

Evelyn Quintanilla
Los Angeles World Airports
P.O. Box 92216
Los Angeles, Ca. 90009-2216

Dear Ms. Quintanilla,

The Neighborhood Council of Westchester Playa supports in concept the long overdue modernization of the LAX airfield and terminals, and submits the following comments to the Notice of Preparation - Airfield and Terminal Modernization issued by LAWA on April 4, 2019. However, the few short weeks given for review of such a significant project is insufficient for the community to digest and respond. The amount of time given for community review is incongruous with the project's impacts.

Not long ago, Westchester and Playa del Rey neighbors were concerned over proposals by LAWA officials to move the LAX north runway closer to our homes. Through a ground breaking agreement with neighbors, including the Alliance for a Regional Solution to Airport Congestion (ARSAC), LAWA agreed to shelve those plans and instead established the parameters for modernization, not expanding, LAX.

The Neighborhood Council of Westchester Playa [NCWP] understands the importance of having a safe, modern and efficient "world class airport". We also recognize the need of our residents to be protected from the impacts of airport operations, which we believe is the heart of being a "first class neighbor". The NCWP believes that continuing improvements can be made even greater through detailed and thoughtful feedback from organizations like ours. It is in this spirit the Neighborhood Council of Westchester Playa [NCWP] wishes to provide comments to this NOP. We have grouped these comments into several themes:

- 1) Roadway Congestion & Improvements,
- 2) Aircraft Noise and Pollution Patterns & Monitoring, and
- 3) Impacts on City Services
- 4) Other Considerations

1) Roadway Congestion and Improvements

Road congestion, both in the CTA and the neighborhood, needs to have a unified solution and needs to be built on the improvements and changes LAMP will make once Phase 1 is complete in 2023.

- The Traffic Study for this project must be the same as and consistent with recent and current projects i.e., SPAS, LAMP, LAX Northside.
- The NCWP understands the proposed roadway improvement, a new vehicular entrance near Concourse 0 that crosses Sepulveda west to east and creates new queuing space for cars via an elevated roadway network merging back into the current main airport entrance at Century. However, this proposal does not fully address Central Terminal Area (CTA) traffic that often queues past the Sepulveda/Lincoln merge.
- In fact, this proposal in isolation further encourages cars to drive into the airport, thus reducing the efficacy of the LAMP project. As such, the NCWP believes equal priority should be made for an additional roadway crossing Sepulveda west to east at 96th street. This crossing would either replace or repurpose the bridge now at Vicksburg feeding the ITF -West as an alternate drop off for cars, providing better access into that future parking facility, and creating stronger Taxi/Rideshare access to the ITF-West.
- A more thoughtful roadway design with two bridges would allow vehicle drivers and passengers to choose the entrance option they wish for LAX, either direct to the CTA, or direct to the ITF-West, Metro AMC Station, or ConRAC.
- Taxi/Rideshare staging area needs to be further clarified and enhanced and additional bridging at 96th could provide for this.
- The creation of additional multi-story parking via a proposed garage at Terminal 9 also appears to contradict the promise of LAMP to reduce vehicular traffic in the CTA and would create a wall of dead activity fronting Century Boulevard as the Gateway to LA Business Improvement District seeks to create a more vibrant walkable Century Boulevard. The NCWP requests that LAWA revisit the size and scale of this parking facility and consider reducing or eliminating it in favor of adding additional parking at the ITF-West.
- The NCWP requests study of additional roadway mitigation and improvements to Airport Boulevard between Westchester/Arbor Vitae and La Tijera Boulevard. There is a clear nexus between this corridor and the successful operations of LAX. Current signage directs vehicles to LAX rental car returns. La Tijera Blvd also represents an alternate connection to LAX from the 405. NCWP requests that during the NOP for the Airfield and Terminal

Modernization Project, that LAWA study the impact Terminal 9 and proposed enhancements through an additional station of the Automated People Mover will have on shifting traffic, requiring additional improvements to Airport Blvd for the aforementioned section. Study should include roadway reconstruction, utility undergrounding and relocation, enhanced wayfinding and signage, and stronger bike and pedestrian connections.

- In this same vein, NCWP requests study of additional roadway mitigation and improvements to Aviation Boulevard between 111th Street and Century Boulevard and Aviation Boulevard between Arbor Vitae and La Cienega. Terminal 9 and Concourse 0 will potentially shift airport-bound vehicular traffic to the east. It is vital that major connections north and south accessing the LAMP area and the proposed improvements to the roadways in this area currently under development and proposed via this NOP take this into account and do not just focus on Sepulveda and the interchanges there. Sidewalks and bike facilities along the aforementioned portions of Aviation are either in bad condition or do not exist. In order to maximize benefits of our growing transit network that will be completed along this corridor, and to prevent further vehicular traffic Concourse 0 and Terminal 9 could bring, we ask LAWA to study pedestrian and cycling infrastructure in this portion of roadway in the EIR for this project

2) **Aircraft Noise and Pollution patterns**

This project replaces aircraft gates now adjacent to Playa del Rey neighbors with gates much closer to the core of the airport's operations with Concourse 0 and Terminal 9. This will reduce plane and ground support equipment emissions and could reduce noise for Playa del Rey. However, noise and pollution patterns in the neighborhoods around the airport could change. Quantifiable goals need to be established, monitored and enforced.

- As noise and pollution profiles are updated, year over year, it is critical that LAWA continue to monitor aircraft noise and emissions closely and report out on these changes via established channels. We, the NCWP, formally request LAWA to work with the FAA to reopen the City of Los Angeles' Sound Insulation Program for neighbors who did not own their homes and were therefore not offered sound insulation at the time the program was last open over a decade ago.

3) **Impacts on City Services**

Though LAWA developments and improvements to the airport offer new amenities to the travelers, stronger transit connections, and better roadway networks, the NCWP is concerned that the additions of Concourse 0 and Terminal 9, along with a general increase in the number of passengers, demands on City Services, in particular Fire and Ambulance services, are likely to increase.

- As such, the NCWP formally requests that LAWA study the demands the airport will have for future Fire and Ambulance services on the landside as a result of Concourse 0, Terminal 9 and general passenger growth. Currently, the City of Los Angeles Ambulance services are regularly called into LAX to serve passengers and workers in the terminals. Concourse 0 and Terminal 9 along with an overall increase in passengers will likely present additional service demands on these services and we request that LAWA study this as part of the NOP for the Airfield and Terminal Modernization Project.

4) Other Considerations

The Neighborhood Council of Westchester Playa has included additional comments specific to sections of this NOP. Specifically, we have the following comments on the “Initial Study and Checklist”.

- What are the passenger growth assumptions used in the analysis for this project?
- The environmental setting for the Project Description (Pg. 59) needs to specifically acknowledge the Westchester Playa community as an important stakeholder.
- Environmental Factors Potentially Affected (Pg. 63) must be changed to identify “Public Services” as being significantly affected. Thereby requiring a full EIR review of these areas to result in maintaining a proper level of service.
- Section III Air Quality (Pg. 65) is properly identified as a “Potentially Significant Impact” and is a primary concern to the community. More neighborhood monitoring on a permanent basis is needed.
- Section VI. Energy (Pg. 66) and Section VIII. Greenhouse Gas Emissions (Pg. 67) are correctly identified as a “Potentially Significant Impact” and are important issues for our neighborhoods and should not be solved by the weakening of existing regulations and policies.
- Section XIII. Noise (Pg. 69) is correctly identified as a “Potentially Significant Impact” but the EIR review needs to take into account not only noise levels but also the substantial increase in the number of times the ambient noise levels increase due to the increase in flights and traffic the availability of more gates creates.
- Section XVI Population and Housing [Pg. 69] must be identified as “Potentially Significant Impact”. The NC strongly disagrees with the findings that the

proposed project would have less than significant impacts on Population and Housing. LAWA repeatedly touts the job creating ability of LAWA. It is known by LAWA that over 20% of the residents of Playa del Rey and Westchester and Inglewood are employed by LAWA or a related LAWA serving enterprise. LAWA also fails to consider the cumulative impact of the 2.5 million square feet of development slated to occur on the Northside of Westchester Parkway and its impacts on housing and population to the area. LAWA fails to consider the cumulative impact of the massive developments underway in Inglewood and the cumulative impact of the ongoing gentrification caused by the southward advancement of adjacent “Silicon Beach” and the Inglewood developments. Further evaluation is required in the EIR.

- As stated above, Section XV. Public Services (Pg. 69-70) must be identified as a “Potentially Significant Impact”. We cannot keep adding more space and more people without matching those increases with the commensurate increase in Public Services. We totally disagree with the “No Impact” findings as they relate to “Fire Protection” and “Police Protection” as they do take into account the 100 million passengers per year that come into our community as they leave the CTA. Also, the 50,000 employees that work at LAX (which will increase) do require our Public Services. The EIR must analyze the community impact to Westchester Playa. Further, please keep in mind our Public Services will have to support the 2.0m sq. ft. Northside and LAMP, which will be completed, operational and occupied before this project starts. As it concerns “e. Other Public Services”, while the increase in employment is certainly an economic positive, it does create higher demand for numerous basic services commuting through our neighborhoods - better streets and safety.
- Section XVI. Recreation (Pg. 70) is categorized as “No Impact”. However, with 50,000 workers (and the number increasing) this area should be studied in the EIR as we believe there is a demand and benefit from providing workers at LAX outdoor recreational opportunities that are so lacking in our community.
- Section XVIII. Transportation (c.) (Pg. 70) needs to be identified as a “Potentially Significant Impact” due to the proposed configuration and impacts to Sepulveda Blvd. Also, the EIR study needs to address traffic intersections in a manner consistent with previous studies on recent and ongoing projects at LAX, namely SPAS, LAMP and LAX Northside.
- Section XXI Mandatory Findings Of Significance (Pg. 72) is properly classified as a “Potentially Significant Impact”
 - Within this area, “(b) Does this project have impacts which are individually limited, but cumulatively considerable?” is very important to the EIR. Table 4 – Development Projects At/Adjacent to

LAX is critical to the EIR analysis. As some of those projects have been approved years ago and not yet completed, the data should be updated for current forecasts, government regulations and any other items that could be important to this new LAX ATMP EIR. Because we cannot afford to continue building under flawed assumptions from older projects.

- Again, as this area of the NOP restates all of the findings for all of the areas in the “Initial Study and Checklist”, the fundamental flaw is the data for cumulative projects has not been adjusted to today’s reality. As an example, this section still contends that ‘Public Services’ are fine and “No further evaluation in the EIR is required”. We fundamentally disagree with this conclusion. Public Services must be an important part of the EIR process.
- Of particular concern is (c.) “ Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?”. The EIR should once again determine both the individual project impacts and look to determine if prior projects have attained their environmental goals.

• Section XXI Mandatory Finding of Significance/Cumulative Impacts/Population and Housing (page 120).

- The NCWP strongly disagrees with the findings that the proposed project would have “less than significant” impacts on Population and Housing. LAWA repeatedly touts the job creating ability of LAWA. It is known by LAWA that over 20% of the residents of Playa del Rey and Westchester and Inglewood are employed by LAWA or a related LAWA serving enterprise. LAWA also fails to consider the cumulative impact of the 2.5 million square feet of development slated to occur on the Northside of Westchester Parkway and it's impacts on housing and population to the area. LAWA fails to consider the cumulative impact of the massive developments underway in Inglewood and the cumulative impact of the ongoing gentrification caused by the southward advancement of adjacent “Silicon Beach” and the Inglewood developments. Further evaluation is required in the EIR.
- In the current environment, Westchester Central Business area is often flooded with taxis, limos, shuttles, busses and TNC. LAWA should take the opportunity to provide a parking lot with sufficient amenities specifically for these vehicles that are servicing LAX and its customers.
- New roadways and approaches to LAX will not doubt be confusing for passengers. Signage to and from LAX should direct travelers to Century Blvd as much as possible.

The NCWP is an active stakeholder in both LAX and the community. In order to ensure positive benefits to Westchester and Playa del Rey residents come to fruition through LAX modernization, it is imperative we ask the right questions and study the right things. To strike the right balance is essential and we will work with all to better LAX, our City of Los Angeles and our local communities. We thank you for your commitment to work with the neighborhood and us.

Thank you and feel free to contact us if you need more information.

Cyndi Hench
NCWP President

Cc- Councilmember Mike Bonin

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