

Appeal of Certification of Airport EIR

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Based on our diligent and exhaustive review of the EIR documents and consultation with experts, LB Council PTA has concluded that the EIR does not adequately provide all the information that the council needs to make an informed decision on the final approval of the project and; therefore, does not satisfy CEQUA requirements.

I. **Capacity Enhancing Potential of the Proposed Project**

We agree and support other appellant's position that the EIR does not sufficiently address this concern.

- \* EIR language describes the purpose of project as "accommodating" and "facilitating growth."
  - \* Therefore, the current facility acts as an obstacle to growth.
- Staff's presentations, including photos of the current facility, support the reasonable conclusion that the facility currently could not handle any additional activity.

I. **Health Risk Impact Analysis - Conclusions are based on significant uncertainties and despite the lack of data.**

- \* **Location of monitor at 36<sup>th</sup> St. / Long Beach Blvd. is not appropriate for accurately assessing air quality impact of the airport** - supported by D. Kringel and Dr. Sexton of LB Health Dept.
- \* **No rationale given for the EIR conclusion that actual emissions near the airport might be less.**
- \* **Omission of all port related planned projects in assessing cumulative impacts** (see city's comments re:LAUSD EIR)
- \* **Jet Engine Emissions were not quantified and points this out as an uncertainty-- studies to address toxicity and exposure risks from jet engines are currently underway and preliminary results are available and requests as to the feasibility of a supplemental study that would address this uncertainty were ignored.** (source: Gary Honcoop of CARE)
- \* **No discussion of risks associated with ultrafine particulates** - an area of increasing concern within the scientific and air quality control communities, especially in connection with aircraft  
(source: Burke, Executive Dir. of AQMD e.g.)
- \* **No analysis of toxics ingestion due to children's proximity to the ground** - no rationale for omission
- \* **Uncertainties related to projects environmental benefits:**
  - No data or study to support that there will be less vehicle traffic due to less passenger drop off.
  - No data showing that the project will actually use less fossil fuel energy
  - No data to support the claim that more aircraft parking spaces will reduce idling times and emissions.

III. **Noise Impact Analysis Inadequate**

- \* EIR fails to analyze psycho-biological effects of noise documented by numerous studies, such as gastrointestinal and heart
- \* Fails to analyze impact of noise on children's ability to learn, e.g. acquisition of reading esp. by those learning the language
- \* Misrepresentation of WHO (World Health Org.) conclusion re: noise impacts at levels below 60 CNEL
- \* No analyze of noise impacts from additional daytime flights - impact from noise, other than sleep disturbances, could increase, esp. for school children.
- \* **References limited to older studies, even though more recent studies are available -**

III. **Mitigation/Mitigation Program seems to be largely left up to the discretion of the polluters**

- \* Significant demolition/construction related impacts were identified that depend on the effectiveness of these programs.
- \* Outline of the proposed programs show a great deal of uncertainty - the term "when feasible" is frequently used. Trigger points are not established - Enforcement mechanism is vague. Failure to specify cost of programs assess leaves uncertain the likelihood that funds are available to effectively achieve mitigation and monitoring.

LB Council PTA respectfully requests the city council to:

1. Approve our appeal
2. Request supplemental analysis of noise impact, of cumulative impacts, of current idling times, of current number of vehicle trips assoc. with drop-off scenario, analysis of cost of mitigation/monitoring programs.
3. Actual emissions monitoring around the perimeter of the airport.