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February 25, 2021

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
1 World Way
Los Angeles, CA 90045

RE: South Bay Cities Council of Governments Comments on the LAX Airfield & Terminal
Modernization Project Draft Environmental Impact Report

Dear Ms. Quintanilla:

The South Bay Cities Council of Governments (SBCCOG) has reviewed Los Angeles World Airport's (LAWA) draft Environmental Impact Report (EIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP) and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

- Enhanced regionalization.** The SBCCOG strongly supports prioritizing efforts to regionalize air traffic to other airports such as Ontario International Airport and Palmdale Regional Airport. As the world begins to emerge from the COVID-19 pandemic and as air traffic begins to return to pre-pandemic levels, there should be a concerted effort to encourage regionalization. Airport officials must begin looking into ways that will encourage major air carriers of both passenger and cargo loads to return to Los Angeles' regional airports, not only LAX. There have been earlier efforts made at regionalization, including as part of a 2006 court settlement over expansion plans at LAX. However, those efforts largely never materialized and have not been revisited in the 15 years since major populations now live in the outlying areas around the regional airports. Now is the time to partner with other airports, LA City, LA County, adjacent counties, local leaders, and communities to work toward truly regionalizing the air traffic coming into the greater Los Angeles region. Regionalization will not only help minimize the impacts of growth on one particular area but will also help expand the economic benefits of increased air traffic to communities who may not have previously benefitted and provide much greater convenience for large areas of the population of the region. The SBCCOG looks forward to working with LAWA and other stakeholders on this endeavor.

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2. **Growth Projections.** Although both SCAG and LAWA project air traffic growth at LAX regardless of the ATMP, it behooves all stakeholders to evaluate the long-term impacts of COVID-19 on previous growth projections. Although the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Additionally, it is imperative that evaluations be done to study if growth forecasts for other regional airports such as Ontario International, can accommodate their planned growth without additional infrastructure investments. Growth at Ontario will likely not perform to forecast levels if that facility cannot accommodate the additional air traffic, which could have long-lasting negative impacts on efforts at regionalization. If significant infrastructure expansion is needed to facilitate that growth, implementation of those improvements must be a top priority of the region. Otherwise, the ATMP will by default induce growth at LAX because the other airports will not be able to accommodate their increasing traffic and airlines will choose to go back to LAX because it will have the capacity and new facilities.

The SBCCOG remains concerned that although LAWA and SCAG projections forecast growth at LAX regardless of the project, the ATMP will significantly accelerate that growth on a timeline that outpaces any required infrastructure improvements. When a new lane is added to a freeway, that additional capacity is always considered growth inducing. Studies have shown that adding capacity to roadways encourages additional use of those facilities. The SBCCOG continues to have reservations about LAWA's denial that the proposed improvements are not inducing growth.

3. **Traffic Impacts to the South Bay.** The SBCCOG believes that the draft EIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. In particular, LAWA should work with other stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on

the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

4. **Terminal 9.** The SBCCOG thanks LAWA for committing to eliminate permanent access from Sepulveda Boulevard to T9. However, temporary access remains a possibility if the Terminal open before the aerial roadway system is complete. We feel strongly that temporary access from Sepulveda Blvd. is unwise. If merging movements within the Sepulveda tunnel are already bad, they will continue with a temporary access to T9 and might be even more confusing. There will already be access to T9 via Century Blvd. and the new Jet Way street which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Blvd at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda. If a third access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

Thank you for providing an opportunity to comment on this draft EIR. Should you have any questions, please feel free to contact SBCCOG Executive Director, Jacki Bacharach, at 310-371-7222 or Jacki@southbaycities.org.

Sincerely,

Olivia Valentine, SBCCOG Chair
Mayor Pro Tem, City of Hawthorne