

January 22, 2017
Michael LoGrande



Honorable Mayor and City Council

City of Long Beach, CA

Subject: Item No. 7 (17-0041), Recommendation to authorize City Manager, or designee, to negotiate with interested Long Beach carriers or operators a financial agreement for the development of a Customs and Border Protection facility at the Long Beach Airport, subject to further City Council action approving the final terms and conditions of the agreement; and Authorize City Manager, or designee, to execute and submit all documents necessary to the United States Department of Homeland Security for designation of the Long Beach Airport as a United States Customs and Border Protection User Fee Airport for the processing of aircraft, passengers and baggage arriving from outside the United States. (Citywide)

Significant Impacts

Below are significant issues and potential unmitigated environmental impacts found in City of Long Beach's reliance upon Jacobs Engineering's Feasibility Study ("Study") evaluating the viability of constructing a Federal Inspection Services facility ("Facility") at Long Beach Airport ("Project"). Environmental Compliance Assessment and Facility Siting Alternatives sections and appendices ("App-B" and "App-D," respectively).

Generally, the Study concludes that the Project would not have any significant impacts that were not previously studied under the 2006 Long Beach Airport Terminal Area Improvement Project Final Environmental Impact Report No. 37-03 (SCH No. 2003091112) ("FEIR 37-03") approved by the Long Beach City Council on June 20, 2006 (see Study, pp. 15; App-B, p. 28; Q&A, p. 11). It reaches this conclusion by arguing that the FEIR 37-03 evaluated 102,850 square feet (sq.ft.) of terminal area improvements and up to 14 aircraft parking positions (Study, p. 16), only a portion of those improvements have since been built (App-B, p. 3), there remains 37,681 sq.ft. still available (id. at p. 4), and the Facility would be less than that under any of the options considered (ranging between 35,051 to 6,750 new floor area) (Study, p. 31; App-B, p. 1), none of which call for more than 12 parking positions (id. at p. 19). Additionally, the Study assumes that the Facility's workforce (i.e. Homeland Security, TSA staff) is within the operational activities studied under the FEIR 37-03 and that international flights would not expect to change the fleet mix currently operating at the airport (Q&A, p. 12; App-A, p. 24; Opinion Letter, Exhibit B, p. 2 [airport "would use aircraft of the same type currently operating."]; id., Exhibit 3, p. 2 [JetBlue's fleet will use "same aircraft type now operating at the [a]irport in domestic serves."]).

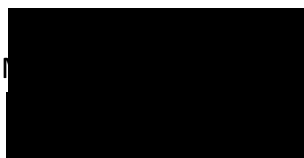
However, despite the City's heavy reliance on its consistency with FEIR 37-03, neither Jacobs nor the City provides the original FEIR 37-03 evaluation to confirm any of the Study's conclusions and assumptions. Specifically, the following:

- Whether the Project poses new impacts or if new mitigation measures have been developed since 2006 (Study, p. 16).
- Whether the buildout studied under FEIR 37-03 is "apples to apples" to the buildout proposed for the Facility (Study, pp. 19, 26). Whether previously studied buildout was in the same location as the proposed sites (Study, pp. 26-30).
- Whether the future modification to the "airfield layout plan," requiring Federal Aviation Administration approval, was previously studied (Study, pp. 16, 20). Whether said modification would increase impact to existing receptors or expose new sensitive receptors?
- Whether air impacts would be greater than the noted incremental increase in air emissions (Study, p. 17), considering the increase traffic demand posed by Homeland Security, TSA agents, and other staff operating within the Facility.
- Whether operations at the Facility (400 passengers per hour) fall within the operational activities previously studied (Study, p. 24).
- Whether similar facilities recently developed at comparable airports (i.e. Fresno Yosemite, John Wayne) experience greater than expected noise impacts, induced traffic trips, etc. (Study, p. 25).
- First, the Study notes that international flights may be heavier aircraft (accommodating more fuel and luggage) and therefore have a "slightly greater" noise characteristics of domestic flights (Study, p. 18; App-B, p. 22). However, no detail is given about what is "slightly," nor whether these noise impacts would be exacerbated if international flights extend beyond those destinations the airport expects to serve (i.e. Canada, Mexico, Central America) (Study, p. 18). I am curious to what was experienced at Yosemite, John Wayne, and other airports on this issue.
- Second, while the City states international flights are unlikely to replace domestic flights since the airport traditionally operates at roughly 80 percent "slot utilization" (Q&A, p. 1; Study, p. 9), recent activity has shown slot utilization close to 100 percent with "all 50 slots scheduled on certain days in January 2017" (id. at p. 15). This may suggest that historical data is less reliable than expected and that the relatively small airport may lose service to domestic locations.
- Third, the Study's 37,681 sq.ft. does not seem to compute (App-B, p. 4). If FEIR 37-03 evaluated 102,850 and 73,769 has already been built, only 29,081 sq.ft. remain; if you account for the 24,826 sq.ft. of future terminal improvements already approved, only 4,255 sq.ft. remain (id). While math was never my strength, these calculations need to be clarified.

I request that the City of Long Beach continues the subject Item No. 7 (17-0041) until a full Environmental Impact Report can be publicly reviewed in compliance with CEQA and all applicable City, State and Federal regulations. Reliance upon an outdated environmental analysis for an entirely different project is deceiving to the public.

In addition, assumptions in Jacobs Engineering's Feasibility Study ("Study") evaluating the viability of constructing a Federal Inspection Services facility ("Facility") at Long Beach Airport ("Project") should not be relied upon based of factual misrepresentation, potentially significant environmental impacts, a lack of scientific data, and compelling expert witness testimony.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike M", enclosed in a thin black rectangular border.

cc: Charles Parkin, City Attorney
Michael J. Mais, Assistant City Attorney