



April 12, 2011

Mr. Richard Ayala
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Subject: Notice of Availability for the Draft Supplemental
Environmental Impact Report (SEIR)
Guasti Plaza Specific Plan Amendment

Dear Mr. Ayala:

Los Angeles World Airports (LAWA) respectfully submits the following comments in response to the Draft Supplemental Environmental Impact Report (SEIR) for the Guasti Plaza Specific Plan Amendment. The proposed project of the Guasti Plaza Specific Plan Amendment involves a revision of the adopted Specific Plan document to provide an update to existing conditions at the site and create a Residential Overlay Zone on approximately 11.72 acres with a maximum of 500 dwelling units.

In our January 13, 2009 letter which commented on the Notice of Preparation for this project, LAWA requested that the noise impacts associated with the costs and risks of allowing new residential developments so close to LA/Ontario International Airport (LA/ONT) be carefully considered. On Page 4.6-7, the report states that the southern section of the site is within the existing 65 dB noise contour. However, according to Figure 4.6-3 labeled "Existing Airport Noise Contours", the project site is entirely outside of the 65 CNEL contour and would not be within the noise impact area for LA/ONT. Please also identify the source and date of the document you are using for the existing contours. As you are aware, LAWA produces quarterly contour maps. The contours often change over time and it is not accurate to label and portray these contours as representative of existing conditions without proper reference or justification of the use of the source.

In LAWA's January 13, 2009 letter, LAWA requested that the project's impacts to LA/ONT be identified and fully mitigated. In addition to the existing and future noise contours analysis LAWA also requested that the residential quality of life in the vicinity of the airport, along with open space, hazards from aircraft emissions and impacts on air commerce including growth in air cargo operations, be discussed since residential uses are generally not compatible with airport operations.



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On page 4.6-7 and 4.6-9, the threshold of significance discussion states that the term "substantial increase" is not defined by any responsible agency and thus, the City of Ontario has chosen to use a 3 dB SPL difference to define substantial increase. The discussion in this section however is mixing metrics incorrectly. The 3 dB SPL figure does not correlate to 3 dB CNEL increase. Moreover, the California Airport Noise Standards (Title 21) does establish thresholds of significance for Land Use Compatibility and the SEIR should provide an analysis based on these standards.

The report indicates that impacts associated with traffic, air quality, noise and GHG emissions from future residential development would remain significant and unavoidable with standard conditions and mitigations incorporated. LAWA concurs with the Federal Aviation Administration (FAA) objection to a residential development project that would place homes close to the airport that may be within the future 65 CNEL contour. (SEIR for Guasti Plaza SPA, FAA response comment letter to the Notice of Preparation, Page S-39, <http://www.ci.ontario.ca.us/index.cfm/22642/75538>)

If you have any questions regarding these comments, please contact Angelica Espiritu of my staff at (424) 646-9495 or aespiritu@lawa.org.

Sincerely,



Cynthia Guidry, P.E.
Chief of Airport Planning
Facilities Planning Division

CG:AE:yl