



Neighborhood Council of Westchester Playa

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Evelyn Quintanilla
Chief of Airport Planning
Los Angeles World Airports
P.O Box 92216, Los Angeles, CA 90009-2216

Ms. Quintanilla,

The Neighborhood Council of Westchester Playa (NCWP) represents the Los Angeles communities of Westchester, Playa del Rey and Playa Vista. We write to register our comments regarding the Draft Environmental Impact Report (DEIR) for the Landside Access Modernization Projects (LAMP) at Los Angeles International Airport (LAX). Thank you for the opportunity to comment on the DEIR.

The NCWP recognizes that LAX is a vital economic engine in Los Angeles and Southern California. We also recognize that it is in great need of improvement and modernization to enhance how passengers experience LAX and perceive our city and region. We have several concerns regarding the DEIR for the LAMP.

- The NCWP requests that the public be granted more time than the required minimum comment period of forty-five (45) days. The LAMP is a very significant basket of projects with enormous impacts for the future of LAX and our community as a whole. Forty-five days is insufficient time for the public to review and comment on these projects that have been years in planning. NCWP requests that the comment period be extended an additional 45 days for a total of 90 days.
- The traffic analysis is flawed and underestimates both traffic volume and the negative impacts on the community. The analysis optimistically relies on “pricing strategies” to divert congestion and offers programs such as the LAX TDM/TMA that have no measure of success. These programs must have performance metrics included in order to determine the traffic reduction forecasts.
- The traffic study assumptions/forecasts for 2024 need to be verified after Phase 1 has been in operation for one year. Any inconsistencies with this current EIR Transportation Model forecast must be rectified prior to any Phase 2 approvals.
- The study includes “Fair Share” mitigation solutions to impacts created on the area freeways however funding for construction of these projects is not identified. This project assumes and enables significant passenger growth that will consequently have significant traffic impacts that are effectively not mitigated.

- A regional, all-inclusive transportation plan, including freeway improvements, intersection improvements and mass transit additions, is needed to insure transportation success of this project. If one area is not addressed/implemented the entire proposed solution to decrease congestion is jeopardized. Funding mandates from LAWA, various cities and state agencies, including Cal Trans, must be required.
- It is unclear if the traffic study has included the anticipated impacts that may result from the Los Angeles Mobility Plan for Playa del Rey - Culver Blvd Street Standards. This recently adopted plan must be considered and traffic study reevaluated.
- Imperial Highway and Aviation Blvd will serve as a primary construction haul routes for this, as well as other projects that are taking place at LAX. Funding needs to be identified to properly improve and maintain these important roadways during and after construction is complete.
- The six years of neighborhood impacts by the reduction of CTA passenger parking during construction will increase parking and ride-sharing pick-ups have not been addressed.
- The assumptions related to the numbers of projected passenger counts and total operations in 2035 are inconsistent with historical trends. The forecast for 2035 has Million Annual Passengers (MAP) at 96 to total operations (in 000's) at 850, which is a ratio of .113. The ratio in 2015 was .127 and you have to go back to 2010/2011 to find a ratio of .113. This may indicate that the MAP is understated by more than 12%.
- LAWA must develop a robust communications plan for the next 10 years that incorporates social media, email, outreach and print, to keep the area stakeholders apprised of construction impacts (noise, late night work, road closures, haul route activity).
- While construction haul routes have been identified, no mention is made of the commuter routes for all other construction related traffic. All construction related traffic routes must be specified.
- This DEIR is silent on this matter but it deserves to be noted. This project must at no time result in new streets or driveways that facilitate access to LAX from the north. This project must in no way result in added traffic or encourage "cut-through" traffic in the surrounding residential neighborhoods.
- The anticipated growth that is facilitated by this project will impact the community of Westchester in the business district on Sepulveda. Many LAX passengers can be seen walking to and from LAX and Westchester on Sepulveda Blvd. The anticipated increase warrants a "Pedestrian Plan" for Sepulveda Blvd. Improvements to the street landscaping, lighting, sidewalks and crosswalks are needed to make this area safer for the visiting LAX passengers.

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- The Consolidated Rental Car Facility (ConRac) will be built in the areas known as Belford and Manchester Square. The DEIR indicates that there are 80 homeless individuals who live in the area as per the 2015 LAHSA homeless count. This number may have been correct at that time but grossly understates the current condition of the area. A current unofficial count indicates that the homeless population is more than twice that at roughly, at least 200. Other than underestimating the number of people directly impacted, the DEIR is silent on this enormous social impact on the area. The DEIR concludes that there is not a “substantial number of people” being displaced and that the impacts will be “less than significant”. The NCWP strongly disagrees with these conclusions. There are a “substantial” number of people who are being impacted by this project and this should require that LAWA participate financially in the construction of transitional and replacement housing.

We reiterate the need for additional time for a thorough review of the enormous document that is this DEIR. Thank you for the opportunity to comment on this important and much needed project.

Sincerely,

/s/Cyndi Hench

Cyndi Hench
NCWP President

Cc: Councilmember Mike Bonin
Congresswoman Maxine Waters