any attachments should be delivered separately, in writing, and in person or by regular mail, to the address specified above. The virus protection measures of the City's e-mail system, as well as the variety of potential formats for attachments, limit the ability for attachments to be delivered by e-mail. The website contains directions on how to provide comments via e-mail.

It should also be noted that a transcript of verbal comments will be made at each of the public meetings. These comments will also be responded to in writing as part of the Final EIR.

Where Can I See a Copy of the Draft EIR: Copies of this Draft EIR, the technical appendices, and cited or referenced studies or reports are available for review at the City of Long Beach, Planning and Building Department, 333 West Ocean Boulevard, Long Beach, Fourth Floor. The Draft EIR and technical appendices are also available for review on the City of Long Beach website (www.lgb.org) and in the following libraries:

Alamitos Neighborhood Library
1836 East Third Street
Long Beach, CA 90802

Bret Harte Neighborhood Library
1595 West Willow Street
Long Beach, CA 90810

Mark Twain Neighborhood Library
1325 East Anaheim Street
Long Beach, CA 90813

Brewitt Neighborhood Library
4036 East Anaheim Street
Long Beach, CA 90804

Iacoboni Library
5571 Orange Avenue
Lakewood, CA 90712

Ruth Bach Neighborhood Library
4055 Bellflower Boulevard
Long Beach, CA 90806

Dana Neighborhood Library
3680 Atlantic Avenue
Long Beach, CA 90807

Bay Shore Neighborhood Library
195 Bay Shore
Long Beach, CA 90803

Main Library
101 Pacific Avenue
Long Beach, CA 90822

Los Altos Neighborhood Library
5614 Britton
Long Beach, CA 90815

Burnett Neighborhood Library
560 East Hill Street
Long Beach, CA 90806

Signal Hill Library
1770 East Hill Street
Signal Hill, CA 90755

North Neighborhood Library
5571 Orange Avenue
Long Beach, CA 90805

El Dorado Neighborhood Library
2900 Studebaker Road
Long Beach, CA 90815

Key Dates: Four key dates that have been set at this time.

- | | |
|-------------------|--|
| November 29, 2005 | A public meeting will be held at The Long Beach Grand located at 4101 E. Willow Street, Long Beach. The intent of the meeting is to provide the public an overview of the findings of the EIR. The public will have an opportunity to provide comments at this time. Verbal comments made at this meeting will be responded to as part of the Final EIR. |
| December 3, 2005 | A second public meeting will be held at the City Council chambers (333 W. Ocean Boulevard) to provide the public an overview of the findings of the EIR. The public will have an opportunity to provide comments at this time. Verbal comments made at this meeting will be responded to as part of the Final EIR. |
| December 15, 2005 | A joint meeting of the Planning Commission and Cultural Heritage Commission will be held at the City Council chambers. |
| December 22, 2005 | The EIR is being circulated for a 45-day public review period. The review period closes on December 22, 2005. All comments received by the end of the review period will be responded to in writing. |

These comments are in response to the Draft EIR report for Long Beach Airport Terminal Area Improvement Project. I will preface them with the following personal information:

I live in the flight path of departing commercial aircraft.
 I purchased my home in 2000, before so many of the commercial slots were filled.
 I am not a frequent flyer or traveler.
 I attended the last public meeting on the DEIR, though I did not choose to speak there.

After reviewing the draft EIR, I have concluded that the only proposal I can support is Alternative C: No Project.

Although I think it is necessary to improve passenger and baggage security and I support the electrical upgrades listed on page 15 of Table 2 (Summary of Impacts and Mitigation Measures), no proposal under consideration is limited to those improvements. Consequently I do not support Alternative A or B.

At the public forum I attended, I heard from residents who actually patronize the airport far more than I. All of them were satisfied, as customers, with the existing facilities except for those pertaining to security screening. Therefore I feel that the proposed new holding rooms and parking structure and many other items in the Draft EIR are a bit like the pork that gets rolled into the federal budget. Worse yet, I feel that such facilities would risk making the airport a target for expansion in terms of the number of flights.

I hear frequently that the proposed project would have no direct impact on the noise ordinance. First of all, I have been keeping logs in the past few months and I can assure those interested that the noise ordinance is frequently and regularly violated as things stand now. Military aircraft regularly exceed the decibel level that human ears can tolerate. Commercial and general aviation flights violate the curfew on a regular basis. If 11 more commercial flights and 25 commuter flights are added, I don't think I will be able to tolerate living here any longer. As many of my neighbors pointed out in the forum I attended, there is a cumulative effect to all of this noise and pollution.

Let me add here that I looked at the economic impact report for the airport that was posted on the WEB. I suspect that the report's statement of the scope of the impact on surrounding commercial establishments is highly exaggerated. Certainly those businesses that deal directly with the airlines and the airlines themselves contribute revenue. However, I question the claim that a car repair shop's revenue increases because of proximity to the airport. I think just as sound a case could be made for a LOSS of revenue for certain types of businesses in close proximity to the airport. Why didn't anybody study that? One could argue that Atlantic Avenue in Bixby Knolls would be the perfect venue for a trendy mall with outdoor cafes: except, of course, for that fact

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that patrons could not have a conversation in them because of the roar of airplanes. My point is that speculation about sources of revenue is just that. Citizens need hard numbers to make decisions.

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cont.

As was pointed out in the meeting I attended, the station that monitors air quality for the area surrounding the airport is far away from the airport itself and not directly in many (if any) of the flight paths. Therefore I don't believe the DEIR is extensive enough with regard to air quality. We don't even have an accurate picture of what the situation is now. Consequently, we can't assess the added pollution that would result from the 11 more commercial flights and 25 more commuter flights that might want to take advantage of the improved terminal, if it's built.

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Finally, I would like to go on record as saying that I don't think one nickel of city money should be spent on terminal improvements, with the possible exception of helping with the electrical upgrades which might result in energy use reduction as well as reduced air pollution. There was a young employee of Jet Blue at the public meeting I attended. She stated that some of the staff facilities at the present airport are unsafe for employees. She did not elaborate on their nature. With all due respect, I spent a number of years educating the youth of Long Beach. I worked in crumbling facilities with large cockroaches and even a black widow spider. Though I don't wish poor working conditions on anyone, I think the city needs to consider its priorities. I've tried to go to the library twice recently, and it has been closed. I have been reduced to checking books out on my sister's Orange County card. I believe that if we give the airlines the green light on this project, we are sending them the message that commercial interests are far more important to Long Beach as a city than the quality of life of the people who live here. I am perfectly happy with a funky-looking airport (or, better yet, none), but I'd like to be able to go to the library during normal business hours.

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Sincerely,



Sandra Thompson

7885 E. Garner Street
Long Beach, CA 90808

Angela Reynolds, Environmental Officer
City L.B. Planning & Building Dept.
333 W. Ocean Blvd.
Long Beach, CA 90802

Re: L.B. Airport Terminal Area Improvement Project

I support this project consistent with the Noise Ordinance. The EIR clearly supports the largest design for the terminal modernization. This project will create the gateway to Long Beach via the airport. I want this gateway to reflect the vibrant city that Long Beach can be. The project must support fully the number of flights allowed by the Noise Ordinance. Passengers must be provided comfortable accommodation, handicapped served jet way for boarding, in-door baggage service and other services befitting a tourist/business city airport.

I want this project to be completed in a timely fashion. The EIR points out that modernizing the terminal has environmental benefits while doing nothing continues a 1930's facility with its out-of-date operations. Let's get this project moving forward and completed soon.

Respectfully

Floyd V. Wilcox

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