

# TURBULENCE AHEAD

---

**What LAX's Expansion Means for the  
City of Los Angeles' Legacy on  
Racial Equity & Environmental Justice**



# CONTENTS

■ Executive Summary & Introduction . . . . .	1
■ The Essential Workers & Diverse Stakeholders at LAX . . . . .	2
■ Airfield & Terminal Modernization Project—The Proposed Development . . . .	4
■ Red Flags in the Draft Environmental Impact Report . . . . .	6
■ Statewide Leader in Air Pollution Failing to Study Long-Term Air Quality Impact of Expansion . . . . .	7
■ The Demographics Behind Pollution Near the Airport . . . . .	9
■ Public Health Consequences . . . . .	11
■ LAX Prepared to Contribute Even More to Region’s Notorious Traffic . . . . .	14
■ LAWA’s Determination to Dismiss Noise Impacts of Expansion . . . . .	16
■ Equitable Development, Avoiding Gentrification & Displacement . . . . .	19
■ The Airline Industry’s Actual Record on Essential Workers . . . . .	22
■ Airlines Cannot Use the COVID Crisis as an Excuse to Exploit Workers & Communities . . . . .	25
■ LAWA’s Role in Ensuring that Public Resources Going Towards the LAX Development Serve the Public Good . . . . .	26
■ Moving Forward . . . . .	27



# Executive Summary & Introduction

Right now, Los Angeles International Airport (LAX) is charging ahead on an expansion project of a scale not seen for decades. Los Angeles World Airports (LAWA), the organization that owns and operates LAX, quietly released a draft Environmental Impact Report late last year that reveals a project with a host of alarming implications for communities near the airport. If the City of Los Angeles and its elected officials are serious about leadership on environmental justice and equity, resolving the issues presented by this project will be critically important.

**“...Black and Brown communities near LAX... grapple with a longstanding history of environmental racism...”**

As it stands, the proposed development is poised to worsen traffic in an area already infamous for it, expose thousands of new residents to the noise of one of the busiest airports in the world, and intensify the air quality impact of a facility that is already a statewide leader in air pollution. Worse still, these outcomes are set to be concentrated within Black and Brown communities near LAX that already grapple with a longstanding history of environmental racism—communities that have suffered disproportionately from the health and economic fallout of the COVID pandemic.

LAWA’s current approach signals that the airport is not only failing to adequately protect the community from the consequences of LAX’s largest expansion in decades, but is, in effect, *concealing* the real, long-term effects of that expansion as it rushes toward approval as early as this year. The City of Los Angeles, LAWA, and the airlines that will occupy the new terminals have an obligation to do better and ensure that this project is carried out equitably, that it will not become another sad chapter in the story of environmental injustice in South Los Angeles and the continued exploitation of essential workers as the city emerges from the pandemic.

In this report, we take a deeper look at the proposed development and what the draft Environmental Impact Report does and doesn’t reveal about the consequences of LAWA’s plans for the airport. We will contextualize this project and what it means for workers, families and communities—particularly communities of color—as well as the direction of the City of Los Angeles as a whole. Finally, we will lay down a foundation for how the airport can approach this project as a real, positive opportunity for the region, and not a cautionary tale of corporate greed and bureaucratic complicity in the making.

In the coming years, the City of Los Angeles will prepare to host major events—the Super Bowl, the 2028 Summer Olympics, the World Cup—and enjoy global attention. It is critical that the city and its leaders take every opportunity to be a leading model for an equitable and just economy. With the whole world watching, showing how LAX’s development can be done without harm to communities of color will be an excellent place to start.



# The Essential Workers & Diverse Stakeholders at LAX

Even though the airport plays a critical role in the region's economy and saw close to 90 million annual passengers at its peak in 2019, the plain truth is that the diverse group of people who work at or live near LAX are the ones who will be most directly impacted by its expansion.

Airport workers have always been essential, but during the pandemic that description became official. Cabin cleaners, baggage handlers, wheelchair agents, food service workers, security guards—these workers saw their lives and conditions change drastically in 2020, when they found themselves serving a vital public health function. These airport service workers also happen to largely be immigrants and people of color, groups that research has shown are more at risk of both getting COVID-19 and of dying from it.<sup>1</sup> One recent study found that throughout the United States, an increase of 1% in a county's Black population was associated with a nearly 2% increase in COVID infection and a 2.6% increase in related deaths. A similar increase in a county's Hispanic population was linked to a 2.4% rise in infections and 2% increase in deaths.<sup>2</sup> Compared to the rate for non-Hispanic whites, the death rate is nearly twice as high for Black individuals and 2.3 times as high for Hispanics or Latinos. Black and Brown workers have been on the frontlines of a pandemic that is significantly more dangerous in their communities and, as airport workers, they've been considerably

more exposed to the economic ramifications, seeing their jobs and hours disappear, sometimes for good.

The communities near LAX are as diverse as the airport's workforce. Adjacent to the airport to the north and south, Westchester and El Segundo are predominantly white and relatively affluent compared to the other areas near LAX. The picture changes dramatically east of the airport though, under the flightpath, where the emissions and noise footprint of LAX extend for miles. Inglewood is 40% Black and 50% Hispanic or Latino, Hawthorne is 25% and 55%, and Lennox is over 90% Hispanic or Latino.<sup>3</sup> Smaller neighborhoods like Gramercy Park, Westmont, Vermont Vista and others all fall under the airport's noise contour maps to some degree, and all are majority non-white by significant margins. These neighborhoods and cities also happen to be cut through or surrounded by high traffic commercial corridors: the I-405, the I-110, the I-105 and the I-10.

This isn't a fluke or an accident. Redlining and restrictive covenants limited housing options for minority communities in Los Angeles dating back over a century, cutting people of color from access to nearly 95% of the city's housing.<sup>4</sup> Black and Brown residents were concentrated where they were able to, primarily in what is now South Los Angeles, and the decades to follow saw the placement of industrial manufacturing facilities and transportation corridors within these same areas.

Development does not exist in a vacuum. It lands in a real place, it affects real people. These places and people have their own history and context, much of it run through with stories of injustice and stratification. There are two paths ahead for the elected officials and decision makers involved in this project: continue to be part of the problem and add to this unfortunate history, or break the cycle and confront this reality in a meaningful way. If the City of Los Angeles wishes to be known as a progressive city of the future—a leader on issues of justice and equity—it will need to correct its course on this project and do just that.

<sup>1</sup> CDC, "Covid-19 Racial and Ethnic Health Disparities," 12/10/20

<sup>2</sup> University of Minnesota Center for Infectious Disease Research and Policy, "Race, income inequality fuel COVID disparities in US Counties," 01/20/21

<sup>3</sup> US Census Quickfacts, 07/01/19

<sup>4</sup> SCOPE LA, "Between the 110 and the 405: Environmental Injustice in South Los Angeles," 11/27/17







# VALERIE KING

## Screenener at LAX

I also live in Inglewood, about 5 minutes from the airport. We hear planes all the time. As the airport has expanded, it has bought up so much land. They offer cash for people's properties. It used to be people's homes. Now it's airport construction, the arena, the football stadium, the race track, the casino, and other tourist spots. The traffic is awful now. There's so much congestion, causing the air quality here to be bad.

The airport expansion has also caused the rent to go through the ceiling. My unit is \$2,195 for a two bedroom. A three bedroom costs over \$3,000. I live here with my son who also works at the airport. It's not easy living here anymore with the increase of the rents. This is a burden with low income being forced to move or be displaced because of the increase in the rents and the surrounding upcoming attraction expenses being forced on the community. A lot of people, including my coworkers, have had to relocate because they couldn't afford the rent. They've moved further away, like to Lancaster or Palmdale, and then their commute is worse and it takes them longer to get home. California is already known for smog. The LAX expansion will make all of this worse.



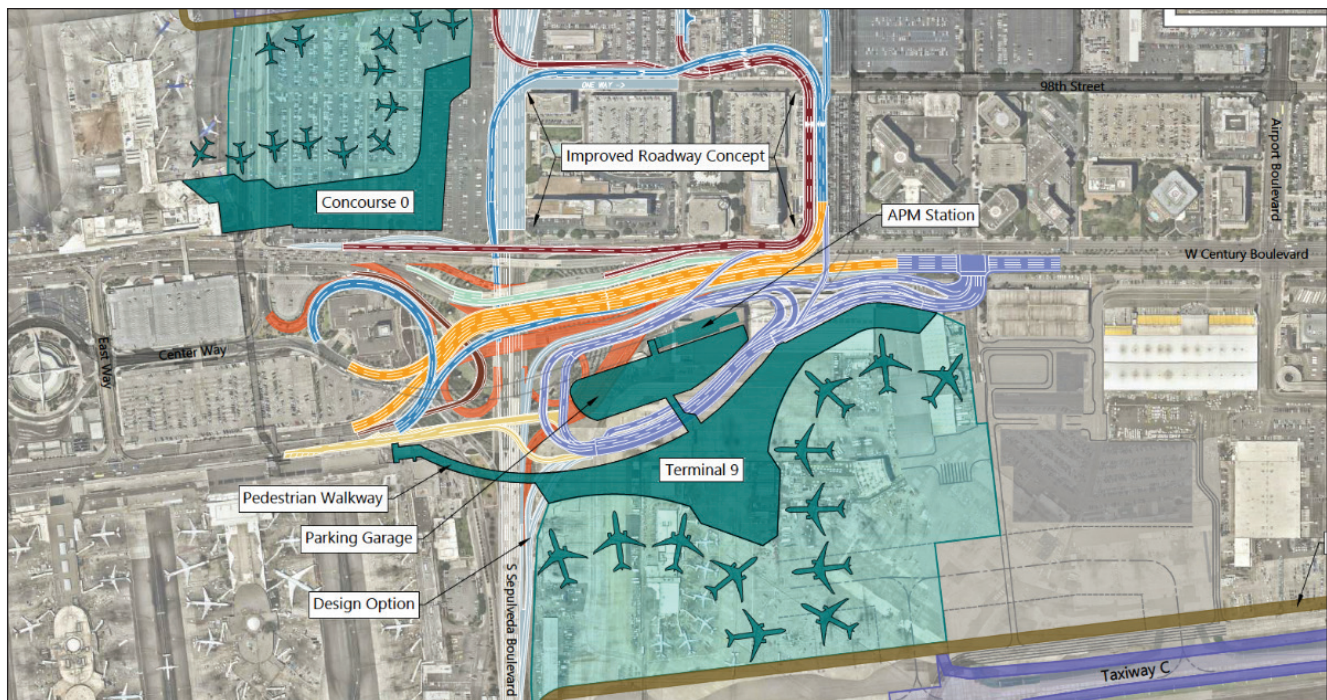


# Airfield & Terminal Modernization Project — The Proposed Development

Before addressing the issues within LAX's proposed development project, let's take a look at what the airport has planned and why. LAX is the second busiest airport<sup>5</sup> in the United States, seeing over 88 million annual passengers in 2019—ranking third in the world<sup>6</sup> that year. In recent years, LAX has also been one of the fastest growing major airports in

the country<sup>7</sup>, despite the fact that the airport has long been constrained by infrastructure and a lack of space (LAWA's former chief executive, Deborah Flint, told the Wall Street Journal in 2019 that LAX was already “accommodating more people than the infrastructure allows for.”<sup>8</sup>). The airport has been developing incrementally for decades, with the most recent major expansion happening in the early 1980s when Terminal 1 and the Tom Bradley International Terminal were added as the city prepared to host the 1984 Summer Olympics.

LAX's latest development—officially called the Airfield & Terminal Modernization Project (ATMP)—is moving for similar reasons, with Los Angeles set to host the Olympics in 2028. The new project has three main components: terminal improvements, landside improvements, and improvements to the airfield. Airfield improvements include an extension of one of the taxiways and a reconfiguration of taxiway and runway exits, aimed at reducing airfield wait times, which means the airport could accommodate additional flights in the same amount of time. Terminal improvements, the largest element



<sup>5</sup> Rankings based on annual enplaned passenger figures from the US DoT

<sup>6</sup> Port Authority of NY & NJ, 2019 Airport Traffic Report

<sup>7</sup> FAA Airports Data, Commercial Service Airports Based on CY 2018

<sup>8</sup> WSJ, “Can an Airport Get Too Big?” 11/13/2019

of the project, will include the additions of Terminal 9 and Concourse 0, each with over a million square feet of facilities, international processing, and a combined 21 new gates. The landside improvements include the addition of an automated people mover train station and increased access to a restructured Central Terminal Area. The planned Concourse 0 would extend LAX eastward from Terminal 1 all the way to Sepulveda, replacing a large parking lot and the primary northern entrance to the airport.

Terminal 9 would replace the airport's primary entrance from the south, extending the airport's southeastern point further down Century Blvd.

The assumed future tenants of Concourse 0 and Terminal 9 would benefit greatly from such a project. Southwest Airlines, who currently occupy Terminal 1, would likely become a primary tenant of the adjacent Concourse 0, allowing for a consolidation of their international operations at LAX.<sup>9</sup> Despite the recent completion of a \$500 million renovation at Terminal 1, Southwest, third in market share at LAX, will certainly welcome the needed growth. Indeed, project mock-ups even show Southwest's

unique red, blue and yellow planes parked at Concourse 0.

Beyond speculation, Southwest has directly acknowledged that the expansion is necessary for them to grow in the region beyond 2021, the year they expect to be limited without additional gates. Southwest forecasts a regional growth rate of 3-5% annually over the next 10 to 15 years, and with Burbank constrained by facilities, Long Beach by slots, and Orange County by an enplanement cap, the airline is counting on much of this growth to come from LAX, where they have the airport's highest gate utilization rate, a figure they are trying to reduce.<sup>10</sup> Concourse 0 isn't simply and solely a 'modernization' of the airport—it's a necessary endeavor for a growing and bottlenecked airline to concentrate this growth at LAX.

United Airlines finds itself in a similar position, fourth in market share at the competitive and growing LAX, an airport it considers a hub. Terminal 9 would be a boon for the airline, allowing it to consolidate its operations and that of its international Star Alliance partners.



<sup>9</sup> *Cranky Flier*, "A Look at LAX's Plans for Terminal 9 and Concourse 0," 04/16/2019

<sup>10</sup> Southwest Airlines, Terminal 1 East CDO & TDIP DED Briefing, 01/15/2020



# Red Flags in the Draft Environmental Impact Report

The footprint of an airport of the scale of LAX goes far beyond just flights and passengers. It also means noise in surrounding neighborhoods and cities, traffic in connected roads and highways, and emissions that impact entire regions. Each of these factors carry with them their own implications. To name just a few: traffic can have significant economic impacts, noise can affect human health, and pollution can touch the lives of generations of families. An airport isn't only an airport—it's the center of a cascade of potential changes to the lives of countless people and their communities. As LAX grows to serve more passengers each year, these impacts grow too. There are serious, lasting consequences involved for the stakeholders at and around LAX, and any plan to develop or expand the airport warrants intense scrutiny. It is vital to see that development is approached responsibly and with the airport's many stakeholders in mind.

Based on the draft Environmental Impact Report produced for this project, LAX will fail to meet that standard.

The draft EIR for this project is rife with red flags. LAX appears committed to obfuscating the impact of the project in numerous areas—traffic, noise, air quality, greenhouse gas emissions. The result is a review that understates the development's impacts and effectively conceals its long-term effects. Further still, LAX's planned mitigation measures fall short.

According to LAX's own projections, LAX will grow from 88 million annual passengers in 2019 to over 110 million in 2028. By 2045, LAX could see well over 155 million annual passengers, an increase of 76%

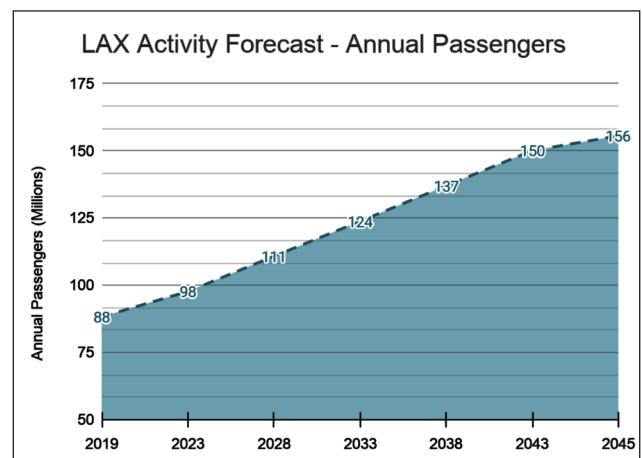
from 2019.<sup>11</sup> LAX forecasts over 250,000 additional flights at the airport between 2018 and 2045.

Despite this amount of growth based on LAX's own forecasts, their analysis of the project's noise, traffic, air quality and greenhouse gas emissions cuts off at 2028 in the DEIR, the year the project is supposed to be completed.

By overanalyzing the project's near-term conditions, LAX elects to ignore the years where the project—designed to increase the capacity of the airport—actually does just that.

With these kinds of fundamental flaws, can it actually be said that this project is proceeding responsibly? That the long-term interests of the people who will know the project's lasting effects firsthand are being considered? The current approach is a sign that LAX is caught up in short-term thinking, intent on pushing a major development through without due diligence and leaving vulnerable communities, families and workers to confront lasting impacts that haven't been adequately considered.

If that is the route LAX is preparing to go down, the airport runs the risk of doubling down on the racial and economic inequalities that essential workers and airport-adjacent communities have been facing for years, and which have only intensified during the COVID pandemic.



<sup>11</sup> ATMP DEIR, Appendix B, Table 3-5



# Statewide Leader in Air Pollution Failing to Study Long-Term Air Quality Impact of Expansion

One of the most serious and complex elements of LAX's planned development is the change it will bring to air quality in the region. Before diving into what the draft EIR reveals about that though, some perspective on the airport first.

Put simply: it is difficult to understate the impact that LAX has on regional air quality. Much of Los Angeles County (in addition to all of Orange County and parts of Riverside and San Bernardino counties) falls within the South Coast Air Basin, which covers an area that represents nearly half the population of the entire state. Within the South Coast Air Basin, out of nearly 1,400 facilities, LAX is the largest emitter of NO<sub>x</sub>, CO, and SO<sub>x</sub> pollutants. It is the 2nd largest emitter of ROG, the 6th in TOG, 10th in PM<sub>10</sub> and 17th in PM.<sup>12</sup> Quite often, the other highest ranking facilities for these pollutants are oil refineries or major factories.

LAX's role in CO and NO<sub>x</sub> emissions is particularly pronounced. LAX produced over 4,400 tons of Carbon Monoxide in 2018, with the second-place facility, John Wayne Airport, producing just 1,100 tons. LAX also

**LAX — Criteria Pollutant Emissions 2018  
South Coast Air Basin & Statewide:**

Type of Pollutant	Tons/Year	2018 Rank SCAQMD	2018 Rank Statewide
<b>TOG</b> (Total Organic Gases)	645	#6	#48
<b>TOG</b> (Reactive Organic Gases)	636	#2	#6
<b>CO</b> (Carbon Monoxide)	4,433	#1	#2
<b>NO<sub>x</sub></b> (Nitrogen Oxides)	4,607	#1	#1
<b>SO<sub>x</sub></b> (Sulfur Oxides)	409	#1	#7
<b>PM</b> (Particulate matter)	48	#17	#139
<b>PM10</b> (Particulate matter <10 micrometers)	47	#10	#77

produced over 4,600 tons of NO<sub>x</sub> that year, with the second-place facility producing just 970 tons. In what is no small coincidence, that facility is the Torrance Refinery, which produces “a very significant amount” of the jet fuel used at LAX.<sup>13</sup> Looking at this data, airports in general play a huge role in CO emissions, with all of the top 3 and 15 of the top 20 emitters in the South Coast Air Basin all being airports.<sup>14</sup>

Even statewide, out of about 20,000 facilities, LAX is an emissions leader: still 1st in NO<sub>x</sub>, 2nd in CO, and in the top 10 in ROG and SO<sub>x</sub>. Its lowest rank in any criteria pollutant statewide is 139th in particulate matter—still in the top .7% of all facilities in California.<sup>15</sup>

All of this is to say, LAX is a *huge* part of the emissions landscape within the Greater Los Angeles area and the state as a whole, and any proposed expansion of the airport carries with it significant implications for air quality and environmental equity.

So what does the draft EIR reveal about the air quality impact of the development project? That, even by just its planned build-out year, 2028, LAX with the ATMP would have a significant impact on air quality in both construction and operations. In order to qualify as significant, the EIR considered whether or not both

<sup>12</sup> CA Air Resources Board, Facility Search, 2018 Criteria Pollutants Data

<sup>13</sup> About Us - Torrance Refinery, 2021

<sup>14</sup> CA Air Resources Board, Facility Search, 2018 Criteria Pollutants Data

<sup>15</sup> Ibid.



direct and indirect emissions of various pollutants would exceed certain daily peak thresholds. Analysis showed that in project construction, this was the case for CO, VOC, NO<sub>x</sub> and SO<sub>x</sub>.<sup>16</sup> Not only was this the case, but daily peak emissions of CO and NO<sub>x</sub> would exceed their respective thresholds by about 800%.

For operational emissions, this was the case for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.<sup>17</sup>, exceeding the thresholds for NO<sub>x</sub> by over 4,560%.

It helps to remember that this is LAWA's estimate of the project's impact merely by the year it is expected to be fully built. A longer view with respect to the air quality impact of this development doesn't exist because LAWA opted not to study it. By LAWA's own estimates, LAX could see compounded annual growth of 2.2% in passenger activity going all the way until 2045<sup>18</sup>, and all of this growth means a corresponding increase in emissions. For Southwest Airlines, the assumed tenant of Concourse 0, 2.2% growth would

be modest, as internal records from the airline show that they expect anywhere from 3 to 5% yearly growth in the Los Angeles area, mostly concentrated at LAX.<sup>19</sup>

All indications, including the airport's, are that LAX will continue to grow rapidly. LAWA's decision not to study the long-term impact of a project that can jumpstart this growth doesn't mean it isn't there, it just means it isn't being made known, least of all to the people who stand to be affected most. This is a troubling approach made all the more disturbing by the fact that many of the communities near LAX—Inglewood, Hawthorne, Lennox—are majority non-white. Communities that already have a history of environmental racism and disproportionately suffered the worst health and economic consequences of the pandemic are being set up to take on all of the inadequately studied impacts of a project they are not even the intended beneficiaries of.

#### Operational Emissions — 2018 Baseline vs. 2028 With Project:

	<b>NO<sub>x</sub> (lbs/day)</b>	<b>SO<sub>x</sub> (lbs/day)</b>	<b>PM<sub>10</sub> (lbs/day)</b>	<b>PM<sub>2.5</sub> (lbs/day)</b>
2018 Baseline Totals:	30,690	2,314	2,834	1,090
2028 w/Project Totals:	33,199	2,808	3,492	1,268
<b>Difference:</b>	<b>+2,509</b>	<b>+495</b>	<b>+658</b>	<b>+178</b>
<i>Threshold:</i>	55	150	150	55

#### Direct & Indirect Construction — Related Emissions of Criteria Pollutants:

	<b>CO (lbs/day)</b>	<b>VOC (lbs/day)</b>	<b>NO<sub>x</sub> (lbs/day)</b>	<b>SO<sub>x</sub> (lbs/day)</b>
Peak Daily Direct Emissions:	483	67	160	2
Peak Daily Incremental Indirect Emissions:	3,911	327	645	171
<b>Total Peak Daily Emissions:</b>	<b>4,394</b>	<b>385</b>	<b>805</b>	<b>173</b>
<i>Threshold:</i>	550	75	100	150

<sup>16</sup> ATMP DEIR, Section 4.1.1-40

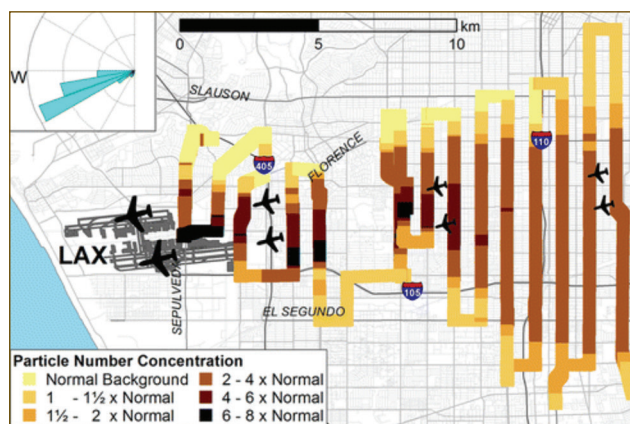
<sup>17</sup> ATMP DEIR, Section 4.1.1-45

<sup>18</sup> ATMP DEIR, Appendix B, Table 3-8

<sup>19</sup> Southwest Airlines, Terminal 1 East CDO & TDIP DED Briefing, 01/15/2020



# The Demographics Behind Pollution Near the Airport

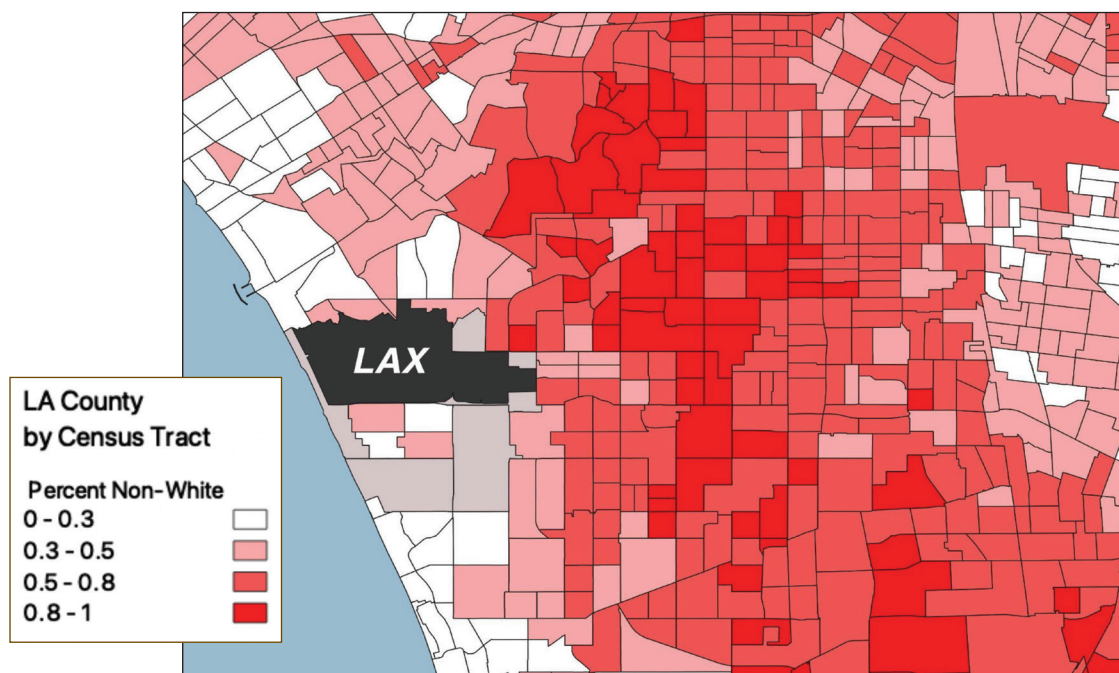


The implications of this development for communities of color around the airport are serious, but unfortunately they are not new. One groundbreaking 2016 study on airport-adjacent communities found that the populations within three miles of hub airports throughout the country tend to be not only majority non-white, but have nearly twice the proportion of people of color than the population at large.<sup>20</sup> This study also found that these disparities were

increasing, and that these areas also saw larger groups of people living in poverty, renters, and fewer college-educated individuals.<sup>21</sup>

This is dramatically true for LAX, where the neighborhoods and cities east of the airport are predominantly non-white. Five of the ten least-white census tracts in Los Angeles County are just east of the airport, under the flightpath.<sup>22</sup>

Map below shows percent of non-white population around LAX.<sup>23</sup>



<sup>20</sup> Woodburn, Amber Victoria "Pushback in the Jet Age: Investigating Neighborhood Change, Environmental Justice, and Planning Process in Airport-Adjacent Communities" (2016) Publicly Accessible Penn Dissertations. 2101.

<sup>21</sup> Ibid.

<sup>22</sup> American Community Survey 5-Year Estimates, US Census Bureau 2019

<sup>23</sup> Map Created from American Community Survey 5-Year Estimates, US Census Bureau 2019



The other unfortunate correlation for these communities is the presence of increased levels of pollution. An air quality study by a team at USC's School of Medicine in 2014 found that some types of pollution from jet airplanes reached neighborhoods as far as 10 miles downwind of LAX.<sup>24</sup> Even at that distance, ultrafine pollution tied to jet exhaust was still found at levels double the concentration of outside areas. Concentrations of particle-matter pollutants within a 2-mile area east of LAX reached levels ten times higher than non-impact areas.

By the study's most conservative estimates, it found that about 175 to 490 miles of freeway were needed to produce the same amount of impact as LAX. There are only about 930 miles of freeway and highway in all of Los Angeles County.

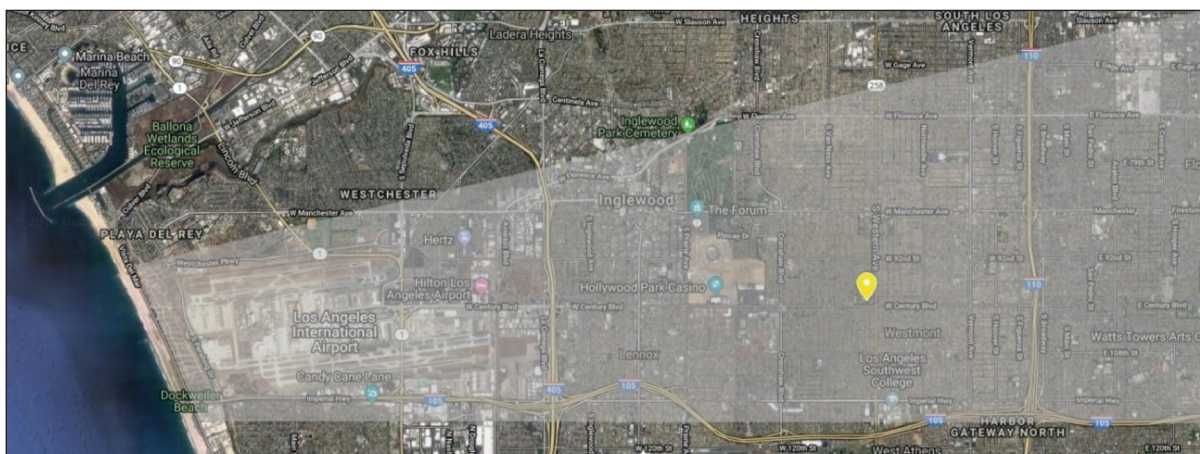
About 95% of all LAX flights take off and land into the west-to-east onshore winds, so the spread of toxic pollution generated by air travel at the airport hits the same communities in South Los Angeles that happen to be primarily non-white, such as Inglewood and Lennox. The USC study noted that "a significant fraction of urban dwellers living near airports likely receive most of their outdoor PN (particle number) exposure from airports rather than roadway traffic." It is no surprise that the study concluded by acknowledging that "LAX should be considered

one of the most important sources" of this type of pollution in all of Los Angeles.

The proposed expansion of LAX also comes at a time when the world is grappling with the irreversible threat of climate change. Increased flight volume and corresponding increases in ground traffic will not help the City of Los Angeles reach its goal of net zero carbon emissions by 2050. The industry in general has an enormous carbon footprint: if global aviation were a country, it would rank in the top 10 emitters of greenhouse gases.<sup>25</sup> Mile for mile, air travel is the most damaging way to travel for the climate.<sup>26</sup> And while fuel efficiency is improving, it is not doing enough to offset the increased demand for air travel. Between 2020 and 2050, global emissions from international aviation are expected to grow between 300 to 700%.<sup>27</sup>

With this kind of context surrounding the airport, a grim picture starts to emerge with respect to the unconstrained growth of operations and passenger activity that LAX's expansion would accommodate. Over 67 million additional annual passengers, over a quarter million new flights by 2045, the impact of which set to worsen the already stratified conditions for majority minority communities near LAX. This is what environmental racism looks like before it begins.

*The map shows the approximate location of the plume of ultrafine particles created by air traffic around LAX, that usually occurs when the winds are blowing steadily from the west.<sup>28</sup>*



<sup>24</sup> Emissions from an International Airport Increase Particle Number Concentrations 4-fold at 10km Downwind, USC Keck School of Medicine, Published 05/29/2014

<sup>25</sup> USC Environmental Health Centers, Airport pollution linked to acute health effects among people with asthma in Los Angeles, Gutschow, W. 02/14/19

<sup>26</sup> European Commission, "Reducing emissions from aviation" 2021

<sup>27</sup> BBC, "Should we give up flying for the sake of the climate?" 02/18/20

<sup>28</sup> European Commission, "Reducing emissions from aviation" 2021



# Public Health Consequences

It is already the case that these communities suffer from disparate health impacts. The South Los Angeles area has some of the highest asthma emergency visit and hospitalization rates in the country<sup>29</sup> and the zip code adjacent to LAX has one of the highest rates of asthma of any neighborhood in Los Angeles County.<sup>30</sup>

All of the pollutants that LAX is a statewide leader in—CO, NO<sub>x</sub>, SO<sub>x</sub>, Particulate Matter, organic gases

—have known health risks. Heart disease, asthma, respiratory conditions, heart conditions, headaches, even cancer. Judging by the draft EIR, this project as it is currently planned is a moral hazard in the making, gearing up to worsen conditions for communities near the airport.

Using just one example, the ultrafine particles (UFPs) downwind from LAX are an unregulated pollutant that are known to contribute to reduced lung function and airway inflammation in populations regularly exposed.<sup>31</sup> A 2019 study looked at the health impact of UFPs and found that the ones from airport-related pollutants had effects that were distinct from those derived from normal ground-traffic. Ultrafine

<b>CO</b> (Carbon Monoxide)	A toxic gas formed by burning fuel, the primary source of which is emissions from vehicles and machinery that utilize fossil fuels. Deadly in high concentrations within an enclosed environment, elevated levels of CO outdoors are still possible outdoors and can impact people with heart disease by reducing the amount of oxygen in the blood.
<b>NO<sub>x</sub></b> (Nitrogen Oxides)	Nitrogen oxides are highly reactive gases, with nitrogen dioxide, NO <sub>2</sub> , often used as an indicator for the larger group of oxides of nitrogen. Combustion of fuel is the primary source of NO <sub>2</sub> , so vehicle emissions, including that of aircraft, are major contributors. NO <sub>x</sub> can react with other chemicals in the air to form both ozone and particulate matter. NO <sub>2</sub> in high concentrations can irritate human airways, and exposure can lead to respiratory symptoms and even hospital admissions. Long-term exposure may contribute to asthma or respiratory infections, and the health effects are greatest in children and the elderly.
<b>SO<sub>x</sub></b> (Sulfur Oxides)	Sulfur oxides (SO <sub>x</sub> ), with sulfur dioxide (SO <sub>2</sub> ) being the most prevalent, are formed by the burning of fuel that contains sulfur: primarily coal and oil. SO <sub>2</sub> can harm the respiratory system and cause difficulty breathing, particularly in small children, the elderly and people with asthma.
<b>PM</b> (Particulate Matter)	Consists of particles of dust, soot, aerosols, and other matter that is inhalable and can remain in the air for extended periods of time. It is referred to by its size: PM <sub>10</sub> for particles smaller than 10 micrometers, PM <sub>2.5</sub> for fine particulate matter. Exposure to particulate matter can affect both your lungs and your heart, and has been tied to heart attacks and heart conditions, aggravated asthma, decreased lung function and other respiratory conditions.
<b>ROG</b> (Reactive Organic Gases)	Reactive Organic Gases (ROG) are a class of organic compounds that react in the atmosphere to form smog, or ozone (O <sub>3</sub> ). Ozone is not a direct emission, it is formed in the air through reactions of NO <sub>x</sub> and volatile organic compounds (VOCs). O <sub>3</sub> has been linked to chest discomfort, coughing, nausea, respiratory tract and eye irritation, and decreased pulmonary functions. There is scientific evidence to support that this can affect even healthy children and adults.
<b>TOG</b> (Total Organic Gases)	Total Organic Gases (TOG) refers to most gaseous organic compounds, including most compounds of carbon. It includes all gas compounds emitted to the atmosphere. This also includes all Reactive Organic Gases (ROG). Various subsets of TOG can cause headaches, dizziness, irritation to the upper respiratory tract, nausea or cancer.

<sup>29</sup> Scope LA, “Between the 110 and the 405; Environmental Injustice in South Los Angeles,” 11/27/2017

<sup>30</sup> LA DoT, “Asthma (18 & Over) 2011-2012 AskCHIS Neighborhood Edition”, 03/01/16



particles are known to cause asthma, but airport related UFPs cause inflammation in the blood that is tied to cardiovascular and respiratory conditions, as well as metabolic disease.

The effect of unregulated UFPs along the LAX flight path on communities of color worsens the already disparate rates of asthma and other respiratory disease. There are persistent disparities in pediatric and adult asthma hospitalizations and emergency room visits across racial and ethnic groups. Hispanic adults have asthma hospitalization rates twice that of non-Hispanic white adults, while African Americans are three times more likely to be hospitalized for asthma than their white peers.<sup>32</sup> As LAX moves to expand, it is imperative to directly address the impact of airport pollutants within communities of color so that the airport isn't simply worsening these existing issues.

The Federal Aviation Administration has acknowledged how airports contribute to environmental racism and its resulting health impacts.<sup>33</sup> A 2016 presentation by the FAA's Office of Airport Planning and Programming recognized the duty to mitigate

environmental impacts and support environmental justice whenever airports modernize or expand. All federal agencies are required by law to identify and address disproportionately high and adverse health or environmental effects of its programs, policies, and activities on minority and low-income populations. Additionally, all airport-operating administrations are required to fully consider environmental justice principles throughout their planning and decision-making processes.

Pollution along the LAX flight path is making neighborhoods near the airport—predominantly populated by residents of color—dangerous and toxic. If the airport and the City of Los Angeles hope to grow equitably and truly modernize, they have a duty to address these issues in a meaningful way.

---

<sup>31</sup> USC Environmental Health Centers, Airport pollution linked to acute health effects among people with asthma in Los Angeles, Gutschow, W. 02/14/19

<sup>32</sup> Everage, Nicholas J. "Disparities by race/ethnicity and sex: asthma hospitalizations and emergency department visit rates in Rhode Island and Healthy People 2010 goals." *Medicine and health, Rhode Island* vol. 93,6 (2010): 177-8, 181-3.

<sup>33</sup> FAA National Civil Rights Training Conference, "FAA Office of Airports on Environmental Justice and Related Issues" 2016







# JOVAN HOUSTON

## Customer Service Agent

Where I work is a big open garage, or warehouse-style building, directly across from the jetway. All the planes park next to where we work. The air quality is really bad. I used to wear masks and scarves to protect myself even before the pandemic. When the planes first start their engines, there's a big cloud of smoke and it blows back to me. When you go home, there's a layer of filth on your hands and nails. It gets inside your nose. If you blow your nose, Black particles come out. I always leave the airport with a cough. Then if you take time off work, like for a week, you notice you're not coughing as much. I get headaches. I even got a bad nose bleed a couple of months ago and had to go home.

I think it is because of the pollution.

A while after I got transferred to the bag room, I got diagnosed with COPD [Chronic Obstructive Pulmonary Disease]. It's usually caused by smoking, but I don't smoke. I guess it's like I'm smoking jet fuel by working at the airport! I came down with what I thought was a bad cold. My chest was really heavy and I couldn't breathe and didn't sleep for 2-3 weeks because I couldn't breathe lying down. I went to the hospital. They said my lungs were inflamed. They put me on steroids, and had me using an inhaler and nebulizer for a while.

I used to be really active and play softball, but now I can't. I want to exercise more and get healthy but I feel so weak because I get tired when I can't breathe.

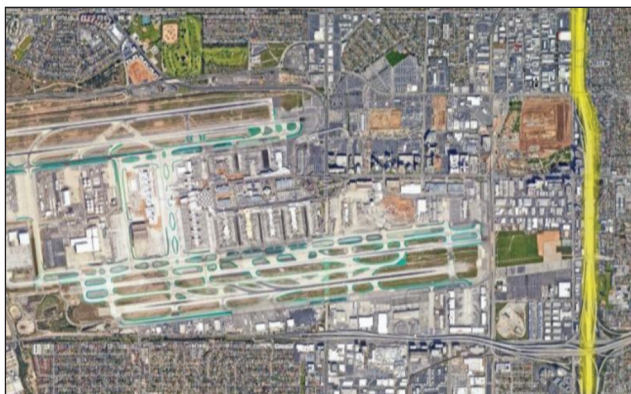




# LAX Prepared to Contribute Even More to Region's Notorious Traffic

Los Angeles is well known for its traffic, leading the world as the most congested city for the better part of the last decade despite its sprawling geography.<sup>33</sup> Even within this context LAX stands out. The 405 between the 101 and the 105, which runs directly past the airport, is one of the ten most congested roads in the United States<sup>34</sup>. Travelers lost 56 hours a year to congestion in that corridor alone in 2019<sup>35</sup>, and Terminal 9 brings LAX closer to it.

LAX saw over 316,000 daily vehicle trips in 2019<sup>36</sup>, and with the inclusion of the proposed development, nearly 100,000 additional trips are projected by 2028<sup>37</sup>. In terms of Vehicle Miles Traveled (VMT),



**“An irresponsible approach to development on projects with serious traffic implications in Los Angeles could mean that those burdens fall disproportionately on the Black and Brown communities adjacent to LAX...”**

a common metric used in transit planning, LAX with the development is looking at 8.7 million VMT from passenger activity in 2028, a 32% increase from 2019 levels.<sup>38</sup>

The project will also have both short and long-term impacts on induced travel, a term that refers to the way travel demand responds to increases in the capacity of a road system. If travel time on a road is reduced through improvements, for example, it may actually *increase* traffic through additional use. LAWA's review shows that the development will prompt significant levels of both short and long-term induced VMT, on top of the VMT generated by passengers and employees.

Judging from the draft EIR, LAWA is preparing to walk headfirst into unanticipated traffic impacts associated with this development even as early as during construction, but particularly in the years after project build-out.

The draft EIR fails to specify any transportation impacts during the seven-year construction phase of the project, including the impacts on parking, the impact of an influx of construction workers, or from the storage of equipment and materials. The draft also fails to include a “Level of Service” analysis that

<sup>33</sup> INRIX, Los Angeles Tops INRIX Global Congestion Ranking, 02/05/2018

<sup>34</sup> INRIX, Most Congested U.S. Roads in 2019, 03/09/2020

<sup>35</sup> INRIX, Most Congested U.S. Roads in 2019, 03/09/2020

<sup>36</sup> ATMP DEIR, Section 4.8-40

<sup>37</sup> ATMP DEIR, Section 4.8-40

<sup>38</sup> ATMP DEIR, Section 4.8-41



would have shed more light on the project’s impacts on local and area-wide roadway systems.

Perhaps most critically, the draft EIR fails to analyze long-term VMT impacts beyond 2028, even though such impacts are admitted, and even though the EIR predicts airport passenger growth going all the way to 2045. It is in this run-up to 2045 after construction where the project would have enabled significantly more growth in passenger travel and therefore a substantially greater potential increase in traffic activity. The project isn’t doing as much as it could on mitigation either, with no mitigation planned to address the significant levels of passenger VMT impact acknowledged in the EIR.

Congestion cost the city of Los Angeles \$8.2 billion in 2019—more than any other American city, with an average cost of over \$1,500 per driver and

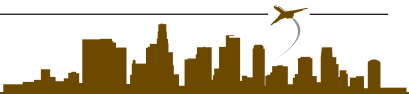


over 100 hours lost<sup>39</sup>. An irresponsible approach to development on projects with serious traffic implications in Los Angeles could mean that those burdens fall disproportionately on the Black and Brown communities adjacent to LAX and the essential workers who keep the airport operating.

**Summary of Projected VMT & Daily Trip Impact —  
2019 Existing Conditions & 2028 Projected w/Project:**

	2019 Existing	2028 Projected w/Development	Increase
Daily Trips	316,128	407,942	91.8k / 29%
Passenger VMT	6,581,811	8,708,995	2.12m / 32%
Short-term Induced VMT	N/A	3,306	N/A
Long-term Induced VMT	N/A	18,220	N/A

<sup>39</sup> INRIX, Most Congested Urban Areas in the U.S., 03/09/2020



# LAWA's Determination to Dismiss Noise Impacts of Expansion

For many that live in airport-adjacent communities, noise pollution is a well-known annoyance and everyday reality. What may be less obvious is that this noise has serious potential consequences, with numerous studies drawing significant links between exposure to high levels of aircraft noise and negative health outcomes, ranging from diabetes to heart disease. The California Noise Control Act explicitly describes excessive noise as a “serious hazard to public health and welfare”.

With this in mind, the noise implications of any airport expansion call for careful study, and initial data from the EIR shows that thousands of new

people and households have cause for concern. LAWA's own estimates, which experts have described as a vast understatement<sup>41</sup>, show that nearly 8,200 more people and over 2,600 households will be exposed to additional noise from the airport by 2028 when the development is finished. Well over half of these people—4,700 or so—live within what would be the new, outermost noise contours surrounding the airport—and would be newly exposed to airport noise.<sup>42</sup>

Moreover, much of this growth in the noise footprint of the airport is localized to majority Black or Brown cities and neighborhoods, such as Inglewood, South Los Angeles, Vermont Vista, Westmont, and Manchester Square (*see map below*).

Following completion of the expansion, LAWA's own analysis shows that 59 non-residential “noise-sensitive uses” would be exposed to significant levels of noise from LAX, including 25 houses of worship, 29 schools, three libraries, and two colleges.<sup>43</sup>

This kind of disparate impact becomes more alarming with a look at the science related to the potential health effects of airport noise. One European study from 2017 found that residents who lived underneath an airport flightpath were 86% more likely to have



<sup>41</sup> Draft EIR Comments; LAX Airfield and Terminal Modernization Project, 03/15/2021

<sup>42</sup> ATMP DEIR, Section 4.7.1-35

<sup>43</sup> ATMP DEIR, Section 4.7.1.-36

type 2 diabetes, with scientists speculating that noise, particularly when it disrupts sleep, affects the metabolism, leading to increased blood sugar levels.<sup>44</sup>

A 2013 study even tied aircraft noise to an increased risk in older people of hospitalization for heart disease. The study determined that every 10-decibel increase in noise from planes was tied to a 3.5% increase in hospital admission rate for cardiovascular problems in seniors living near airports.<sup>45</sup>

LAWA's language in the EIR does not inspire confidence that they are taking these potential impacts seriously, let alone the prospect of the impacts being inequitably distributed. LAWA claims that a relationship between noise and health effects "has yet to be convincingly demonstrated" and insists

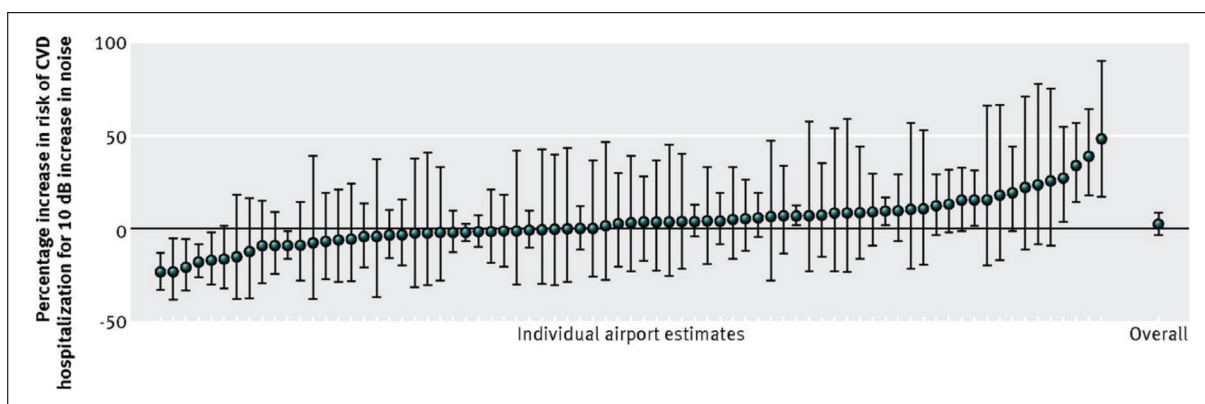
that "isolating the effects of aircraft noise alone as a source of long-term physiological change has proved to be nearly impossible."<sup>46</sup>

Similar to their approach on traffic, LAWA completely fails to evaluate the noise impact of the project beyond its build-out year, 2028, choosing to outright ignore the prospective long-term effects of the ATMP. The limited analysis that LAWA did conduct is not without flaws either, as the noise contour maps did not change to reflect the fact that the development will be replacing existing parking lots with airport terminals.<sup>47</sup>

With another major section of the EIR revealing a project with serious blind spots, a pattern is starting to emerge.

**Estimated Population & Housing Units with Aircraft Noise Contours —  
2018 Baseline vs 2028 w/Project Conditions**

	Population				Housing Units			
CNEL Range:	65-70	70-75	75+	Total	65-70	70-75	75+	Total
2018 Baseline Conditions:	56,632	16,499	780	73,911	20,938	4,819	303	26,060
2028 w/ Project Conditions:	61,311	19,596	1,183	82,090	22,651	5,660	413	28,724
<b>Difference:</b>	<b>+4,679</b>	<b>+3,097</b>	<b>+403</b>	<b>+8,179</b>	<b>+1,713</b>	<b>+841</b>	<b>+110</b>	<b>+2,664</b>



<sup>44</sup> *Daily Mail*, "Living under flightpath roar 'may cause diabetes': Scientists say residents who are exposed to daily aircraft noise are 86 percent more likely to have the type 2 condition," 04/01/2017

<sup>45</sup> *The British Medical Journal*, "Residential exposure to aircraft noise and hospital admissions for cardiovascular diseases: multi-airport retrospective study," 09/05/2013

<sup>46</sup> ATM DEIR, Section 4.7.1-12

<sup>47</sup> Draft EIR Comments; LAX Airfield and Terminal Modernization Project, 03/15/2021







# WILMA SHARPE

## Passenger Service Agent

I live in Inglewood, directly in the LAX flight path. The planes fly so low that you can actually identify the plane. My grandson stands outside and says “Look Grammy, there’s a Delta 747.”

The planes are so low that we joke that we can see them waving to us. You can also see the jet fuel drops.

On a scale of 1-10, the noise from the planes is a 12. When a plane comes, we stop talking because it’s so loud. I’m used to it, but when my daughter, son, or other people come into town they can’t sleep because it’s so loud. I feel embarrassed because I want my kids to come visit me and be comfortable but how do I do that when there are planes flying past?

I want to tell the planes to shut up.

Where I live, everyone has new sound proof windows except me. They sent a contractor to my house to take measurements, but then they did nothing. I’ve asked the city about it and they say I’m next, but I’m still waiting.





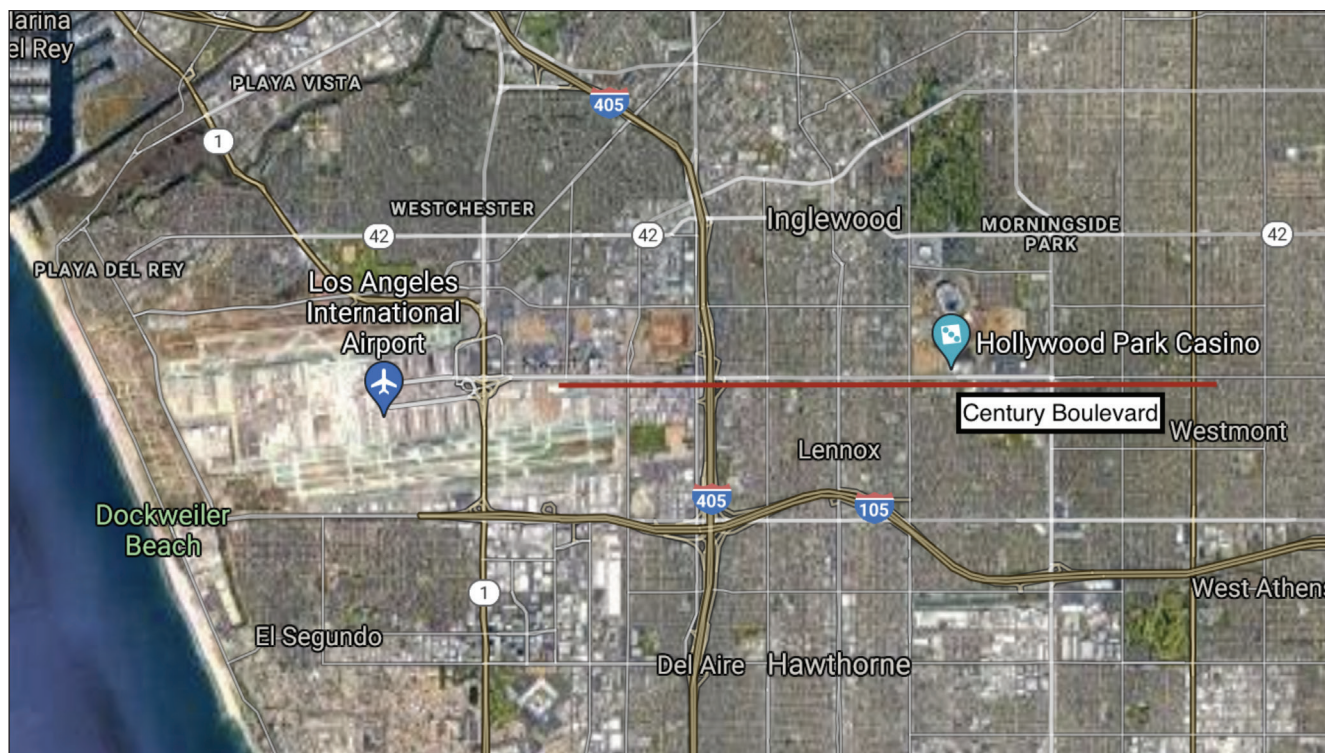
# Equitable Development, Avoiding Gentrification & Displacement

Equitable development at the airport goes beyond the need for clean air in adjacent communities, it also means sustainable and just housing in these areas, too. Residents need to be protected from the effects of gentrification so that large-scale development does not necessarily translate into displacement. Airport workers should be able to continue to affordably live close to where they work. All of these principles become even more critical when one considers the fact that many communities near LAX, particularly

those east of the airport under the flightpath, are majority Black and Brown. A thoughtless approach to development at the airport risks accelerating displacement within areas that have become enclaves for minority communities in the Los Angeles area.

Housing costs in the area have already been rising at a rate well above the national average in recent years. As recently as 2017, median rent for a two-bedroom apartment in Inglewood was around \$1,500—about the average nationally. By 2019 this figure rose to \$1,950 in Inglewood and \$1,625 nationally.<sup>48</sup> In this same span, median home values soared at a rate far beyond the national average. Unmitigated increases in the cost of housing may lead to people being displaced or pushed into homelessness. LAX workers who have been lauded as “essential” throughout the pandemic run the risk of being squeezed out of affordable housing near their own workplace.

Recent developments along the Century corridor have already displaced some low-income residents and increased rents and the cost of living for residents near the airport.<sup>49</sup> Most recently the new



<sup>48</sup> *Los Angeles Times*, “One of California’s last Black enclaves threatened by Inglewood’s stadium deal,” 04/10/19

<sup>49</sup> *The Appeal*, “The Struggle Against A Stadium’s Construction Became A Battle for the Soul Of Los Angeles,” 09/10/20

SoFi stadium sparked backlash from residents of Inglewood concerned about gentrification. While the stadium was in development, locals collected over 20,000 signatures (about 20% of the entire population of Inglewood) demanding community input on the project.<sup>50</sup> After the stadium broke ground, Inglewood became a prime target for companies like Wedgewood Inc., a real estate firm specializing in flipping homes through foreclosure. Lack of rent stabilization policy in the city until recently has led to a spate of extreme rent increases, with some tenants seeing hikes in excess of \$1,000.<sup>51</sup>

It's not just the more affordable neighborhoods around LAX that are facing out of control housing costs—Westchester, the neighborhood immediately north of the airport, has seen the median home price increase over 50% since 2017, up to over \$1.4 million this year.<sup>52</sup> El Segundo, south of LAX, is even less affordable, with a median home price of \$1.5 million this year, and an increase of nearly 70% in this same span.<sup>53</sup>

It's not always the case that residents simply find more affordable housing elsewhere: increased cost of housing has a strong correlation to an increase in people living on the streets or in shelters, according to one UCLA study in 2018.<sup>54</sup> Any development with

**“In the near 750 page main document of the draft EIR, the words ‘gentrification’ or ‘affordable housing’ fail to appear a single time.”**

housing implications that lacks a robust affordable housing component may well push Los Angeles residents out of stable housing altogether.

In the near 750 page main document of the draft EIR, the words “gentrification” or “affordable housing” fail to appear a single time. If Los Angeles hopes to be an equitable city for all it needs to address issues of displacement, homelessness, and environmental racism when considering new developments like the ATMP. The impacts that development and gentrification may have on the residents and airport workers that live in the area need to be taken into account, especially when these impacts disproportionately land in communities of color.



<sup>50</sup> *The Appeal*, “The Struggle Against A Stadium’s Construction Became A Battle for the Soul Of Los Angeles,” 09/10/20

<sup>51</sup> *bid.*

<sup>52</sup> *Redfin*, Westchester Housing Market Trends, 2017-2021

<sup>53</sup> *Redfin*, El Segundo Housing Market Trends, 2017-2021

<sup>54</sup> *Los Angeles Times*, High cost of housing drives up homeless rates, UCLA study indicates, 06/13/2018





# ARMANDO MUÑOZ

## Passenger Services Agent

I live in South Watts, about 15 minutes from the airport. Watts is known for the projects, but because of the airport there's a lot of gentrification going on.

They're demolishing the projects and putting in new homes. With what I get paid here, I could not afford one of those. In order to survive in LA, you have to make \$27/hour and I'm only making \$18.25. Before we had 40 hours, but now I only get 7.5 hours 4 days per week. I work two other jobs on the side.

When I worked here during the recession, I had to live in my car for a few weeks and then live in a friend's garage for a few months so that I could rent out my home until I could catch up with the payments so I could avoid foreclosure. Even after that, I had to put up a wall in my living room so I could rent out the other half.





# The Airline Industry's Actual Record on Essential Workers

Essential airport workers, who are largely people of color, immigrants and women, are on the frontlines at LAX, keeping cabins clean, airports secure and elderly and disabled passengers cared for—even through a global pandemic, climate disasters and busy travel seasons. Despite the essential services these workers provide, many of them—such as cabin cleaners, wheelchair agents, baggage handlers and security personnel—are underpaid and under-protected. This is no accident. Wealthy and powerful airlines that will directly benefit from the LAX development, like United and Southwest, have fragmented airport workplaces. Today, even with LAWA's Certified Service Provider Program, any given flight out of LAX might be serviced by employees of dozens of different companies with varying standards for pay, benefits and training.

Airlines have created this highly fragmented system of employment which has driven down standards for tens of thousands of workers. At the same time, the airlines, through their lobbying arm, Airlines for America (A4A), have consistently opposed any effort these workers attempt to improve their lives, including healthcare and living wages. Below, are just a few examples:

**Los Angeles:** In 2017, A4A sent a letter to members of the Los Angeles City Council opposing increases to

**“Despite the essential services these workers provide, many of them—such as cabin cleaners, wheelchair agents, baggage handlers and security personnel—are underpaid and under-protected.”**

the City's living wage agreement that covers LAX<sup>55</sup>. And, since the airport was considering changes to its health insurance requirement, A4A also argued that “any health care mandate at LAX is impossible to justify.”<sup>56</sup> Finally, the airlines opposed the City's program to provide emergency response training for airport workers.<sup>57</sup>

**San Francisco:** In 2021, A4A sued the City and County of San Francisco over its Healthy Airport Ordinance that will ensure SFO workers and their families have health care. The airlines argued that the law “makes no sense” and threatens job cuts.<sup>58</sup> The case is pending.<sup>59</sup>

**Miami:** In 2014, when airport workers advocated an increase to the airport's living wage policy, the airlines and A4A refused any responsibility. From the *Miami Herald*:<sup>60</sup>

*“The airlines say they have no responsibility for the policies of their subcontractors. United Airlines referred questions about wages to its subcontractor, while JetBlue said in an email that it works with local partners to “ensure they comply with*

<sup>55</sup> Re: Motion #15-0817-S1 on Living Wage at LAX, Airlines for America, City of LA Council File No. 15-0217-51, 09/19/17

<sup>56</sup> Re: Motion #15-0817-S1 on Living Wage at LAX, Airlines for America, City of LA Council File No. 15-0217-51, 09/19/17

<sup>57</sup> Re: Motion #15-0817-S1 on Living Wage at LAX, Airlines for America, City of LA Council File No. 15-0217-51, 09/19/17

<sup>58</sup> Re: Proposed City Ordinance No. 201133, San Francisco Office of the City Attorney, 10/26/20

<sup>59</sup> Legal Newswire, “Airlines say new San Francisco law goes too far,” 04/08/21

<sup>60</sup> *Miami Herald*, Union pushes for better pay for service workers at Fort Lauderdale-Hollywood airport, 08/07/2014



*applicable state and local wage laws for their employees.”*

*“Airlines have hundreds of contractors with whom they do business, including travel agencies, aircraft manufacturers, security companies, petroleum companies and countless others, and no company—in any industry—dictates to its vendors what their employees should be paid,” a spokeswoman for Airlines for America, an airline trade association, said in an email.*

*Changing the minimum wage and investigating violations of wage laws is the responsibility of the local, state and federal governments, the group’s email said.*

**Washington DC Area:** In late 2016, A4A raised opposition to a proposed living wage increase at Reagan National and Dulles airports:<sup>61</sup>

*The airline industry and its contracting companies have emphasized that they abide by federal and state labor laws and say that the government should dictate wage minimums, not airport governing bodies.*

*“We continue to believe that the appropriate way to address minimum wages is at the statewide or national level, so that minimum-wage standards apply to all workers and employers equally, regardless of industry sector or geographic location,” said Kathy Grannis Allen, a spokeswoman for Airlines for America.*

**Chicago:** Airlines for America fought Chicago’s 2017 airport policy that included wage increases: Airlines for America argued that there is “no legal or policy justification for imposing a higher minimum wage on a few thousand workers who provide services to one industry at two locations” and the city’s “status as an

**“After layoffs during the initial months of the pandemic, many service workers have returned to work without employer-provided healthcare coverage.”**

airport operator/proprietor does not give it authority to regulate private labor relations.”<sup>62</sup>

**Massachusetts:** In 2018, A4A brought a suit against the State of Massachusetts’ sick-time law. The airlines argued in the complaint that the law placed “burdens on operations” and “is both unconstitutional and preempted by the [Airline Deregulation Act].”<sup>63</sup>

**New York and New Jersey:** A4A lobbied heavily against the proposed minimum wage increases at the Port Authority of New York and New Jersey in 2018.<sup>64</sup> A4A relied largely on legal objections and rejected the Port Authority’s “legal power to regulate wages of third parties.” A4A later argued that the Port Authority’s “assertion of safety and security to justify higher wages is ‘gloss’ to mask social goals.”

**State Attorneys General Lead Pushback on A4A’s Attacks:** A4A’s record of opposing improvements for airline industry workers, particularly in the middle of a pandemic, triggered significant pushback from 19 State Attorneys General in 2020. The AG’s filed an amicus brief with the US Ninth Circuit Court of Appeals that supported a State of Washington law regarding sick pay. The case was being challenged in court by Airlines for America.<sup>65</sup> Massachusetts

<sup>61</sup> *Washington Post*, “Contract workers at National and Dulles look to 2017 for a wage increase win,” 12/29/2016

<sup>62</sup> *Chicago Sun Times*, “\$13.45-an-hour wage cleared for takeoff at O’Hare, Midway Airports,” 09/06/17

<sup>63</sup> *Courthouse News Service*, “Airlines Call Out Massachusetts Sick-Leave Law,” 04/05/18

<sup>64</sup> RE: Supplemental Comments Regarding Proposed Minimum Wage Mandate, Airlines for America, Port Authority of NY & NJ, 07/27/2018

<sup>65</sup> Brief in Support of Appellees and Affirmance, *Air Transport Association of America, Inc. v. Washington State Department of Labor and Industries, et al*, US Court of Appeals 9th Circuit, Case No. 19-35937, 05/18/20

Attorney General Maura Healey argued that “[w]orkers need to be able to stay home when they are sick to recover and stop the spread of serious illnesses like COVID-19 to their families, coworkers, and the public,” said AG Healey. “We filed this brief because these workers have a right to paid time off without risking their livelihoods.”<sup>66</sup>

LAX in particular has been falling short of doing right by essential workers—past efforts to eliminate poverty jobs at the airport are being wiped away by the rapidly increasing cost of living in Los Angeles. The last increase to LAX’s Living Wage policy is set for July 1st, 2021<sup>67</sup>, with no planned increases for subsequent years. While the current living wage is set at \$16.50 with healthcare or \$22.05 for those without, the National Low Income Housing Coalition estimated just a few years ago that Californians would need an hourly full-time wage of \$32.68 to afford a two-bedroom rental.<sup>68</sup> The legally required contribution for healthcare is currently just \$5.55 per hour, but costs for a family health plan in the area can be as high as \$9.50 an hour. After layoffs during the initial months of the pandemic, many service workers have returned to work without employer-provided healthcare coverage.

Airlines cutting costs can result in the hiring of irresponsible contractors with records of wage theft and skirting training requirements, and it can take years to identify and correct these violations, let alone hold employers and airlines accountable. Despite LAX having some of the strongest labor peace policies of any American airport, labor disputes are not uncommon, in part because of the total lack of funding for outreach, education and enforcement of the city’s labor standards at the airport.

---

<sup>66</sup> Press Release, AG Healey Leads Multistate Coalition Supporting Paid Sick Leave for Airline Workers, 05/19/20

<sup>67</sup> Living Wage and Service Worker Retention Ordinances, Los Angeles World Airports, June 2021

<sup>68</sup> National Low Income Housing Coalition, “Out of Reach,” 2018





# Airlines Cannot Use the COVID Crisis as an Excuse to Exploit Workers & Communities

In September 2017 American Airlines CEO, Doug Parker, said “I don’t think we’re ever going to lose money again.”<sup>69</sup> Airline executives had reason to believe that was true: the industry had “an unbroken decade of profits in 2010” with profits during this period topping \$220 billion.<sup>70</sup>

In the middle of that decade, between 2014 and 2019, major U.S. airlines delivered nearly \$45 billion to Wall Street in the form of stock buybacks and dividends. Southwest spent \$8.5 billion on buybacks and \$1.4 billion on dividends, American almost \$12 billion and \$1 billion, Delta \$10 billion and \$3.2 billion, and United Airlines spent nearly \$9 billion on buybacks.<sup>71</sup>

As COVID-19 hit the airline industry, taxpayers came to the rescue with nearly \$80 billion in public assistance, sustaining it through historically low

travel.<sup>72</sup> Since the start of the pandemic, the federal government has allocated \$54 billion in grants and an additional \$25 billion in low cost loans.<sup>73</sup> In this same time, airlines have raised tens of billions of dollars in additional capital from private lending or from issuing additional shares.<sup>74</sup>

With Americans arriving on the other side of the pandemic, airlines are recovering and in a position to do the right thing on projects that will be of enormous benefit to them.

The major airlines that operate out of LAX are rebounding from the pandemic and poised to return to their large profits as passengers return to travel:

- ▶ Southwest “reported a \$116 million profit, boosted by more than \$1 billion in federal payroll aid and said it expects its core cash flow to break even “or better” in June 2021.”<sup>75</sup>
- ▶ United returned to positive cash flow in March 2021 and is telling investors about a “clear path to profitability”.<sup>76</sup>
- ▶ Delta expects to return to profitability by the third quarter of 2021.<sup>77</sup>
- ▶ American says the company is “well-positioned for the recovery” and has been using their increased cash to pay down debt early.<sup>78</sup>

<sup>69</sup> *USA Today*, “American Airlines CEO: We’ll never lose money again”, 09/28/17

<sup>70</sup> Flight Global, “How the airline industry grew profitable over the past decade”, 12/30/19

<sup>71</sup> *Washington Post*, “U.S. airlines want a \$50 billion bailout. They spent \$45 billion buying back their stock”, 04/06/20

<sup>72</sup> NASDAQ, “U.S. extends \$14 billion lifeline to airlines in third government aid package,” 03/10/21

<sup>73</sup> NASDAQ, “U.S. extends \$14 billion lifeline to airlines in third government aid package,” 03/10/21

<sup>74</sup> *Market Watch*, “American Airlines raises about \$2 billion in funds via stock and convertible bond offerings,” 06/23/20; *The Motley Fool*, “Southwest Airlines to Raise \$2.6 billion in Equity and New Debt,” 04/28/20; Freight Waves, “United Airlines to raise \$1 billion in stock offering,” 04/22/20

<sup>75</sup> CNBC, “American and Southwest report stronger bookings, ramp up schedules ahead of summer,” 04/22/21

<sup>76</sup> Investopedia, “United Airlines Q1 2021 Earnings Report Recap,” 04/20/21; Press Release, “United Releases First-Quarter Financial Results - Rebounding Demand is Driving Clear Path to Profitability,” 04/19/21

<sup>77</sup> Investopedia, “Delta Air Lines Q1 2021 Earnings Report Recap,” 04/15/21

<sup>78</sup> Investopedia, “American Airlines Q1 2021 Earnings Report Recap,” 04/22/21; Press Release, “American Airlines Reports First-Quarter 2021 Financial Results,” American Airlines Newsroom, 04/22/21



# LAWA's Role in Ensuring that Public Resources Going Towards the LAX Development Serve the Public Good

LAWA owes the taxpaying public who underwrite LAX and its proposed modernization with a responsible return on their investment: an airport that benefits not only airlines, but also those essential workers that make LAX successful—these workers who are largely people of color, immigrants, and women. More than that, LAWA has a responsibility to these communities to live up to its core values of respect, collaboration, and stewardship.

Airlines operating out of LAX that will directly benefit from the proposed development—such as Southwest and United—not only received billions of public dollars to see them through the pandemic, but regularly receive billions of dollars through other forms of public support. US airlines rely heavily on aviation infrastructure built with taxpayer support, and the airlines have used tens of millions in political spending and lobbying to ensure that they retain as much control over the system of airports and airport development as possible. The airlines have used laws

**“Airlines operating out of LAX that will directly benefit from the proposed development—such as Southwest and United—not only received billions of public dollars to see them through the pandemic, but regularly receive billions of dollars through other forms of public support.”**

like the Airline Deregulation Act in attempts to limit the power of local communities and their elected officials to ensure that our aviation system meets public interest goals.

Despite all that public support, airlines at LAX undercut essential airport worker wages through patchwork systems of contractors;<sup>79</sup> and as outlined above, when those workers seek better for themselves, their families and their communities, the airline industry pushes back.

It is LAWA's responsibility to hold the airlines at LAX accountable and to create an airport where every essential worker has the opportunity to thrive—no matter race, immigration status, gender, job, or where they live. It is their responsibility to ensure that development is handled responsibly, and that the airlines are not going to be the only ones who benefit as their growth comes at the expense of the health and welfare of the communities near the airport.

<sup>79</sup> Course Correction: Reversing Wage Erosion to Restore Good Jobs at American Airports, UC Berkeley Labor Center, October 2013





# Moving Forward

**So what can be done about any of this?** How can the city’s leaders and decision makers help move toward a more equitable LA?

To start, LAWA needs to actually acknowledge the scope of this development and the breadth of its impacts. It is self-evident that this project will at some point increase the capacity of the airport, so an EIR that cuts off analysis at the project’s expected build-out year couldn’t possibly acknowledge the effects of that increased capacity, let alone begin to adequately mitigate them. This project isn’t merely a “modernization” of airport facilities, it’s a fundamental, permanent addition to LAX’s infrastructure and a significant factor in the airport’s ability to grow unconstrained for the foreseeable future. The project’s mitigation measures, as currently proposed, are woefully inadequate and fail to address the project’s true and cumulative impacts on the climate and surrounding communities.

**“...all of this needs to be done in a way that properly reckons with issues of environmental justice and equity, front and center.”**

From there, LAWA needs to meet with stakeholders and begin a process of radically re-imagining the project as a modernization centered on the needs and health of the Black and Brown communities near LAX. LAWA needs to negotiate with stakeholders and begin developing a comprehensive community benefits agreement (CBA) alongside this project to ensure that it benefits, rather than harms, communities of color.

Any CBA must include provisions that will improve the quality of jobs at LAX so that essential workers are not relegated to a second-class economy, unable to sustain themselves and their families or continue to live in the region. It is startling that in this current project, LAWA has not contemplated any new efforts to ensure that the permanent service-sector jobs resulting from this project become the kind of high quality work that airport employees can sustain a family on.

A CBA must also do more than what is currently planned on transportation and traffic reduction, particularly in a way that’s aimed at LAX workers who are forced to contend with traffic and parking at the airport on a daily basis. The proposed project fails to support workers struggling with the high cost of transportation, and even contemplates charging workers more for parking at the airport, a solution that would contribute to workers’ inability to afford housing near their work and avoid long, polluting commutes.

An adequate CBA must also do better for the communities near the airport, addressing issues of environmental health and air quality; LAX should aim to be a leading model for how a major commercial airport confronts its own impact in these areas and how it coexists with its stakeholders. Rather than set ambitious, forward-thinking targets for the use of sustainable aviation fuels or investment in research, the draft EIR only contemplates limited ways to deal with emissions from ground transportation at the airport, like electric vehicle charging stations. While this is positive change, it still ignores the catastrophic impacts of the ever-increasing emissions from an aviation industry expected to grow rapidly for decades to come. LAX must also tackle the implications of its continued growth and development on the affordability of housing near the airport, so that longtime residents and essential workers do not become victims of the airport’s success.



All of this needs to be done in a way that properly reckons with issues of environmental justice and equity, front and center. Because of the demographics and history of the communities surrounding LAX and the workers at the airport itself, anything that affects these groups cannot be separated from these issues and from history.

Finally, accountability should be a prime concern: all of this needs to be done in a way that is enforceable by community stakeholders. In past agreements, many provisions were delayed for years or never implemented, such as community-based health studies that never materialized. This underscores a need for any CBA to be legally binding and enforceable, with a structure in place to ensure that LAWA is communicating to stakeholders, reporting on its progress to the city, and funding community partners to monitor compliance and progress.

**“Los Angeles has the chance to be a leading example of a modern, progressive place that offers a better future for its residents.”**

LAX’s stakeholders are already doing the difficult work of improving the lives of the airport’s workers and securing LAX for the traveling public. SEIU United Service Workers West, which represents thousands of unionized aviation service workers at LAX alone, has two thousand members that live within six miles of LAX. USWW was proud to work with Mayor Garcetti to develop a comprehensive Emergency Preparedness Training program at the airport and continues to be proud of the work being done to raise standards for essential airport workers. It is vital that LAWA and the City work with a broad coalition of stakeholders in the community to reorient this project in a far more inclusive direction than what is currently planned and proposed.

The City of Los Angeles has a once in a generation opportunity before it, one where it can assert its values on the world stage. Falling short would be a devastating continuation of decades of injustice dealt to far too many communities and to the working class people that make the city thrive. Los Angeles has the chance to be a leading example of a modern, progressive place that offers a better future for its residents, carried out with justice and equity. Let’s hope *that* is the kind of legacy this city is prepared to leave.







# REYNA AMAYA

## Janitor at LAX

We live in this area. It is a Latino and African American area. We are breathing everything that is emitted by the airplanes. The airlines and the city officials aren't thinking about that. I don't think it's fair. They should think about us a little bit. There are human beings.

We won't get any benefits from this project, only the companies.

Most people don't think about the fact that they live in a contaminated area and how that impacts your body. One day they will die and it will be from "natural causes," but there are so many ailments that one can attribute to the chemicals we breathe—asthma, cancer, diabetes, allergies.

The airport, the mayor, and the city council should think about us, help us, make something better for us. Because right now they are not thinking about airport workers, they are not thinking about the communities around the airport. We want to see that we are taken into account with the expansion of the airport. We are people equal to them and we have families.





# Additional LAX Worker Stories

---



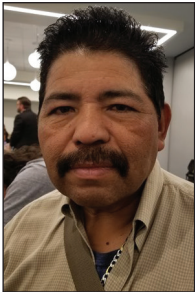
## ROSA RIVERA

**My name is Rosa Rivera. I work in Terminal 6 for Alaska and I am a janitor.**

LAX expansion is going to be a serious problem. Expanding the airport is going to cause a lot of problems for the community—for example, more pollution from flights. Sometimes the planes have emergencies and they dump fuel at a certain level when they are going to land and go near the communities. All of this is going to cause problems—problems like illness in older people, children who are young who have health problems like asthma.

I have a girl who when she was little—when she was 4 years old—suffered a lot from her bronchial tubes. She always had a really bad cough. I took her to the hospital with an asthma attack twice. It is traumatic because you are watching your child who is unable to breathe and there is nothing you can do. I imagine when everything is back to normal, there will be more pollution, more flights arriving, more people, much more traffic. It's going to be chaos.

Right now with this problem of the expansion of the airport, we fear the rent will continue to go up. Workers like me will no longer be able to afford houses.



## MIGUEL TORRES

**My name is Miguel Torres. I work as a janitor at LAX. I have worked in cleaning for 20 years.**

With the expansion of the airport, we are going to see a profound change with traffic. Freeways are already very saturated. I drive two hours every day to get to work. At best, if there is no traffic, only an hour and a half. I spent many years battling traffic to get to work. I live in Palmdale. Because of my distance, the gas I pay is different than anyone who lives here in Los Angeles. I spend \$100 a week on gas just for work.

The salary that we have is not enough to provide the basic food necessities, with the current cost of living. We can't pay for bills and food. We cannot save money. Sometimes we have to make decisions—for example "Do we buy enough food with this payment or do we pay for electricity and gas and other bills that we have?" The expansion is very worrying. With the construction, the politicians have not thought about improving the situation of the employees. It is necessary to have medical coverage for our families that doesn't have a high copay.



## ESMERALDA ESPINOZA

**My name is Esmeralda Espinoza. I have been working at LAX for 8 years. I work in clean-up in the dining room area, the shops and the corridors.**

Air and airport pollution affect us a lot. We are here directly receiving all the smoke, all the dust, all the things that can affect our system. Allergies affect me. This is what bothers me a lot. I always have to buy and take medicine. Even though I have days off and I am not working at the airport, the air still bothers me because I live close by. We are not very far from the airport. There are also polluting companies around where we live.

My oldest son who is 20 years old is very affected by climate change. His allergies are affected. He's asthmatic and that also affects his bronchitis.



## OSCAR ANTONIO

**My name is Oscar Antonio. I have worked at LAX as a security guard since 1999.**

When LAX remodeled Delta's terminal, there was a lot of dust in the air, we weren't even given masks. Two other security guards working in the same area as me got sick with pneumonia, and then I got pneumonia too. I had considered myself really healthy. I was a runner and I would go hiking for hours.

I almost died. I was taken off work for a month. For four months afterwards, the doctor said I had a whistle in my lungs. I can still hear it in the morning. It's asthma. Now I have an inhaler.

The politicians can live miles from here, away from the construction and contamination, but we can't. The communities around the airport breathe in the pollution too. The companies see you as a machine, a machine to create money for them. If you're not there one day, they will just get someone else to replace you. But we have rights in this country that have to be respected.



## ANA BELL GONZALEZ

**My name is Ana Bell Gonzalez. I've worked at LAX for 18 years. I'm a cabin cleaner.**

If we're going to have a world class airport, we need world class jobs. It's important to me that we have responsible employers that provide us with health care because I don't want what happened to me to happen to anyone else.

In 2013, I was working for a non-union company that lowered our pay because they were going to give us health insurance. I'd get insurance and then the following week I'd have no coverage again. They kept dropping me. I was literally dying—bleeding to death—and didn't have health insurance. Maybe if I'd had continuous insurance, they would have caught the cancer sooner because I was struggling to get the tests done when my coverage kept dropping. But with cancer, you can't have delays. It wasn't until a year later when I finally got insurance that they caught it. By then, I was already in Stage 3.

With this expansion, the airport needs to be more responsible to have good companies inside the airport. I don't want to go back to being non-union when we had to just keep our heads down and just take it because we needed the job and had a family to support. With a union, the companies think twice before doing what they used to do. And when there is a problem, you have a say. With the union, we work with more dignity.



[WWW.SEIU-USWW.ORG](http://WWW.SEIU-USWW.ORG)